



## Interreg Europe 2021-2027 – Public consultation

### Overview analysis of the submitted contributions

Chapters	Main recurrent and/or relevant comments from the public consultation ( <i>numbers in brackets refer to the individual comments in the compiled pdf file</i> )	Key lessons from the Q&A session of the webinar on March 24 <sup>th</sup> 2021	Response and proposed follow-up <i>Colour code: revision of cooperation programme text / to be addressed in programme manual / no change</i>
<b>1/ Programme strategy</b>	<p><b>Comments for discussion / decision</b></p> <ol style="list-style-type: none"> <li>12 comments point to the need to reinforce the coordination with other funding sources. Some comments refer to the need of an overview on how to apply 'cascade investments'. Links could be reinforced with: <ul style="list-style-type: none"> <li>- the Recovery and Resilience funds (1)</li> <li>- strand D (3)</li> <li>- I3, Interregional Innovation Investments (4,10,13, 14)</li> <li>- Horizon Europe (10, 38, 40, 47, 49, 68)</li> <li>- S3 (13, 14)</li> <li>- Digital Agenda (13)</li> <li>- all existing platforms (KEEP, CORDIS) (25)</li> </ul> </li> <li>Outermost regions and their challenges in accessibility, youth unemployment (3, 33, 31, 42)</li> </ol>	<ul style="list-style-type: none"> <li>The links to Interregional Innovation Investments (I3), Sustainable Development Goals (SDGs) and smart specialisation were raised, and it was clarified that the links to S3 will continue to be as in 2014-20. Projects will also need to be in line with SDGs.</li> <li>On the other hand, the links and synergies with macro-regional strategies will be rather indirect, as regional policy instruments are mostly developed at local, regional or national levels. As a possibility, Interreg Europe could still support a project between different MRS</li> </ul>	<ol style="list-style-type: none"> <li>Links to other funding sources: <ol style="list-style-type: none"> <li>Section 1.2.3 will be revised in the updated version of the cooperation programme (CP). <b>In particular, further information on the possible links to I3 is provided in the updated version of the CP.</b></li> <li><b>Additional details on the links with S3 may be introduced in the programme manual.</b></li> <li><b>The possible links to strand D in section 1.2.3 is included in the updated version of the CP.</b> Reference to SDGs (section 1.2.2) is already part of the overall strategic framework.</li> </ol> </li> <li><b>The reference to outermost regions is added when possible in several paragraphs in the updated version of the CP.</b> This reference has to remain however</li> </ol>



	<ol style="list-style-type: none"> <li>3. Underline the 'ecosystem approach' under 'A more social Europe' to highlight that all actors of the territorial social environment co-influence each other and co-create the services of general interest (1)</li> <li>4. Not only less developed regions, but also regions with very low diversification, could be included in the 'A smarter Europe' section, first paragraph (8)</li> <li>5. In 1.2.1 a reference to the Sendai Framework for Disaster Risk Reduction (UN) could be made (9)</li> <li>6. Under 'A greener Europe' a close link between biodiversity and climate change could be made: 'biodiversity restoration' should be used instead of 'investing in biodiversity' (15)</li> <li>7. Combination of Green and Digital technologies more explicitly (37)</li> <li>8. Introduction of 'well-being' at the end of 'A more social Europe': 'role of culture and tourism in economic development, well-being, social inclusion and social innovation'. (70)</li> <li>9. The draft Programme document refers to the six priorities in the Territorial Agenda for the development of the European territory, but does not list them. Please consider adding six priorities to the current wording.</li> <li>10. 1.2.2: 'Rural regions in Southern and Eastern Europe and most of Eastern Europe are the most vulnerable to energy poverty.' Please clarify if with the Eastern Europe is meant also Latvia, if not then please supplement the text "Northern Europe, incl. the Baltic States".</li> <li>11. 1.2.2: "Working conditions are also an increasing issue, with aspirations for a better balance between work life and private life, as well as more flexible forms of work. Moreover,</li> </ol>	<p>interested in exchanging their experience and good practices in the way they implement their strategies.</p>	<p>reasonable not to put a disproportionate emphasis to a certain kind of regions only.</p> <ol style="list-style-type: none"> <li>3. The 'ecosystem approach' is included in the updated version of the CP (section 1.2.2).</li> <li>4. Regions with very low diversification is included in the updated version of the CP (section 1.2.2)</li> <li>5. In 1.2.1 a reference to the Sendai Framework for Disaster Risk Reduction (UN) to be made. Although relevant, this reference may be too specific for the issue concerned and level of details currently provided in the cooperation programme.]</li> <li>6. The link between biodiversity and climate change is included in the updated version of the CP. 'Biodiversity restoration' is also used instead of 'investing in biodiversity' (section 1.2.2)</li> <li>7. Combination of Green and Digital technologies is more explicit in the updated version of the CP (section 1.2.2)</li> <li>8. The notion of 'well-being' is included at the end of 'A more social Europe in the updated version of the CP': 'role of culture and tourism in economic development, well-being, social inclusion and social innovation'. (section 1.2.2)</li> <li>9. The current description already reaches the limits of the character limitation imposed by the CP template. It is therefore not possible to provide further details on the Territorial Agenda and its six priorities.</li> <li>10. Latvia is considered included in Eastern Europe.</li> <li>11. Section 1.2.2 ('A more social Europe): equal opportunities and role of persons with disabilities in employment is included in the updated version of the CP.</li> </ol>
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	<p>pensioners' role and place in the society should be better considered in an ageing society." In the first sentence please mention <b>equal opportunities</b> in general. In the second sentence please expand this sentence mentioning also the <b>role of persons with disabilities in employment</b>, taking into account that in the draft Programme document are mentioned disadvantaged people in general.</p> <p>12. Please clarify if in the draft Programme document mentioned healthcare includes also social care, if not, please supplement the text mentioning also social care</p> <p>13. 1.2.3: Please make reference also to the <b>Recovery and Resilience Facility</b> support mechanism, as well as <b>Employment and Social Innovation</b> programme.</p> <p>14. 1.2.6: Please specify what programmes are meant under Investment for Growth and Jobs programmes – ESF+, ERDF, Cohesion Fund, Just Transition Fund?</p> <p>15. 1.2.2: disparities and inequalities (pages 15-18): It is proposed to add the following text: "Climate change triggers an increased number of catastrophes. The economic losses the European Union incurs only due to extreme weather events amount to EUR 12 billion on an annual average basis. The risks caused by climate factors were classified into the key risks included in the Overview of natural and man-made disaster risks the European Union may face. The adverse impacts of the catastrophes triggered by climate change on the environment and infrastructure and the standard of living and health of the population make it necessary to act for strengthening resilience thereto."</p>		<p>12. Social care is explicitly mentioned in the updated version of the CP.</p> <p>13. Recovery and Resilience Facility and Employment and Social Innovation programmes is included in the updated version of the CP.</p> <p>14. The programmes under Investment for Jobs and Growth considered are: ERDF, ESF, Cohesion Fund and Just Transition Fund. This is specified in the updated version of the CP.</p> <p>15. The description provided already reached the text limitation imposed by the CP template but the main elements on the climate change and threats contribution are accommodated in the updated version of the CP.</p>
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	<p><b>Suggestions and requests for further clarification and guidance (can be addressed in programme manual and during programme implementation)</b></p> <p>16. Is the improvement of ETC programmes included? (23) 17. More explicit mention to the national level policy making (43)</p> <p><b>Suggestions to address specific themes</b></p> <p>18. Democracy and human rights, including treatment of migrants and refugees (2, 5) 19. Transport of goods and the linkage to low-emission transport (22) and to the European Strategy for low-emission mobility (45) 20. (many specific sub-themes not considered in this summary)</p>		<p>16 &amp; 17: <b>The manual will provide further clarification on the two first questions.</b></p> <p>18 &amp; 19 &amp; 20: The suggestions for additional specific themes are not recommended considering that: 1/ they are too specific for the level of detailed currently provided in the CP; 2/ they are already covered in the available thematic range.</p> <p>When it comes to the issue of ‘democracy’ and human rights’ this can be addressed if relevant within regional development policies and if it fits within the scope of the groups as defined in section 1.2.6.</p>
<p><b>2/ Priorities</b></p>	<p><b>Comments for discussion / decision</b></p> <p>21. Outermost regions [2/29] a) Introduce sufficient flexibility in selection criteria to allow projects among the outermost regions (in particular related to a possible requirement to cover 4 zones of the EU) [2] b) Add a reference to outermost regions in section 1.2.2 (Ch1, analysis of disparities) [29]</p> <p>22. The programme should support cooperation between EU countries on receiving and</p>	<ul style="list-style-type: none"> <li>• <i>‘less emphasis on improving Structural Funds’</i> Several participants wished to clarify what was meant by this. The answer referred to the comparison between the 2014-20 requirement and the 2021-27 one. In 2014-20, it was required that at least 50% of the partners selected a policy instrument related to a Structural Fund programme, whereas in 2021-27, only one partner needs to select a policy instrument related to Structural Funds.</li> </ul>	<p>21. Outermost regions a. The guiding principles for selection of projects described in section 2.1.4 do not prevent cooperation among outermost regions. Such cooperation goes beyond transnational areas and can also comply with the minimum requirements set in ETC regulation for interregional cooperation (i.e. at least 3 different countries to be represented). The balanced combination of regions of varying development levers is just a recommendation. Actually, the particular territorial challenges of the partners applying to the programme have always been and will continue to be covered in the programme selection criteria. b. <b>Reference to the outermost regions is added when possible in section 1.2.2 of the updated version of the CP.</b></p> <p>22. Interreg Europe targets the improvement of regional policy instruments, in a scope defined by the cohesion</p>



	<p>helping migrants and refugees (in a dedicated priority) [5/21]</p> <p>23. Maintain the funding rates at the levels of the current programme [9, 13]. Apply the same co-financing rate for private-non-profit bodies as for public bodies (80%) [PL]</p> <p>24. Public authorities with limited capacity should be able to participate as stakeholder (with letter of support) with another actor from the region as partner [15]</p> <p>25. Re-introduce sub-projects (as in Regional Framework Operations) [18]</p> <p>26. Add the cultural and creative sector to the indicative list of target groups [19]</p> <p>27. Bodies with industrial/research character should be eligible as they have a key role in developing policy [28]</p> <p>28. Maintain the requirement that 50% of all policies addressed should be Investment or Jobs and Growth programmes [23]</p>		<p>policy specific objectives. Projects may address issues related to (for instance) the integration of migrants in the context of Policy Objective 3 (Social Europe) where this is a regional policy responsibility. Cooperation and coordination at state level is not within the mandate of Interreg Europe.</p> <p>23. The funding rates are based on the regulations for the new period, i.e. maximum EU co-financing of 80% at programme level. The differentiation in co-financing rates between private-non-profit and public partners is needed to keep the total co-financing rate for operations (projects and the Platform) at the maximum allowed share of 80% [no change in CP]. The fact that the programme is primarily aimed at managing authorities/policy makers, also explains that the lower co-financing rate is applied to private partners.</p> <p>24. <b>The partnership requirements will be further elaborated in the manual.</b></p> <p>25. Regional Framework Operations were abandoned after the 2007-2013 period since their policy achievements remained low in comparison to the budget and efforts invested.</p> <p>26. This reference is too specific. The list in the CP is indicative, remains generic so it does not need to be exhaustive. Cultural and creative sector can participate in the programme.</p> <p>27. Research institutes can be partners in projects (provided they meet the requirements of eligible bodies). Industrial-type bodies which are profit oriented bodies are not eligible to the programme. In principle, they do not have direct responsibility for regional policy and can anyway join the stakeholder groups if relevant.</p> <p>28. The lighter focus on Investment for Jobs and Growth programmes (which is also reflected in the new regulation) is meant to make the programme accessible for more regions in the EU on a broader range of regional policy issues.</p>
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	<p>29. Policy instruments: What is a regional policy instrument, what qualifies as improved implementation? [17]</p> <p>30. Stakeholder groups: Clarify the role, composition and modalities (incl. funding) of stakeholder groups [17,25]. Provide guidance and tools to improve quality of stakeholder involvement [51].</p> <p>31. The possible involvement of advisory partners [30]</p> <p>32. Pilot actions: specify conditions and requirements [22]</p> <p>33. Target groups: Other organisations can participate if their policy relevance is demonstrated – how is this criterion specified? [25, 31]. Cross-border organisations should also be targeted [62]. What is the criterion for “organisations responsible for regional policy” [LV]</p> <p>34. Platform: Clarify and strengthen the synergies between projects and platform (e.g. of Interreg MED horizontal projects) [13, 52]; Make participation in platform activities easier for actual policy actors [38, 45, 54]</p> <p>35. Clarify the scope of several indicators (do they refer to projects and/or platform) [22, 43]</p> <p>36. Consider dedicated calls for proposals for EGTCs [24] rural areas or transition regions [62]</p>	<ul style="list-style-type: none"> <li>• <i>Pilot actions</i> - Participants asked about the specific conditions and details. The answer highlighted the need to consider the policy context when proposing and approving of a pilot action. If the pilot action matches that policy context, it could be possible to propose several pilot actions in the same project. Pilot actions could relate to the transfer of a practice or experience from one region to another, or could be a test new to all regions in a project.</li> <li>• <i>Simplified cost options</i> - will continue to be a key implementation tool for Interreg Europe and will be further detailed in the programme manual.</li> <li>• <i>Small-scale projects</i> - the nature of interregional cooperation and the need to involve at least 3 different countries in one project partnership makes it difficult to match the notion of small projects.</li> </ul>	<p>From 29 to 35:</p> <p><b>These suggestions and remarks will be taken on board in the programme manual which will also provide definition of all important terms.</b></p> <p>36. For equal treatment reasons, calls for proposals cannot be restricted to specific organisations like EGTCs who are anyway eligible to the programme. Similarly, the calls usually do not target specific territories. Due to the programme rationale in particular in terms of balanced partnerships, rural areas or transition regions are usually well represented.</p>
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<p><b>3/ Financing plan</b></p>	<p>37. The co-financing rate should be increased to ensure wider participation in the Interreg Europe programme (small entities, research institutions for instance). [6]</p> <p>38. Will this rate be higher for Outermost regions? [8] [10]</p> <p>39. Recommend to have staff costs not only in the first phase of the projects, but in the second phase as well. [7]</p> <p>40. Some suggestions on the calculation of flat rates (e.g. administrative costs relative to staff costs should be increased) [6, 23]</p> <p>41. Same co-financing rates for the private non-profit bodies as foreseen for the public bodies (the co-financing rate for the private non-profit bodies should amount to 80%). (Contribution from PL)</p>	<p>//</p>	<p>37 &amp; 38</p> <p>The co-financing rates takes into consideration the reduction of the maximum rate from 85% to 80% in the new regulation.</p> <p>39. Staff costs will continue to be eligible throughout all phases of the project. <b>This will be clearly specified in the programme manual.</b></p> <p>40. <b>The different financial rules and possible simplified costoptions will be developed in the manual,</b> taking into consideration also the maximum rates defined in the Interreg Regulation (e.g. 15% maximum flat rate for office and administration).</p> <p>41. 80% is the average co-financing rate at the programme level. Details to ensure this overall average will be discussed and decided at a later stage.</p>
<p><b>4/ Actions taken to involve the relevant programme partners</b></p>	<p><b>b. Role of those programme partners in the implementation, monitoring and evaluation</b></p> <p>42. Proposal to include the participation of one representative from Outermost regions to raise the awareness on the specificities and needs of these territories.[1]</p> <p>43. Dedicate one of the three seats of each national delegation in the MC for an association of local and regional authorities (upon a rotating participation?) [8]</p> <p>44. The spectrum of programme partners needs to be widened and involve those stakeholders that create real added value (e.g. on social, economic and environmental level) [3, 21, 22]</p> <p>45. Ensure more transparency by attaching the list of organisations participating in the PC and the list of NCPs [16]</p>	<p>//</p>	<p>42. The composition of the Monitoring Committee will be discussed when defining the rule of procedures of the new programme. Considering that the current rules provide 3 seats per Partner States, it is in principle already possible for outermost regions to participate but it is up to the concerned countries to decide on the allocation of these seats.</p> <p>43. As in the current programme, each national delegation will probably benefit from 3 seats at the monitoring committee which allows the local/ regional level to be represented but it is again up to each country to decide on the allocation of these seats.</p> <p>44. The spectrum of the programme partners is already large considering that the composition of its monitoring committee will most likely gather 3 representatives per country, the European Commission and the European Committee of the Regions. This means that up to 90 participants per Committee.</p> <p>45. The detailed lists of NCPs and Monitoring Committee members have always been (and will continue to be)</p>



	<p>46. Quality assessment of the applications – resort to external experts given the increasingly technical nature of the projects [8]</p> <p>47. Give the opportunity to widely spread approved projects to other regions (to be inspired by the Spreading Excellence and Widening Participation part of Horizon 2020) [20]</p> <p>48. Award a quality label where relevant to non-selected - project proposals, in order to help these proposals finding alternative funding sources.[20]</p> <p>49. Add one § on involving MAs and IBs in the projects, beyond administrative requirements [26]</p>		<p>available on the programme website. This point is clarified in the updated version of the CP.</p> <p>46. Due to its focus on regional development policies and capacity building, projects are usually not of very high technical nature. The systematic use of external expertise for quality assessment was used in previous programmes with very low return on investment. It is therefore likely that the use of external expertise will remain exceptional only when needed.</p> <p>47. Although the positioning of Interreg Europe is different from that of Horizon Europe (not necessarily focusing on Excellence but more on cohesion), synergies with other programmes is clarified in the updated version of the CP.</p> <p>48. The situation is different in Interreg Europe than in Horizon Europe. In Interregional cooperation, funding has always been available to support relevant applications. In other words, it is because the quality standards of the programme were not met that applications were rejected. In this context, the creation of a quality label is not relevant.</p> <p>49. The partnership requirements will be further specified in the programme manual.</p>
<p><b>5/ Approach to communication and visibility</b></p>	<p><b>5.2. Target audiences</b></p> <p>50. Proposal to add transnational networks/platforms as multipliers in section 5.2 3) [4, 5]</p> <p>51. Communication should not just be confined to regional authorities or EU institutions/bodies but needs to reach other stakeholders at European level like business platforms, NGOs, as well as local decision makers and association of local authorities [39]</p> <p>52. The IJ&amp;G programmes representatives should be a specific target audience (under 5.2.) – Their awareness-raising could go through the national coordination authorities jointly with NCPs where relevant. [33]</p>	<p>//</p>	<p>50. The words “transnational” and “platforms” are added in the updated version of the CP.</p> <p>51. Reference to (potential) beneficiaries is made clearer in the updated version of the CP.</p> <p>52. Since the focus on the Investment for Jobs and Growth programmes will be lightened, there is no need to add this specification in the cooperation programme.</p>





	<p><b>5.3. Communication channels</b></p> <p>53. Several comments were made in favour of increasing the budget share allocated to the social media channel that appears underestimated (especially compared to the one for the website); proposal to focus on a limited number of social media. The importance given to websites is questioned by several contributors. [1, 12, 13, 24, 32, 35, 36] Introduce new interactive ways to implement conferences, study visits etc. without travelling. [28]</p> <p>54. Give the opportunity on the project website to complement the information with dedicated partner webpages in local languages [29]</p> <p><b>5.5. Monitoring and evaluation</b></p> <p>55. Include projects' progress reports, as a key source of data [9]</p>		<p>53. The updated version of the CP is updated as follows: “up to” 23% website, “at least” 2% social media. In terms of volume, the dedicated budget to social media may appear low since it is mainly ensured in-house while the website is mainly externalised. The programme manual will provide further information on the new ways to carry out interregional exchange of experience.</p> <p>54. The possibility to have dedicated webpages in local languages may be considered in the programme manual</p> <p>55. Projects progress reports have always been and will continue to be a key source of data in programme evaluations. The reference to progress report is included in the revised version of the CP.”</p>
<p><b>6/ Support to small scale projects</b></p>	<p>56. Several comments questioning the practical modalities for the development of small-scale projects (size, territorial scope, etc.) [2, 12, 16, 26]</p>	<p>A few questions were also submitted before the webinar. It was for instance whether the programme would support <b>small-scale projects</b>. Actually, small-scale projects, as introduced by the Interreg regulation (Article 24 and 25), are primarily relevant to cross-border programmes and do not apply to interregional cooperation. However, the policy learning platform will continue to support the regions in their need for targeted cooperation.</p>	<p>56. There may be a misunderstanding on the notion of small-scale projects which, in principle and as explained in the cooperation programme, does not apply to Interreg Europe.</p>



<p><b>7/ Implementing provision</b></p>	<p><b>7.2. Procedure for setting up the joint secretariat</b></p> <p>Comment regarding the internal organisation of programme bodies:</p> <p>57. Set up smaller secretariats in all countries [2]</p> <p>58. Establish a management capacity in regions NUTS 2 not only of INTERREG Programmes but also of the other programmes funded by the ESIF [7]</p> <p>In the part related to Chapters 3, 6 and 8:</p> <p>59. Support to projects: strengthen the toolbox with generic Gantt chart templates for actions to be taken, communication actions, etc [3]</p> <p>60. Several comments highlighting the differences in FLCs modalities and the severe difficulties faced in some countries – call for more uniformity – in part related to Chapters 3, 6 and 8 [14, 21, 22]</p>	<p>//</p>	<p>57 &amp; 58: The programme has limited means to support all regions in the European Union, Norway and Switzerland. However, the network of NCPs can multiply the programme channel and provide further assistance to applicants and beneficiaries when needed. This element is already included in the cooperation programme.</p> <p>59. The possibility to develop a place on the programme website where projects could exchange their templates and tools will be investigated (in the current period, this is already possible through a dedicated shared Google doc).</p> <p>60. First level control systems are designed at Partner State level and their practical system organisation and modalities may need to be adapted to the national context. However, the programme is doing its utmost to ensure harmonisation of FLC procedures, notably through the harmonisation of control reports and checklists.</p>
<p><b>8/ Use of unit costs, lump sums, etc.</b></p>	<p>61. Several comments highlighting the added-value of SCOs and recommending their use. [1, 5, 9, 15, 20, 24, 28]</p>	<p>The use of <b>simplified cost options</b> (SCOs) was also raised. The experts confirmed that the programme was fully committed to simplification. The possible use of lump sum or flat rate at project level will be further detailed in the programme manual. The chapter in the CP however does not refer to the use of such simplified cost options on project level but only on the use of such options in the relationship between the E and programme level.</p>	<p>61. This chapter does not refer to the use of simplified cost options that are used as a basis for payment by the programme to the project partners (falling under Article 46 of the CPR Regulation). This chapter has to be completed only if the programme intends to make use of simplified cost options as a basis for payments from the Commission to the programme and thus falling under Article 88 of the CPR Regulation. The answer 'No' is ticked since this options will not be used for the reporting from the programme to the EC. The programme confirms the added-value of the SCOs applied at project level. The scope of the use of simplified cost options falling under Article 46 of the CPR Regulation and applying to projects will be detailed in the programme manual.</p>