



# **Public consultation on the Interreg Europe Cooperation Programme 2021 2027**

**Online survey**

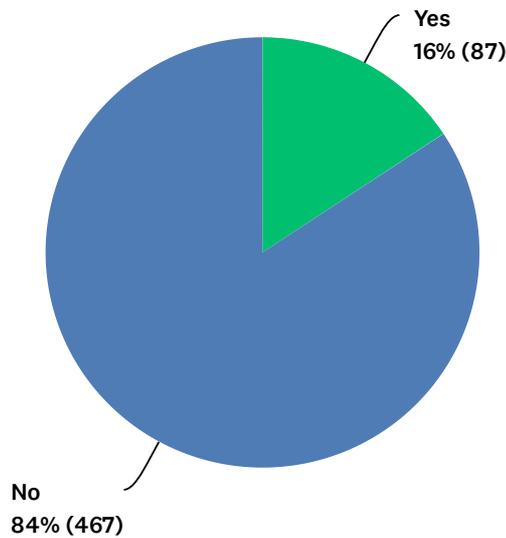
**Organised from 15 March until 16 April 2021**

**Overview of results and contributions**



# Q1 Do you have any comments/ questions/ suggestions on chapter 1?

Answered: 554 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	16%	87
No	84%	467
TOTAL		554

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	In the framework of “A more Social Europe” and in order to overcome challenges arisen by the Covid-19 outbreak, ProMIS underlines the importance of the “ecosystem” approach, which focuses the attention on the innovation network perspective where all the actors of the “territorial social environment” co-influence each other and co-create the services of general interest. This approach doesn’t exclude any vulnerable group and people living in territories with low accessibility. As for the point 1.2.3 (not included in the report) it’s worth mentioning the importance of supporting regions which decide to align the Interreg Europe resources with the Recovery and Resilience funds in order to respond to the “additionality” principle of the European Union. The Programma Mattone Internazionale Salute -ProMIS is the network that involves all the Italian Regions, Ministry of health and the National Agency for Regional Health Services. ProMIS gives its input on the consultation by collecting inputs from all the Italian Regions.	4/16/2021 8:37 PM
2	I miss 2 areas 1) active citizenship closely related to the fight for democracy a human rights in the widest range (including cultural aspects) 2) Cultural in/tangible heritage protection and its use, for example, for improving (spreading, splitting) touristic pressure on the most popular places in Europe (typically Venice, Paris, Prague etc.)	4/16/2021 7:01 PM
3	La Conférence des Présidents des Régions ultrapériphériques (CPRUP) est en phase avec les thématiques du nouveau Programme Interreg Europe, en particulier celles sur lesquelles les ressources devraient être concentrées (transition écologique, tourisme, santé, social... telle que décrite dans le groupe 1 thématique), même si elle serait favorable à une concentration plus équilibrée permettant de consacrer suffisamment de financement à des sujets tout aussi essentiels pour ses régions (connectivité, éducation, intégration...). Les RUP ont maintes fois démontré leur forte volonté de renforcer leurs actions communes, favoriser les échanges d’expérience et le partage de connaissances dans l’optique de consolider leur développement régional. Cet engagement s’est notamment traduit à travers la création des réseaux thématiques (Énergie, Emploi, S3) et la coordination de plusieurs projets conjoints (GROW RUP, RESOR, URBAN WASTE, ORFISH, FORWARD1 ...). La coopération inter-RUP incluant des régions issues de 3 Etats Membres dans 3 bassins océaniques distincts s’inscrit pleinement dans l’approche transeuropéenne du programme Interreg Europe. Les simplifications qui semblent avoir été apportées en termes	4/16/2021 4:18 PM

d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus concernées par certaines des disparités mentionnées, notamment: - Page 7 – « A smarter Europe » devrait inclure une référence au coût plus élevé des infrastructures numériques dans les régions ultrapériphériques en raison de leurs spécificités géographiques reconnues à l'article 349 du TFUE. - Page 9 – « A more connected Europe » devrait inclure une référence aux difficultés d'accessibilité rencontrées par les RUP, or seules les régions faiblement peuplées et les îles sont expressément mentionnées. - Page 9-10 – « A more social Europe » devrait inclure une référence aux RUP lorsqu'on parle du chômage des jeunes, dans la mesure où elles connaissent des taux parmi les plus élevés de l'UE, et en ce qui concerne l'accès aux services d'intérêt général. - Page 11, concernant la complémentarité avec d'autres programmes Interreg, il est uniquement fait référence à la complémentarité avec les sections A et B, mais aucune mention n'est faite au volet D. Cela devrait être inclus, puisque Interreg Europe complète, dans le cadre de son champ d'action, les programmes d'intégration régionale qui sont développés dans le cadre d'Interreg D. - Page 12– « The complementarities to other EU instruments and EU policies » devrait inclure une référence à la complémentarité avec Widening – Horizon Europe, auquel les RUP sont éligibles. 1: Bien que financé par H2020, ce projet de coopération témoigne de la capacité de la Commission européenne à concevoir un traitement sur-mesure, particulièrement adapté pour les RUP. Cette approche sur-mesure a été également mise en œuvre par l'appel à proposition de la DG Mare en 2015 et a permis le montage du 1er projet européen des RUP sur la pêche (ORFISH).

<p>4</p>	<p>In this very focused contribution to the consultation, we wish to put exclusive attention to the synergies between Interreg Europe and the I3-Interregional Innovation Investments scheme. While IE and I3 are both financed by the European Regional Development Fund, there are less references at the moment to synergies of Interreg Europe with I3 than there are to synergies with Horizon Europe and with S3 Strategies. More ambition is needed to actively seek for complementarities among them and actively exploit these. Strengthening the link between Interreg Europe and I3 could be very beneficial in order to cover a wider range of activities and reinforce each other. I3 has the goal to build and strengthen EU wide value chains, by funding a portfolio of business driven innovation activities towards investment readiness. I3 project partners belong to place-based innovation ecosystems which are fully part of their own region's RIS3, find each other for strengthened collaboration on the basis of identified complementarities and have the ambition to strengthen the foundations for structural long-term collaboration. In terms of terminology used by the Thematic Smart Specialisation Partnerships, a key target audience of the instrument, I3 is covering activities in the learn-connect-demonstrate phases, with a main focus on 'connect' and 'demonstrate'. By deliberately allowing and stimulating synergies between Interreg Europe and I3, Interreg Europe can enhance its own impact significantly in terms of sharing knowledge and transfer of expertise, and in terms of policy improvements. We are thankful to be given the opportunity through this consultation to share a few suggestions to make that happen. Interreg Europe projects should be allowed to be a 'back-to-back' or 'mirror' project with an approved I3 project. The endorsing I3 partners (i.e. the public authorities stating the topic of the I3 project corresponds to their own RIS3) of I3 consortium project partners are in their turn central project partners in the Interreg Europe project, with endorsing partners of 'cascade projects' within the I3 project can be involved in a 2nd circle of Interreg Europe project partners. Interreg Europe project partners will look in detail at existing policies which support the learn-connect-demonstrate phase activities, and how to improve them. They will each work on policy instruments within their own region, and on policy instruments which allow/hinder innovation collaboration in between regions. The latter based on the experiences (successes and difficulties in the implementation) of the related I3 project, which by obligation has an interregional nature. An Interreg Europe project constructed as such is of high value during I3 project implementation and links it directly to a wide range of real-life activities and experiences, while respecting core IE objective, i.e. exchange of experiences and policy improvement. An Interreg Europe project constructed as such equally has a high 'post project' value, by improving policies which will continue to have their effect during the long time collaboration I3 project partners strive for. In addition, building on the Interreg Europe approach of policy learning, some calls could be oriented towards the 'learn' and 'connect' phase and towards policy developments for matching smart specialisation strategies with a clear aim for a long-term policy collaboration in a given value chain. It could contribute to create upstream solid collaborative projects flows for the I3, and give a clear contribution to the outward looking perspective of S3, helping in developing new policy practices for interregional collaboration.</p>	<p>4/16/2021 4:09 PM</p>
<p>5</p>	<p>Humans Before Borders ("HuBB") was created in Lisbon in 2018 and aims to promote and keep the topic of migration on the public and political agenda in Portugal and beyond. In the</p>	<p>4/16/2021 2:36 PM</p>

context of its activity, HuBB not only calls for action against inhumane and illegal treatment of migrants and refugees, it also organizes, develops, implements and integrates several initiatives and projects that support migrant's inclusion and protection across borders. Needless to say, the comments and opinions to the Interreg Europe Cooperation Programme presented below primarily focus on the way European Member States have (not) addressed the migration flows of the last decade, and directly result from the hands on experience of HuBB's members in several affected regions. It is HuBB's strong belief that a robust and comprehensive cooperation programme between Member States could play a key role in solving the current migration crisis and definitively cease the systematic human rights' violations that the world continues to witness in refugee camps. The cross-sectional relevance of this matter, and, most importantly, the undeniable humanitarian concerns inherent to it, make it difficult to understand its absolute omission from the Interreg Europe Cooperation Programme 2021-2027, which we hope is duly remedied after this public consultation. Regarding this first chapter, it has been noticed that this document clearly intends on continuing to approach the social dimension of the Interregional Cooperation Strategy, mentioning problems related to unemployment and education. However, when addressing this same dimension (section 1.2.2) we can't help but notice the poor mention it is made to the increasingly complex and urgent subject of migration/refugees, as we came across these terms when only referring to the positive impact these groups could have on a country's economy . To rectify the aforementioned issues we suggest that the chapter "A more social Europe" (section 1.2.2) includes one or two paragraphs on the social and moral impacts for sheltering refugees. It is pressing to change the EU's current approach to migration, which is currently based on economic factors alone. Migrants are not merely economic agents. There is an humanitarian dimension to the topic of migrations that is completely overlooked in the Programme and, therefore, fails to uphold EU provisions on human rights: "[t]he Union shall offer its citizens an area of freedom, security and justice without internal frontiers, in which the free movement of persons is ensured in conjunction with appropriate measures with respect to external border controls, asylum, immigration and the prevention and combating of crime", "It shall combat social exclusion and discrimination, and shall promote social justice and protection, equality between women and men, solidarity between generations and protection of the rights of the child. It shall promote economic, social and territorial cohesion, and solidarity among Member States" (article 3 of the Treaty on European Union). Furthermore, it should be reinforced that more than 100,000 people have been either unlawfully pushed back or kept under inhumane conditions in refugee camps across several EU countries; More than 100,000 human rights violations that have occurred at the hands of EU governments; More than 100,000 opportunities for EU governments to work together on finding a territorial solution to embrace and provide safe haven for generations of migrants that were lost; More than 100,000 times that the EU failed to comply, obey and enforce its own humanitarian principles and human rights' rules.

6	<p>Chapter 1 develops each of the points in a very complete way. Having read and carefully analyzed each one of them, and attended the public consultation webinar, I support and share that its focuss on the cross-cutting priority of capacity building based on governance as well as smart, green, connected, and social citizens. I highlighted its specific objective of enhancing the institutional capacity of public authorities and relevant stakeholders. Copied from the program: - Interreg contribution to smart specialisation could be regarded as a space for experimentation, learning and generation of good practice in smart specialisation strategies that can serve broader purposes. - Focus this cooperation on policy objectives as well as on process-related issues covered by the Interreg-specific objective "a better cooperation governance, to enable regional policy actors to learn and adopt novel approaches and increase their capacities for the design and delivery of regional policies of shared relevance</p>	4/16/2021 2:31 PM
7	<p>Especially welcome is the reference to the "uniqueness of each region". Distinctiveness between regions is vital to recognise; differences do not debar meaningful co-operation and must not be misunderstood as "divides". Indeed, to recognise and value the different natures of different places/regions is a key tenet of the Territorial Agenda 2030. We urge a place-based/territorial approach and welcome the stated aim (P12) to ".. assure awareness of the territorial settings of project partnerships". This in turn connects to the welcome references to reducing disparities (8ESTC etc), but we would stress the need to look at disparities within as well as across regions – especially where individual regions encompass a mix of types of territories – e.g peri-urban and urban, or peri-urban and rural. We welcome the lighter focus on ESIF policy instruments – they are important, but there is much else that has potential or actual equal value and is just as worthwhile as a focus for investment.</p>	4/16/2021 2:05 PM
8	<p>Reference is made to "Innovation in the EU remains highly concentrated in a limited number of regions. In the southern and eastern Member States, innovation performance is poorer and regions close to innovation centres - mainly capitals - do not benefit from their proximity. It is therefore necessary to develop policies that support technological and non-technological innovations in less developed regions and that connect businesses, research</p>	4/16/2021 12:36 PM

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centres and specialized services to businesses in different regions." Not only less developed regions, but also regions have very low economy diversification, especially islands in the Mediterranean that highly depend on Tourism. Efforts need to be made to further incentivize, using special treatment in such islands. If not, these islands will continue to rely on tourism, an industry that was hard hit, and will take time to recover. Moreover, it will be a means to foster, develop and sustain talent on these islands.

9	<p>First of all, thank you for the great work! Chapter 1 Suggestions: - ref 1.2.1: Implementation also of the Sendai Framework for DRR as transversal strategy - ref 1.2.2: Analyses of the potentialities of digitalization for overcome inequalities among territories - ref 1.2.6: It could be useful to create a sort of 'virtual academia' for policy makers at programme level and a related permanent platform in dialogue with the main EU Institutions? - Ref 1.2.4 It is necessary to take in consideration also local Policy Instruments that, although not directly linked to structural funds, can influence regional policies in a broader sense - Ref 1.2.6 - Scope of the Programme: Why not think, within the Interreg Europe Programme, at a sort of 'Young' Interreg with focus and/or activities ad hoc for the young communities (for example, of every partners) . Comments: It is really effective the idea to reinforce the learning process in the future programme via a stronger anchoring of practice-based learning.</p>	4/16/2021 12:31 PM
10	<p>There are less references to synergies of Interreg Europe with I3 than to synergies with HE and with S3 Strategies while IE and I3 are both financed by the European Regional Development Fund. We consider that it is not enough to mention there are no overlaps between those two programmes (IE and I3). More ambition is needed to actively seek for complementarities among them. Strengthening the link between Interreg Europe and I3 could be very beneficial in order to cover a wider range of activities and reinforce each other. As the Cooperation Programme draft document states when mentioning the overall objective of the Interreg Europe 2021 – 2027: Based on the objective set in the European territorial cooperation regulation and the rationale described above, the following overall objective is defined for the Interreg Europe programme: To improve the implementation of regional development policies, including Investment for jobs and growth goal programmes, by promoting the exchange of experiences, innovative approaches and capacity building in relation to the identification, dissemination and transfer of good practices among regional policy actors. IE should integrate policy experimentation within its objectives. Moreover, project beneficiaries should be able to make use of cascade funding in order to integrate more participants to the project, extend its scope or address a specific task. We highly value the contribution of Interreg Europe to the development of the S3 strategies by the European regions, as it must be, given that these strategies have become the cornerstone guiding the innovation efforts of our territories. In this regard, we call on the Commission to set up the necessary mechanisms to adequately coordinate and integrate all available financial instruments around S3 strategies: ERDF POs, I3, Horizon Europe, Digital Europe, etc. In fact, Interreg Europe has supported the development of several S3 Platform partnerships. Nevertheless, more Joint Actions between the JRC (responsible for the S3 Thematic Platforms) and Interreg Europe Secretariat are missed. We believe that it would be necessary to expand both the spectrum and number of joint actions in order to achieve concrete results.</p>	4/16/2021 11:47 AM
11	<p>The accent to rural sustainable development and youth participation is important also.</p>	4/16/2021 11:30 AM
12	<p>We are pleased to acknowledge the recognition of sustainable tourism, under the priority A More Social Europe, as part of thematic concentration Group 1 where 80% of the share will be allocated. The COVID-19 pandemic has caused and is still causing outrageous effects for the tourism sector and its whole ecosystem. We, the European regions and Destination Managing Organisations, are still investing own budget to provide direct support for our sector to survive and we are working against clock to develop recovery, resilience and regeneration plans that will contribute to the sector revamp and its green and digital transition. This is why the Interreg Europe should also promote the tourism ecosystem capacity to drive the green and digital transition of the regional policies and business and, therefore, encourage our participation not only in policies related to A More Social Europe but also a Smart and Digital Europe. We would appreciate if a clearer overview on how to apply "cascade" investments would be given to better understand how to find complementarities and synergies between our projects developed under Interreg Europe and other EU funds and programmes, specially the Interregional Innovation Investment Instrument and the Smart Specialisation Strategies (S3) and its Platforms.</p>	4/16/2021 10:51 AM
13	<p>- We should consider the major impacts of the COVID crisis on people and organizations. Particular attention should be paid to human-oriented policies supporting lifelong learning and skills development. - The programme area : four thematic priorities, namely: 1) R&amp;I; 2) SME competitiveness; 3) Low-carbon economy; 4) Environment and energy efficiency. These priorities are still relevant for the next programming. Digitalization could be transversal to these 4 priorities. - Synergies with other programmes: We strongly support the synergy with the S3. Interreg Europe projects could be great to foster policy learning</p>	4/16/2021 9:46 AM

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between S3 governance bodies. We support the link with Europe's Digital Agenda 2030 and "a digital compass for Europe". As well as the link with the "European Socle of Social Rights" and the Interregional Innovation Investment Instrument (I3). An Interreg project could be an early stage of an I3 consortium. - Programmes objectives: We support the proposal to make the link between Interreg Europe projects and measures financed by ESIF more flexible. Linking Interreg Europe projects to regional policies seems to be the way that will create more impact on the evolution of territorial development instruments.

14	<p>We are pleased to acknowledge the recognition of sustainable tourism, under the priority A More Social Europe, as part of thematic concentration Group 1 where 80% of the share will be allocated. Interreg Europe should promote the tourism ecosystem capacity to drive the green and digital transition of the regional policies and business and therefore encourage their participation not only in policies related to A More Social Europe but also a Smart and Digital Europe. The Interreg Europe programme should provide a clearer overview on how to apply "cascade" investments between Interreg Europe and other EU funds and programmes, specially the Interregional Innovation Investment Instrument and the Smart Specialisation Strategies (S3) and its Platforms.</p>	4/16/2021 9:45 AM
15	<p>In the section "A greener, low-carbon and resilient Europe" (pag 8 - 9) I miss more presence of biodiversity. As the European Comission says "We cannot address biodiversity loss without tackling climate change, but it is equally impossible to tackle climate change without addressing biodiversity loss. Protecting and restoring ecosystems can help us reduce the extent of climate change and cope with its impact" (<a href="https://ec.europa.eu/environment/nature/climatechange/index_en.htm">https://ec.europa.eu/environment/nature/climatechange/index_en.htm</a>) Considering this, the text should be changed to clearly refer to this link between biodiversity and climate change. In addition, it's necessary to include terms like "biodiversity restoration" instead of "investing in biodiversity" for being more inclusive and reinforce the link with the objectives of the EU Biodiversity Strategy 2030 (<a href="https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030_en">https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030_en</a>) Finally, in this section of challenges, I suggest to mention the strategy "From farm to fork" linking Green Deal objectives with agriculture as one sector which needs innovation and can generate more employment in rural areas.</p>	4/16/2021 9:33 AM
16	<p>We appreciate the contents in general, as well as the quality of the analysis and the argumentation. The reference to EU major strategic orientations as well as to the Sustainable Development Goals provides a good framework for the argumentation. We also welcome the statement that "the uniqueness of each region is also of enormous added-value for other regions in Europe through various forms of mutual learning." The careful reference to the covid pandemic ("trends need to be interpreted with a lot of caution as the economic and social consequences of the 2020 health crisis could have very huge" effects is wise. From the perspective of a prosperous metropolitan region however, we perceive a covert tendency of overlooking the needs of these powerhouses of Europe. Leaving no places behind also applies to places within regions that might perform well on a NUTS 3 level. Mutual learning needs to be taken seriously. References to regulatory frameworks (e.g. "should be adapted to the principles of a circular economy") shouldn't be too prescriptive to avoid deterring potential project partners.</p>	4/16/2021 8:56 AM
17	<p>I think that in chapter 1.2.1. also other sectors that were hit by crisis need to be mentioned: local value chains especially in combination with usage of local resources/local materials were severly hit question of young - perhaps should be specifically mentioned chapter 1.2.2. greener Europe- also usage of local materials/local resources and local value chains need to be mentioned supported Question of 1.2.6. two groups two groups -in first group also local vauve chains - local materials, local resources need to mentioned the question of private non profit bodies - in the case that they are established for public purposes and have to return profit for development of the area - I kindly ask you for special "arrangement" - for posibility for 80 % of cofinancement - otherwise is very difficult to be part of the program (70 % of cofinancement is very low) since private non profit (e. g. in some cases also regional development agencies are private non profit)are working on the regional level on behalf of their founders - policy holders (local communities, state,...)</p>	4/16/2021 5:25 AM
18	<p>pppp</p>	4/15/2021 10:33 PM
19	<p>Mentioning the cultural and creative sector (CCS) in relation to three out of five strategic orientations ("A smarter Europe", "A more social Europe" and "A Europe closer to its citizens" is remarkable and shows that the programme acknowledges the importance of the CCS regarding both Europe's economy and society. Furthermore, it emphasizes that the CCS has been severely hit by the current health crisis and might face long periods of recovery. Against this backdrop and taking the high fragmentation of this sector into account which also includes strong regional disparities, it is crucial to further support and encourage interregional cooperation regarding the CCS. With view to the scope of the programme, it is favourable that culture is addressed under group 1 given that a high</p>	4/15/2021 6:10 PM

percentage of the budget is dedicated to this thematic area. However, it should also be taken into consideration that culture is important in the context of the thematic areas of group 2. With view to the beneficiaries of the programme which will be further outlined in the programme manual, it is important to further facilitate the participation of non-profit bodies and small enterprises and offer conditions that allow especially small organizations to participate in and access interregional cooperation as part of their recovery as they can be very valuable for regional development in both rural and urban areas.

20	Need too demonstrate, in each proposal, the clear link between needs analysis, to be included, changes / improvements in policy instruments and activities to be carried out	4/15/2021 4:53 PM
21	The Humans Before Borders ("HuBB") organization was created in Lisbon in 2018 and aims to put, promote and keep the topic of migration on the public and political agenda in Portugal and beyond. In the context of its activity, HuBB not only calls for action against inhumane and illegal treatment of migrants and refugees, it also organizes, develops, implements and integrates several initiatives and projects that support migrant's inclusion and protection across borders. Needless to say, the comments and opinions to the Interreg Europe Cooperation Programme presented below primarily focus on the way European Member States have (not) addressed the migration flows of the last decade, and directly result from the hands on experience of HuBB's members in several affected regions. It is HuBB's strong belief that a robust and comprehensive cooperation programme between Member States could play a key role in solving the current migration crisis and definitively cease the systematic human rights' violations that the world continues to witness in refugee camps. The cross-sectional relevance of this matter, and, most importantly, the undeniable humanitarian concerns inherent to it, make it difficult to understand its absolute omission from the Interreg Europe Cooperation Programme 2021-2027, which we hope is duly remedied after this public consultation. Chapter 1 - Programme Strategy: main development challenges and policy responses The overarching objective of this Programme is to promote a harmonious economic, social and territorial development of the European Union as a whole, building on three strands of cooperation: cross-border, transnational and interregional. Building on that, it has been noticed that this document clearly intends on continuing to approach the social dimension of the Interregional Cooperation Strategy, mentioning problems related to unemployment and education. However, when addressing the same dimension (section 1.2.2) we can't help but notice the poor mention it is made to the increasingly complex and urgent subject of migration/refugees, as we came across these terms when only referring to the positive impact these groups could have on a country's economy . To rectify the aforementioned issues we suggest that the chapter "A more social Europe" (section 1.2.2) includes one or two paragraphs on the social and moral impacts for sheltering refugees, since this can still be qualified as a Disparity and inequality across Europe as opposed to being a crisis that happened only during the "mid-2010s".	4/15/2021 3:54 PM
22	The text refers few times to "mobility". Does this topic include also the idea of "Goods transport"? or only passenger transport ? It would be relevant to specify the importance of developing multimodal transport of goods and low-emission goods transport in order to achieve the target of "greener Europe"	4/15/2021 3:30 PM
23	Section 1.2.4. - It is good news that pilot actions will now be possible under certain conditions in phase 1, to convince policymakers and put knowledge into practice. - It is good news that particular attention will be paid to establishing an effective link with regional development policies in a broad sense rather than focusing on SF programmes. Section 1.2.6. - IRE 2014-2020 aims to improve regional development policies and programmes, esp. IJ&G programmes and ETC programmes. While the improvement of ETC programmes is no longer part of the overall objective of the 2021-2027 programme (page 15), it is not entirely clear if cooperation on this issue is totally excluded or if it could still be tackled under the Interreg-specific objective 'a better cooperation governance' (page 16). It would be useful to clarify this issue. - Although it is a very good idea to encourage the participation of SMEs in the activities of the programme, it is difficult to imagine how this could work in practice, esp. in the absence of financial incentives. SMEs have limited resources, and many must prioritise their business at the moment (e.g. in the tourism or cultural and creative sectors).	4/15/2021 3:19 PM
24	1 - Please make a referecne to EGTC in the section "The complementarities to other EU instruments and EU policies" 2 - Please also include tourism as a priority area 3 - Please insert a reference to the Conference on the future of the EU	4/15/2021 12:53 PM
25	- Platforms on projects results: they are very numerous (KEEP, the Interreg Europe platform, CORDIS ...) --> It would be interesting to try to group them together or to create more bridges between them. - Therefore, the main learning point focuses on the need to ease the obligation of linking the project to a certain number of ESIF programs and the need to foster an effective link with regional policies in a broader sense. --> This sometimes generates dropping interesting activities only because they were not directly related to ESIF	4/15/2021 11:58 AM

- The final evaluation also points to the need to involve as project partners the organizations that are directly responsible for the targeted policy instruments. --> On the contrary, we suggest easing the participation of organisations not directly responsible. This facilitates cooperation of research centres, non-profit organizations, etc. and therefore the inclusion of ideas out-of-the-box and unexpected good practices. - The cross-cutting priority on capacity building of Interreg Europe programme is a clear improvement. As well as the largest menu of topics. - The resources concentration on those policy areas that are most relevant and urgent is key. All SOs under PO 2-Greener Europe that are in the group 1 should be considered as the top priority. - Private companies, especially SMEs, are an important target group in the context of several supported specific objectives.--> In fact, we suggest opening the selection of Good Practices to private initiatives, which were not recommended in past programmes.

26	It has to be ensured that there must be a chance/enough funding to promote sustainable mobility, active mobility and tourism mobility especially as sustainable mobility is an essential mean to reduce green house gas emissions of the transport sector. Sustainable mobility has suffered from the negative effects (more using of private cars, etc.) of the Covid-19 pandemic and would need intensive further promotion to reach the goals of the Paris climate agreement.	4/15/2021 11:49 AM
27	Concerning this chapter, in the topic: Target group - Eligible beneficiaries, it would be recommended to include also the Community Development Associations to be eligible participants for calls of proposals.	4/15/2021 9:55 AM
28	The programme strategy corresponds to the needs and objectives of climate neutral Europe 2050.	4/15/2021 8:29 AM
29	some topics suggestions: Alternative fuel mobility (hydrogen , e-mobility, biofuels) applied on Local Public Transport (including navigation), freight transports, sustainable tourism in accordance with Energy efficiency. Local energy communities development. Synergies among energy and mobility issues with ict platform and ecosystems.	4/14/2021 6:09 PM
30	Extending the programme area to candidate countries will extend its success	4/14/2021 4:46 AM
31	It would be important to specifically mention the outermost regions, considering their unique potential and distinctive assets, while outlining the challenges that arise due to their remoteness, insularity and economic dependence. These territories are the subject of several ongoing policies and strategies across several activity sectors.	4/13/2021 3:35 PM
32	In the chapter it is clearly indicated the need for innovation. However I have not found the link from innovation to its commercialization, which is especially evident in the Central and Southern regions, but I think basically everywhere. So innovation is good, but we need to bring products to market and connect innovation, digital and entrepreneurial ecosystem.	4/13/2021 2:38 PM
33	La Conférence des Présidents des RUP (CPRUP) est en phase avec les thématiques du nouveau Programme Interreg Europe, en particulier celles sur lesquelles les ressources devraient être concentrées (transition écologique, tourisme, santé, social... telle que décrite dans le groupe 1 thématique), même si elle serait favorable à une concentration plus équilibrée permettant de consacrer suffisamment de financement à des sujets tout aussi essentiels pour ses régions (connectivité, éducation, intégration...). Les RUP ont ainsi maintes fois démontré leur forte volonté de renforcer leurs actions communes, favoriser les échanges d'expérience et le partage de connaissances dans l'optique de consolider leur développement régional. Cet engagement s'est notamment traduit à travers la création des réseaux thématiques (Énergie, Emploi, S3) et la coordination de plusieurs projets conjoints (GROW RUP, RESOR, URBAN WASTE, ORFISH...). La Coopération inter-RUP incluant des régions issues de 3 EM dans 3 bassins océaniques distincts s'inscrit pleinement dans l'approche transeuropéenne du programme Interreg Europe. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ	4/13/2021 11:21 AM

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d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées.

34	<p>Missing elements: • p5 promote cross-regional learning also for climate adaptation • P8 focus not only on coastal areas but all Art.174's regions • P8 Regional plans on green energy, energy communities, NBS can contribute to reduce CO2. All solutions must be affordable and inclusive for all, also remote areas • P9 Authorities shall develop lifelong education and vocational trainings also in remote areas and on traditional knowledge • P10 EU closer to territories: introduce rural proofing of policies to remove territorial disparities • P12 what synergies with Next Generation EU and LT Vision for Rural Areas? Precisions to add: • P6 Consider sub-regional disparities while looking at GDP • P7 Definition of smartness shall be bottom-up and place-based, include social innovation and be inclusive also for seniors • P9 Prioritize culture, tourism, handcraft highly impacted by COVID. Connected EU shall foster high-speed internet and remote working also remote areas. Silver economy must be seen as a business opportunity especially in rural EU</p>	4/12/2021 3:11 PM
35	<p>A smarter Europe is all about innovation. According to the programme, this is very interesting for East- and Southeast-Europa. What are the evolution possibilities for western countries in the Interreg programme? If the western countries pay more attention to innovation and technology 4.0, wouldn't this mean that the gap between West-Europe and (South)East-Europe becomes only bigger? And thus the cooperation between this two parts of the continent more difficult? A more connected Europe is about mobility and accessibility of sparsely populated regions in Europe. How can this theme be interesting and advantageous for a more densely populated area with good mobility?</p>	4/12/2021 12:04 PM
36	<p>We very much agree on the selection of S.O. 4.5 on culture and sustainable tourism as part of the group 1 thematic areas, since the tourism and culture sectors have been severely hit by the COVID-19 pandemic and need support and adequate/strengthened administrative structures.</p>	4/12/2021 10:39 AM
37	<p>The overall approach to share best practices and develop regions in topics such as digitalisation, sustainability / green transition and health is excellent in order to elevate the competence in Europe. Perhaps it would be beneficial to combine Green and Digital technologies more explicitly. Even though SMEs are not suitable for beneficiaries, the programme should acknowledge SMEs as important regional drivers for G&amp;D transition as well as improved health technologies. At the moment, the programme draft lacks this aspect a bit. Business potential and innovation potential for SMEs could make, for example, the G&amp;D transition reality. The Social Europe aspect is extremely relevant, as building competence in Europe elevates G&amp;D transition to be deployable in practice. There is a slight imbalance in funding between Group 1 and 2. Especially items under PO 4 might be combined (e.g., SOs related to labour markets and SOs related to education).</p>	4/9/2021 7:28 AM
38	<p>Hi, I would just say that I think there would be benefit from better mutual knowledge sharing between interreg and the Horizon 2020 programme/future Horizon activities. Knowledge from both programmes is directed at the same practitioners, e.g. on electric mobility, but the two programmes move in their own circles and there is not enough collaboration informally or formally. If this could be strengthened in the work of the secretariat I think this would ultimately help our target audiences understand better the outputs and recommendations of EU funded innovation and research work as a whole. Largely, those looking for advice are less concerned about which programme it emanates from, but more about a clear path to navigate and understand the findings that have been generated. It is currently a very mixed field for the practitioner to try and navigate with many interreg/horizon/smart cities projects on individual topics. Could this link be referenced as a "will" rather than a "could", with specific ideas for actions to achieve this?</p>	4/7/2021 5:52 PM
39	<p>The scope of the programme proposal is in line with the interests of our region and we continue to regard Interreg Europe as a very relevant programme for funding projects.</p>	4/7/2021 3:32 PM
40	<p>The complementarity to Horizon Europe is significant underestimated (compared to the other Interreg programs). Obviously no one from the INterreg community seems to have any experience there - in fact a large amount of running projects in Horizon demonstrate very close, result oriented and policy based international cooperation (at least the "Societal challenges-sction", equipped in the last period with more than 25 Bn €. The future program</p>	4/6/2021 12:02 PM

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(Horizon Europe) aims to develop common solutions in similar topics like IR-E. A link to the Horizon program described in the draft as "could be established" is so weak, obviously it is NOT on the agenda. Should be changed into "will be..." - formulated in terms like "is welcome", "appreciated" etc. in order to foster links of activities of this new 90 bn programme with Interreg. Cooperation is better than ignoring... and so many cities and regions work with Horizon, more than in Interreg...

41	vvvv	4/3/2021 12:13 AM
42	Although the document covers the regions as a whole, it would be important to specifically mention the outermost regions considering their potential, but also the challenges arising from their archipelagic situation. A lot of policies and strategies from several areas of activity are being implemented in those territories.	4/2/2021 9:30 PM
43	Challenge for the programme: that also national level policy makers (government level actors) in member states know the main ideas and main results (like data of good practices) of Interreg as they often "guide" regional policies.	4/1/2021 1:28 PM
44	it would be great to get a synergy table reference with outh EU funding instead of a general description ones.	4/1/2021 12:23 PM
45	On this point re transport and decarbonisation, "Considering that the transport sector remains one of the main contributors to greenhouse gas emissions, public actions supporting the decarbonisation of transport is more important than ever. The supported actions should be inspired by the European strategy for low-emission mobility which aims at ensuring a regulatory and business environment that is conducive to meeting the competitiveness challenges that the transition to low-emission mobility implies". In IE we have dismantled the rail freight handling capacity over previous years and today have made no effort whatsoever to shift freight to rail despite the many objectives and agreements at EU level including the TEN-T corridors plan. Simply having a grand statement without concrete targets will not create change in decarbonisation.	4/1/2021 11:13 AM
46	Interregional learning should encourage more bilateral knowledge transfer. The biggest benefit of the previous projects has been the possibility for the stakeholders to visit other project regions to learn about their good practices. Study visits are the most effective way to make a difference. Local learning within the framework of an Interreg project should be possible to count as project results.	4/1/2021 9:07 AM
47	Beyond complementarities with other ERDF related programmes, synergies should also be sought with Horizon Europe, and in particular with close to market activities, under Pillar III.	3/31/2021 9:54 PM
48	Preservation and development of the cultural heritage, actions on development of tourism as a driver of local economy, especially recovering after COVID-19 related problems, should be stressed more as priority.	3/31/2021 8:33 AM
49	Our comment is targeted at the description of the five crucial challenges EU regions face, specifically the aim of "a smarter Europe". The explanation of the goal is, in our opinion, a bit misleading. Innovations are understood in a too industrial/economic way. The aim of this policy objective shall not only be to create a supportive environment for businesses, but also to encourage the development of the R&I sector in more general terms. Capacities in science should be not put on the side lines when it comes to the regional development as they play also an important role. Also, complementarities with Horizon Europe are not clarified enough in the text. It seems Interreg Europe will support mainly the development of entrepreneurial and digital skills and the technology transfer. In fact, the framework programme supports a much broader variety of topics, incl. research on climate change or energy, which are also declared goals of Interreg Europe (i.e. the Greener Europe objective).	3/30/2021 1:23 PM
50	<ul style="list-style-type: none"> <li>• p5 cross-regional learning is also for climate adaptation</li> <li>• P6 Important to consider sub-regional disparities (regions may have high GDP because there is a big city but very harmful situations elsewhere)</li> <li>• P7 A smarter Europe shall not only be centred also on social innovation. The definition of smartness shall be bottom-up and place-based</li> <li>• P8 Coastal areas shall not be only priority. Climate change act faster in mountains and impacts high/lowland areas (e.g. ecosystem services, disasters). Energy efficiency and building renovation are major cause of CO2, NBS can be part of the solution. Ensure all solutions are affordable and inclusive for all, including vulnerable groups/remote areas</li> <li>• P9 Authorities shall consider lifelong education and vocational trainings, included in remote regions. Connected Europe goes is linked to high-speed internet everywhere, also remote areas with mobility barriers</li> <li>• P10 For a Europe is closer to all territories: introduce rural proofing of policies</li> <li>• P12 Synergies with Next Generation EU and the Vision for Rural Areas?</li> </ul>	3/29/2021 9:31 AM
51	KKK	3/28/2021 4:00 PM

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52	Pilot actions can be an added value to the projects, in that they allow a concrete testing of the interregional learning acquired; therefore, we consider it important to strengthen the possibility to include them and implement them in next programme.	3/26/2021 12:41 PM
53	c	3/26/2021 11:44 AM
54	n/a	3/24/2021 4:37 PM
55	Would there be a possibility that Interreg programme include the possibility to exchange good practices and experiences from different European countries to understand how reduce the risk for different groups (elderly people, people with low incomes, people living in rural areas etc.) of being forgotten because of the changes brought by the digital transformation.	3/24/2021 2:13 PM
56	I find the 1st chapter very interesting and I fully agree with all thesis. My suggestion is to undertone all aspects of entrepreneurship, but not only as an act of running a business but all that is before that: strengthening entrepreneurial mindset among students, providing opportunities to learn soft skills, creating space for learning from business, ngos etc.	3/24/2021 1:02 PM
57	xx	3/24/2021 11:08 AM
58	COSTAL AREAS .. FROM THE RISK OF FLOODS .. BUT IT IS POSSIBLE TO INTERVENE THROUGH ENERGY RECOVERY, EXTRACTION OF SALT, INCREASE OF FISH PRODUCTIONS, BRINGING THE GREAT LAGOON COMPENDS TO THE HISTORICAL PRODUCTION FUNCTION, WITHIN AN ECONOMY OF ECOLOGICAL TOURISM... THE OBJECTIVE OF AN URBAN MOBILITY LESS DEPENDENT ON THE PRIVATE CAR SEE IN EUROPEAN CITIES AN EXTREMELY VARIED SITUATION, WHERE THE USE OF THE CAR IS VERY CONTAINED IN SOME REALITIES, AND IN MORE AGAIN IN THE ORDER OF 70-80% OF COMMUTERS MOBILITY, WITH A ROLE OF MARGINAL PUBLIC TRANSPORT, AND A ROAD NETWORK THAT DOES NOT GUARANTEE THE SECURITY OF "ZERO EMISSIONS" MOBILITY - A more connected Europe in particular by building INTERMODAL integration between a public transport more frequent and fast and sustainable mobility : rental and recharging points for electric cars, cyclostations, micro-mobility).	3/23/2021 7:54 PM
59	The design of the Program strategy is clear and comprehensive. Challenges to the implementation of the Program strategy were addressed. In this line, we propose that all those challenges should involve a strong human dimension that is a prerequisite of successful territorial cooperation. For example, connectivity facilitates human interaction and brings people, places and opportunities closer. A 'Greener, Low-carbon and smarter Europe' as well as connectivity needs a more human-centered policy approach and must be managed not only environmentally and economically, but also socially sustainable. Human dimension of the identified challenges, especially in the light of the Covid-19 crisis has been put in the center of governance and linked strongly to health and educational domain; because of the latter we propose to establish a greater synergy between the Program and the new Erasmus program. Health sector shall also gain a more central role for governance in order to tackle challenges with which territorial cooperation are facing today.	3/23/2021 3:19 PM
60	Spacial conditions	3/23/2021 2:29 PM
61	kk	3/23/2021 2:17 PM
62	Eligible beneficiaries: please add European Grouping of territorial cooperation	3/23/2021 8:38 AM
63	"to integrate successful experiences and policies from other regions into their own regional programmes ....promoting the transition to a circular economy, ..... etc." We propose to give more space to holistic approaches that embed the single fields of activity into an overreaching vision of a sustainable regional development. The lack of developing sectorial policies in teh context of an encompassing vision seems one of the biggest obstacles.	3/22/2021 3:53 PM
64	The greener, low-carbon Europe principles should also be integrated into the strategy for the digital economy as this sector is projected to be one of the fastest growing industries next to transport. Thus, I would suggest sustainability measures for data centres.	3/22/2021 3:14 PM
65	...	3/22/2021 2:19 PM
66	I suggest to include cooperation in energy production, energy independence and regional energy cooperatives.	3/22/2021 11:29 AM
67	In relation to lessons learned more emphasis could be included from project learnings in last programming period e.g. A Smarter Europe - should all funding under this PO have a requirement for innovation that complies with the guidelines of RRI or Should all funding under Sustainable Transport also incorporate the impact for Active & Inclusive Travel. Building on the learnings that were most identified as a result of projects during this programming period would create much greater impact.	3/22/2021 10:44 AM

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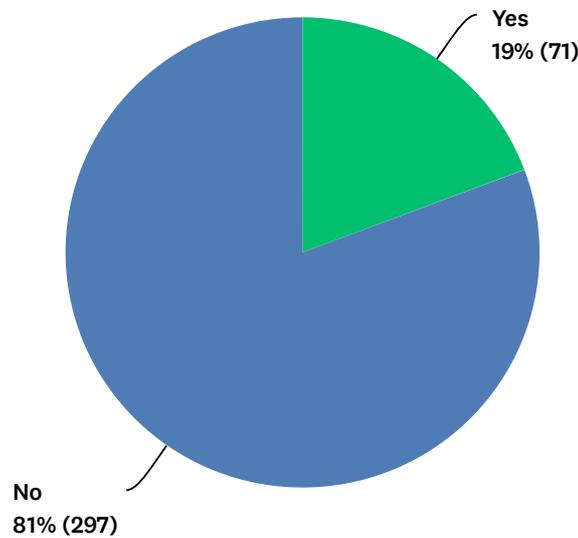
68	Section 1.2.3: I am missing complementarities to H2020 and alike research programmes: what has been tested and/or proven through them, could/should be enhanced through Interreg Europe projects, either through transfer of knowledge, or through the improvement of the institutional capacities of policy makers to follow the progress achieved	3/20/2021 3:28 PM
69	More information is needed concerning the sea-basin approach, including the basins where non-members of the EU are participating (Baltic, North Sea, Med)	3/19/2021 7:51 PM
70	At page 9 I suggest to add after "including promoting": "urban sustainable Development". At page 10 instead of: "role of culture and tourism in economic development, social inclusion and social innovation" is better: "role of culture and creativity and tourism in economic development, individual well-being, social inclusion and social innovation".	3/19/2021 4:59 PM
71	It's too long to read for a survey... I'd like to find a more inclusive website and direct contact channels with the management and the institution to really understand, propose or follow projects...	3/19/2021 2:35 PM
72	,llllkooooo	3/19/2021 12:44 PM
73	Sorry to say, but it's not very inviting to find as first question this 40 pages document as a starter. It's like the manuals of medicines nobody reads. Please, if you want people to interact, ask simple, short questions. Especially in the beginning.	3/18/2021 11:03 PM
74	Regarding to energy efficiency, the main focus is different production (renewables), however the focus should be energy efficiency. And in Atlantic Area, with low industry, the main consumption is in buildings. So, specific topics regarding to building energy efficiency research should be provided to reduce the building consumption (new materials, types of renovation, certification schemes specific for this Area, hot water production, centralized technical management systems for houses, etc.). Regarding to digitalization it is essential that all members of Atlantic Area, could use the BIM (Building Information Modelling), a real technology for Industry 4.0. A plan for this Area needed to be provided to achieve the full BIM integration in public and private organisations related to AECO (Architecture, Engineering, Construction, Operations) sector. So, specific topics related with BIM (implementation plan, training, case studies, support measures) and digital twins should be provided.	3/18/2021 8:12 PM
75	yes	3/18/2021 4:27 PM
76	Interreg promotes collaboration but it is more about knowledge transfer, not research per se. There should be a clearer link in terms of outputs that further research progress and make a tangible contribution to R&D. The reporting is too complex and laborious.	3/18/2021 4:20 PM
77	involve small businesses as much as possible, but also the smallest public bodies closest to the people. we need a Europe that is close to the citizens and proactive; there is a need for more information actions on European policies and training for human resources specialized in European subjects	3/17/2021 3:48 PM
78	I feel the overall approach is very good. From experience, I would to propose that good practices are not only practice-based but also science based, and thatdownstreaming of Horizon 2020 and Horizon EUROPE results are strongly encouraged. Also, the involvement, rather, the commitment of regional and where applicable national governments is required maybe should be more emphasised from the very beginning. Finally, one small § stressing capacity building among regional authorities as well as GP-relevant absorbing actors maybe should also be mentioned.	3/17/2021 11:34 AM
79	Intruduction give a hint of "Change we can believe in," as many will remember the slogan for the first presidential campaign of Barrack Hussein Obama in the USA (2008).	3/17/2021 8:38 AM
80	In order to to overcome climate change and environmental degradation, the European Green Deal provides a roadmap for making the EU's economy sustainable with action to boost the efficient use of resources by moving to a clean, circular economy, and to restore biodiversity and cut pollution. It outlines investments needed and financing tools available, and explains how to ensure a just and inclusive transition. Circular economy in particular should be boosted at regional level by taking into full account the social and economic impact it can have at different levels. Properly implemented policies favouring circular economy can not only reduce the burden on the environment but as well create jobs for people that are often excluded from the traditional labour market. In particular developing networks of re-use centres will allow for an improved use of resources by extending the life of products and by offering jobs opportunity at local level. A re-use centre can create on average 67 jobs per 1.000 tonnes of material collected and prepared for re-use. A very high figure if compared with the 4 jobs per 1.000 tonnes created by traditional recycling operations. Boosting re-use means sharing knowledge between countries and regions where re-use centres are well developed ie Flanders, Austria, Spain, the Netherlands and those	3/16/2021 11:52 AM

lagging behind (mainly East and central Europe). Regional authorities can hugely benefit for such centres since they can reduce the bill to be paid for disposing of their waste and create a virtuous circle involving different stakeholders. Moreover the professional profile needed in re-use centre do not necessarily require very high skills so they are a good opportunities for people who are excluded from the traditional job market.

81	Perchè solo in lingua inglese ????? La lingua inglese non appartiene a tutti i cittadini. L'inglese separa a volte.... In Europa TUTTE LE LINGUE e tutti i cittadini devono avere la stessa dignità.	3/16/2021 11:10 AM
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## Q2 Do you have any comments/ questions/ suggestions on chapter 2?

Answered: 368 Skipped: 186



ANSWER CHOICES	RESPONSES	
Yes	19%	71
No	81%	297
TOTAL		368

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	Even though I understand you are not willing to support non-profit organizations as the project leaders, this may be contra-productive as, for example, many villages gather in so called non-profit associations (Local Action Groups), which are becoming the main 'movers' especially in the countryside. You should revise this approach at least when the NGO's are 100% owned by public authorities.	4/16/2021 7:07 PM
2	Il existe une volonté constante des RUP de coopérer entre elles, au sens d'échanges de bonnes pratiques et de partage de connaissances. Il est important de souligner qu'en réponse à leur demande récurrente quant à un instrument opérationnel pour mettre en œuvre cette coopération, la Commission européenne, notamment par la voix de la Commissaire européenne en charge de la cohésion et de la réforme (lettre Novembre 2020), les oriente systématiquement vers Interreg Europe. Or, INTERREG Europe présente des restrictions, notamment sur les critères géographiques, qui rendent difficile la sélection de projets de coopération interrégionale entre les RUP uniquement. Ainsi, l'exigence de participation de partenaires appartenant aux quatre zones (Nord, Sud, Est et Ouest) du programme afin de garantir un équilibre géographique à l'échelle européenne, réintroduit dans le nouveau programme 2021-2027 (page 25), constitue un obstacle majeur pour la coopération inter-RUP. Le programme ayant pour vocation de prendre en compte les spécificités territoriales des régions, la situation particulière et singulière des RUP définie dans l'article 349 du TFUE, est un élément déterminant à prendre en considération dans le futur programme INTERREG Europe. La participation des neuf régions ultrapériphériques, qui appartiennent à trois États membres et qui sont situées dans trois zones éloignées et diverses, offre une couverture géographique large qui devrait permettre la sélection de leurs projets. Il serait fortement souhaitable que cette disposition soit incluse dans le programme. Par conséquent, la Conférence des Présidents des RUP propose l'introduction d'une flexibilité pour les RUP dans l'évaluation des critères géographiques de façon à leur permettre de présenter des projets de coopération interrégionale entre elles.	4/16/2021 4:19 PM
3	• Policy Learning Platform A specific section devoted to creation of synergies and complementarities could be included so to make the community better aware of the possible linkages with relevant EU funds/initiatives and implement IE projects in a functional way to other actions aiming at strengthening regional policy-making.	4/16/2021 4:11 PM

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4	<p>As in the previous program, just adding that I fully support that the core target groups should be the policy responsible organizations, as national, regional and local authorities, as well as other bodies responsible for regional development policies. Likewise, other actors can be business support and organizations, environmental organizations and education and research institutions. Also I consider very important that other relevant actors (SMEs, for example) can also be involved in projects through regional stakeholders groups. On the other hand, it is really useful that Interreg Europe supports a Policy Learning Platform to facilitate policy learning and capitalization of regional policy good practices on an ongoing basis. The two main actions, the Interregional cooperation projects (which aim is to improve through an exchange of experience the implementation of the regional development policies of the participating regions.) and this Policy Learning Platform will be very useful.</p>	4/16/2021 2:47 PM
5	<p>Building on what was pointed out and suggested in chapter 1 (paragraphs addressing the refugee crisis and related social and moral impacts European countries could have), it is crucial that this Programme includes at least one priority focused on how cooperation between European countries should be established in order to receive and help migrants and refugees; this could entail shared policies and/or partnerships between countries and stakeholders and the creation of housing alternatives to refugee camps. Furthermore, the refugee crisis must be addressed by EU governments and can only be solved through cooperation mechanisms that take stress out of the most affected countries and provide dignified, long-term solutions for the refugees seeking asylum in the EU. HuBB's proposal is clear: to plan and implement a comprehensive collaboration programme across all EU Member States that would result in the elimination of refugee camps, which shall instead be substituted by proper alternatives that allow refugees to live with dignity and independence, such as providing public housing for them to own, rent or occupy, while being duly integrated, culturally, socially and economically, in each relevant EU country. Refugee camps may only be maintained as exceptional, temporary and short-term measures to quickly respond to forced displacement and must in all cases (i) have the proper infrastructures to provide adequate housing conditions, (ii) meet the proper safety, health and sanitary conditions, as well as (iii) supply enough food and water to all. The changes mentioned above are only possible if all EU Member States work together in carrying out the necessary national and transnational policies. Given the humanitarian concerns at stake, such changes must be a top priority of the Interreg Europe Cooperation Programme.</p>	4/16/2021 2:36 PM
6	<p>The central focus on governance is welcome and important – it lies at the heart of both place-based approaches and of interregional cooperation. As a transnational network of regions PURPLE is acutely aware of the importance of cooperation governance – it literally underpins all work, and it is vital to focus on getting this right, capacity building and engagement/participant are key dimensions of this, the greater scope for pilot actions is especially valuable in this regard, as is the continuing emphasis on stakeholder groups. The place-based approaches at 2.1.5 etc are key and the reference to diversity as an asset especially welcome – it resonates especially strongly in peri-urban regions where urban &amp; rural features co-exist and overlap. Cooperation between territories of different types might therefore be brought out more strongly - for example in the context of the role of regional cooperation in establishing better rural-urban linkages/synergies (e.g. <a href="https://rural-urban.eu/">https://rural-urban.eu/</a>).</p>	4/16/2021 2:06 PM
7	<p>Water and circular economy. Cascade financing/ vouchers to support testing and piloting for SMEs.</p>	4/16/2021 2:00 PM
8	<p>"Interreg Europe aims to improve the implementation of regional development policies, including Investment for jobs and growth goal programmes. It will do this by promoting exchange of experiences, innovative approaches and capacity building in relation to the identification, dissemination and transfer of good practices among regional policy actors to strengthen their institutional capacities for a better implementation of their policies." First and foremost, one has to go beyond policy and further understand economic dynamics of how investments are attracted, and what the main challenges are for certain peripheral regions to attract valuable and meaningful investments. Smaller islands already face barriers of perceptions, despite having strategies, policies and talent.</p>	4/16/2021 12:36 PM
9	<p>Suggestions: Need of more funds, compared to the previous Program, also for the follow-up phase</p>	4/16/2021 12:31 PM
10	<p>We particularly welcome the support for policy learning actions that bring together regional actors from different Macro-regional and Sea Basin Strategies, as well as from Euro-regions. These projects allow to build on previous experiences and best practices of cooperation, adapting them to the specific needs of each relevant geographical area. In this sense, it is worth highlighting already existing bottom-up experiences, such as those that we have taken over the regions of the Atlantic Arch for exchanging experiences with the Baltic, Alpine and Adriatic Ionian Macro-regions. We also have a project in the pipeline to</p>	4/16/2021 11:48 AM

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map the priorities of the Atlantic regions S3 Strategies that will allow to better fine-tune the fields of our cooperation. Moreover, S3 mapping is a task already accomplished too within a cross-border project financed by POCTEFA ETC programme. Support for the exchange of all these experiences is an undeniable added value of Interreg Europe.

11	Accent to rural sustainable development and youth involvement is also important.	4/16/2021 11:42 AM
12	We would appreciate the financing rate for both public bodies and nonprofit organisations would remain the same with regards to the former programming period. We believe the programme should further exploit and explain how the Interregional Cooperation Projects can take advantage of the Policy Learning Platform in both, the Core and the Follow up phase with twofold objectives: 1) to find synergies with other projects talking the same priority 2) support the dissemination and sustainability of the findings and results.	4/16/2021 10:51 AM
13	We consider the programme should further exploit and explain how the Interregional Cooperation Projects can take advantage of the Policy Learning Platform in both, the Core and the Follow up phase with twofold objectives: 1) to find synergies with other projects talking the same priority 2) support the dissemination and sustainability of the findings and results. For this we would also recommend that Interreg Europe applies the Interreg MED horizontal projects methodology, consisting on clustering projects under the same policy priority to jointly disseminate, promote and establish cooperation among them. We regret that the co-financing rates have decreased from 85% to 80% for public bodies and from 75% to 70% for nonprofit organizations with regards to the former programming period. It would be appreciated to avoid the decrease of the co-financing rates.	4/16/2021 10:24 AM
14	Types of actions: For us, the most value-added action types are policy roundtables and staff exchanges. These actions really enhance the cooperation to foster a common topic and find best practices. Study-visits are important but not enough accurate to serve as a good practice that could be immediately transferred. We strongly support the proposal to develop pilot actions from the beginning of the project, which promotes the "learning by doing" approach. The relevance and the utility of regional meeting should be reviewed to include more the local stakeholder group and to tackle field issues. A closer and stronger link between field problem solving and policy improvement could be made. Methodology: The timeline of 5 years of project with 3 years benchmarking and 2 years of implementation of Local Action Plan seems to be appropriated. We welcome the flexible approach introduced in the proposal. Policy learning Platform: We should consider to organize activities among similar projects to break the silos. Target groups: It seems interesting to have partners directly influencing the managing authority. We welcome the strengthening of the public authorities' role as neutral aggregator	4/16/2021 9:48 AM
15	Regarding the target actors, I would like to remarks the difficulties that public administration have to participate as a partner of any Interreg project. In my region, the day-to-day don't enable them to work deeply on this kind of projects. The best option for them here, is to include a not public administration as a partner, for the project day-to-day activity (project coordination, documents, certifications...) and the public administration can be another partner in the region, or a stakeholder. Letters of support can help to establish the real compromise of the public administration in project's development.	4/16/2021 9:42 AM
16	2.1.5 Page 25 before last paragraph a "l" is missing in "n this context". 2.1.6 financial instruments might be the topic of some webinars or GP	4/16/2021 9:07 AM
17	Both the wording of the specific objective and the definition of the target group is clear, and in line with both our perception and our needs. The reference to "those mandated to manage a specific territory" is welcome. We fully subscribe to the call for "place-based approaches that give regions the ability and means to deliver policies that meet their specific needs." Concerning the interregional cooperation projects, we appreciate the clarity of the wording as well as the possible option of pilot actions. It is, however, hoped that the Programme manual yet to be written will provide for exact guidance of what a Regional Policy Instrument actually is supposed to be, and the improvement of the implementation of regional development policies. This also applies to the proposed Regional stakeholder groups; their composition, influence and duties should be made explicit.	4/16/2021 8:57 AM
18	question of the piloting in the projects: As I understand piloting is possible- already in AF, during the first phase. Might it be possible that we could have also - during the implementation sub projects (as in INTERREG IVC mini program), especially in the case when we have very innovative issues - that need to be learned. public equivalent bodies - I kindly ask you to include here also the private non profit, which fulfill all the requirements of the public equivalent (for example regional development agencies which are regulated by national laws and have specific status according to national laws) in the case of the states with no second level of administration	4/16/2021 5:36 AM
19	Apart from the core target group, chapter 2 presents a list of different relevant organisations	4/15/2021 6:10 PM

that might profit from Interreg. Even though it is said that the list is not exhaustive, it would be integral to explicitly mention the cultural and creative sector as an important additional target group and thus, add it to this list and also with view to the programme manual. Of course, this also depends on the eligibility of the respective organisational form, yet chapter 1 clearly underlines the importance of culture in the context of various strategic orientations of the programme which should be reflected in the target groups.

20	It's good to along the priorities with the ERDF priorities, and ask to demonstrate how the project will increase the capacity oof the public authorities / officers involved	4/15/2021 4:55 PM
21	<p>Building on what was suggested for chapter 1 (paragraphs addressing the refugee crisis and related social and moral impacts European countries could have), it is crucial that this Programme includes at least one priority focused on how cooperation between European countries should be established in order to receive and help migrants and refugees; this could entail shared policies and/or partnerships between countries and stakeholders and the creation of housing alternatives to refugee camps. Firstly, it is pressing to change the EU's current approach to migration, which is currently based on economic factors alone. Migrants are not merely economic agents. There is an humanitarian dimension to the topic of migrations that is completely overlooked in the Programme and, therefore, fails to uphold EU provisions on human rights: "[t]he Union shall offer its citizens an area of freedom, security and justice without internal frontiers, in which the free movement of persons is ensured in conjunction with appropriate measures with respect to external border controls, asylum, immigration and the prevention and combating of crime", "It shall combat social exclusion and discrimination, and shall promote social justice and protection, equality between women and men, solidarity between generations and protection of the rights of the child. It shall promote economic, social and territorial cohesion, and solidarity among Member States" (article 3 of the Treaty on European Union). Furthermore, the refugee crisis must be addressed by EU governments and can only be solved through cooperation mechanisms that take stress out of the most affected countries and provide dignified, long-term solutions for the refugees seeking asylum in the EU. The refugee camps maintained in EU borders manifestly violate human rights and mirror a EU policy which is in direct violation of article 14 of the Universal Declaration of Human Rights, in accordance to which "everyone has the right to seek and to enjoy in other countries asylum from persecution". As per the World Report 2020 of the Human Rights Watch, "[j]ust under 101,000 people had arrived at EU borders in 2019 by mid-November, the majority by sea. EU governments remained focused on sealing borders including through reported unlawful pushbacks from EU borders including Croatia, Greece, Hungary, Romania, Poland, and Spain". More than 100,000 people have been either unlawfully pushed back or kept under inhumane conditions in refugee camps across several EU countries. More than 100,000 human rights violations that have occurred at the hands of EU governments. More than 100,000 opportunities for EU governments to work together on finding a territorial solution to embrace and provide safe haven for generations of migrants that were lost. More than 100,000 times that the EU failed to comply, obey and enforce its own humanitarian principles and human rights' rules. HuBB's proposal is clear: to plan and implement a comprehensive collaboration programme across all EU Member States that would result in the elimination of refugee camps, which shall instead be substituted by proper alternatives that allow refugees to live with dignity and independence, such as providing public housing for them to own, rent or occupy, while being duly integrated, culturally, socially and economically, in each relevant EU country. Refugee camps may only be maintained as exceptional, temporary and short-term measures to quickly respond to forced displacement and must in all cases (i) have the proper infrastructures to provide adequate housing conditions, (ii) meet the proper safety, health and sanitary conditions, as well as (iii) supply enough food and water to all. The changes mentioned above are only possible if all EU Member States work together in carrying out the necessary national and transnational policies. Given the humanitarian concerns at stake, such changes must be a top priority of the Interreg Europe Cooperation Programme.</p>	4/15/2021 3:55 PM
22	<p>Section 2.1.2 It is a good idea to support both the projects and the platform as those activities are complementary and can benefit from each other. Regarding pilot actions in phase 1, it would be useful to clarify under which conditions such activities can be planned at the start of the project (see Interreg IVC experience). A specific section of the application must be foreseen so that evaluators can assess to which extent the 'innovative approach is worth testing'. Section 2.1.3 It is not entirely clear if the output indicator 'participations in joint actions across borders' includes both project and platform activities and if specific targets are set for each of these activities. The same remark applies to the second output indicator 'organisations cooperating across borders'. The ratio of 50% 'no of policy instruments improved' vs. 'no of policy instruments addressed' seems realistic given the success of the predecessor and current programmes.</p>	4/15/2021 3:35 PM
23	I believe there should still be a requirement that a minimum of 50% of policies should be regional or national operational programs. Changes in operational programmes have a much	4/15/2021 3:30 PM

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greater impact on the region than changes in any strategic document, e.g. a small municipality's strategy or some industry strategic document in a town x. The value of such a project relating to operational programs allows the entire region / country to use the project's effects, not the selected one residents of some town.

24	1- Explore the possibility to have a specific call for all EGTCs in Europe to share their experiences and link the results with the Interreg Europe objectives. 2- Indicate a pragmatic mechanism to use the seal of excellence of Horizon Europe.	4/15/2021 1:03 PM
25	- Pilot actions possible right from the start of the project (that can be proposed during the application or implementation phases)--> it is a very positive change to facilitate learning by doing! - Regional stakeholder group --> they have positive impacts. But the modalities should be more precise: can they benefit from the project funds to participate in actions? And to what extent? - Target groups: "The core target group of the Interreg Europe programme consists of the policy responsible organisations, meaning organisations that are in charge of regional development policies. Beyond the core target group, other relevant organisations are also targeted as long as their relevance and competence in regional development policies is demonstrated." --> it is very important that this criterion is specified. It should not be too strict to ensure that diverse entities can continue to participate in Interreg Europe programme. - On the same territory (regions), it would be a real added value if the Interreg Europe programme supported cooperation between the "core target group" and "the other relevant organisations" in the project preparation phase (matchmaking events organized by NCPs, etc.). Pairings such as research institutes / local authorities for each territory in the framework of projects should be encouraged. - "To reflect the programme contribution to territorial cohesion, a balanced combination of regions of varying development levels will be encouraged in the project partnerships. In this respect, a broad geographical coverage, spanning different parts of the programme territory would also be desirable in each partnership. This implies that partnerships must in principle go beyond cross-border and transnational areas." --> Does this mean that there will be a clear criterion of minimum and maximum number of partners per project with precise criteria of geographical diversity? - Horizontal principles in the selection of projects: gender equality should have a real importance in the selection of projects with precise criteria linked to a score.	4/15/2021 12:00 PM
26	As well as in the previous chapter the main target groups should be extended with associations.	4/15/2021 9:58 AM
27	mm	4/15/2021 9:12 AM
28	I have a question as to why the bodies that have an industrial/research character are not eligible? Especially when it comes to e.g. innovation, greening, it is important to include competent institutions, which the authorities often rely on to develop and implement policies. So I think they have a crucial role in developing policies, and improving capacities of public stakeholders, and skills. With this in mind, I think it is crucial they are included together with public institutions.	4/13/2021 2:50 PM
29	La Conférence des Présidents des RUP (CPRUP) est en phase avec les thématiques du nouveau Programme Interreg Europe, en particulier celles sur lesquelles les ressources devraient être concentrées (transition écologique, tourisme, santé, social... telle que décrite dans le groupe 1 thématique), même si elle serait favorable à une concentration plus équilibrée permettant de consacrer suffisamment de financement à des sujets tout aussi essentiels pour ses régions (connectivité, éducation, intégration...). Les RUP ont ainsi maintes fois démontré leur forte volonté de renforcer leurs actions communes, favoriser les échanges d'expérience et le partage de connaissances dans l'optique de consolider leur développement régional. Cet engagement s'est notamment traduit à travers la création des réseaux thématiques (Énergie, Emploi, S3) et la coordination de plusieurs projets conjoints (GROW RUP, RESOR, URBAN WASTE, ORFISH...). La Coopération inter-RUP incluant des régions issues de 3 EM dans 3 bassins océaniques distincts s'inscrit pleinement dans l'approche transeuropéenne du programme Interreg Europe. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités	4/13/2021 11:22 AM



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bodies; or not having more than half of whose members are appointed by the State, regional or local authorities, or by other bodies governed by public law": this definition remains tricky as it could exclude de facto many NGOs very relevant for interreg Europe (e.g. ALDA, Association of European Regions, CPMR, AREPO, Euromontana)

42	v	3/26/2021 11:45 AM
43	Table 3: Result indicators We welcome the inclusion of 'Organisations with increased capacity..'. However the target number of 7900 is rather high considering the target number of 4200 for the indicator 'People with increased capacity...'. Usually the number of people that can be reached is always higher then the number of organisations.	3/24/2021 2:48 PM
44	Would there be a possibility that Interreg programme include the possibility to exchange good practices and experiences from different European countries to understand how reduce the risk for different groups (elderly people, people with low incomes, people living in rural areas etc.) of being forgotten because of the changes brought by the digital transformation.	3/24/2021 2:14 PM
45	The policy learning platforms have also involved a quite active group of consultants. Perhaps more emphasis should be laid on the real actors in regions.	3/24/2021 1:52 PM
46	When it comes to capacity improvement of e.g. regional governments/authorities, it would be great to practically test the operation and impact of an institutional unit responsible for local and regional exchange of experience. As usually no institutional/regional/national funding available for this purpose, the option to establish such institutional unit and operate it for 2-3 years using IE funding could clearly show its necessity, efficiency and role in wider capacity improvement, advising and linking different stakeholders and affecting developments and awareness raising particularly for rural regions.	3/24/2021 9:36 AM
47	THE TEACHINGS OF COOPERATION PATHS FOR THE FUTURE IT SEEMS NECESSARY TO STRENGTHEN THIS PROCESS, USING THE INTERNATIONAL COMPARISON AS A TOOL FOR READING AND REorienting REGIONAL PROGRAMS IN PARTICULAR, EACH PROJECT COULD BEGIN WITH REVIEW (EVALUATION!) OF THE ACTIONS DEVELOPED IN PREVIOUS PROGRAMS, IDENTIFYING THE BEST PRACTICES TO BE PROPOSED TO INTERNATIONAL COMPARISON, WITH LOCAL STAKEHOLDERS AND "INDEPENDENT" EVALUATORS, AND ALSO READING THE CRITICALITIES THAT HAVE REDUCED THE EFFECTIVENESS OF THE ACTIONS. A FINANCIAL RESERVE PROVIDED WITHIN THE OPERATIONAL PROGRAMS COULD THEREFORE LEAD TO THE IMPLEMENTATION OF ACTIONS BUILT ON THE "BEST PRACTICES" MODEL, IN DIFFERENT REALITIES. THE ROLE OF LOCAL STAKEHOLDERS WOULD ALSO BE EXALTED, FOR WHICH ACHIEVES THE POSSIBILITY OF ORIENTING THE GOVERNANCE EVALUATION DESIGN OF THE REGIONAL REFERENCE PROGRAM, ON THE BASIS OF A SHARED REFLECTION ON THE EFFECTIVENESS OF DIFFERENT ACTIONS	3/23/2021 8:00 PM
48	I think its a great idea to being able to include pilot actions from the beginning! It would be good if there was some kind of flexibility within the pilot actions though. E.g. if you learn about something similar you plan to do in your pilot action throughout the exchange phase it should be possible to ammend the pilot action throughout the project (with consent of JS) when it makes sense. I think it would be good if not too many details are asked about the pilot action already in the application form.	3/23/2021 5:05 PM
49	As the two main types of actions of the Program are concerned we welcome that a.) interregional cooperation projects will cover activities dedicated to exchange of experience, capacity building, transfer of good practices, innovative approaches as well as monitoring. We are also agreed that b.) Policy Learning Platform will support networking and exchange of experience in different fields. On the other hand, all these types of supportive actions shall ensure larger civil project ownerships and thus allow civil society organisations to make a more dynamic and added-value contribution to achieving a 'Greener, Low-carbon and smarter Europe', connectivity, a ' more social Europe' and a 'Europe closer to citizens'. In this line, the Program shall provide more funding for pilot actions, exchange of knowledge and good practices of civil actors who are active among others in areas e.g. strengthening of dialogue with territorial governance; education, training and life-long learning, gender equality, equal opportunities, youth employment, health care, support to children, inclusion of people with disabilities, housing and assistance for the homeless people.	3/23/2021 3:19 PM
50	We believe that one of the priorities should be related to the university-business knowledge transfer in Europe; the way in which regions face that challenge and how to improve with the good practices from other regions.	3/23/2021 11:33 AM
51	The improvement of a policy instrument as central to the activities of the partners is fine. But again, particular attention should be given to the embeddedness of the policy instrument into a more general vision of sustainable development. A crucial part is the involvement of	3/22/2021 4:01 PM

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stakeholders and there the impression is that often it is a more symbolic than substantial process in the context of Interreg projects. MOre guidance and attention to that might be helpful (mapping of stakeholders, encourage their contributions to the newsletter, make number and specificity of letters of support in the application phase a strong criterium for selection of projects?). The PLP is a very valuable instrument. Report more on succesful failures, i.e. valid activity that didn't produce the expected results. Why? What needs to change? Not only success stories.

52	Strengthening the link between PLP and projects through the LP (e.g. mandatory activities in project applications, annual or biannual thematic events to be calendared in advance)	3/22/2021 12:38 PM
53	In the main objective emphasis on the climate neutrality	3/22/2021 12:20 PM
54	Phase 2 for a period of 1 year is too short to gain a real insight into the impact of a policy change and consideration should be give to this period remaining at 2 years. Even if a partner manages to achieve a policy change in phase 1 it will most probably be towards the latter part of phase 1 as the policy improvement can only take place once the exchange of experience is underway and in some cases when most of the exchange of experience period is completed. With regard to the policy learning platform consideration should be give to live streaming all training that is made available to Lead Partners to empower other partners to aspire to lead projects into the future. In addition, this would allow a higher percentage of partners to attend, on an inline basis, physical events that they do not have the capacity to attend. Consideration should also be given to the location of policy learning platform events. Could some of these be located in member states to allow more participation and less travel miles. Could consideration be given to including some inclusion or greener indicators - e.g. number of citizens where quality of life was improved as a result of a Interreg Europe policy improvement or number of citizens benefitting from cleaner air etc. If we are seeking to be create a smarter Europe why are we excluding SME's from the Interreg Europe Programme. Most innovation is created within SME's and we could all learn from their experience. They do not need to be Lead Partners but we should consider allowing them to participate in the programme to share their wealth of knowledge with Interregional partners.	3/22/2021 11:10 AM
55	I would like to see ICT becoming again a first class citizen in the new INTERREG call and not relegated again to an enabling technology. The COVID pandemic showed how much ICT is useful in dealing with many aspects of the pandemic and therefore the new INTERREG call should reflect this.	3/21/2021 12:09 PM
56	limited attention for the production side in the circular economy. how will local industry go hand in hand with life -living, recreation etc.- in the city of the future?	3/20/2021 7:51 PM
57	Governments and administrations are only there to complicate life of normal people. Moreover they are already excessively paid by the money of working tax-payers and they only have an eye to defend their nationalist interests. The real actors that deserve to participate in these projects are the working stakeholders, referring to the MSP-exercices. The governments and administrations are allowed to take notice of the cooperation of the working stakeholders	3/19/2021 7:55 PM
58	Again too long, high and might talk about anything... Need to express concept with simple examples	3/19/2021 2:37 PM
59	kkkkkkkkkéép	3/19/2021 12:45 PM
60	I believe the "action plan" phase is unnecessary. It brings complexity to the programme. The initial objectives of interreg are great, but the way the projects should be organized impair these objectives, and discourage smaller public authorities to take part in Interreg projects. Project partnerships are too large, the needs analysis are often inexistant, in order to implement effectively an action plan at the end of a project. The first phase should be enough to lead a good project, it would avoid a waste of time and a waste of money in consultants drafting action plans.	3/18/2021 11:07 PM
61	yes	3/18/2021 4:27 PM
62	Part of the target groups should alos be cross-border ogranisations and cross-border projects with competences in regional development There should be a distinctions within the calls of Interreg Europe. For example: a call for rural areas. Or a call for regions in transition. etc.	3/18/2021 4:10 PM
63	COMMENT ON: 2.1.1. Specific objective (repeated for each selected specific objective, for priorities other than technical, assistance) - --> Please it is important to raise capacity and acceptance of / for tools and synergies of more permanent forms of interregional collaboration. 2.1.2 Related types of action, and their expected contribution to those specific objectives and to macro-regional strategies and sea-basis strategies, where appropriate. -->	3/17/2021 11:38 AM

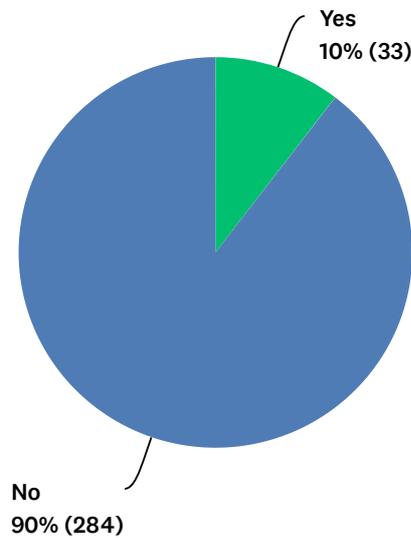
## Interreg Europe - Public consultation on the programme 2021-2027

Any project ideas, any pilots for strengthening. Marco regions and also liaising between and among macro regions?

64	It appears there is a decent coherence between programme priorities, overall EU goals and other EU financial instruments.	3/17/2021 8:41 AM
65	Policy learning is fundamental to fill the gap between regions. Again talking about circular economy the differences between countries/regions are huge. INTERREG should allow for a better exchange of knowledge between the various stakeholders and make sure that local government can fully benefit from the exchange. Investment should be supported as well especially in the area of infrastructure to boost circular economy so that in place where policies are still not developed enough local decision makers can receive an help by creating the facilities needed for a better control of the flow of material.	3/16/2021 11:56 AM
66	it would be interesting to know about planned use of financial instruments	3/16/2021 11:11 AM
67	Perchè solo in lingua inglese ?????? La lingua inglese non appartiene a tutti i cittadini. L'inglese separa a volte.... In Europa TUTTE LE LINGUE e tutti i cittadini devono avere la stessa dignità.	3/16/2021 11:10 AM

### Q3 Do you have any comments/ questions/ suggestions on chapter 4?

Answered: 317 Skipped: 237



ANSWER CHOICES	RESPONSES	
Yes	10%	33
No	90%	284
TOTAL		317

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	Le processus de consultation publique sur le programme Interreg Europe ainsi que l'atelier en ligne de Mars 2021 permettent à la fois une meilleure compréhension du nouveau programme et une remontée d'information dans une approche bottom-up qui favorise l'adhésion. Concernant la participation au programme, une représentation d'un expert issu d'une RUP permettrait de renforcer la sensibilisation sur les spécificités des RUP, régions les plus éloignées d'Europe, afin qu'INTERREG EUROPE soit davantage axé sur la prise en compte de leurs besoins.	4/16/2021 4:19 PM
2	Of extreme added value, both the online public consultation process and the online stakeholders workshop'organized with the aim of consulting pan-European organizations and networks of European relevance, EU institutions and organizations, and Brussels regional offices.	4/16/2021 2:47 PM
3	All public consultation exercises are commendable and of potential value. The strict character limits imposed in the response mechanism for the formal public consultation exercise do not however give sufficient opportunity to respond to the considerable richness, depth, and breadth of the substantial text upon which comment is invited. Processes have to be made manageable of course, but this seems on this occasion over-prescriptive and has the unhappy effect of narrowing down engagement in a way that seems at odds with the spirit of the exercise. The stakeholder event on Mar 24 was especially welcome and proved valuable and we were grateful for the opportunity to take part. With regard to partner involvement going forward, & given the focus of the proposed programme on regions/regional cooperation we would make a particular plea that regional level voices are not lost in the implementation process, and that careful consideration be given to balancing national and regional level inputs.	4/16/2021 2:07 PM
4	We totally support the need to ease the obligation of linking the projects to a certain number of ESIF programmes and the need to foster an effective link with regional policies in a broader sense. We believe that what should be justified is the alignment of the project with strategic objectives of the EU and its Cohesion Policy. Also we are fully aligned with the need to involve as project partners the organisations that are directly responsible for the targeted policy instruments.	4/16/2021 11:49 AM



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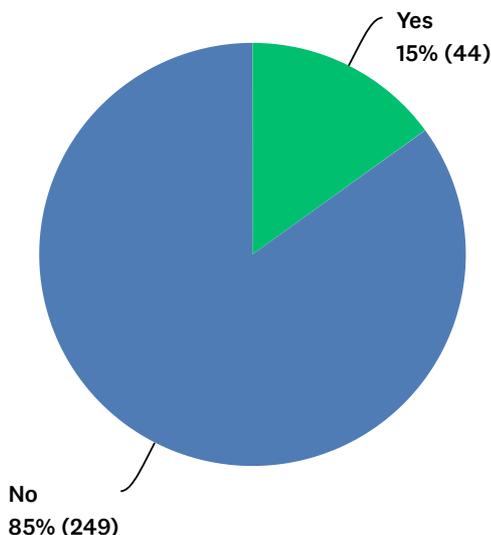
13	In stead of focusing on regions, I could se som advantages in focusing om smaller geografic areas (single or grous of municipalities)	4/7/2021 5:03 PM
14	vvvv	4/3/2021 12:14 AM
15	National government bodies should also be informed and if possible involved somehow to ensure going to same direction in member states.	4/1/2021 1:34 PM
16	For transparency purposes, it is desirable to attach the list of organisations participating in the Programming Committee (PC) so that it is clear which institutions were involved in negotiations on the partner state level. Also, the list of National Points of Contact ought to be included or, if appropriate, a link where all contacts can be found might be added.	3/30/2021 1:23 PM
17	• Pg. 31: How does the implementing, monitoring and evaluating bodies cooperate with other bodies responsible of relevant EU policies and programmes (as listed in chapter 1)?	3/29/2021 9:31 AM
18	v	3/26/2021 11:45 AM
19	Comment: really appreciate the involvement of programme partners. Thanks for the 24 March 2021 webinar.	3/24/2021 2:49 PM
20	We would appreciate to consider the possibility of the "Hop on" scheme like in the Horizon Europe, to be introduced in the Interreg Europe too. It will give the opportunity to widely spread approved projects to other regions, previously not involved in the partnership. Introducing of the " The Seal of Excellence" in the project evaluation process, would bring clear benefits for countries/ regions. A quality label awarded to project proposals submitted to Interreg Europe, will help these proposals find alternative funding. Projects which were judged to deserve funding but did not get it due to budget limits receive the label. It recognises the value of the proposal and helps other funding bodies take advantage of the Interreg Europe evaluation process. Partnerships would appreciate the accompanying letter explaining how to search for alternative funding sources.	3/23/2021 12:50 PM
21	It is important to look for new strategies to reach the programme partners and specially the decision policy makers in order to have a more important involvement in the Programme and projects.	3/23/2021 11:36 AM
22	Insofar you consider as programme partners only the governments and administration, it is a useless exercise, as they will only defend their proper nationalist interests. The nature of the progamme partners need to be opened and involve those stakeholders that create real added value on social, economic and environmental level.	3/19/2021 7:57 PM
23	Until that only big company or istitutionale partner can do something, little but good ideas can't do nothing!	3/18/2021 4:29 PM
24	yes	3/18/2021 4:28 PM
25	Why not using an public blog or exchange platform on the futre Europe Interreg Programmme. These could be a good participation tool.	3/18/2021 4:13 PM
26	COMMENT ON 4. Action taken to involve the relevant programme partners in the preparation of the Interreg programme and the role of those programme partners in the implementation, monitoring and evaluation --> Please, add one § on involving MAs and IBs in the projects, beyond administrative requirements.	3/17/2021 11:41 AM
27	Multilevel governance in real life and real time. Well done and in accordance with the Maastricht and Lisbon Treaties, ensuring participation and coordination between levels of government in decision making process.* *The Community shall act within the limits of the powers conferred upon it by this Treaty and of the objectives assigned to it therein. In areas which do not fall within its exclusive competence, the Community shall take action, in accordance with the principle of subsidiarity, only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States and can therefore, by reason of the scale or effects of the proposed action, be better achieved by the Community. Any action by the Community shall not go beyond what is necessary to achieve the objectives of this Treaty.	3/17/2021 9:03 AM
28	It would be good to see in the consultation phase an accrued participation of bodies and platform operating at European level to support policies favouring circular economy. This participation could be of a great help to enlarge the discussion by bringing a pan-European point of view/dimension. European platform thorough the experience of their members can bring innovative approaches at the disposal of other entities being these Regional government or business representatives.	3/16/2021 12:00 PM
29	Perchè solo in lingua inglese ?????? La lingua inglese non appartiene a tutti i cittadini. L'inglese separa a volte... In Europa TUTTE LE LINGUE e tutti i cittadini devono avere la	3/16/2021 11:10 AM

stessa dignità.

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## Q4 Do you have any comments/ questions/ suggestions on chapter 5?

Answered: 293 Skipped: 261



ANSWER CHOICES	RESPONSES	
Yes	15%	44
No	85%	249
<b>TOTAL</b>		<b>293</b>

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	I have a fear you strongly underestimate the budget share (2%) for 'social media'. Websites (23%) are getting 'dead', while social media are getting a real engine in informing public about anything.	4/16/2021 7:11 PM
2	La CPRUP partage la nécessité que les avancées et progrès réalisés par le biais des projets Interreg Europe soient largement diffusés en vue d'une appropriation par divers acteurs régionaux pour un effet multiplicateur, y compris à la fin du projet. Le déficit de connaissance de ce programme explique en partie la faible participation des RUP. Aussi, en termes d'animation, des ateliers d'information spécifiques et réguliers pourraient être envisagés pour les divers bassins des RUP, notamment sur les règles du programme (procédures de certifications des dépenses en lien avec les procédures propres à chaque entité publique partenaires). En effet, certaines RUP ont rencontré des difficultés à remplir leurs obligations administratives sur plusieurs projets (RESOR, Grow RUP). Des sessions thématiques, dans toutes les langues des RUP permettraient de lever ce point d'achoppement et de renforcer l'adhésion à ce programme.	4/16/2021 4:19 PM
3	Regarding the eligible beneficiaries I can't see there will be hardly any differences with the previous program, since they will be 80% public authorities and bodies governed by public law and 70% private non-profit bodies. As they pointed out during the webinar, the programme won't be a revolution because the key features remain, but yes a great evolution! As I have read, its single priority is to better reflect the core nature of the programme (capacity building) and there is an enlargement of the scope of the programme.	4/16/2021 2:50 PM
4	We support the level of ambition here and are fully on board with the need to promote, make visible and explain the positive contribution of the one pan-European ETC programme. As a transnational cooperation network of regional authorities, we feel a particular affinity with the programme, as of course do many individual regions. We would go so far as to suggest that transnational networks/platforms such as PURPLE – which is of course only one of a large number – might warrant specific reference as multipliers at section 5.2 3) as are others – indeed to specifically include national networks but not transnational ones there seems slightly strange in the inherently transnational context of this programme.	4/16/2021 2:09 PM

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5	Together with a strengthened cooperation with the JRC, a close collaboration should be set up with the Knowledge Exchange Platform of the Committee of the Regions. Within this cooperation framework, more thematic events should be organised in order to present and share best practices in relevant priority areas.	4/16/2021 11:49 AM
6	Combination of visibility and local brandings is also needed.	4/16/2021 11:45 AM
7	We would recommend that Interreg Europe applies the Interreg MED horizontal projects and the ENI CBC MED methodology, consisting on providing a unique website where where all the projects under the same policy priority are gathered and develop. In addition, the Interreg MED horizontal project has the goal to act as a one stop shop platform of information to facilitate synergies among the ongoing projects under the same policy priority to jointly disseminate, promote and establish cooperation among them.	4/16/2021 10:52 AM
8	We would recommend that Interreg Europe applies the Interreg MED horizontal projects methodology, consisting on clustering projects under the same policy priority to jointly disseminate, promote and establish cooperation among them. The objective would be to provide a one stop shop platform of information to facilitate synergies among ongoing projects, use one unique website where all the projects under the same policy priority are gathered and develop a joint communication and dissemination plan.	4/16/2021 10:27 AM
9	In the section "5.5. Monitoring and evaluation" I suggest to include the Projects' Progress Reports, because PR are a data providers about Communication activity of projects funded by the IE Programme, which are also in line with the IE Communication Strategy.	4/16/2021 9:55 AM
10	We regard the approach as adequate.	4/16/2021 8:57 AM
11	Communication must go ahead a formal requirement, and become a multiplier element	4/15/2021 4:55 PM
12	Experience at project level shows that communication is changing rapidly, and that new tools and new ways of communicating quite often appear. In line with what the programme already did with videos, one could imagine a series of podcasts to highlight success stories, give the floor to policymakers and build the case for interregional cooperation.	4/15/2021 3:44 PM
13	- Target audiences: Interreg Europe programme should try to ensure the communication on the programme (calls ...) gives equal opportunities in all the eligible countries. In addition to the events organised at the level of the Interreg programme, each country (or each region within a country) may choose to carry out specific communication and support actions for its national applicants and potential beneficiaries. These local events are generally very popular with applicants but vary a lot in quality and frequency from country to country.	4/15/2021 12:01 PM
14	Concerning communication it would be recommended to include in the budget a dedicated chapter also for promotional materials within projects.	4/15/2021 10:03 AM
15	no prints, more on-line meetings	4/14/2021 6:10 PM
16	La Conférence des Présidents des RUP (CPRUP) est en phase avec les thématiques du nouveau Programme Interreg Europe, en particulier celles sur lesquelles les ressources devraient être concentrées (transition écologique, tourisme, santé, social... telle que décrite dans le groupe 1 thématique), même si elle serait favorable à une concentration plus équilibrée permettant de consacrer suffisamment de financement à des sujets tout aussi essentiels pour ses régions (connectivité, éducation, intégration...). Les RUP ont ainsi maintes fois démontré leur forte volonté de renforcer leurs actions communes, favoriser les échanges d'expérience et le partage de connaissances dans l'optique de consolider leur développement régional. Cet engagement s'est notamment traduit à travers la création des réseaux thématiques (Énergie, Emploi, S3) et la coordination de plusieurs projets conjoints (GROW RUP, RESOR, URBAN WASTE, ORFISH...). La Coopération inter-RUP incluant des régions issues de 3 EM dans 3 bassins océaniques distincts s'inscrit pleinement dans l'approche transeuropéenne du programme Interreg Europe. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi,	4/13/2021 12:09 PM

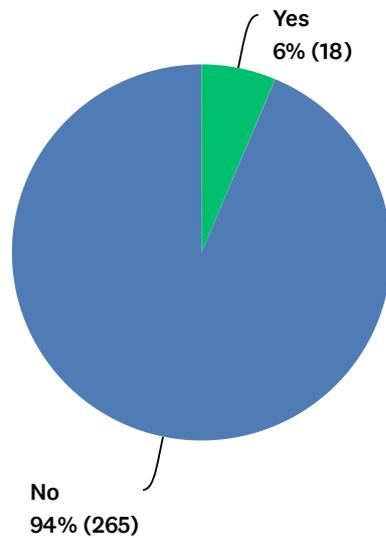


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31	My main suggestion is to simplify the financial management of the projects as most as possible, by taking example on the H2020 or Erasmus+ programs for instance, which partly use lump sums.	3/23/2021 10:00 AM
32	as follows: 23% website, 2% social media, 15% public relations, 55% events, 5% publications is really NOT OK. Less website, MUCH more social media, and LESS offline events, also in regards to corona abd costs	3/20/2021 7:54 PM
33	The people in charge of the EU cohesion policy funds (ERDF, ESF, CF) should be a specific target (appearing more clearly in the section 5.2) as they are often not aware of the existence of the INT Europe programme and thus not taking the outputs into account in the implementation of their programmes. The support letter is often signed by other departments (eg. the European affairs service). The project partners have then difficulties to get EU funding to implement the action plans. This targeted communication could go through the national coordination authorities (ministries), who should be systematically contacted and invited to participate to the programme' events. The NCPs could be the right player to involve in this activity.	3/20/2021 11:31 AM
34	Sorry to say, I have not heard from one concrete project during the last 6 years. insofar it is the aim to promote incestuous communication tools, dedicated to administrations and governments that are paid by working tax-payers, you have reached your goal. It seems that the programmeis not able to reach the stakeholders that are creating added value within sustainable European cooperation	3/19/2021 8:00 PM
35	maybe a more in depth analysys on the correct means of communication is needed: is a web site a useful instrument nowadays?	3/19/2021 5:01 PM
36	Please stop with unadapted communication objectives! It is not necessary to multiply communication channels in order to propose a good communication. Choosing three different social media is not relevant. Projects partners end up creating youtube channel, paying a lot of money to braodcast their meetings, often with poor quality from a technical point of view. At the end, nobody wants to watch these videos!	3/18/2021 11:10 PM
37	There should be a stronger use of Social Media. And there could be a target specific communication. Communication to politics, communication to population, etc.	3/18/2021 4:15 PM
38	The programme's ambition is to use communication and visibility actions as a tool to achieve the programme's objective of better cooperation governance. Easy to say hard to do. Give it a go! (And please do invest heavily in digital innovation, plus cooperate closely with ESPON-programme, Interact and so fourth.)	3/17/2021 9:06 AM
39	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 etc.	3/16/2021 12:03 PM
40	Perchè solo in lingua inglese ?????? La lingua inglese non appartiene a tutti i cittadini. L'inglese separa a volte.... In Europa TUTTE LE LINGUE e tutti i cittadini devono avere la stessa dignità.	3/16/2021 11:10 AM

## Q5 Do you have any comments/ questions/ suggestions on chapter 7?

Answered: 283 Skipped: 271



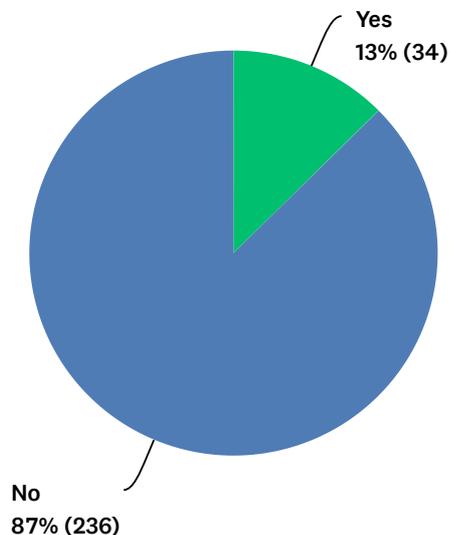
ANSWER CHOICES	RESPONSES	
Yes	6%	18
No	94%	265
<b>TOTAL</b>		<b>283</b>

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	<p>La Conférence des Présidents des RUP (CPRUP) est en phase avec les thématiques du nouveau Programme Interreg Europe, en particulier celles sur lesquelles les ressources devraient être concentrées (transition écologique, tourisme, santé, social... telle que décrite dans le groupe 1 thématique), même si elle serait favorable à une concentration plus équilibrée permettant de consacrer suffisamment de financement à des sujets tout aussi essentiels pour ses régions (connectivité, éducation, intégration...). Les RUP ont ainsi maintes fois démontré leur forte volonté de renforcer leurs actions communes, favoriser les échanges d'expérience et le partage de connaissances dans l'optique de consolider leur développement régional. Cet engagement s'est notamment traduit à travers la création des réseaux thématiques (Énergie, Emploi, S3) et la coordination de plusieurs projets conjoints (GROW RUP, RESOR, URBAN WASTE, ORFISH...). La Coopération inter-RUP incluant des régions issues de 3 EM dans 3 bassins océaniques distincts s'inscrit pleinement dans l'approche transeuropéenne du programme Interreg Europe. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines des disparités mentionnées. Les simplifications qui semblent avoir été apportées en termes d'architecture (une seule priorité transversale) et de mise en œuvre (projet en une seule phase avec suivi, plan d'action pas systématiquement obligatoire etc.) ainsi que l'ouverture à un champ d'action plus large, au-delà de la stricte amélioration des programmes FESI, vont dans le bon sens. Cependant, l'analyse des disparités régionales dans l'UE (point 1.2.2) ne mentionne pas du tout les RUP, malgré le fait qu'elles soient les plus touchées par certaines</p>	4/13/2021 12:09 PM



## Q6 Do you have any comments/ questions/ suggestions on chapters 3., 6. and/ or 8.?

Answered: 270 Skipped: 284



ANSWER CHOICES	RESPONSES	
Yes	13%	34
No	87%	236
<b>TOTAL</b>		<b>270</b>

#	PLEASE SHARE YOUR COMMENTS/ QUESTIONS/ SUGGESTIONS AND SPECIFY THE CHAPTER'S SECTION, IF APPLICABLE. (1,000 CHARACTERS)	DATE
1	Support via lump sums and flat rates are mor easy for majority of grantees. I would recommend to keep an 'open gate' for using this method of financing.	4/16/2021 7:14 PM
2	Dans le cadre de l'accompagnement des projets de petite échelle, des sous-programmes devraient permettre le montage de projets INTERREG Europe avec des critères permettant une meilleure accessibilité.	4/16/2021 4:20 PM
3	Support to projects: It could be useful for the Programme or the Joint Secretariat to strengthen the toolbox with generic Gantt chart templates for actions to be taken, communication, etc.	4/16/2021 9:49 AM
4	flat rate - adm.costs, flat rate for travel and accomodation - in some cases especially now after crisis the travel could be significantly higher- propose to use real costs	4/16/2021 5:41 AM
5	use of SCO costs complementarity of projects with HE and other EU direct funding	4/15/2021 1:06 PM
6	- Cofinancing rate: 80% for public entities -->This rate should be increased to ensure wider participation in the Interreg Europe programme (small entities, research institutions for instance). - Office and administrative expenditure in the previous Interreg Europe programme: Flat rate of 15% of the staff costs --> this rate is definitely too low and needs to be recalculated to be increased. This will ensure more equal participation of more entities across Europe. - Preparation costs were fixed as a lump sum of EUR 15,000 in the previous Interreg Europe programme --> this amount is underestimated, and is very low compared to other Interreg programmes (A and B schemes).	4/15/2021 12:01 PM
7	Concerning the financial planning it would be recommended to have staff costs not only in the first phase of the projects, but in the second phase as well.	4/15/2021 10:06 AM
8	Regarding the cofinancing rate, does it apply to every EU region or will outermost regions have a specific one?	4/13/2021 3:38 PM
9	Page 35: what will be the size of these small-scale projects? Will they follow the same	4/12/2021 3:13 PM

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eligibility criteria, priorities, actions and structure of other Interreg Europe projects? That is a pity not to envisage some lump sums or flat rate costs for at least some of the activities, some travels could be funded through a lump sum for instance, such as the organisation of events, depending on the country of implementation. It would ease the implementation and monitoring of the financial aspects. Overall, we thank you for giving the option of conducting pilots as it will facilitate regional actors to develop new place-based practices and build capacity based on the good practices. It will also allow to give more visibility to EU contribution via communication activities.

10	Regarding cofinancing rate, does it apply to every EU region or will outermost regions have a specific one?	4/2/2021 9:31 PM
11	The more flexible, the better.	4/1/2021 1:49 PM
12	Please specify the chapter on small-scale projects. What are terms and conditions for this type of projects.	4/1/2021 9:36 AM
13	It would be recommended that stakeholder organisations could participate officially in the projects. Would it be feasible for stakeholder organisations to receive funding to participate the project through sharing the partnership in a region?	4/1/2021 9:32 AM
14	Will the control of financial reporting by first level controllers remain applicable in the next programming period?	3/29/2021 4:23 PM
15	Reimbursement of eligible expenditure based on unit costs, lump sums and flat rates were developed for decreasing the project management costs and the hours spend on managing the projects and I would recommend using them to drive down management costs and hours spend on management and improve efficiency and real work accomplished.	3/29/2021 11:07 AM
16	Pg. 35: what will be the size of these small-scale projects? Will they follow the same eligibility criteria, priorities, actions and structure of other Interreg Europe projects? That is a pity not to envisage some lump sums or flat rate costs for at least some of the activities, some travels could be funded through a lump sum for instance, such as the organisation of events, depending of the country of implementation. It would ease the implementation and monitoring of the finances.	3/29/2021 9:32 AM
17	.	3/26/2021 11:46 AM
18	The use of financing not linked to cost is a useful approach in reducing administrative burden and will help ensuring an efficient and result based monitoring of projects	3/25/2021 1:37 PM
19	The SME test en OIM test are not working good. They are not similar to de SME questionnaire from the EC. There is no option for business angels en specific group of investors. Also de Interreg programme needs to look company on its own when it is set free for consolidation.	3/25/2021 9:00 AM
20	Question: In chapter 8 you indicated 'No' for lump-sums and flat rates. Is that correct if the programme intends to apply SCO-s, like in the current period?	3/24/2021 2:59 PM
21	All Interreg programmes should have similar new cost models, how they are handled in first or second level control. Same in state-aid questions.	3/24/2021 1:59 PM
22	I'm not sure if that's something you could influence, but the FLCs of each country are acting very differently. And some are to be honest insane. Which causes some organizations to want to stop being engaged in Interreg projects. I think this can endanger Interreg projects in general and there should be a strong voice from the JS telling the national FLC how they should do their work and give them limitations on their behaviour.	3/23/2021 5:27 PM
23	I propose to have for not linked costs 20-25%. More flexibility in budget changes. If possible, more funds for pilots.	3/22/2021 12:29 PM
24	Consideration should be given to a more streamlined reporting of costs and the use of lump sums where possible. Interregional partners should be focused on the creation of policy improvements and capacity building and not undue focus on reporting costs. Also there should be more acceptance that as learning occurs there may be a need to transfer some budget from staff costs to external expertise to procure assistance for technical aspects that could not have been foreseen during the application phase. This will only enhance the learning for Interregional Partners and should therefore not be subject to the 10% rule. In addition feedback we have received from Social Enterprises who can greatly benefit from participation in Interreg Europe and have a significant impact on regional growth is that the timing of payments is making it difficult for them to participate. They could be waiting between 9 -12 months for reimbursement of staff costs from the date they incurred the costs. This is too long for some social enterprises who are managing on low incomes. Consideration should be given to front loading of costs and then taking back a proportion on	3/22/2021 11:32 AM

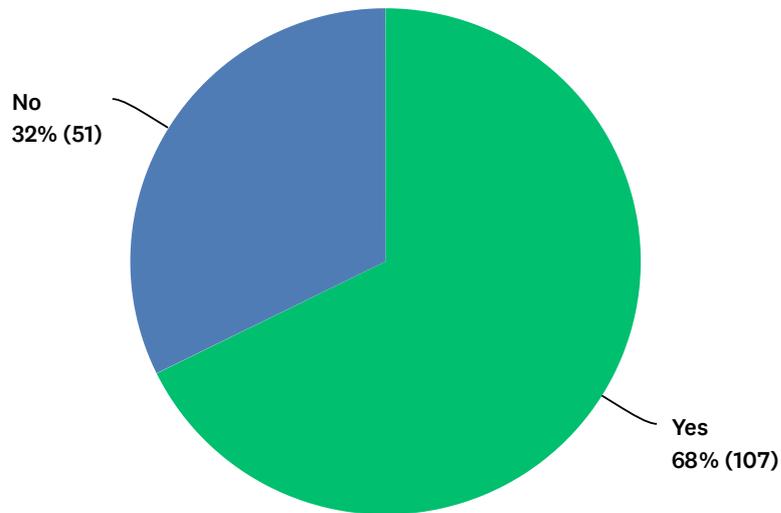
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a pro rata basis during the course of the project like some other Programmes i.e. North West Europe

25	There isn't more information available about these chapters at this moment.	3/22/2021 10:43 AM
26	How do you want to promote small-scale projects, for ex on sea-basin level or between 2 seabasing, or is it again for the incrowd of well-paid administrations and governments who are defending nationalist interests?	3/19/2021 8:07 PM
27	Keep it simple.	3/18/2021 4:16 PM
28	Flat-rates and lump sums hugely simplify the whole procedure. Assessment of project should be done more on results than on bills and invoices or timesheets	3/16/2021 12:07 PM
29	Perchè solo in lingua inglese ?????? La lingua inglese non appartiene a tutti i cittadini. L'inglese separa a volte.... In Europa TUTTE LE LINGUE e tutti i cittadini devono avere la stessa dignità.	3/16/2021 11:11 AM

## Q7 Has your organisation been a partner in an Interreg Europe project?

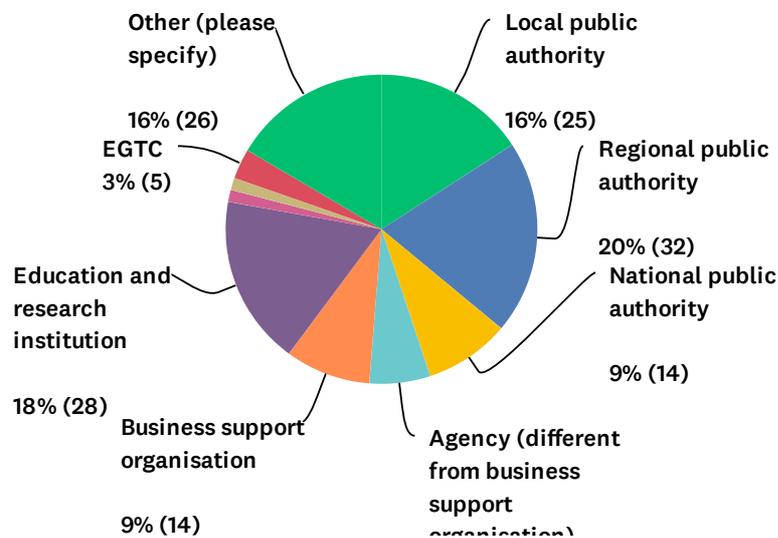
Answered: 158 Skipped: 396



ANSWER CHOICES	RESPONSES	
Yes	68%	107
No	32%	51
TOTAL		158

## Q8 Type of organisation

Answered: 158 Skipped: 396



ANSWER CHOICES	RESPONSES
Local public authority	16% 25
Regional public authority	20% 32
National public authority	9% 14
Agency (different from business support organisation)	6% 10
Business support organisation	9% 14
Education and research institution	18% 28
Infrastructure and public service provider	1% 2
Interest group	1% 2
EGTC	3% 5
EU institution	0% 0
Other (please specify)	16% 26
<b>TOTAL</b>	<b>158</b>

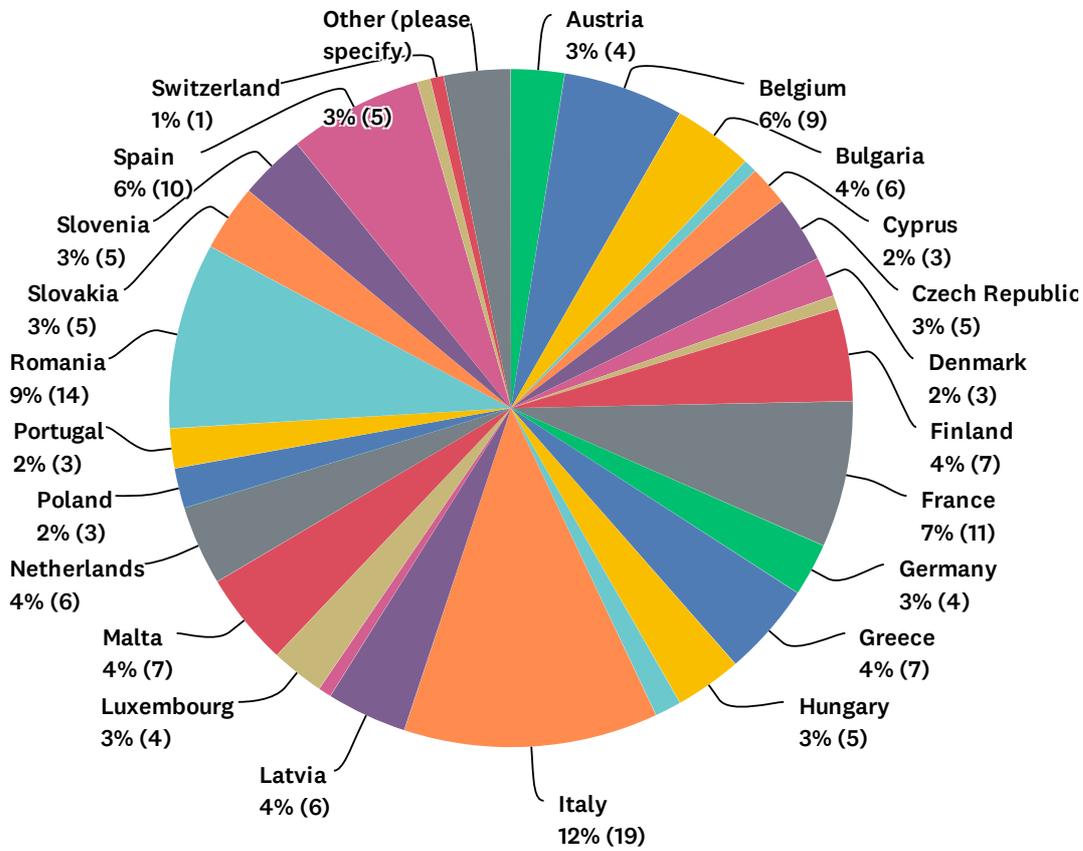
#	OTHER (PLEASE SPECIFY)	DATE
1	HuBB not only calls for action against inhumane and illegal treatment of migrants and refugees, it also organizes, develops, implements and integrates several initiatives and projects that support migrant's inclusion and protection across borders	4/16/2021 2:38 PM
2	Transnational network	4/16/2021 2:10 PM
3	Network of regions	4/16/2021 10:28 AM
4	Freelance company	4/15/2021 3:49 PM
5	NGO - public equivalent body	4/15/2021 8:32 AM
6	NGO	4/14/2021 4:49 AM
7	NGO	4/12/2021 3:14 PM
8	xxx	4/9/2021 5:25 PM

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9	NGO/local government association	4/7/2021 5:53 PM
10	Private person	4/7/2021 5:08 PM
11	Association of 21 municipalities from the Opolskie Voivodeship	4/7/2021 1:47 PM
12	Company owned by the Government	4/5/2021 11:17 AM
13	Association	3/29/2021 9:33 AM
14	SME	3/25/2021 9:02 AM
15	Business company	3/24/2021 11:13 AM
16	Nature Park	3/23/2021 4:58 PM
17	Art gallery	3/23/2021 2:12 PM
18	Local government network	3/22/2021 4:09 PM
19	Energy Agency	3/22/2021 1:29 PM
20	Cluster of Quintuple Helix Organisations (NGO with members from Public sector, academia, SME's, environment and social enterprises)	3/20/2021 3:38 PM
21	Consulting agency in EU funding (managing 2 INT Eur projects)	3/20/2021 11:32 AM
22	Port authority	3/19/2021 8:07 PM
23	NGO	3/19/2021 12:30 PM
24	Free lance	3/18/2021 4:30 PM
25	NGO of Public Utility	3/18/2021 12:33 PM
26	Non-profit organisation	3/18/2021 8:33 AM

## Q9 Country

Answered: 158 Skipped: 396



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ANSWER CHOICES	RESPONSES	
Austria	3%	4
Belgium	6%	9
Bulgaria	4%	6
Croatia	1%	1
Cyprus	2%	3
Czech Republic	3%	5
Denmark	2%	3
Estonia	1%	1
Finland	4%	7
France	7%	11
Germany	3%	4
Greece	4%	7
Hungary	3%	5
Ireland	1%	2
Italy	12%	19
Latvia	4%	6
Lithuania	1%	1
Luxembourg	3%	4
Malta	4%	7
Netherlands	4%	6
Norway	0%	0
Poland	2%	3
Portugal	2%	3
Romania	9%	14
Slovakia	3%	5
Slovenia	3%	5
Spain	6%	10
Sweden	1%	1
Switzerland	1%	1
Other (please specify)	3%	5
<b>TOTAL</b>		<b>158</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Outermost Regions (Regions from Portugal, Spain and France)	4/16/2021 4:24 PM
2	network of EU regions	4/16/2021 4:13 PM
3	Belarus	4/16/2021 11:48 AM

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4	Turkey	4/14/2021 4:49 AM
5	Norway	3/17/2021 9:08 AM