





We recognize the need for ESI funds simplification

BECAUSE:

- Money needs to reach the most needy beneficiaries e.g. farmers in marginal HNV areas, SMEs working on sustainable innovation
- Programme instruments need to be regionally-relevant and easily adaptable to specific, major challenges – such as climate change or solving pressing issues on sustainable regional development

HOWEVER:

- Broader use of integrated approaches (as proposed) including horizontal principles and ex-ante conditions remains essential
- Greater flexibility in programming and localizing and streamlining thematic concentration should not be at the expense of working to achieve EU headline goals for 2030 – mandatory and indicative.
- Risk-based, system auditing can reduce burdens on beneficiaries, but must provide avenues for intervention of EU in risky projects



Brief proposal reflections: on ex-ante conditions

Strongly Agree:

- The fulfilment of an ex-ante conditionality should be much more clearly recognised as proof that the national system is functioning properly and should result in a smaller control burden.
- The discussion on which ex-ante conditionalities would be appropriate in the next period could even start now, taking into account both good and bad experience from the current period.

We should take care to:

- Recognize the major role of ESI ex-ante conditions as drivers of much needed sector reform (especially in newer member states who struggle to meet EU legislation relevant to ESI effectiveness)
- Focus general conditions on "really crucial areas" as proposed, which may still reflect on some core EU values newly under threat: democracy, the rule of law, fundamental rights and sustainability.



Brief proposal reflections: on programme streamlining

Strongly Agree:

- Programmes should be strategic documents and thus much more concise. They should focus on intervention logic, indicators and elements which require agreement with the Commission.
- Indicators [..], used to assess the performance of the different funds should be outcome- and result-oriented and form a coherent system aligned to overarching objectives of the European strategy.

We should take care to:

- Make sure that programme result-oriented indicators. Results and milestones are both relevant, as well as adequate and ambitious
- Delegate operational issues to management authorities, but also strengthen the essential role of effective monitoring committees, representing the interest of the EU, beneficiaries and stakeholders.



Brief proposal reflections: on controls and audits

Strongly Agree:

- The primary criterion for assessment should be as objective as possible – for example, relying on the existence of serious infringements and procedures against the Member State.
- Focus on preventive measures: measures should include the involvement of auditors before approval of all (limited) guidelines, better and regular communication between the Commission, audit and managing authorities to discuss recurring issues...

We should take care to:

- Reduce audit burdens to beneficiaries with proven capacity, but also focus risk-based auditing on problematic activities or sectors.
- Consider new "differentiated approach" initiatives on treating errors and fraud with care to differentiate errors made by lack of capacity (e.g. for CAP farmer beneficiaries) and systemic process offences.



Thank you

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