



# **CPR 2021-2027: Communication provisions explained article-by-article**

Questions and answers from the training held on 28 January 2021

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**Directorate-General for Regional and Urban policy**



**Disclaimer:** This document provides a collection of questions\* asked by participants of the "CPR 2021-2027: Communication provisions explained article-by-article" training, held on 28 January 2021 via MS Teams. The questions and answers below provide a better understanding on communication, visibility and transparency-related articles of the proposal for a CPR (COM(2018) 375 final, 2018/0196(COD)) and proposal for the ETC regulation (COM(2018) 374 final, 2018/0199(COD)), and as such do not constitute a generalized guidance. In addition, the regulation is yet to be adopted, therefore changes in articles are still possible in upcoming months. The responsibility for correctly applying the aforementioned articles remains on Member States, managing authorities and beneficiaries.

*\* Please note that several questions raised during the training are currently being interpreted with the support of REGIO's legal service. Answers will be published subsequently.*

## **Art. 17 Content of programmes**

**We do not have to have Common Communication Strategy for 2021-2027, but we can have one (as we had in 2014-2020) - is it OK?**

The approach to describe communication shall be part of the communication chapter of the programme. Additional strategies (for example, to coordinate communication across funds) can be drafted and adopted, but the main points concerning the communication approach have to be described in the communication chapter.

**To what extent should we be explicit about the budget in the communication chapter? Should we add a precise amount? Or can we mention that we'll take in consideration the regulation percentage?**

There is no specific mention of a percentage in the regulation. 0.3% of the programme's total budget is a value that we give as an indication based on historical averages. You can indicate a percentage or an amount, as you see fit.

**How much detail on the budget and indicators do you need in that CP chapter on COM? No tables can be put in, right?**

For the budget, please see previous replies. For adding tables, our Business Process Team confirmed that you can copy-paste tables in the Operational Programme, but be aware that such tables will be included in count of characters. A general approach to monitoring and evaluation should be included, spelling out main indicators, realistic targets and where possible, baselines for indicators.

**Where in Teams can we find the two Support Booklets?**

[Booklet](#) and [Evaluation toolbox](#).

**Is it correct that the Communication Chapter in the cooperation programme for Interreg programmes can contain 10.000 characters (with or without blank spaces)?**

No, it is 4.500 for all programmes (without spaces).

## **Art. 35 Annual Performance Review**

**Could you please clarify the annual performance review? Is it a preparation of annual implementation report approved by the MC? Is it just a wording change?**

Annual implementation report as we know them are not foreseen in the new CPR. The Annual performance review is what in the 2014-2020 was called Annual Review meeting.



### **In practice, what's the difference of the AIR and the ARM (Annual performance review)?**

As said above, the Annual Implementation Report as such is no more mentioned in the CPR. CPR only mentions Annual performance report for the HOME funds.

### **Communication-wise, given that the Annual Performance Review can be submitted via a written format, what's the difference with the current communication section within the AIR?**

The Annual Review can be an actual physical meeting. If it is replaced by a written exchange, the same level of data reporting should be ensured.

## **Art. 37 Transmission of Data**

### **What do you mean "that MA has to publish or provide a link to all the data transmitted to the Commission on the website portal"?**

It is a provision for the sake of transparency: all data exchanged with the Commission should be made available to the public.

### **What does it mean that all data provided to EC should be online? Is it again mainly related to the annual reports sent to you?**

Please see previous reply.

## **Art. 41 Visibility**

### **What are the criteria that define operations of strategic importance? How to define strategic: amount? regional impact? European impact? partners? Major projects does not equal projects of strategic importance?**

Article 2(4) of the future CPR defines an operation of strategic importance as "*an operation which provides a significant contribution to the achievement of the objectives of a programme and which is subject to particular monitoring and communication measures*". The article defines operations of strategic importance based on the contribution of an operation to objectives of a given programme.

### **Is there a "sample" or "example" set of TORs that Member States can refer to when creating the website?**

Suggestions on setting up websites, including single website portals (article 41) and programme websites (article 44), in terms of navigability, accessibility and relevance are provided in the [Communicating Cohesion policy 2021-2027 booklet](#).

### **Who is responsible for establishing and managing the national website? We assume that a national web site is a complement to the individual programme websites?**

The single website portal is the responsibility of the Member State and a single entry point for most users to information on the EU funds in a Member State. The booklet on Communicating Cohesion Policy in 2021-2027 gives ideas on how the national website could be structured, including links to programme websites. Ideally, it would be a lively, regularly updated gateway to funding possibilities.

### **What is the deadline for the national portal website?**

The single website portal should be ready when all programmes are adopted. Ideally, the website is up and running as soon as the programming period starts.



## Art. 42 Emblem of the Union

**Can we use a double logo like on 2014-2020 period – EU flag + funded by European Union and national flag logo + national slogan?**

Annex VIII defines the following: *“The European Union emblem shall not be modified or merged with any other graphic elements or texts. If other logos are displayed in addition to the Union emblem, the Union emblem shall have at least the same size, measured in height or width, as the biggest of the other logos. Apart from the Union emblem, no other visual identity or logo must be used to highlight the support from the Union.”*

**Is it required to keep the funding statement next to the EU emblem also for the reduced version of the logo?**

The statement *“Funded by the European Union”* or *“Co-funded by the European Union”* shall be spelled out in full and placed next to the emblem”.

**It was mentioned that both the EU emblem and the co-funding statement must be used on all communication materials (art.45). Is it required to keep both mandatory elements for the reduced version of the logo (that may be used to produce small-scale promo materials)?**

As the regulation stands, no such flexibility for small-scale promo materials is foreseen.

**We are implementing projects from two different periods (2014-2020 and also 2021-2027) then we will use two different logos for this period from now on we only use the emblem for period 2021-2027?**

The beneficiaries, including beneficiaries of the technical assistance, are required to follow the regulation of the source of the funding. In practice, you are likely to have two different approaches to communication in the overlapping period.

**How about the logo and the requirement for the white background? I saw that you used a see through logo in this presentation and would like to know if this is possible?**

If there is no alternative to a coloured background, a white border shall be put around the rectangle of the EU emblem, the width of the border being 1/25th of the height of the rectangle. The European Union emblem shall not be modified, including changes regarding transparency.

**At this moment we start up with the REACT EU program. There is no clear standard logo and use of text for this. The usual text with usual EU logo and then, what are the regulations with mentioning REACT EU? Also in this text beside the logo or only in the body text? Is there an accemple to use this right?**

The reference to the “Fund”, “Funds” or “ESI Funds” in Section 2.2 of Annex XII shall be complemented by a reference to “funded as part of the Union’s response to the COVID-19 pandemic”, where financial support is provided to operations from the additional resources.” We do not have visual examples on this. The legislation, including the reference is available at EUR-Lex: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R2221&qid=1612284368717>.

**In case of Regional Programme in which interventions are programmed/managed by sub regional independent agencies to which level can the different logo displayed? That is the set: UE logo, regional logo, esf regional programme logo and sub-regional Agencies logo are allowed?**

**Programme logo/branding: We understand that all programmes and funds must communicate in a uniform and transparent manner. But there must be a possibility for us to create recognizable national brands as well. Does your strategy mean that we cannot use our current Interreg logos anymore?**



Article 36 of the ETC regulation requires the programmes and beneficiaries to spell out “Interreg” next to the EU emblem. As such, Interreg programme logos can be used, provided that they comply with the CPR and the ETC regulation, and respect the principle of proportionality across communication products.

### **Can our projects still develop and use their own logos?**

There is no requirement to develop project specific logos. The development of project specific logos should be considered on a case-by-case basis, but it is not encouraged.

### **Regarding the statement on communication material. Should this be the Fund or the European Union?**

The financing statement should be as is outlined in the Annex VIII of the CPR; “*Funded by the European Union*” or “*Co-funded by the European Union*”

### **Can the funding statement be in two languages (English and national language (Gaelic))?**

It may be possible. There could be some adjustment to be made (alignment, mainly) but DG COMM is willing to provide us some examples on how they would solve the issue graphically.

## **Art. 43 Communication officers and networks**

### **Is it a requirement to call the new 'programme communication officer' by that title? Or is it enough to mention it in the CP chapter that such a person will be appointed by the programme's MA? But the actual title can differ?**

According to the CPR’s article 43, “*each managing authority shall identify a communication officer for each programme ('programme communication officer'). A communication officer may be responsible for more than one programme.*” The communication chapter in the programme should provide the envisaged approach to communication and visibility for the programme. While the chapter can mention the communication officer, it is not sufficient alone. The programmes are expected to communicate the ‘programme communication officer’ to the Commission.

### **How will the Interreg Next network relate to the national communication network?**

The Interreg programmes are part of the national network.

### **Who nominates the national communication coordinator?**

Member States are responsible for identifying a communication coordinator for visibility, transparency and communication.

## **Art. 44 Responsibilities of the managing authority**

### **So we can chose whether to publish it (calls) on the programme website or the single MS website. Or it should be on both?**

The timetable of planned calls for proposals can be published both on the programme website and single website portal.

### **Could programmes fulfill the obligation to publish the list of beneficiaries by adding a link to the [www.keep.eu](http://www.keep.eu) database?**

The list of operations, according to article 44, shall be published on the website in open, machine-readable formats, which allows data to be sorted, searched, extracted, compared and reuse. Providing a link to the [Keep.eu](http://www.Keep.eu) database is not sufficient.



## **Art. 45 Responsibilities of the beneficiaries**

**Could you please send us the link to the online generator.**

The online generator link will be provided as soon as it is available.

**It is not clear that the statement on 45b is the same as funded on the European Union.**

The statement referred to in Annex VIII - "*Funded by the European Union or "Co-funded by the European Union"* - shall be used as a general reference to the support provided by the EU.

**What do you mean by "durable plaques"? Permanent?**

The durability aspect refers in particular to the material used for the plaques, which should be resistant and suited for long-lasting display.

**That means that there is no permanent billboard to install once the project is finished?**

In comparison to the Regulation (EU) No 1303/2013, which required beneficiaries to put up a temporary billboard and a permanent billboard, the future CPR requires beneficiaries (and bodies implementing financial instruments) to display durable plaques or billboards only.

**What is the difference between plaque and a billboard? Should we distinguish them in national regulation more specifically? What period of time the plaque or the billboard have to be up? How long has to be the emblem up on a projects website? Where is it regulated? can we set a limit -for example 5 years sustainability period - for "durable" plaques?**

Both plaques and billboards should follow the same requirements set in the article 45 and acknowledge support from the Funds in a long-lasting time frame. Article 42, in accordance with Annex VIII, defines that the emblem shall be used when carrying out visibility, transparency and communication activities.

**Is it necessary to put up a PERMANENT PLAQUE AFTER COMPLETION of an operation? (see: Annex XII of previous CPR)**

Please see previous replies.

**Where is defined „small project fund“?**

Small projects funds are defined in the proposal for the ETC regulation.

**What is the exact thing you expect the final recipient of financial instruments to do?**

According to article 45 (2), the beneficiary shall ensure that final recipients comply with the requirements set out in point (c) of paragraph 1, which refers to the plaque and billboard requirement. Please note that specific requirements apply in article 45(1, c), depending on total costs of operations and different Funds.

**Formulation "up to 3 %" - can we start at 0% and use penalties only for the repeated violation of the rule?**

The principle of proportionality should be applied. It is up to the Managing Authority to define the approach.

## **Annex VIII**

**Where can we find the latest version of Annex VIII? Would it be possible to upload Annex VIII in the Files section here in Teams?**

Annexes are still under negotiation; the current version is the one of the Commission proposal.



## Other questions

**In Annex V, 7. Communication and transparency the Reference is for Article 17(3)(i), Article 42(2), CPR. What's under art. 42 (2) ? There is only art. 42 CPR**

This should be considered as reference to article 42.

**Financial correction = measures..it seems the same, no?**

Yes.

**Could you tell us if there is a possible percentage of the cost reserved for communication actions for project exceed 10 mln euro?**

There is no specific mention of a percentage in the regulation to be allocated for communication.

**Can you please provide a contact for preliminary questions regarding the Communication chapter**

All questions concerning operational programmes should be submitted via desk officers.

**Shall we assume that all actions planned under intervention filed code 140 of the programme should be in the communication plan? In case of a Technical assistance programme, that is our case, we have two types of communication: First is under the main arias of interventions (which will be implemented by the beneficiary (Central Coordination Unit) via projects) and will implement actions in horizontal level for the whole country development of a national web portal for EU funds [www.eufunds.bg](http://www.eufunds.bg), support for the functioning of the network of regional information centre. Second one concerns the communication and visibility actions of the MA of TA programme. By now, under point 7 of the programme template we have mentioned only the second one, do you think we have to describe both, i.e. all planed under intervention code 140? If yes, the communication and visibility budget will become more than 0,03 % of the programme. Where this limitation of percentage is stipulated?**

There is no specific mention of a percentage in the regulation. 0.3% is a value that we give as an indication based on historical averages. To answer this question, we need more details regarding your specific case.

**Could you tell us if there is some materials about GDPR and privacy protection on the future communication actions required by CPR**

Currently, there is no guidance on GDPR and privacy protection issues. Training covering these issues will be organized within the INFORM EU network.

**To whom we can refer to for adding other collegeaus in the INFORM team?**

Please contact [REGIO-EXTERNAL-COMMUNICATION@ec.europa.eu](mailto:REGIO-EXTERNAL-COMMUNICATION@ec.europa.eu).

**It would be nice if the country team meeting is joined by someone who can answer our questions about the CPR immediately.**

The Country Team meetings are organised and chaired by EMPL, HOME and REGIO representatives, including desk officers and REGIO's communication unit officers, who provide support on communication, visibility and transparency requirements. Please note that certain questions refer to interpretations of the regulation, which needs official clarification and coordination with the legal unit, unless already covered.

**Is there a German translation of the presentation about the regulatory framework or a summary about all regulations relevant for Interreg programmes?**

Please note that an updated version of the Communicating Cohesion policy 2021-2027 booklet, which covers basic communication, visibility and transparency requirements of the future CPR, will soon be published in German language. Also, the EUR-Lex service offers access to EU legal documents in all of the EU's 24 official languages, including the proposal for the [ETC Regulation in German language](#).