



# **Support to public consultation on cohesion policy Final report**

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**Support to public  
consultation on cohesion  
policy  
Final report**

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## **Abstract**

The EC launched an open public consultation on 'EU Funds in the area of Cohesion' on 10 January this year which ran until 9 March. It covered the European Regional Development Fund, the Cohesion Fund, the European Social Fund) the European Aid to the Most Deprived, the European Globalisation Fund and the European Programme for Employment and Social Innovation. It was conducted through an online questionnaire covering five multiple-choice and four open questions on the policy challenges facing the Funds, their success in responding to them, the added-value of the Funds, the obstacles to achieving their objectives and the means of simplifying their administration. In all 4,395 valid responses were received, 438 of which were identified as part of a campaign. Some 582 respondents also submitted a position paper. This report summarises the results of the questionnaire and the points made in the replies to the open questions and in the position papers.

Keywords: Cohesion, EU Funds, public consultation.

## **Résumé**

La Commission a lancé le 10 janvier de cette année une consultation publique ouverte sur les Fonds de l'UE dans le domaine de la cohésion qui s'est clôturée le 9 mars. Elle couvrait le Fonds européen de développement régional, le Fonds de cohésion, le Fonds social européen, le Fonds européen d'aide aux plus démunis, le Fonds européen d'ajustement à la mondialisation et le programme européen pour l'emploi et l'innovation sociale. Elle a été réalisée au moyen d'un questionnaire en ligne comprenant cinq questions à choix multiples et quatre questions ouvertes portant sur les défis auxquels ces Fonds sont appelés à répondre; la mesure dans laquelle ils y parviennent; leur valeur ajoutée; les obstacles à la réalisation de leurs objectifs; et les moyens de simplifier leur administration. Un total de 4 395 réponses ont été reçues, dont 438 identifiées comme relevant d'une campagne. Quelque 582 répondants ont également fait parvenir un document de prise de position. Le présent rapport résume les résultats du questionnaire ainsi que les points soulevés dans les réponses aux questions ouvertes et dans les documents de prise de position.

Mots-clés: Cohésion, Fonds de l'UE, consultation publique.

## Executive summary

The public consultation on 'EU Funds in the area of cohesion' ran from 10 January 2018 to the 9 March. It covered the ERDF (European Regional Development Fund), the CF (Cohesion Fund), the ESF (European Social Fund), the FEAD (European Aid to the Most Deprived), the EGF (European Globalisation Fund) and the EaSI (European Programme for Employment and Social Innovation). It was conducted through an online questionnaire containing five multiple-choice questions on the policy challenges confronting the Funds, their success in responding to these, the added-value of the Funds, the obstacles to achieving their objectives and the means of simplifying their administration. Four open questions were included for respondents to expand on their views and they were also able to attach a position paper. The replies to the multiple-choice questions and the open questions and the points made in the position papers are summarised in turn below.

### THE RESPONDENTS

In all, 4,395 questionnaires were completed. Some 10% were identified as being part of 'campaigns', in that the views expressed were identical, or virtually so. These have been treated separately, in each case, one from each campaign being included among the replies analysed. The latter totalled 3,958, split 47-53 between individuals replying on their own behalf and those replying on behalf of an organisation. Among the latter, regional and local authorities accounted for 18% of total replies, NGOs for 8% and international and national public authorities for 4%. Each of the other types of organisation distinguished – enterprises, consultancies, researchers, associations, churches – accounted for 2-3% of the total.

Respondents were from all Member States, the largest number (21% of the total) from Italy, followed by Poland (14%). France, Germany and Spain together made up almost a quarter of the total. The number of respondents partly reflects country population size and the amount of funding received. In all but five Cohesion countries (Greece, Estonia, Cyprus, Lithuania and Romania), the proportion of respondents was greater than their share of EU population. The proportion of respondents was particularly small in the UK relative to population, as might be expected.

Some 74% of respondents reported experience of the ERDF and/or the CF, 57% of the ESF, 7-9% in each case of the FEAD and EaSI and only 2% of the EGF, while 10% did not indicate experience of any of the funds. There is, accordingly, substantial overlap between those with experience of the different funds.

### POLICY CHALLENGES TO ADDRESS

#### *The perceived importance of different challenges*

Respondents were asked how important they considered 14 specified challenges, which cohesion policy could address, to be. The largest proportion (94% of respondents) identified 'reducing regional disparities' as very important or rather important, followed by 'reducing unemployment, promoting quality jobs and labour mobility' and 'promoting social inclusion and combating poverty' (91%) (Figure a). The smallest proportion saw 'addressing the adverse side-effects of globalisation' (72%) and 'promoting sound economic governance and reforms' 68% as important. The latter perhaps reflects the fact that the Funds, apart from the EGF, are not directly targeted at these challenges.

Respondents with experience of the ERDF/CF ('ERDF respondents') and those with experience of the ESF and/or the other three funds ('EMPL respondents') had much the same view of the relative importance of the different challenges. However, those with experience of the FEAD or EaSI attached more importance than others to promoting social inclusion and improving the quality of institutions, while those with



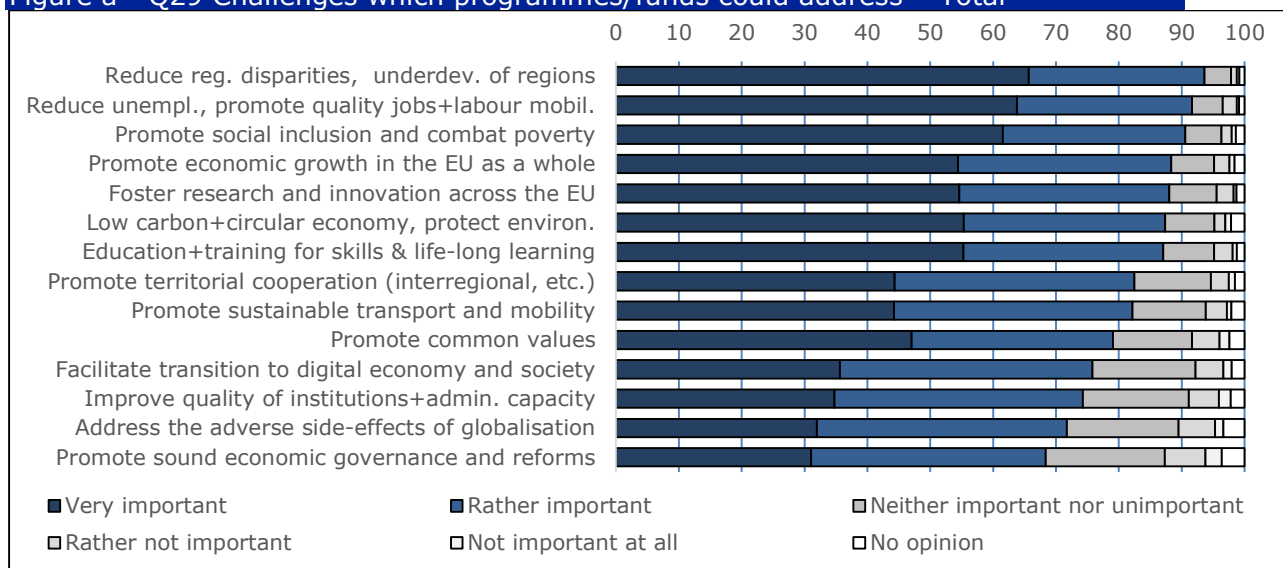
experience of the EGF considered addressing the adverse side-effects of globalisation to be more important than others.

There was little difference between countries in the relative importance attached to the different challenges, despite differences in national circumstances, which might suggest a tendency for respondents to take an EU-wide perspective on the challenges.

On the other hand, there was some tendency for organisations to assign high importance to challenges in the area of their specific interest. For example, NGOs attached high importance to promoting social inclusion and reducing poverty and unemployment, regional and local authorities to territorial cohesion and reducing regional disparities.

Other challenges identified as important to address, apart from those listed in the questionnaire, included security, the cultural heritage, demographic change, combating corruption and migration.

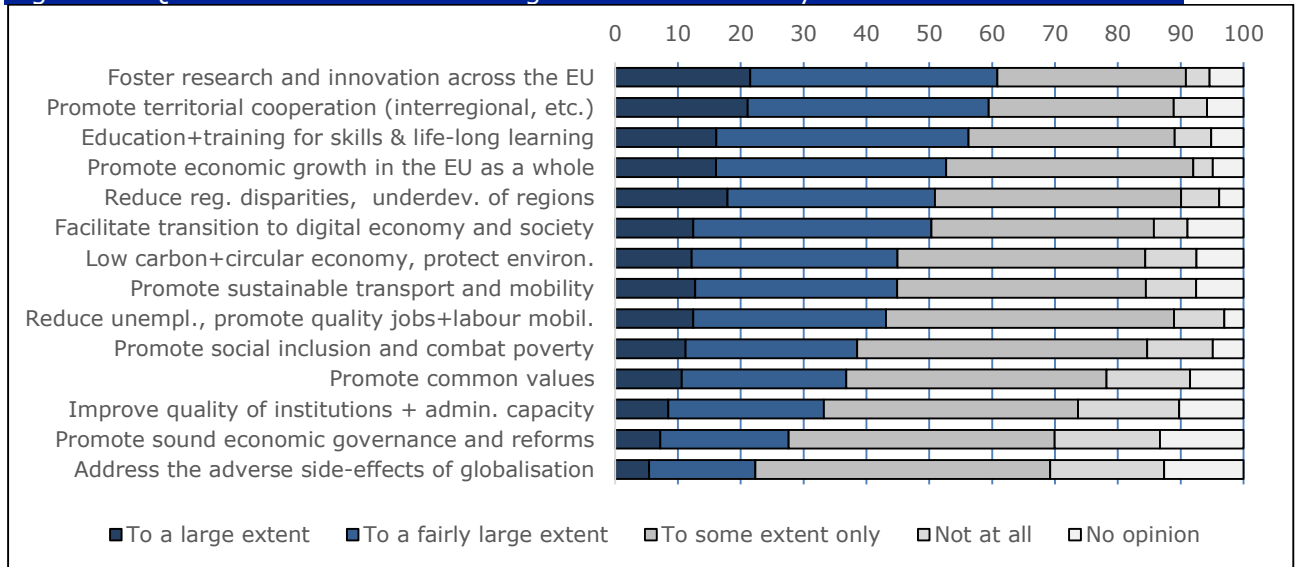
**Figure a - Q29 Challenges which programmes/funds could address – Total**



**The perceived success in addressing the challenges**

Respondents were then asked ‘To what extent do the current programmes/funds successfully address these challenges?’ ‘Fostering research and innovation’ was regarded as being successfully addressed to a large extent or fairly large extent by the largest proportion of respondents (61%), followed by ‘territorial cooperation’ (59%) (Figure b).

Figure b - Q31 Extent to which challenges were successfully addressed – Total



The challenges considered successfully addressed by the smallest proportion of respondents were 'addressing the adverse side-effects of globalisation' (28%) and 'promoting sound economic governance and reforms' (22%). Both challenges are only indirect objectives for cohesion policy. The same applies to 'ensuring the quality of institutions and administrative capacity' and 'promoting common values', which under 40% of respondents regarded cohesion policy as successfully addressing. At the same time, less than 20% of respondents considered that cohesion policy was not successful at all in addressing these four challenges.

ERDF respondents tended to view the Funds as more successful in addressing most of the challenges than ESF ones. The two exceptions are 'promoting social inclusion and combating poverty' and 'reducing unemployment and promoting quality jobs and labour mobility'. Both of these are challenges which the EMPL Funds are directly targeted at, whereas most of the other challenges are ones that the ERDF and CF are targeted at. This seems to imply that those with experience of a particular fund are more likely than others to have a favourable view of its success.

Respondents differ between countries as regards how successful they consider policy to be in addressing the various challenges. Those from Italy, Slovakia, Hungary and Bulgaria – all recipients of large amounts of funding – considered policy as being less successful in this regard than those from other countries. Respondents from Luxembourg, Romania, Malta, Finland and Denmark considered it to be more successful than those from elsewhere. There is no systematic tendency, however, for opinions as to the success of policy to be related to the amount of funding received.

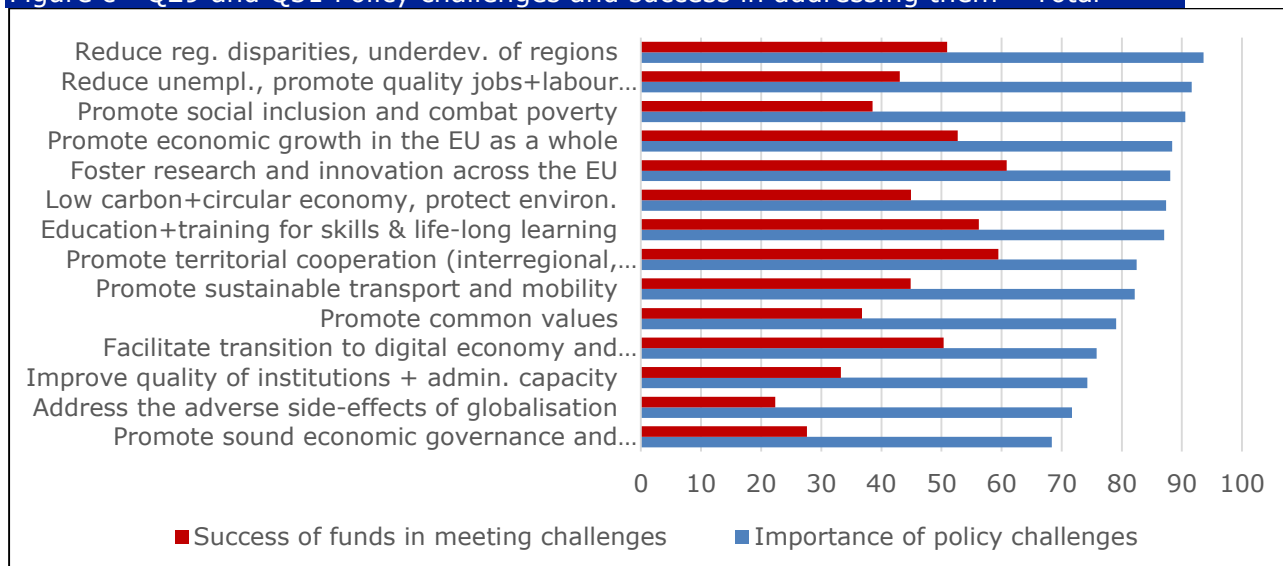
Nevertheless, despite differences in the overall perception of success, the relative proportions considering policy to be successful in addressing the different challenges are similar across countries. Fostering research and innovation, promoting regional cooperation, supporting education and training, reducing regional disparities and promoting economic growth were, therefore, in most countries, viewed as being most successfully addressed. Addressing the side-effects of globalisation, promoting sound economic governance and improving the quality of institutions were seen as least successfully tackled.

The same is true for the different types of respondent. Overall 'Regional and local authorities' and 'International and national public authorities' - the two main direct recipients of funding – had the most positive view of the policy's success.

There is some tendency for respondents to consider cohesion policy to be more successful in addressing what they regard to be the more important challenges (Figure c). A relatively large share of respondents, therefore, regarded policy as being

successful in reducing regional disparities and promoting economic growth, both among the challenges considered most important for policy to tackle. Conversely, a relatively small share thought that promoting common values, improving the quality of institutions, addressing the adverse effects of globalisation and promoting sound economic governance – considered among the least important challenges to address – were being successfully tackled.

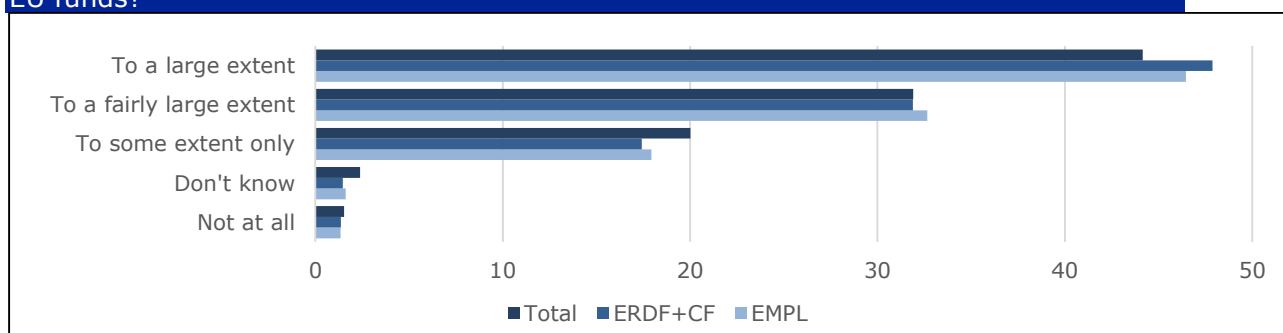
**Figure c - Q29 and Q31 Policy challenges and success in addressing them – Total**



**The added-value of EU funding compared with national and local policies**

Respondents were also asked about the extent to which they believed the EU Funds and programmes added value in relation to national and local or regional policies. Some 76% considered that they add value to a large or fairly large extent and under 2% that they have no added-value at all (Figure d). The views of ERDF and EMPL respondents were similar in this respect, though more of those with experience of FEAD and EaSI (83-84%) than others thought that they add value.

**Figure d - Q33 To what extent do the current programmes/funds add value compared to what Member States could achieve at national, regional and/or local levels without EU funds?**



Among organisations, and in line with their relative perceptions of the success of policy, public authorities at all level had a more favourable view than others of the added-value of the Funds, private enterprises and professional consultancies, the least favourable view. In each case, however, less than 4% of respondents thought they added no value at all.

Respondents from Austria, Croatia, Romania and Italy had the least positive opinion of the added-value of the Funds (30% or more indicating that the Funds added value only to some extent or not at all). Conversely those from Denmark, Lithuania, Luxembourg, the UK, Greece, Poland and Slovenia had the most positive view (over 85% signalling that they added value to a large or fairly large extent). Romania stands

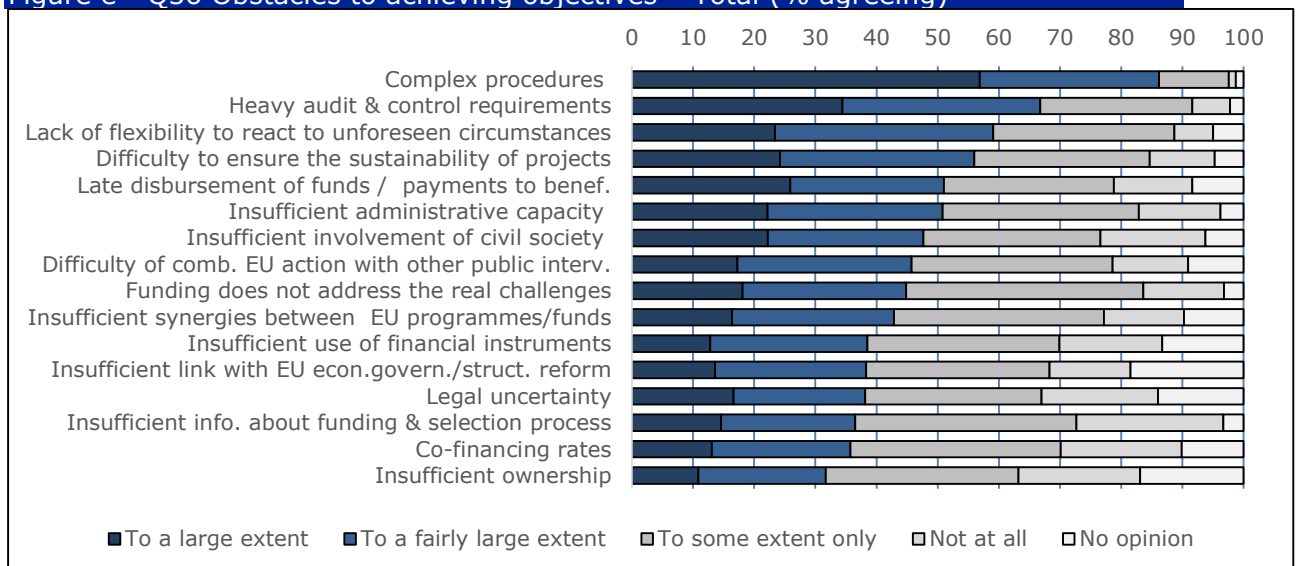
out as having respondents with a relatively favourable view of the success of the Funds but with among the least favourable views of their added-value.

### **The obstacles preventing the achievement of the objectives**

Respondents were asked too about the extent to which they thought particular obstacles prevent the Funds/programmes from successfully achieving their objectives. Complex procedures were seen as by far to be the most important obstacle, 86% of respondents indicating that they prevent objectives being achieved to a large or fairly large extent (Figure e). Heavy audit and control procedures were regarded as the second most important obstacle (68% indicating this), followed by a lack of flexibility to react to unforeseen circumstances (60%). Insufficient ownership of projects was considered the least important obstacle, followed by the co-financing rates and insufficient information about funding and project selection procedures.

The opinions of ERDF and EMPL respondents do not differ much in this respect, though the latter attached slightly more importance to the different obstacles than the former. This is especially so as regards the difficulty of ensuring the sustainability of projects and, to a lesser extent, insufficient administrative capacity and insufficient involvement of civil society.

Figure e - Q36 Obstacles to achieving objectives – Total (% agreeing)



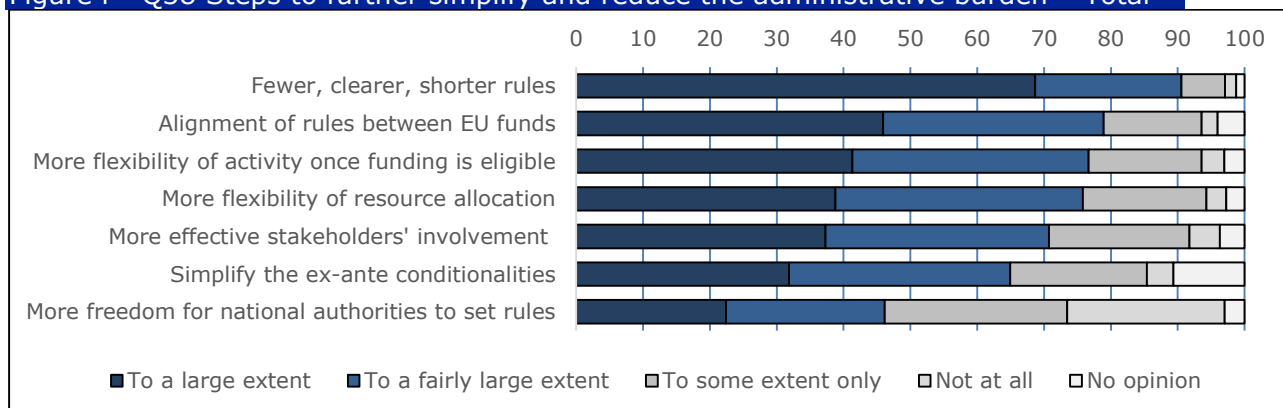
Respondents from all types of organisation (except 'Churches and religious communities', which tend to differ in their view from other respondents) considered complex procedures to be the most important obstacle. This was especially so for 'Regional or local authorities' and 'Business and trade associations. For most types, heavy audit and control requirements were the second most important obstacle. For all organisations, the insufficient ownership of projects was the least important.

Other obstacles indicated as important, in addition to those listed, were corruption and a lack of transparency in managing the Funds, a lack of strategy and priority setting in their allocation and a lack of integration of the Funds.

### **Ways of simplifying and reducing administrative burdens**

The final question was on the extent to which respondents thought that the particular steps listed in the questionnaire would 'help to further simplify and reduce administrative burdens for beneficiaries'. The most frequent choice was 'fewer, clearer, shorter rules', almost all respondents (over 90%), indicating that this would help to a large or fairly large extent (Figure f). This was followed by 'alignment of rules between EU funds' (identified by 79% of respondents) and 'increased flexibility', as regards both activity once a particular area is eligible for funding and in allocating resources (identified by 76-77%).

Figure f - Q38 Steps to further simplify and reduce the administrative burden – Total



The least frequent choice was 'more freedom for national authorities to set rules', identified as being significant by less than half of respondents.

ERDF and EMPL respondents again had similar views on the relative importance of the different steps, with both regarding 'fewer, clearer and shorter rules' as the most important one. More ERDF than EMPL respondents, however, considered aligning the rules between Funds as being important. The reverse was the case as regards the more effective involvement of stakeholders, those with experience of the FEAD and EaSI attaching particular importance to this.

In most cases, different types of respondent also had similar views on the relative importance of the various steps, both individuals and respondents from all types of organisation regarding 'fewer, clearer and shorter rules' to be the main step and giving more freedom to national authorities to set rules as the least important.

Other steps which respondents reported as being important were mostly similar to those listed but slightly rephrased, such as 'simplification of rules' and 'harmonisation of rules'. A few, however, were more different, in particular, 'changes in the system of controls' and 'more flexibility in the management of the funds'.

## REPLIES TO OPEN QUESTIONS

Four open questions were included in the consultation questionnaire, three on specific issues:

- the added value of cohesion policy in comparison to national policies
- the principal objectives of cohesion policy
- the synergies between programmes or funds.

The fourth was a general question for respondents to add any further points they wished.

There were 2170 usable and relevant replies to the first question, 1647 to the second, 1441 to the third and 602 to the general open question.

### ***Added-value of cohesion policy***

The points made in reply to this question (summarised below) can be grouped under a number of themes (ordered below in terms of the number of replies focusing on them):

#### ***Territorial cooperation***

Transnational and cross-border cooperation initiatives are a clear example of the added-value of the cohesion policy, facilitating the transfer of knowledge and exchange of good practice as well as investment with strong cross-border spill-over effects. Such initiatives also help lagging regions to tap into measures applied in more developed ones and enable joint initiatives to be undertaken to tackle common

challenges (energy security, climate change adaptation and mitigation, water management and safeguarding biodiversity).

### ***A more social and inclusive society***

The contribution to social integration and a more inclusive Europe is an important aspect of cohesion policy added-value. The policy, together with the additional resources it provides, has made it possible to carry out social initiatives across the EU, so helping to combat poverty and to support the disadvantaged. It has also helped to spread common values, such as equality and non-discrimination.

### ***Innovation policy***

An essential feature of EU added-value is related to the support given to policy experimentation and innovation.

### ***Higher institutional standards***

An important element of the added-value of cohesion policy lies in the set of common objectives and rules that requires high institutional standards (transparency, evidence-based policies) and which leads to the investment financed being more efficient and effective than for national or regional policies. It has also strengthened institutional capacity.

### ***Financial support***

Added-value is seen in the financial support that cohesion policy gives to regional and national policies and the fact that the funding for national policies would have been much smaller in many cases without the support provided.

### ***Economic and territorial cohesion***

Added-value stems from cohesion policy reducing regional disparities and facilitating convergence. It is also seen in the contribution that EU funding made to mitigating the negative effects of the global economic and financial crisis, which would have been significantly more serious without EU support.

### ***Networking and exchanges within countries***

Added-value arises not only from European Territorial Cooperation programmes but also from the opportunities for cooperation and partnership between Managing Authorities within countries.

### ***Adding to or modifying cohesion policy objectives***

The replies to this question focused mainly on changing the priority given to particular objectives rather than on suggesting how existing ones might be extended or modified.

### ***Education and employment***

According to respondents, ESF support should be multi-stage and comprehensive and be able to extend beyond the timeframe of a single programming period. A number of initiatives supported by the ESF (such as the Youth Guarantee), should be reviewed to make them less restrictive and open to more broadly-defined target groups (such as in terms of age).

### ***The environment, energy, sustainable urban development***

Cohesion policy in future should put more emphasis on objectives such as climate change mitigation and adaptation, energy transition, biodiversity, sustainable use of natural resources and environmental protection and remediation.

### ***Transregional cooperation***

Since cross-border cooperation programmes have significant added-value, they should have greater strategic and financial importance in the next programming period. However, such programmes should not focus on specific themes (such as innovation)

but need to be more flexible to respond to emerging transregional challenges (e.g. common public services, clean transport, energy transition and climate change).

### ***Administrative simplification***

Many responses under this theme focused on the need to overcome the administrative and management issues that limit the effectiveness and efficiency of cohesion policy funds rather than on providing suggestions relating to objectives. They called for simplification in this regard so that efforts can be focused on the real objectives of policy.

### ***Territorial competitiveness: SMEs and tourism***

Tourism is seen by many as being one of the main levers for achieving economic growth, employment and social development at local level. In consequence, support for tourism in the future programming period should be emphasised more, along with innovation in SMEs.

### ***Combating poverty and promoting social inclusion***

ESF and FEAD support for creating a more inclusive society in the next programming period should be increased. Within the ESF, the share of funding for initiatives to reduce poverty should be raised (to more than 20%). Greater attention should be given to support of migrants and refugees and to their social integration. The FEAD should be renewed in the next period and should increasingly promote measures for social inclusion. The ESF and FEAD should be more closely linked in order to implement the European Pillar of Social Rights successfully.

### ***Strengthening synergies between programmes/funds***

Most of the replies under this theme suggested either merging funds, harmonising their regulations or ensuring more coordination between programmes and funds in terms of their objectives and implementation.

Concrete examples to strengthen synergies between programmes are:

- merging funding, in particular, the ERDF and the Cohesion Fund and the ESF and the other funds targeted at tackling social issues and which in both cases are managed by the same DG;
- creating a common fund merging the ESF and the ERDF and adopting a common set of principles;
- harmonising rules and procedures for greater synergy between the ESI Funds and with other EU funds, programmes and initiatives;
- strengthening coordination between the institutions managing and implementing the ESI Funds at EU, national and regional levels without merging the funds as such.

The need for **simplification** was again stressed as either a potential outcome of merging funds or a major objective in itself, which was more important than increasing synergies or reducing overlaps, which many regarded as not being important. A number of respondents called for funds to be merged so long as it led to simplification and a reduction in administrative burdens.

### ***Replies to the general open question – other proposals for future cohesion policy***

#### ***Need for streamlining and simplifying administrative requirements***

The ESI Fund procedures involve excessive complexity and bureaucracy, which limits the effectiveness of programmes. The regulations need to be simplified and made more flexible. Excessive auditing and too many controls are a particular problem in respect of a small projects or small OPs. The focus should be more on results and less on administrative aspects.

### ***Doing more to address local, social and territorial challenges***

Cohesion policy is important in building more democratic, prosperous, inclusive and resilient societies throughout the EU and not only in the less developed regions.

Cohesion policy should maintain its current strategic focus and framework and continue to be the main public investment policy in the next programming period. The current configuration of Funds, geographical coverage and the core principles should be maintained, but the share of cohesion policy in the future EU Budget needs to be increased or at least kept unchanged.

Information, and publicity, on the projects supported should improve to ensure more transparency and make people more aware of the EU added-value which is generated.

The **place-based dimension of development policies** should be strengthened and there should be greater flexibility in priority setting and resource allocation in order to promote 'smart strategies' targeted at tackling different territorial needs.

### ***Smart and sustainable urban development***

The urban dimension is of major importance in local and regional development. After 2020, cohesion policy should pay greater attention to urban planning and aspects, which can increase the attractiveness of cities as well as their economic potential.

However, cities and metropolitan areas cannot prosper at the expense of surrounding rural areas, so particular attention should be given to infrastructure connecting urban and rural areas if balanced development is to be achieved and depopulation avoided.

## **POSITION PAPERS**

Overall 676 documents were uploaded by 582 different respondents –around 15% of all those who participated in the consultation. Respondents from just four countries, Germany, Belgium, France and Italy, uploaded over half of all papers. The vast majority - nearly 90% - of the papers were uploaded by individuals responding in a professional capacity or on behalf of organisations, mainly regional or local authorities and NGOs.

In general, the papers had a clear link with the main issues covered by the consultation and which were developed in some detail in the reflection papers published by the Commission, particularly the reflection paper on the Future of EU Finance. In many cases, they reiterated the points made in the replies to the open questions summarised above. The main points to come out of the positions papers are outlined below.

The fundamental and original objective of cohesion policy is to strengthen cohesion across Europe and this should be maintained. The policy should, accordingly, continue in the post-2020 period to be targeted at reducing regional disparities and promoting economic, social and territorial cohesion across the EU.

In terms of **eligibility**, while some respondents emphasised that all EU regions should be supported, the consensus was that the focus should continue to be on the less developed ones.

There were a number of proposals to broaden the set of indicators used beyond GDP (or GNP) per head to determine the **allocation** of funding. These indicators should cover employment, education, demography and the environment, though a note of caution was voiced that any extension should not reduce the concentration of support on the less developed regions.

Bottom-up approaches, **shared management** structures and multi-level governance were considered by virtually all respondents as more suitable for addressing local needs than centralised structures. Some expressed the need for a more meaningful application of the partnership principle.



**Result-orientation** should continue to be the Leitmotif of cohesion policy in the post-2020 period according to all respondents who expressed a view on this issue. An efficient monitoring system, appropriate indicators and independent evaluations are recognised as essential pillars of a result-oriented policy.

Most respondents agree that **thematic concentration** is helping to achieve larger impacts and more significant results. It should continue to be a principle in the next period. Some consider in addition that *ex ante* conditionality has helped to avoid dispersion of funding and to ensure stronger links between cohesion policy objectives and national strategies and structural reforms.

A number of **investment priorities** were advocated, in particular:

- Research, innovation and SMEs support
- Digital infrastructure and ITC
- Urban development based on digitalisation (i.e. smart city development)
- The environment and energy efficiency
- Combating poverty and social exclusion

**Cooperation between regions** should be strongly supported not only in the form of cross-border cooperation but also across regions throughout Europe. This is essential for making smart specialisation happen. Innovation in high tech sectors often depends on knowledge exchanges and spill-overs from cooperation between clusters or knowledge hubs across Europe.

Very different positions were expressed in respect of the organisation and the **management of the funds** in the future. Proposals range from harmonising rules and regulations to creating a unique fund merging all the current ones. The objective is better coordination and integration of the instruments.

Better coordination and **streamlining** is not only needed between the different ESI funds but also with the other EU funding instruments. Regulations should be harmonised and horizontal rules, such as state aid rules, should be the same everywhere.

There is a strong call for simplification of procedures and rules, less control and more trust. **Controls** and audits are perceived as excessive and working against the effective application of the subsidiarity, proportionality and partnership principles. Excessive control causes delay in programme implementation. Proposals for improvement range from the 'single audit principle' to 'performance-based approaches'.

National and local authorities, in particular, called for **simplification of regulations and procedures**. Regulations should define the essential framework but Member States should be given flexibility to adapt this to their specific national and regional needs. The simplified cost option is seen as an effective tool for simplifying and accelerating payment procedures.

Many of the respondents urge better **communication** in respect of EU policy objectives and outcomes and the role of Europe in people's daily lives.

## Synthèse des points clés

La consultation publique sur «Les Fonds de l'UE dans le domaine de la cohésion», qui s'est déroulée du 10 janvier au 9 mars 2018, couvrait le Fonds européen de développement régional (FEDER), le Fonds de cohésion (FC), le Fonds social européen (FSE), le Fonds européen d'aide aux plus démunis (FEAD), le Fonds européen d'ajustement à la mondialisation (FEM) et le programme européen pour l'emploi et l'innovation sociale (EaSI). Elle a été réalisée au moyen d'un questionnaire en ligne comprenant cinq questions à choix multiples portant respectivement sur les défis auxquels les Fonds européens sont appelés à répondre; la mesure dans laquelle ils y parviennent; leur valeur ajoutée; les obstacles à la réalisation de leurs objectifs; et les moyens de simplifier leur administration. Quatre questions ouvertes étaient prévues ensuite pour permettre aux répondants de développer leurs points de vue. La possibilité de joindre un document de prise de position leur était également offerte. Les réponses aux questions à choix multiples et aux questions ouvertes ainsi que les points soulevés dans les prises de position sont successivement résumés ci-après.

### LES RÉPONDANTS

Un total de 4 395 questionnaires ont été complétés. Quelque 10 % ont été identifiés comme relevant de «campagnes» dans la mesure où les points de vue exprimés étaient identiques ou presque. Ces questionnaires ont été traités séparément et une réponse par campagne a été incluse dans l'analyse. Celle-ci a porté sur un total de 3 958 réponses dont 47 % émanaient de particuliers répondant à titre personnel et 53 % de personnes répondant pour le compte d'organisations. Parmi ces dernières, les autorités régionales et locales représentent 18 % du total des réponses, les ONG 8% et les autorités publiques internationales et nationales 4 %. Chacune des autres catégories d'organisation répertoriées – entreprises, cabinets de consultants, chercheurs, associations, églises – représentent 2 à 3 % du total.

Les répondants appartiennent à tous les États membres avec un nombre particulièrement élevé (21 % du total) en provenance d'Italie, suivie de la Pologne (14 %). La France, l'Allemagne et l'Espagne représentent ensemble pratiquement le quart du total. Le nombre de répondants reflète partiellement la taille de la population nationale et le montant des financements reçus. Dans tous les pays couverts par la politique de cohésion hormis cinq (Grèce, Estonie, Chypre, Lituanie et Roumanie), la proportion de répondants a été supérieure au poids de l'État membre concerné dans la population de l'Union. Sans surprise, la proportion de répondants par rapport à la population a été particulièrement faible au Royaume-Uni.

Quelque 74 % des répondants font état d'une expérience de recours au FEDER et/ou au FC, 57 % d'un recours au FSE, 7 à 9% d'un recours au FEAD et à l'EaSI, et 2 % seulement d'un recours au FEM; 10 % des répondants n'ont signalé pour leur part aucune expérience d'utilisation de l'un quelconque de ces Fonds. Il existe en conséquence un chevauchement important entre répondants ayant expérimenté les différents Fonds.

### LES ENJEUX

#### *L'importance perçue des différents défis*

Il était demandé aux répondants de préciser l'importance qu'ils accordent aux quatorze défis qui leur étaient spécifiés et auxquels la politique de cohésion pourrait répondre. La plupart d'entre eux (94 % des répondants) considèrent qu'il est très important ou assez important de «réduire les disparités régionales»; viennent ensuite les propositions «réduire le chômage, promouvoir les emplois de qualité et soutenir la mobilité de la main-d'œuvre» et «promouvoir l'inclusion sociale et lutter contre la pauvreté» (91 %) (graphique a). Les propositions «faire face aux répercussions négatives de la mondialisation» et «promouvoir la bonne gouvernance économique et

la mise en œuvre des réformes» ont mobilisé les pourcentages les plus faibles de répondants estimant qu'il s'agit d'enjeux importants (72 % et 68 % respectivement) – ce qui pourrait refléter le fait qu'hormis dans le cas du FEM, lesdits enjeux ne sont pas directement ciblés par les Fonds visés par la consultation.

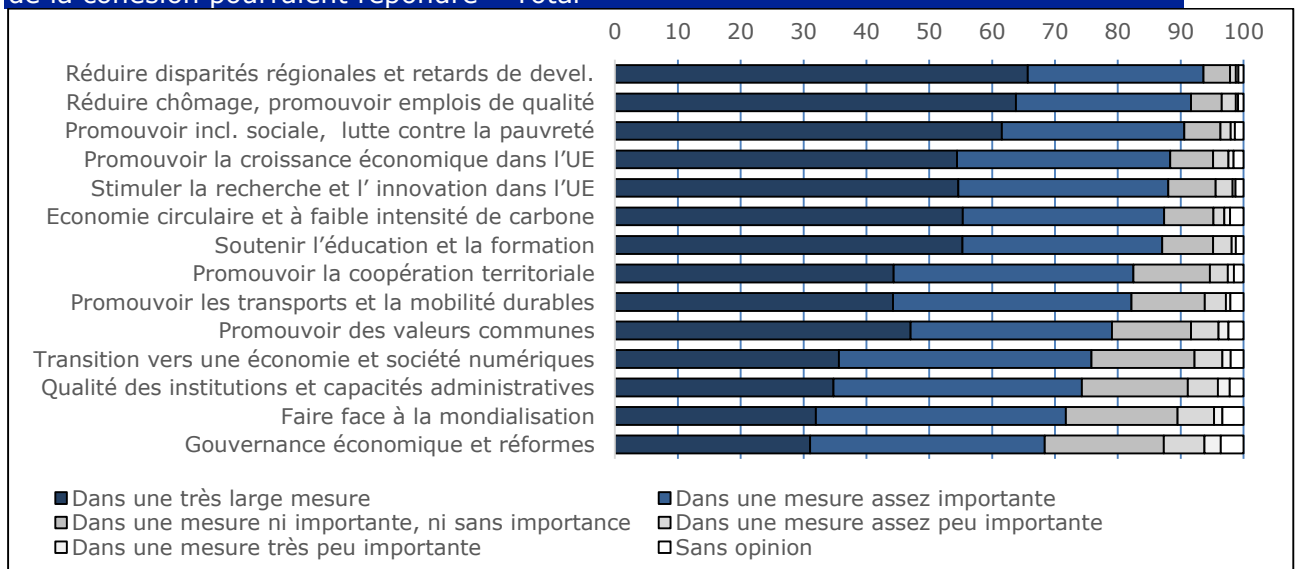
Les répondants ayant une expérience d'utilisation du FEDER/FC («répondants FEDER») et ceux ayant une expérience relative au FSE et/ou à l'un ou l'autre des trois autres Fonds («répondants EMPL») ont globalement la même vision de l'importance relative des différents enjeux. Il convient de préciser toutefois que les répondants signalant une expérience du FEAD ou de l'EaSI attachent davantage d'importance que les autres à la promotion de l'inclusion sociale et à l'amélioration de la qualité des institutions, et que ceux ayant une expérience du FEM confèrent davantage d'importance à la lutte contre les répercussions négatives de la mondialisation.

On observe peu de différence entre pays en ce qui concerne l'importance relative attachée aux différents enjeux en dépit de la disparité des situations nationales, ce qui pourrait indiquer que les répondants tendent à envisager lesdits enjeux sous l'angle européen.

On note par ailleurs une certaine tendance des organisations à conférer une grande importance aux enjeux dans les domaines relevant spécifiquement de leurs centres d'intérêt: ainsi par exemple, les ONG attachent beaucoup d'importance à la promotion de l'inclusion sociale et à la réduction de la pauvreté et du chômage, et les autorités régionales et locales à la cohésion territoriale et à la réduction des disparités régionales.

D'autres enjeux considérés comme des domaines d'action importants en dehors de ceux énumérés dans le questionnaire sont la sécurité, le patrimoine culturel, l'évolution démographique, la lutte contre la corruption et la migration.

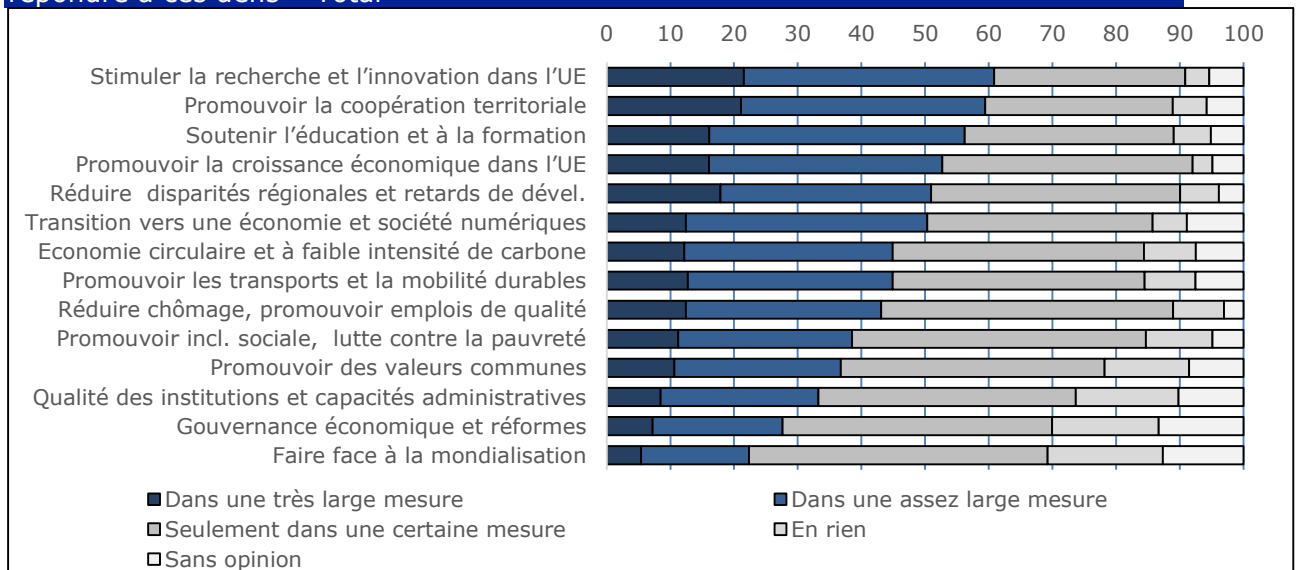
**Graphique a - Q29 Enjeux auxquels les programmes/Fonds liés au domaine d'action de la cohésion pourraient répondre – Total**



### **La réussite perçue de la réponse aux défis**

Les répondants étaient invités ensuite à répondre à la question suivante: «*Dans quelle mesure les programmes/Fonds actuels permettent-ils de répondre à ces défis?*». C'est la proposition «stimuler la recherche et l'innovation» qui a été considérée par la plus grande proportion de répondants (61 %) comme bénéficiant d'une très large ou d'une assez large réponse, suivie par la proposition «coopération territoriale» (59 %) (graphique b).

**Graphique b - Q31 Mesure dans quelle les programmes/Fonds actuels permettent de répondre à ces défis – Total**



Les défis à propos desquels les proportions les plus faibles de répondants estiment qu'une réponse peut être trouvée grâce aux Fonds structurels sont «faire face aux répercussions négatives de la mondialisation» (28 %) et «promouvoir la bonne gouvernance économique et la mise en œuvre des réformes» (22 %). Il s'agit dans les deux cas d'objectifs indirects seulement de la politique de cohésion. Il en va de même des propositions «améliorer la qualité des institutions et les capacités administratives» et «promouvoir des valeurs communes» auxquelles 40 % seulement des répondants estiment que la politique de cohésion peut apporter une réponse. Moins de 20 % des répondants considèrent pour leur part que la politique de cohésion n'a apporté absolument aucune réponse à ces quatre défis.

Les répondants FEDER tendent à considérer davantage que les répondants FSE que les Fonds parviennent à relever la plupart des défis cités – les deux exceptions étant «promouvoir l'inclusion sociale et lutter contre la pauvreté» et «réduire le chômage, promouvoir les emplois de qualité et soutenir la mobilité de la main-d'œuvre», deux enjeux directement ciblés par les Fonds EMPL alors que la plupart des autres sont ciblés par le FEDER et le FC. Ce constat conduit à penser que les répondants ayant l'expérience d'un Fonds particulier sont davantage susceptibles d'avoir une opinion favorable quant à son taux de réussite.

On observe une disparité selon le pays pour ce qui concerne la perception des répondants quant à la capacité de la politique de cohésion d'apporter une réponse aux différents défis. Ceux d'Italie, de Slovaquie, de Hongrie et de Bulgarie – autant de pays bénéficiaires de financements importants – jugent la politique moins performante que ceux d'autres pays. Les répondants du Luxembourg, de Roumanie, de Malte, de Finlande et du Danemark la considèrent pour leur part plus performante que les répondants situés ailleurs. On n'observe néanmoins aucune tendance systématique quant à un lien entre les opinions positives sur le succès de la politique et le montant du financement reçu.

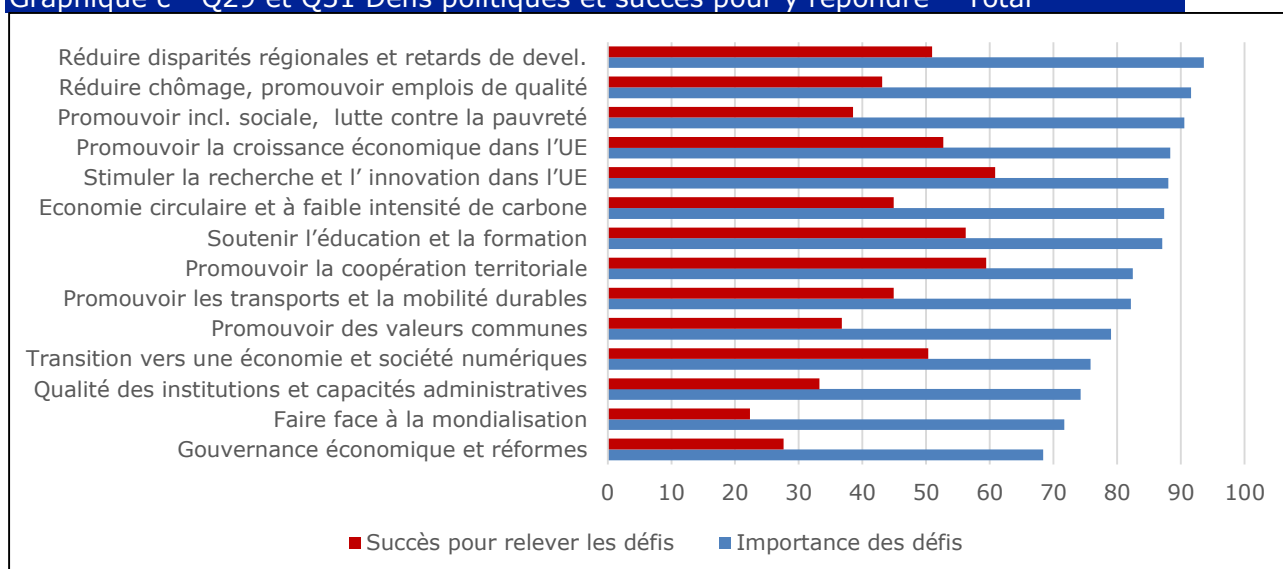
Les disparités dans la perception globale de réussite n'empêchent pas une similitude entre pays en termes de proportions relatives de répondants estimant que la politique parvient à répondre aux différents enjeux. La stimulation de la recherche et de l'innovation, la promotion de la coopération régionale, l'apport d'un soutien à l'éducation et à la formation, la réduction des disparités régionales et la promotion de la croissance économique sont ainsi considérés dans la plupart des pays comme des défis relevés avec succès. La lutte contre les répercussions négatives de la mondialisation, la promotion d'une bonne gouvernance économique et l'amélioration

de la qualité des institutions sont par contre perçus comme les défis face auxquels la politique a été la moins performante.

Il en va de même des différents types de répondants: de façon générale, les «autorités régionales et locales» et les «autorités publiques internationales et nationales», qui sont les deux principaux bénéficiaires directs des financements, expriment l'opinion la plus positive concernant le succès de la politique.

Il existe chez les répondants une certaine tendance à considérer que la politique de cohésion répond mieux aux enjeux qu'ils jugent les plus importants (graphique c). C'est ainsi qu'une proportion relativement élevée d'entre eux estiment que la politique atteint ses objectifs en termes de réduction des disparités régionales et de promotion de la croissance économique, lesquelles figurent l'une et l'autre parmi les principaux défis à relever. À l'inverse, seule une proportion assez faible de répondants estiment qu'une réponse adéquate est trouvée en ce qui concerne la promotion des valeurs communes, l'amélioration de la qualité des institutions, la lutte contre les répercussions négatives de la mondialisation et la promotion d'une bonne gouvernance économique – autant de défis envisagés comme étant parmi les moins importants.

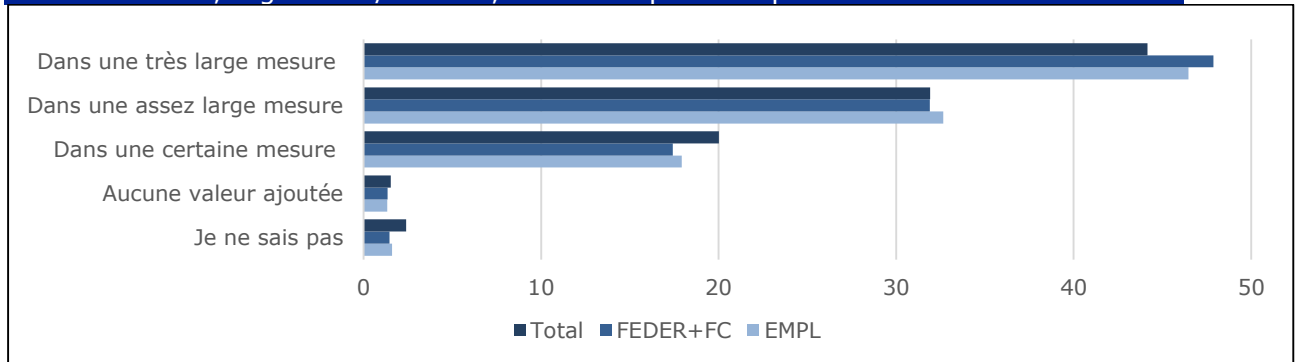
Graphique c - Q29 et Q31 Défis politiques et succès pour y répondre – Total



### **La valeur ajoutée des financements de l'ue par rapport aux politiques nationales et locales**

Les répondants ont été également invités à préciser dans quelle mesure les Fonds et programmes de l'UE constituent, à leur avis, une valeur ajoutée par rapport aux politiques nationales et locales ou régionales. Quelque 76 % estiment qu'ils apportent une valeur ajoutée dans une très large ou une assez large mesure et moins de 2 % qu'ils n'ont absolument aucune valeur ajoutée (graphique d). Les répondants FEDER et EMPL ont des avis similaires à cet égard, même si ceux ayant une expérience du FEAD et de l'EaSI (83-84 %) sont plus nombreux que les autres à considérer qu'ils sont sources de valeur ajoutée.

**Graphique d - Q33 Dans quelle mesure les programmes/Fonds actuels apportent-ils une valeur ajoutée par rapport à ce que les États membres pourraient réaliser au niveau national, régional et/ou local, s'ils ne disposaient pas des Fonds de l'UE?**



Parmi les organisations, et dans le droit fil de leurs perceptions respectives de la réussite de la politique de cohésion, les autorités publiques à tous niveaux ont une opinion plus favorable que les autres quant à la valeur ajoutée des Fonds – l’opinion la moins favorable émanant des entreprises privées et des cabinets de consultants. Dans chaque cas, toutefois, les répondants sont moins de 4 % à estimer que les Fonds n’apportent absolument aucune valeur ajoutée.

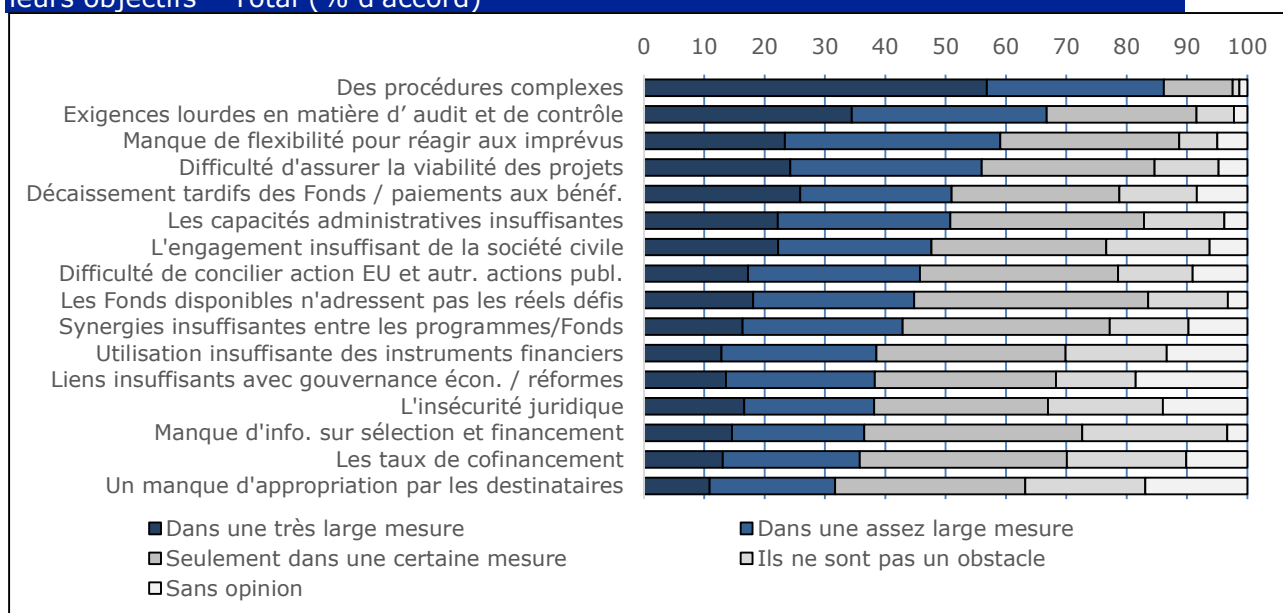
Les répondants d’Autriche, de Croatie, de Roumanie et d’Italie expriment l’opinion la moins positive quant à la valeur ajoutée des Fonds (30 % ou davantage d’entre eux indiquant que les Fonds n’apportent de valeur ajoutée que dans une certaine mesure seulement, voire aucune). Ce sont, à l’inverse, les répondants du Danemark, de Lituanie, du Luxembourg, du Royaume-Uni, de Grèce, de Pologne et de Slovénie qui expriment l’opinion la plus positive (plus de 85 % d’entre eux indiquant que les Fonds apportent une valeur ajoutée dans une très large ou une assez large mesure). La Roumanie présente un profil particulier puisque ses répondants font part d’une opinion relativement favorable pour ce qui concerne le succès des Fonds mais d’une opinion parmi les moins favorables pour ce qui concerne leur valeur ajoutée.

### **Les obstacles à la réalisation des objectifs**

Une question a également été posée aux répondants concernant la mesure dans laquelle ils considèrent que des obstacles particuliers empêchent les Fonds/programmes d’atteindre leurs objectifs. La complexité des procédures est perçue, et de loin, comme l’obstacle principal puisque 86 % des répondants indiquent qu’elle empêche dans une très large ou une assez large mesure la réalisation des objectifs (graphique e). La lourdeur des procédures d’audit et de contrôle est considérée comme le second obstacle (cité par 68 % des répondants), suivie du manque de flexibilité pour réagir aux circonstances imprévues (60 %). L’appropriation insuffisante des projets est perçue comme l’obstacle le moins important; viennent ensuite les taux de cofinancement et le manque d’informations concernant les procédures de financement et de sélection des projets.

Les avis des répondants FEDER et EMPL ne diffèrent pas beaucoup à cet égard, même si les seconds attachent un peu plus d’importance que les premiers aux divers obstacles – en particulier la difficulté d’assurer la viabilité des projets et, dans une moindre mesure, l’insuffisance des capacités administratives et le manque d’engagement de la société civile.

**Graphique e - Q36 Obstacle qui empêche les programmes/Fonds actuels d'atteindre leurs objectifs – Total (% d'accord)**



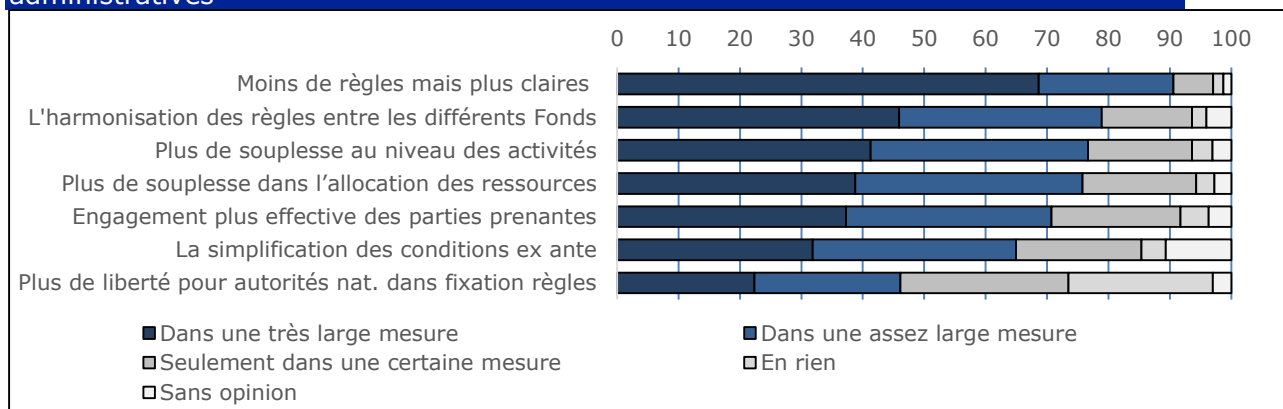
Les répondants de tous les types d'organisation (hormis les «églises et communautés religieuses», qui tendent à avoir un avis différent des autres répondants) perçoivent les procédures complexes comme l'obstacle principal. Tel est tout particulièrement le cas des «autorités régionales ou locales» et des «associations professionnelles ou commerciales». Les lourdes exigences en matière d'audit et de contrôle occupent la deuxième place aux yeux de la plupart des catégories de répondants. Toutes classent le manque d'appropriation des projets comme l'obstacle le moins important.

D'autres obstacles ont été cités en sus de la liste proposée: la corruption et un manque de transparence dans la gestion des Fonds, un manque de stratégie et de fixation de priorités au niveau de leur allocation et leur manque d'intégration.

### **Les moyens de simplifier et d'alléger les charges administratives**

La dernière question portait sur la mesure dans laquelle les répondants estiment que les mesures énumérées dans le questionnaire pourraient «simplifier et réduire les démarches administratives pour les bénéficiaires». La réponse la plus fréquemment choisie a été «la définition de règles moins nombreuses, plus claires et plus courtes», la quasi-totalité des répondants (plus de 90 %) indiquant que cette mesure serait utile dans une très large ou une assez large mesure (graphique f). Les mesures les plus souvent citées ensuite ont été «l'harmonisation des règles entre les différents Fonds de l'UE» (79 % des répondants) et «davantage de souplesse» pour ce qui concerne tant l'activité une fois qu'un domaine particulier est éligible au financement que l'allocation des ressources (76-77 % des répondants).

### Graphique f - Q38 Mesures à prendre pour simplifier et réduire les démarches administratives



La mesure la moins souvent retenue a été «accorder une plus grande liberté aux autorités nationales pour fixer les règles» puisque moins de la moitié des répondants seulement la considèrent comme significative.

Les répondants FEDER et EMPL expriment ici également des points de vue similaires quant à l'importance relative des différentes mesures puisque les uns et les autres confèrent la première place à «la définition de règles moins nombreuses, plus claires et plus courtes». Les répondants FEDER sont cependant plus nombreux que les répondants EMPL à considérer que l'harmonisation des règles entre les Fonds est importante. On observe la situation inverse en ce qui concerne l'engagement plus efficace des parties prenantes, auquel les répondants ayant une expérience du FEAD et de l'EaSI accordent une importance particulière.

Les différents types de répondants partagent le plus souvent le même avis quant à l'importance relative des différentes mesures: tant les répondants individuels que ceux appartenant aux différents types d'organisation mettent en effet «la définition de règles moins nombreuses, plus claires et plus courtes» en tête et l'octroi d'une plus grande liberté aux autorités nationales pour fixer les règles en dernière position.

Les autres mesures signalées comme importantes par les répondants sont très similaires à celles figurant dans la liste mais elles sont formulées de façon quelque peu différente: «simplification des règles» et «harmonisation des règles», par exemple. Quelques-unes se distinguent néanmoins davantage: on peut citer à cet égard «la modification du système de contrôle» et «une plus grande souplesse dans la gestion des Fonds».

## RÉPONSES AUX QUESTIONS OUVERTES

Le questionnaire de consultation contenait quatre questions ouvertes, dont trois portaient sur des aspects spécifiques:

- la valeur ajoutée de la politique de cohésion par rapport aux politiques nationales;
- les principaux objectifs de la politique de cohésion; et
- les synergies entre programmes ou Fonds.

La quatrième était une question plus générale permettant aux répondants d'ajouter librement tout autre point.

La première question a suscité 2 170 réponses utilisables et pertinentes, la deuxième en a suscité 1 647, la troisième 1 441 et la quatrième 602.

### **La valeur ajoutée de la politique de cohésion**

Les points soulevés en réponse à cette question (récapitulés ci-après) peuvent être regroupés sous divers thèmes (classés ici par ordre décroissant du nombre de réponses dont ils forment l'objet principal):



### ***La coopération territoriale***

Les initiatives en matière de coopération transnationale et transfrontalière sont une parfaite illustration de la valeur ajoutée de la politique de cohésion, laquelle facilite le transfert de connaissances et l'échange de bonnes pratiques ainsi que des investissements ayant des retombées positives majeures au-delà des frontières. Ces initiatives permettent également aux régions en retard de développement de faire usage de mesures mises en œuvre dans des régions plus développées, et ouvrent la voie à des initiatives conjointes pour faire face à des défis communs (sécurité énergétique, adaptation au changement climatique et atténuation de celui-ci, gestion de l'eau et sauvegarde de la biodiversité).

### ***Une société davantage sociale et inclusive***

La contribution à l'intégration sociale et à une Europe davantage inclusive est un aspect important de la valeur ajoutée de la politique de cohésion. Cette dernière, conjuguée aux ressources supplémentaires qu'elle représente, a permis de mener à bien des initiatives sociales dans toute l'Union et de soutenir ainsi la lutte contre la pauvreté et l'aide aux plus défavorisés. Elle a également favorisé la diffusion de valeurs communes telles que l'égalité et la non-discrimination.

### ***Des innovations politiques***

L'une des spécificités fondamentales de la valeur ajoutée par l'UE est liée au soutien octroyé à l'expérimentation et l'innovation en matière de politique.

### ***Le relèvement des normes institutionnelles***

Un élément important de la valeur ajoutée de la politique de cohésion réside dans l'ensemble des règles et objectifs communs qui, exigeant des normes institutionnelles élevées (transparence, politiques fondées sur des données factuelles), font que les investissements financés s'avèrent plus efficaces et plus efficaces que ceux relevant de politiques nationales ou régionales. Cette exigence en termes de normes a également contribué au renforcement des capacités institutionnelles.

### ***L'aide financière***

La valeur ajoutée se reflète également dans l'aide financière que la politique de cohésion octroie aux politiques régionales et nationales et dans le fait que le financement de ces politiques nationales aurait souvent été beaucoup plus modeste sans cet apport.

### ***La cohésion économique et territoriale***

La valeur ajoutée provient de ce que la politique de cohésion réduit les disparités régionales et favorise la convergence. Elle se manifeste également dans la contribution financière de l'UE à l'atténuation des répercussions négatives de la crise économique et financière mondiale, lesquelles auraient été beaucoup plus dramatiques encore sans cette aide européenne.

### ***Le réseautage et les échanges à l'intérieur des frontières nationales***

La valeur ajoutée n'est pas seulement générée par des programmes de coopération territoriale européenne (CTE): elle provient également d'opportunités de coopération et de partenariats entre autorités de gestion (AG) d'un même pays.

### ***Compléter ou modifier les objectifs de la politique de cohésion***

Les réponses à cette question ont essentiellement consisté à suggérer de changer la priorité conférée à certains objectifs particuliers plutôt qu'à suggérer l'extension ou la modification des objectifs en place.

### ***Éducation et emploi***

Selon les répondants, l'aide du FSE devrait être un processus global et multi-étapes pouvant se prolonger au-delà du calendrier d'une seule période de programmation. Plusieurs initiatives soutenues par le FSE (la garantie pour la jeunesse entre autres)

devraient être réexaminées en vue de les rendre moins restrictives et de les ouvrir à des groupes cibles définis de façon plus large (en termes d'âge notamment).

### ***Environnement, énergie et développement urbain durable***

La politique de cohésion devrait mettre un accent plus marqué à l'avenir sur des objectifs tels que l'atténuation du changement climatique et l'adaptation à celui-ci, la transition énergétique, la biodiversité, l'utilisation durable des ressources naturelles et la protection et l'assainissement de l'environnement.

### ***Coopération transrégionale***

Au vu de leur forte valeur ajoutée, davantage d'importance stratégique et financière devrait être accordée aux programmes de coopération transfrontalière lors de la prochaine période de programmation. Il conviendrait toutefois que ces programmes ne se focalisent pas sur des thèmes particuliers (l'innovation, par exemple) mais qu'ils soient davantage flexibles afin de pouvoir répondre aux défis transrégionaux émergents (services publics communs, transport propre, transition énergétique et changement climatique entre autres).

### ***Simplification administrative***

De nombreuses réponses portant sur ce thème se concentrent sur la nécessité de régler les problèmes administratifs et de gestion qui entravent l'efficacité et l'efficience des Fonds relevant de la politique de cohésion plutôt que sur des suggestions en rapport avec les objectifs. Ces contributions réclament une simplification en la matière afin que les efforts puissent être centrés sur les véritables objectifs de la politique.

### ***Compétitivité territoriale: PME et tourisme***

Le tourisme est aux yeux de nombreux répondants l'un des principaux leviers de la croissance économique, de l'emploi et du développement social à l'échelon local. Il conviendrait dès lors que la future période de programmation réserve une place plus importante au tourisme ainsi qu'à l'innovation dans les PME.

### ***Lutte contre la pauvreté et promotion de l'inclusion sociale***

L'aide allouée par le FSE et le FEAD à la création d'une société davantage inclusive devrait être augmentée lors de la prochaine période de programmation. En ce qui concerne le FSE, la part de financement attribuée à des initiatives axées sur la réduction de la pauvreté devrait être augmentée (à plus de 20 %). Il conviendrait d'accorder une attention plus grande à l'aide aux migrants et aux réfugiés et à leur insertion sociale. Le FEAD devrait pour sa part être renouvelé pour la prochaine période et intensifier la promotion de mesures en faveur de l'inclusion sociale. Le FSE et le FEAD devraient resserrer leurs liens afin de réussir la mise en œuvre du socle européen des droits sociaux.

### ***Le renforcement des synergies entre programmes/fonds***

La plupart des réponses s'inscrivant dans ce thème suggèrent de fusionner les Fonds, d'harmoniser leurs règlements ou d'assurer une meilleure coordination entre programmes et entre Fonds pour ce qui concerne leurs objectifs et leur mise en œuvre.

Les exemples concrets suivants permettraient le renforcement des synergies entre programmes:

- la fusion des financements, et en particulier du FEDER et du Fonds de cohésion ainsi que du FSE et des autres Fonds axés sur la réponse à des problématiques sociales – la gestion relevant dans les deux cas de la même DG;
- la création d'un Fonds commun fusionnant le FSE et le FEDER et l'adoption d'un ensemble commun de principes;
- l'harmonisation des règles et des procédures en vue d'une plus grande synergie entre les Fonds ESI de même qu'entre ceux-ci et d'autres Fonds, programmes et initiatives de l'UE;

- le renforcement de la coordination entre les institutions chargées de la gestion et de la mise en œuvre des Fonds ESI aux niveaux européen, national et régional sans fusion des Fonds proprement dits.

Le besoin de **simplification** est à nouveau souligné, que ce soit en tant que résultat potentiel de la fusion des Fonds ou en tant qu'objectif majeur à part entière; la simplification est considérée comme plus importante que l'intensification des synergies ou la résorption des chevauchements que beaucoup jugent peu importante. Un certain nombre de répondants réclament la fusion des Fonds pour autant qu'elle conduise à une simplification et à une réduction des charges administratives.

### ***Réponses à la question ouverte plus générale - autres propositions pour la future politique de cohésion***

#### ***La nécessité de rationaliser et de simplifier les exigences administratives***

Les procédures liées aux Fonds ESI s'accompagnent d'une complexité et d'une bureaucratie excessives qui limitent l'efficacité des programmes. Les réglementations doivent être simplifiées et assouplies. Un excès d'audits et de contrôles s'avère particulièrement problématique pour les projets ou programmes opérationnels (PO) de petite envergure. L'accent devrait être mis davantage sur les résultats et moins sur les aspects administratifs.

#### ***Le déploiement d'efforts supplémentaires pour répondre aux défis locaux, sociaux et territoriaux***

La politique de cohésion joue un rôle important dans l'édification de sociétés plus démocratiques, prospères, inclusives et résilientes dans l'ensemble de l'UE et pas uniquement dans les régions moins développées.

Elle doit conserver son orientation et son cadre stratégiques actuels et demeurer la principale politique d'investissement public au cours de la prochaine période de programmation. La configuration des Fonds, leur couverture géographique et leurs principes fondamentaux doivent être maintenus tels que définis aujourd'hui mais il conviendrait d'augmenter, ou du moins de garder inchangée, la part de la politique de cohésion dans le futur budget de l'UE.

L'information et la publicité à propos des projets soutenus devraient être intensifiées afin d'assurer une plus grande transparence et de faire prendre davantage conscience aux citoyens de la valeur ajoutée générée par l'UE.

**L'ancrage local des politiques de développement** doit être renforcé, et une plus grande souplesse doit être de mise lors de la fixation des priorités et de l'allocation des ressources afin de promouvoir des «stratégies intelligentes» axées sur des besoins territoriaux différents.

#### ***Un développement urbain intelligent et durable***

La dimension urbaine est déterminante pour le développement local et régional. Il convient que la politique de cohésion accorde après 2020 une attention accrue à l'urbanisme et aux caractéristiques urbaines susceptibles d'accroître l'attrait des villes et leur potentiel économique.

Les villes et les zones métropolitaines ne peuvent cependant prospérer aux dépens des zones rurales environnantes de sorte qu'il convient, afin de parvenir à un développement équilibré et d'éviter un dépeuplement, de réserver une attention particulière à l'infrastructure reliant zones urbaines et rurales.

## **DOCUMENTS DE PRISE DE POSITION**

Un total de 676 documents ont été chargés par 582 répondants différents (soit 15 % environ de l'ensemble des participants à la consultation). Les répondants de quatre pays seulement – l'Allemagne, la Belgique, la France et l'Italie – ont chargé plus de la moitié de l'ensemble des documents. La grande majorité (près de 90%) des

documents émanant de personnes répondant à titre professionnel ou pour le compte d'une organisation (autorités régionales ou locales et ONG principalement).

Dans l'ensemble, les documents ont un lien évident avec les grands thèmes visés par la consultation et développés en détail dans les documents de réflexion publiés par la Commission et dans le document de réflexion sur l'avenir des finances de l'UE en particulier. Ils réitèrent le plus souvent les aspects soulevés dans les réponses aux questions ouvertes résumées plus haut. Les grands points qui se dégagent des documents de prise de position sont décrits ci-après.

L'objectif fondamental et original de la politique de cohésion est le renforcement de la cohésion en Europe, et il convient de le conserver. Il faudrait donc que la politique post 2020 reste axée sur la réduction des disparités régionales et la promotion de la cohésion économique, sociale et territoriale dans toute l'Union.

En ce qui concerne l'**éligibilité**, si certains répondants insistent sur le fait que toutes les régions de l'UE doivent être soutenues, l'opinion consensuelle réclame le maintien d'une focalisation sur les moins développées.

Plusieurs propositions ont été formulées en faveur de l'élargissement de la série d'indicateurs utilisés en dehors du PIB (ou PNB) par habitant pour déterminer l'**allocation** des financements. Ces indicateurs devraient couvrir l'emploi, l'éducation, la démographie et l'environnement, mais une mise en garde a néanmoins été exprimée, à savoir que l'élargissement, quel qu'il soit, ne devrait pas avoir pour effet de réduire la concentration de l'aide sur les régions moins développées.

Les approches ascendantes, les structures de **gestion partagée** et la gouvernance à niveaux multiples sont considérées par la quasi-totalité des répondants comme mieux aptes que les structures centralisées à répondre aux besoins locaux. Certains répondants ressentent la nécessité d'une application plus pertinente du principe de partenariat.

De l'avis unanime des répondants s'étant exprimés à ce sujet, l'**orientation sur les résultats** doit rester le leitmotiv de la politique de cohésion après 2020. Un système de surveillance efficace, des indicateurs adéquats et des évaluations indépendantes sont reconnus comme des éléments essentiels d'une stratégie de ce type.

La plupart des répondants s'accordent à dire que la **concentration thématique** permet d'obtenir des effets plus importants et des résultats plus significatifs, et que ce principe doit rester en vigueur durant la prochaine période de programmation. Certains estiment en outre que les conditions *ex ante* ont contribué à éviter la dispersion des financements et à garantir des liens plus étroits entre les objectifs de la politique de cohésion et les stratégies et réformes structurelles nationales.

Une série de **priorités d'investissement** ont été prônées, parmi lesquelles en particulier:

- la recherche, l'innovation et le soutien aux PME
- l'infrastructure numérique et les TIC
- le développement urbain basé sur la numérisation (à savoir le développement de villes intelligentes)
- l'environnement et l'efficacité énergétique
- la lutte contre la pauvreté et l'exclusion sociale

**La coopération entre régions** devrait bénéficier d'un soutien majeur sous la forme non seulement d'une coopération transfrontalière mais également d'une coopération entre régions de toute l'Europe. Il s'agit d'un préalable indispensable à l'instauration d'une spécialisation intelligente. L'innovation dans les secteurs de haute technologie dépend d'échanges de connaissances et de retombées de la coopération entre clusters ou pôles de connaissances situés sur l'ensemble du territoire européen.

Des prises de position très diverses ont été exprimées à propos de l'organisation et de la **gestion des Fonds** à l'avenir. Les propositions vont d'une harmonisation des règles

et règlements à la création d'un Fonds unique regroupant tous les Fonds actuels. L'objectif est une meilleure coordination et intégration des instruments.

Une coordination plus poussée et une **rationalisation** ne s'imposent pas seulement entre les différents Fonds ESI mais également avec les autres instruments de financement de l'UE. Les règlements devraient être harmonisés et les règles horizontales, en matière d'aides d'État notamment, devraient être les mêmes partout.

Un appel pressant est lancé en faveur d'une simplification des règles et procédures, d'un moindre contrôle et d'une plus grande confiance. **Les contrôles** et audits sont perçus comme excessifs et comme allant à l'encontre de l'application effective des principes de subsidiarité, de proportionnalité et de partenariat. L'excès de contrôles engendre des retards dans la mise en œuvre des programmes. Les propositions en vue d'une amélioration de cette situation vont du «principe de l'audit unique» aux «approches fondées sur les performances».

Les autorités nationales et locales en particulier réclament la **simplification des règlements et des procédures**. Les règlements devraient définir le cadre essentiel mais une certaine flexibilité devrait être laissée aux États membres pour les adapter à leurs propres besoins nationaux et régionaux. L'option simplifiée en matière de coûts est perçue comme un outil efficace de simplification et d'accélération des procédures de paiement.

De nombreux répondants recommandent avec insistance une meilleure **communication** à propos des objectifs et résultats des politiques de l'UE et du rôle de l'Europe dans la vie quotidienne de ses citoyens.

# Support to public consultation on cohesion policy

## 1 INTRODUCTION

This report presents the results of the public consultation on 'EU funds in the area of Cohesion'. In line with the Better Regulation provisions, the EC launched the consultation on the 10 January this year and it ran until the 9 March. It took the form of an online questionnaire of multiple-choice questions supplemented by open questions enabling respondents to express their views more freely. Respondents could also attach a position paper giving further details of their views on the topics covered by the consultation.

The questionnaire was divided into three sections:

- 'About you' on the characteristics of the respondent and whether they were completing the questionnaire as an individual in a personal capacity or on behalf of an organisation.
- 'EU Funds in the area of cohesion' covering the respondents' views on the main issues relating to cohesion policy, on the general objectives, the effectiveness in achieving these, the added-value in comparison to national policies, the obstacles to implementation and the need for simplification.
- 'Document upload and final comments' giving respondents the possibility of attaching a position paper and of expressing their ideas about the future of cohesion policy in a freer way.

In all, 4,395 questionnaires were completed. Of these around 10% have been identified as being part of a campaign, in that they contain the same, or very similar information. These have been separated from the rest with only one set of replies being included in the main analysis. A few others were duplicates sent by the same respondent and these too have been excluded from the analysis. After 'cleaning' the responses in this way, the questionnaires were reduced from 4,334 to 3,958.

The statistical analysis presented below is mainly descriptive and intended to give a readily accessible overview of the responses to the consultation. These are divided between respondents reporting to have experience of the European Regional Development Fund (ERDF) and/or Cohesion Fund (CF), for which DG Regional Policy is responsible, and those reporting to have experience of the European Social Fund (ESF), the European Globalisation Adjustment Fund (EGF), the Fund for European Aid to the Most Deprived (FEAD) and/or the European Programme for Employment and Social Innovation (EaSI), for which DG Employment is responsible, to see whether and to what extent this difference in experience affects the views expressed. It should be noted, however, that there is a significant overlap between the two groups in that many of those with experience of the regionally-oriented funds (the ERDF and CF) also have experience of the ESF and/or the other three funds covered, which tend to be more nationally-oriented, and vice versa.

After a brief introduction in section 2 describing the way in which the data were prepared for analysis, the responses to the multiple-choice questions on the main policy challenges, the added-value of cohesion policy in comparison to national and local policies, the obstacles which prevent policy objectives being achieved and the ways of simplifying the administration of the funds are summarised in section 3. Section 4 focuses on the responses to the open questions in the questionnaire and section 5 summarises the main views expressed in the position papers that were uploaded by respondents.

## 2 DATA PREPARATION

The main steps involved in preparing the data collected by the questionnaire were:

- *1<sup>st</sup> step* – to clean the data for trivial errors (such as the inclusion of '/' or '\*' or responses such as 'I have nothing to add').

- *2<sup>nd</sup> step* – to remove duplicates (questionnaires submitted by the same respondent with identical or almost identical answers).
- *3<sup>rd</sup> step* – to identify campaigns. This involved examining multiple-choice questions in particular, to which identical responses cannot plausibly occur by chance. Accordingly, where responses were the same, the country, the type of organisation, the mail address and responses to the multiple-choice questions were screened to identify campaigns. This revealed that these could be divided between large groups (from 5 up to 30 or more respondents) and small groups (from 2 to 4 respondents), the former involving similar organisations or a single organisation, the latter involving the same organisation or a few individuals responding together.
- *4<sup>th</sup> step* – to separate campaigns, which consisted of retaining one set of responses (the most complete one) as part of the main data, so treating it as a single respondent, and transferring the rest into a separate ‘campaign’ database.
- *5<sup>th</sup> step* – to recode responses to the ‘other’ questions (questions 30, 32, 37 and 39) in order to be able to compare them with the responses to the multiple-choice questions on the same topic (questions 29, 31, 36 and 38). This was done manually and involved identifying key words and associating each open response with one or more items.

As noted above, these steps reduced the number of the questionnaires for analysis from 4,334 to 3,958 and facilitated examination of responses.

### 3 ANALYSIS OF THE MULTIPLE-CHOICE QUESTIONS

#### 3.1 The respondents

The 3,958 questionnaires were submitted by both individuals and organisations, or those responding on behalf of an organisation, with a fairly even split between the two, though the number coming from the latter was slightly larger (53% of the total) (Table 1).

Table 1 - Q1 You are replying as:

	No.	%
Individual	1,851	46.8
Professional capacity or organisation	2,107	53.2
<b>Total</b>	<b>3,958</b>	<b>100.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

Regional and local authorities represent the largest number of types of organisation replying, accounting for 18% of the total questionnaires received (Table 2). They are followed by NGOs, accounting for 8% of total, and national public authorities, accounting for 4%. Each of the other categories of respondent distinguished accounted for 2-3% of the total. Other features of note are that micro and small enterprises made up over two-thirds of ‘private companies’ replying (which implies that medium-sized and large companies are disproportionately represented since micro and small enterprises account for the overwhelming majority of enterprises in Europe), that universities account for 65% of the ‘research and academia’ category and that 9% of all the responses came from organisations classifying themselves in the ‘Other’ category.

**Table 2 - Q1 and Q13 Type of organisation**

	<b>No.</b>	<b>%</b>
Individual	1,851	46.8
Type of organisation:		
- Churches and religious communities	65	1.6
- International or national public authority	164	4.1
- NGO, platform or network	326	8.2
- Private enterprise	128	3.2
- Professional consultancy, law firm, self-employed consultant	108	2.7
- Regional or local authority (public or mixed)	718	18.1
- Research and academia	118	3.0
- Trade, business or professional association	130	3.3
- Other	350	8.8
<b>Total</b>	<b>3,958</b>	<b>100.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

353 respondents are included in the Transparency Register: 9% of the total and 17% of the organisations responding. Around a third (122) of the latter are NGOs. Registered organisations are particularly important among the 'Trade, business or professional associations' (almost 50% of these).

Responses to the consultation were submitted from all the Member States, though the number from each differed markedly, as well as from a few other countries. The largest number of responses came from Italy (21% of the total), followed by Poland (14%) – i.e. the two together accounting for over a third of the total replies received (Table 3).

**Table 3 - Q5 Country of residence for individuals and Q24 Country of headquarters for organisations**

	<b>No.</b>	<b>% Total</b>	<b>% EU</b>	<b>% EU Population</b>	<b>% CP Funding</b>
Italy	859	21.4	21.9	11.8	9.4
Poland	544	13.7	14.1	7.4	22.2
France	364	9.2	9.3	13.1	4.5
Germany	286	7.2	7.3	16.1	5.5
Spain	250	6.3	6.4	9.1	8.2
Belgium	221	5.6	5.6	2.2	0.7
Latvia	208	5.3	5.4	0.4	1.3
Czech Republic	134	3.4	3.5	2.1	6.3
Romania	125	3.2	3.2	3.8	6.6
Finland	105	2.7	2.7	1.1	0.4
Bulgaria	103	2.6	2.7	1.4	2.2
Netherlands	99	2.5	2.5	3.3	0.4
Hungary	95	2.4	2.4	1.9	6.3
Portugal	84	2.1	2.2	2.0	6.1
Greece	64	1.6	1.6	2.1	4.4
Slovakia	60	1.5	0.9	0.4	0.9
Sweden	57	1.4	1.4	2.0	0.6
Austria	56	1.4	1.4	1.7	0.4
Croatia	47	1.2	1.2	0.8	2.5
Slovenia	35	0.9	1.6	1.1	4.0
UK	33	0.8	0.8	12.9	3.4
Denmark	18	0.5	0.5	1.1	0.2
Ireland	15	0.4	0.4	0.9	0.3
Lithuania	11	0.3	0.3	0.6	2.0
Luxembourg	10	0.3	0.3	0.1	0.0



	<b>No.</b>	<b>% Total</b>	<b>% EU</b>	<b>% EU Population</b>	<b>% CP Funding</b>
Estonia	8	0.2	0.2	0.3	1.0
Cyprus	5	0.1	0.1	0.2	0.2
Malta	5	0.1	0.1	0.1	0.2
Other	57	1.4			
<b>Total</b>	<b>3,958</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Note: The shaded figures indicate instances where the % of responses from the country is equal to or greater than the country's share, first, of the total EU population and, secondly, of total cohesion policy funding for the 2014-2020 period, excluding funding for territorial cooperation and the FEAD

Source: Applica-Ismeri Europa analysis of consultation responses

France, Germany and Spain together accounted for just under a quarter. To some extent, the number of responses appears to be related to the amount of cohesion policy funds received, as well as, of course, to the size of the population. In particular, Poland, Latvia, the Czech Republic and Bulgaria, all 'Cohesion' countries and recipients of large amounts of funding, all account for a significant proportion of replies in relation to their population. This, however, is by no means systematically the case, with Lithuania and Estonia, especially, accounting for only relatively small proportions of responses, though there were only three other Cohesion countries, Greece, Romania and Cyprus, for which the share of replies was less than their share of EU population.

Of the non-Cohesion countries, Italy, Belgium and, to a lesser extent Finland, stand out as accounting for a much larger proportion of responses than their population size and receipt of funding would imply. In the case of Belgium, this no doubt reflects the relatively large number of individuals and organisation with particular interest in EU policy situated there and the fact that many organisations and associations have their European headquarters in Brussels. In the case of Italy and Finland, it is less clear why the number of responses should be disproportionately high.

It should be noted, as might be expected in the light of Brexit, that a particularly small number of replies came from the UK.

The type of respondent varies between countries, though in many cases, the division between individuals and organisations is close to the overall average (Table 4). Noteworthy exceptions are Latvia, Romania and Luxembourg, where the share of individuals replying is over 65% (though in the last, the number of responses is small), and Denmark, Netherlands and Germany, where the share of organisations is over 65% (though in the first, the number of responses is also small).

**Table 4 - Q5 and Q22 (country) with Q1 (type of respondent)**

	<b>Individual</b>		<b>Professional capacity or organisation</b>		<b>Total</b>	
	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
Italy	413	48.1	446	51.9	859	100
Poland	322	59.2	222	40.8	544	100
France	148	40.7	216	59.3	364	100
Germany	63	22	223	78	286	100
Spain	117	46.8	133	53.2	250	100
Belgium	104	47.1	117	52.9	221	100
Latvia	153	73.6	55	26.4	208	100
Czech Rep.	53	39.6	81	60.4	134	100
Romania	81	64.8	44	35.2	125	100
Finland	37	35.2	68	64.8	105	100
Bulgaria	42	40.8	61	59.2	103	100
Netherlands	26	26.3	73	73.7	99	100

	Individual		Professional capacity or organisation		Total	
	No.	%	No.	%	No.	%
Hungary	51	53.7	44	46.3	95	100
Portugal	55	65.5	29	34.5	84	100
Greece	38	59.4	26	40.6	64	100
Slovakia	22	36.7	38	63.3	60	100
Other	15	26.3	42	73.7	57	100
Sweden	14	24.6	43	75.4	57	100
Austria	19	33.9	37	66.1	56	100
Croatia	22	46.8	25	53.2	47	100
Slovenia	16	45.7	19	54.3	35	100
UK	7	21.2	26	78.8	33	100
Denmark	6	33.3	12	66.7	18	100
Ireland	5	33.3	10	66.7	15	100
Lithuania	4	36.4	7	63.6	11	100
Luxembourg	8	80	2	20	10	100
Estonia	5	62.5	3	37.5	8	100
Cyprus	2	40	3	60	5	100
Malta	3	60	2	40	5	100
<b>Total</b>	<b>1,851</b>	<b>46.8</b>	<b>2,107</b>	<b>53.2</b>	<b>3,958</b>	<b>100</b>

Source: Applica-Ismeri Europa analysis of consultation responses

There is a relatively high concentration of 'International and national public authorities' in Croatia (19% of the total responses), Malta and Slovakia (20% in each). The same is true of 'Regional and local authorities' in Austria (27%), Denmark (44%), Germany (35%) and Slovenia (34%), for 'NGOs' in Belgium (24%), Cyprus (40%), Estonia (38%), Ireland (27%) and the UK (30%) and for 'Trade, business or professional associations' in Cyprus (20%), Germany (9%) and Belgium (6%).

### 3.2 Experience of the different funds and orientation towards topics

Question 27 ('Please let us know whether you have experience with one or more of the following funds and programmes') allowed more than one answer and listed the 6 funds covered by the consultation: The ERDF, the CF, the ESF, the EGF, the FEAD and the EaSI.

Some 74% of respondents reported experience of the ERDF and/or the CF and 57% did so in respect of the ESF, while 10% did not indicate experience of any of the funds, either because they had none or because they omitted to answer the question (Table 5). It is evident, therefore, that there is a significant overlap between those with experience of the different funds, especially of the ERDF and/or CF and the ESF.

**Table 5 - Q27 Please let us know whether you have experience with one or more of the following funds and programmes**

Experience of the respondent of funds	Responses		% of replies
	No.	%	
ERDF-CF	2,919	46.5	73.7
ESF	2,262	36.0	57.2
EGF	85	1.4	2.1
FEAD	343	5.5	8.7
EaSI	287	4.6	7.3
No reply	385	6.1	9.7

<b>Total</b>	<b>6,281</b>	<b>100.0</b>	<b>158.7</b>
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Source: Applica-Ismeri Europa analysis of consultation responses

Many fewer reported experience of the FEAD and EaSI (7-9% in each case) and even fewer of the EGF (2%).

For all of the various types of organisation, over 65% of respondents reported in each case experience with the ERDF and/or CF. The one exception are 'Church and religious communities', for which the proportion is only 14%. For the ESF, over half of each type of organisation reported having experience, again except for 'Church and religious communities' (18%) and, to a lesser extent, 'Private enterprises' (41%). On the hand, a relatively large proportion of 'Church and religious community' respondents as well as those from NGOs reported experience of the FEAD and EaSI, which given the nature of the funds is perhaps to be expected. Similarly, 41% of the national authorities responding reported experience of the EGF, very much more than for other types of organisation.

The experience of the different funds by country does not show any systematic pattern. A larger proportion of respondents than average reported experience of the ERDF and/or CF in Luxemburg, Slovenia, Denmark and Croatia, while a larger than average proportion reported experience of the ESF in the Czech Republic, Denmark, Finland, Poland and Slovenia. The proportion reporting experience of the EGF is relatively large in Denmark and Cyprus, for the FEAD in Cyprus, Croatia, Estonia and Italy, and for the EaSI in Belgium, Bulgaria, Cyprus and Luxemburg.

In the following analysis, it is assumed that the responses given to the different questions refer to the funds which respondents have reported experience of, which seems reasonable, though, of course, there is no certainty that this is the case.

Question 28 asks about the topics which respondents have in mind when replying to the questionnaire, specifying three broad possibilities: a) Economic and sustainable development, b) Employment, skills and education and c) Social inclusion, with again the option to select more than one of these.

Most respondents selected more than one topic. The most selected one was 'Economic and sustainable development', which 72% of respondents chose, followed by 'Employment, skills and education', which 63% chose, while 49% selected 'Social inclusion' (Table 6). Just over 2% of respondents gave no indication of which of the three topics their replies related to.

The choice of topic was similar for most types of respondent, the main exception being 'Church and religious communities', for which 'Social inclusion' was relatively important.

**Table 6 - Q28 Please let us know to which of the following one or more topics your replies will refer**

Topics replies refer to	Responses		% of replies
	No.	%	
a) Economic and sustainable development	2,865	38.4	72.4
b) Employment, skills and education	2,483	33.3	62.7
c) Social inclusion	1,938	26.0	49.0
No reply	169	2.3	4.3
<b>Total</b>	<b>7,455</b>	<b>100.0</b>	<b>188.4</b>

Source: Applica-Ismeri Europa analysis of consultation responses

### **3.3 Policy challenges to address**

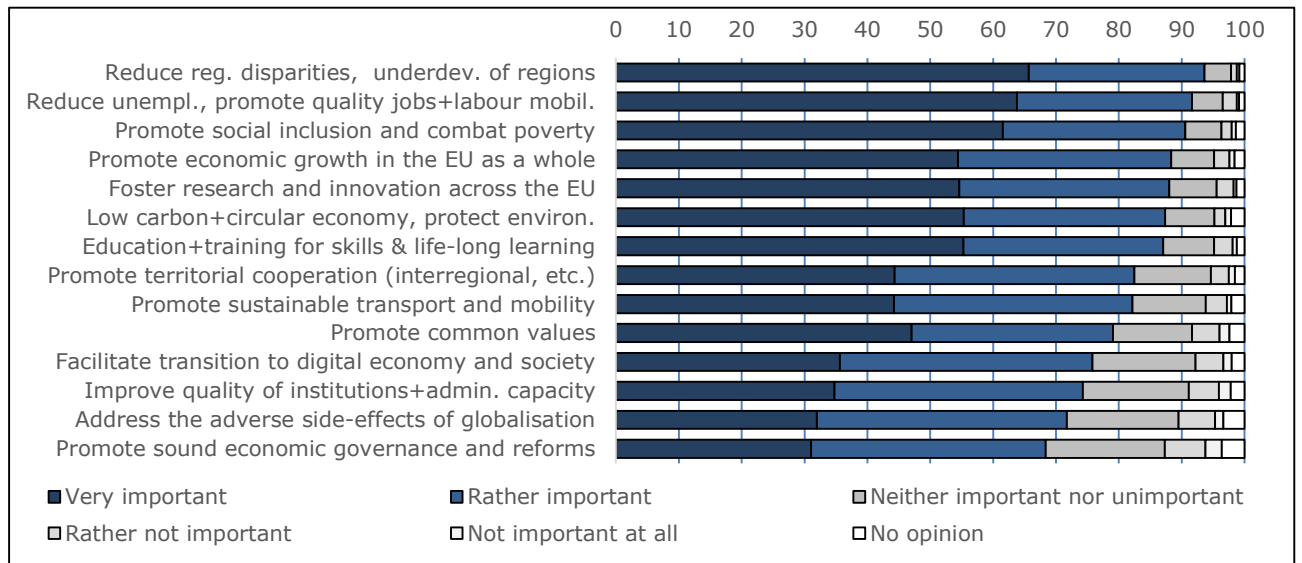
#### ***The perceived importance of different challenges***

Question 29 was aimed at collecting respondent views on the importance of the policy challenges identified in the questionnaire. (The specific policy question was: *'The Commission has preliminarily identified a number of policy challenges which programmes/funds under the policy area of cohesion could address. How important are these policy challenges in your view?'*).

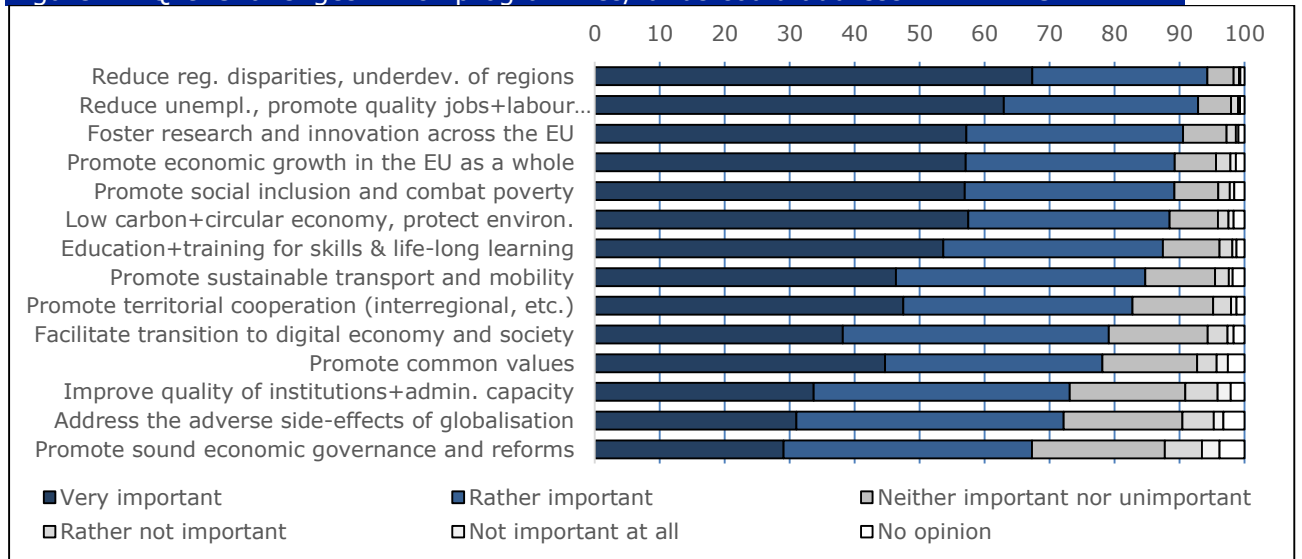
In most cases, high importance was assigned to all the policy challenges listed in the question. With the exception of 'Promote sound economic governance and reforms', for all of the challenges, over 70% of the responses (excluding those not replying to this question) were either 'rather important' or 'very important' (Figure 1). The challenges for which the proportion of respondents choosing either of these options was largest were: 'Reduce regional disparities' (94% of all those replying), 'Reduce unemployment, promote quality jobs and labour mobility' (92%) and 'Promote social inclusion and combat poverty' (91%). The smallest proportion of respondents indicating that the challenge was 'very important' or 'rather important' were in relation to 'Address the adverse side-effects of globalisation' (72%) as well as 'Promote sound economic governance and reforms' (68%), though in each case, the figures concerned represent a substantial majority of respondents. In these two cases, the lower importance attached to the challenges concerned perhaps reflects the fact that, apart from the EGF, the funds in question are not directly addressed to tackling them, even though indirectly they do so. In other words, it is not necessarily the case that respondents place lesser importance globally to the two challenges concerned than the others listed, but it may be that they consider the other challenges more important from the perspective of cohesion policy.

There is relatively little difference in the perceived importance of the different challenges between those reporting experience of the ERDF and/or CF and those reporting experience of the ESF and/or the other two funds or the EaSI programme (Figure 2 and 3 - where the latter together are termed the 'EMPL Funds'). In virtually all cases, the proportions indicating the challenges to be 'very important' or 'rather important' are much the same, which in some degree reflects the significant overlap between the two groups of respondents.

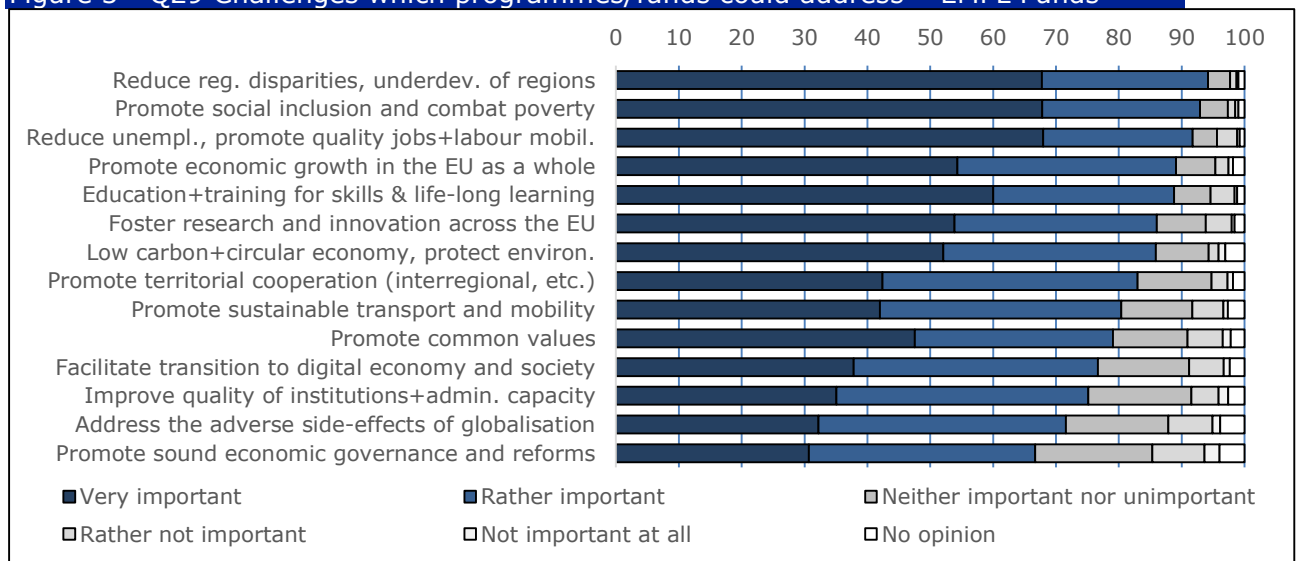
**Figure 1 - Q29 Challenges which programmes/funds could address – Total**



**Figure 2 - Q29 Challenges which programmes/funds could address – ERDF+CF**



**Figure 3 - Q29 Challenges which programmes/funds could address – EMPL Funds**



Nevertheless, there are some differences in the perceived importance of the various challenges between respondents with experience of the FEAD and EaSI and others. In particular, those with experience of these two funds considered fostering research and innovation, promoting sustainable transport and facilitating the transition to a digital economy, as well as, to a lesser extent, reducing unemployment and supporting education and training, as less important than those with experience of the other funds (Table 7). Conversely, they attached more importance to promoting social inclusion and improving the quality of institutions. Equally, those with experience of the EGF, as might have been expected, regarded addressing the adverse side-effects of globalisation to be more important than other respondents.

**Table 7 - Q29 by experience of the different Funds: % of respondents regarding challenges as being very important or rather important**

<b>CHALLENGES</b>	<b>ERDF+CF</b>	<b>ESF</b>	<b>FEAD</b>	<b>EGF</b>	<b>EaSI</b>
Reduce regional disparities	94.3	93.9	95.5	92.6	95.1
Reduce unemployment, promote quality jobs and labour mobility	92.9	94.4	79.4	95.1	84.3
Promote social inclusion and combat poverty	89.2	92.0	97.3	92.8	95.0
Promote economic growth in the EU as a whole	89.3	89.1	90.3	87.7	87.9
Foster research and innovation across the EU	90.5	89.2	73.9	88.0	74.6
Transition to low carbon economy, environmental protection and resilience	88.5	86.1	84.9	87.5	85.1
Support education and training for skills and life-long learning	87.5	91.0	79.3	91.4	81.5
Promote territorial cooperation	82.8	81.7	85.0	86.4	90.0
Promote sustainable transport and mobility	84.7	83.1	68.9	87.3	70.0
Promote common values	78.1	80.4	74.1	79.3	74.5
Facilitate transition to digital economy and society	79.0	79.8	61.8	82.7	67.3
Improve quality of institutions and administrative capacity	73.1	73.2	85.0	68.8	81.1
Address the adverse side-effects of globalisation	72.1	72.3	67.5	81.7	67.6
Promote sound economic governance and reforms	67.3	67.2	67.0	65.0	62.6

Source: Applica-Ismeri Europa analysis of consultation responses

There is little difference between countries in respect of the relative importance attached to the different challenges, with respondents in all countries not only assigning high importance to all of them but also to a large extent implicitly ordering them in a similar way (Table 8). This is despite the differences in their circumstances, which might suggest that respondents tended to take an EU-wide perspective on the challenges and not only a purely national one. Accordingly, for example, respondents in Cyprus, Luxembourg, Estonia and Lithuania attached a relatively high importance to reducing regional disparities and the underdevelopment of regions despite the countries being single NUTS 2 regions, though, of course, regional disparities are not only an issue at the NUTS 2 level of disaggregation. Similarly, reducing unemployment was seen as the most important challenge in Germany even though unemployment in the country is low by recent historical standards and well below the EU average. In addition, promoting social inclusion and combating poverty was viewed among the main challenges in Sweden despite poverty being less prevalent than in virtually all other EU countries.

**Table 8 - Q29 by country of residence of respondents: % of respondents regarding challenges as very important or rather important**

	Promote economic growth in the EU as a whole	Reduce regional disparities	Address the adverse side-effects of globalisation	Reduce unemployment, promote quality jobs and labour mobility	Promote social inclusion and combat poverty	Promote common values	Transition to low carbon economy, environmental protection & resilience	Foster research and innovation across the EU	Facilitate transition to digital economy and society	Promote sustainable transport and mobility	Promote territorial cooperation	Support education and training for skills and life-long learning	Improve quality of institutions and administrative capacity	Promote sound economic governance and reforms
Austria	80.4	92.9	62.5	91.1	83.9	76.4	89.3	89.3	75.0	76.8	90.9	78.2	61.8	69.1
Belgium	76.3	86.9	73.8	88.2	89.0	79.9	87.2	88.0	70.0	81.8	81.0	87.3	64.7	58.9
Bulgaria	93.1	98.0	71.3	97.1	92.0	76.2	74.3	87.0	79.4	80.0	86.0	89.9	84.0	83.0
Croatia	95.6	97.8	68.9	97.8	91.1	81.8	80.0	93.3	84.4	91.1	91.1	91.1	81.8	86.0
Cyprus	75.0	75.0	75.0	75.0	50.0	75.0	75.0	50.0	75.0	75.0	50.0	50.0	75.0	75.0
Czech Rep.	78.2	92.5	63.2	77.3	75.0	65.2	76.7	85.0	72.0	80.2	83.5	88.0	71.2	59.1
Denmark	82.4	94.1	70.6	94.1	82.4	70.6	88.2	82.4	82.4	88.2	82.4	70.6	47.1	50.0
Estonia	100.0	100.0	50.0	100.0	87.5	75.0	62.5	75.0	75.0	75.0	100.0	100.0	50.0	62.5
Finland	85.1	91.8	66.3	98.0	89.0	67.3	90.1	89.1	87.1	87.1	90.0	83.0	45.5	54.0
France	82.6	90.1	69.1	91.5	92.4	77.3	89.4	86.6	73.0	81.4	82.5	84.0	54.7	45.2
Germany	79.7	90.9	70.1	95.3	85.8	84.7	83.9	84.4	81.0	82.8	88.0	88.6	59.9	52.0
Greece	92.1	96.8	74.6	95.2	96.8	85.7	84.1	87.3	87.1	81.0	82.3	92.1	83.9	77.0
Hungary	87.0	95.6	74.7	88.9	84.6	75.0	88.0	94.6	76.1	78.3	78.5	92.5	69.9	72.0
Ireland	92.3	92.3	100.0	100.0	100.0	100.0	84.6	84.6	83.3	91.7	91.7	100.0	66.7	81.8
Italy	92.0	93.8	73.5	90.4	95.5	80.9	89.1	87.6	72.8	80.8	80.9	87.3	88.0	75.5
Latvia	93.2	96.1	63.9	93.2	92.6	81.1	82.3	89.1	67.5	85.1	85.7	93.7	79.3	82.1
Lithuania	100.0	100.0	77.8	100.0	87.5	77.8	100.0	88.9	87.5	100.0	88.9	100.0	66.7	66.7
Luxembourg	88.9	100.0	77.8	100.0	88.9	77.8	77.8	77.8	88.9	88.9	100.0	88.9	66.7	44.4
Malta	100.0	100.0	80.0	80.0	80.0	100.0	100.0	100.0	100.0	100.0	60.0	80.0	80.0	100.0
Netherlands	85.6	77.3	60.8	82.7	72.2	66.7	83.7	92.8	74.2	77.1	76.0	71.6	50.0	63.9
Poland	94.5	97.6	74.5	91.8	89.0	75.4	90.8	86.2	78.3	81.2	74.9	81.5	79.6	71.3
Portugal	89.3	96.4	72.6	96.4	95.1	82.1	89.3	91.7	82.1	88.0	83.3	89.0	79.8	74.4
Romania	96.6	98.3	76.7	88.8	94.8	83.5	93.5	96.6	80.7	87.0	87.1	94.7	92.2	87.4
Slovakia	76.3	96.6	62.1	88.3	86.7	78.3	78.3	85.0	63.3	78.3	73.3	86.2	74.6	61.7
Slovenia	82.9	97.1	71.4	94.3	91.2	76.5	88.6	90.9	85.3	88.2	88.2	94.3	61.8	68.6
Spain	92.5	97.1	82.6	96.7	96.3	87.2	90.5	93.4	78.6	86.3	84.4	92.2	80.8	78.1
Sweden	94.5	89.3	63.6	96.4	92.9	82.1	89.3	89.1	75.0	76.4	94.6	89.3	57.1	55.6
UK	80.6	93.5	71.0	90.6	90.6	84.4	93.3	81.3	70.0	77.4	90.3	93.8	67.7	64.5
Others	82.4	88.2	70.0	92.3	84.6	82.7	86.3	84.3	76.5	82.4	92.3	90.4	82.7	78.8

Source: Applica-Ismeri Europa analysis of consultation responses

In terms of the different types of respondent, in the case of organisations, there is some tendency to highlight challenges which relate to their area of specific interest. For example, 'Church and religious communities' and NGOs tended to emphasise the importance of promoting social inclusion and reducing poverty as well as reducing unemployment and 'Regional and local authorities', territorial cohesion and reducing regional disparities.

Respondents were also able to identify other challenges that need to be addressed in the current programming period in addition to those listed. In most of the cases, however, respondents did not indicate new challenges as such but gave their own interpretation of the challenges listed (i.e. they slightly changed the wording). The new challenges identified included security, cultural heritage, demographic change, combating corruption and migration. But while these suggestions are clearly relevant for cohesion policy, in each case, only around 1% of respondents or less referred to them.

### ***The perceived success in addressing the challenges***

Question 31 was aimed at collecting respondent views on the extent to which programmes and funds succeed in responding to these challenges (*'To what extent do the current programmes/funds successfully address these challenges?'*).

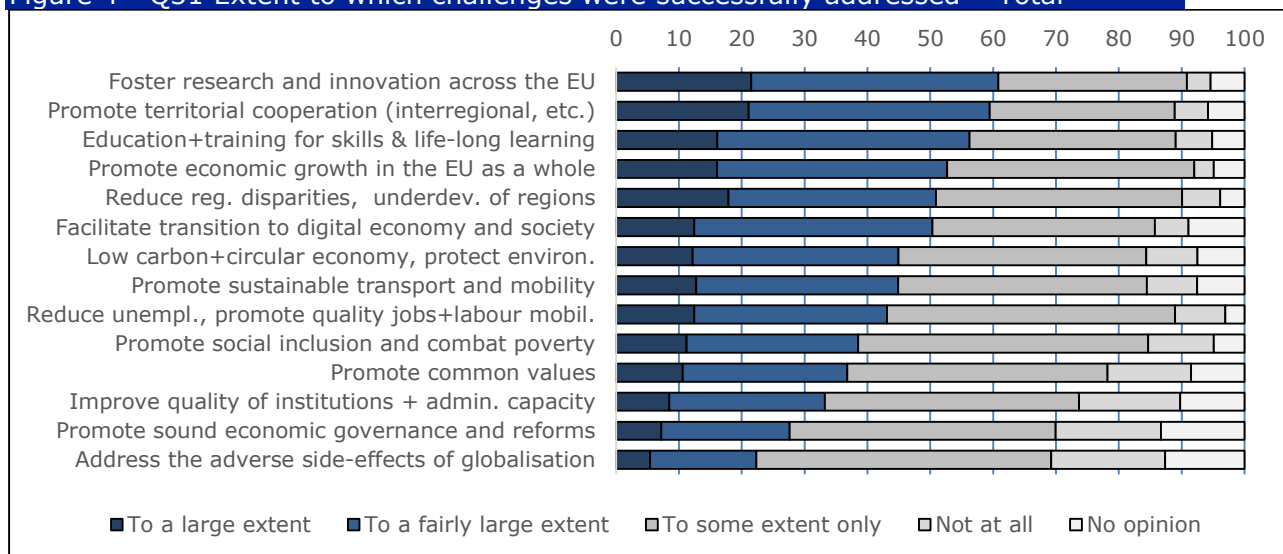
The challenges which, according to respondents, are being addressed most successfully are the need to 'foster research and innovation' and 'territorial cooperation', with around two-thirds of respondents in each case considering cohesion policy to be successful in addressing these challenges 'to a large extent' or 'to a fairly large extent' (Figure 4). The cohesion policy response to other challenges was regarded as being less successful. This applies, in particular, to 'addressing side-effects of globalisation' and 'promoting sound economic governance and reforms', for which in both cases, less than 30% of respondents considered that cohesion policy is successfully or fairly successfully addressing these challenges.

As indicated above, however, these challenges are not ones which cohesion policy is directly targeted at and respondents may have paid due regard to this when giving their views. The same applies to 'ensuring the quality of institutions and administrative capacity' and 'promoting common values', for which in each case, less than 40% of respondents regarded cohesion policy as being largely successful or fairly largely successful in addressing them. At the same time, over 40% of respondents considered that policy was successful to some extent in addressing both the latter two challenges and the former two, while around 10% in each case had no opinion one way or the other. Accordingly, less than 20% of respondents (less than 15% in the case of promoting common values) thought that cohesion policy was not successful at all in addressing each of the four challenges.

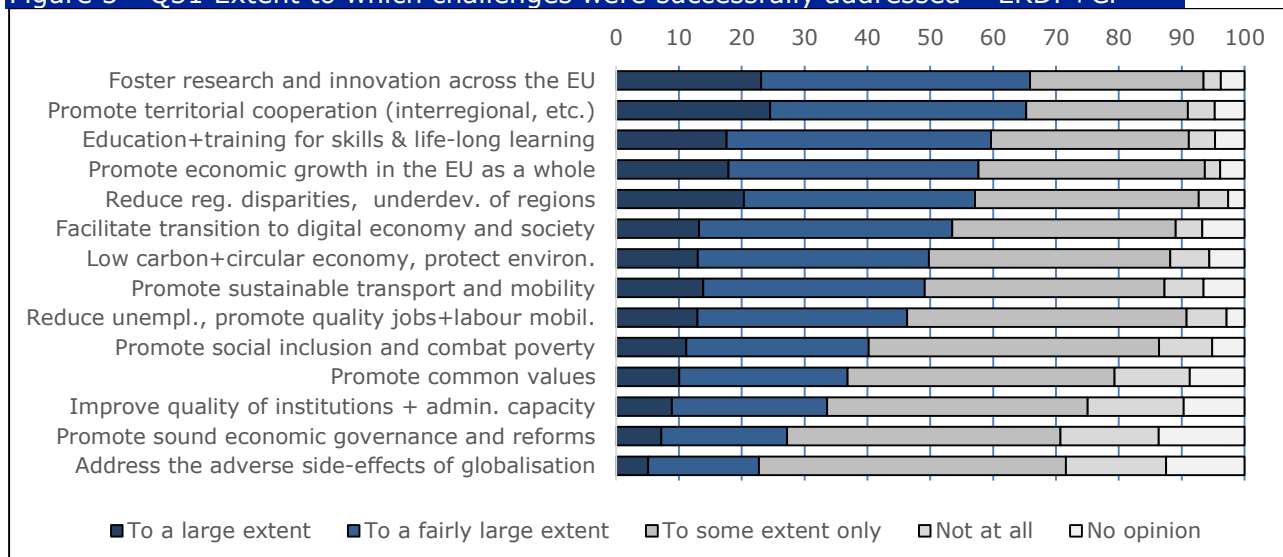
There are some differences between the views of respondents as to the success of cohesion policy in addressing the challenges according to whether they have experience of the ERDF and/or the CF or the ESF and/or the other three funds (i.e. those for which DG Employment is responsible). In particular, a larger proportion of those with experience of the ERDF and/or CF considered cohesion policy as being largely successful or fairly largely successful in addressing most of the challenges than for those with experience of the ESF and the other funds (Figures 5 and 6).



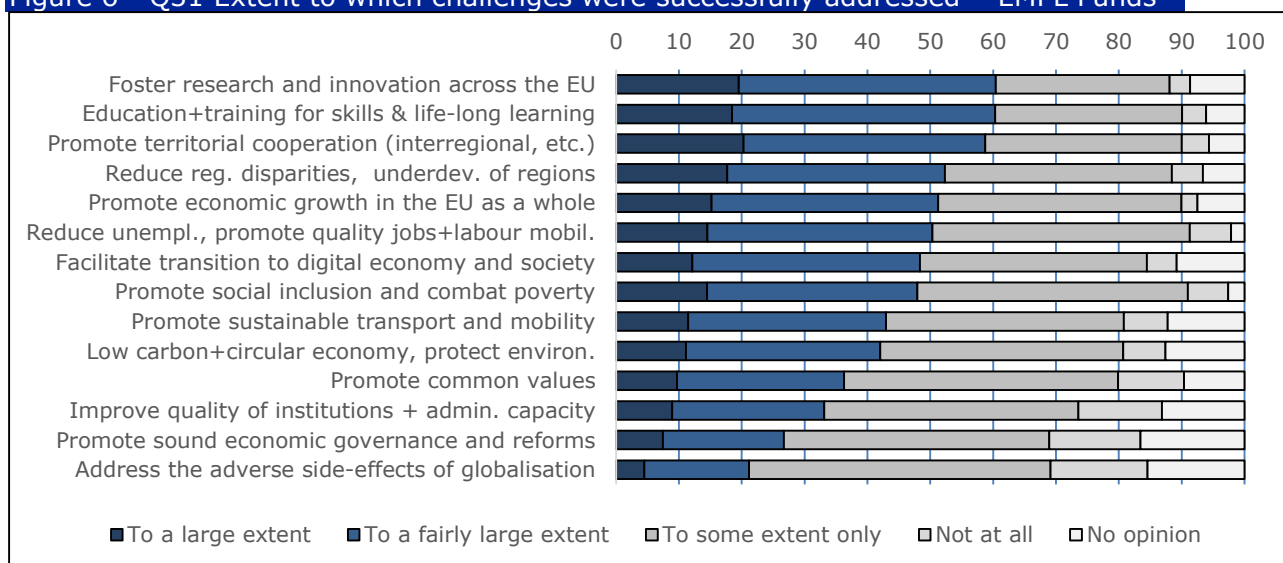
**Figure 4 - Q31 Extent to which challenges were successfully addressed – Total**



**Figure 5 - Q31 Extent to which challenges were successfully addressed – ERDF+CF**



**Figure 6 - Q31 Extent to which challenges were successfully addressed – EMPL Funds**



At the same time, most of the challenges listed in the questionnaire are those with which the former two funds are more directly concerned. The only two challenges for which a larger proportion of respondents with experience of the ESF and the other three funds considered cohesion policy to be largely successful or fairly largely successful than the proportion with experience of the ERDF and/or Cohesion Fund are 'promoting social inclusion and combating poverty' and 'reducing unemployment and promoting quality jobs and labour mobility'. Both these are challenges at which the ESF and the other three funds are more directly targeted than the ERDF and CF. In addition, much the same proportions of the two groups regarded policy as being successful in supporting education and training with which both sets of funds are concerned (the ERDF/CF with infrastructure and equipment, the ESF/other funds with personnel and operational issues). Moreover, the difference between the two groups in the proportions considering policy as successful is largest for the challenges with which the ERDF/CF is directly concerned – territorial cooperation, environmental sustainability, economic growth, research and innovation and sustainable transport. Conversely, the difference between the two groups in this respect is minor in relation to the challenges with which cohesion policy is only indirectly concerned – promoting common values, sound economic governance, administrative capacity and addressing the side-effects of globalisation.

The implication seems to be that those with experience of a particular fund, or set of funds, are more likely to have a favourable view of its success in addressing the challenges that it is most directly concerned with than those without this experience.

**Table 9 - Q31 by experience of the different Funds: % of respondents regarding challenges as being largely successfully or fairly largely successfully addressed**

<b>CHALLENGES</b>	<b>ERDF+CF</b>	<b>ESF</b>	<b>FEAD</b>	<b>EGF</b>	<b>EaSI</b>
Reduce regional disparities	57.1	55.4	33.9	66.7	45.4
Reduce unemployment, promote quality jobs and labour mobility	46.4	50.1	45.0	57.7	56.1
Promote social inclusion and combat poverty	40.2	45.6	57.1	60.5	51.8
Promote economic growth in the EU as a whole	57.7	54.5	32.1	67.9	43.0
Foster research and innovation across the EU	65.9	64.1	37.6	71.8	53.8
Transition to low carbon economy, environmental protection and resilience	49.7	45.3	25.1	50.6	33.1
Support education and training for skills and life-long learning	59.7	63.5	42.0	70.9	52.4
Promote territorial cooperation	65.3	61.6	40.1	69.6	53.8
Promote sustainable transport and mobility	49.1	46.0	27.6	48.7	34.2
Promote common values	36.8	37.0	31.3	41.8	34.8
Facilitate transition to digital economy and society	53.5	52.1	30.2	49.4	38.5
Improve quality of institutions and administrative capacity	33.6	33.7	28.2	46.8	30.5
Address the adverse side-effects of globalisation	22.7	22.0	13.8	32.1	19.9
Promote sound economic governance and reforms	27.2	26.6	24.5	35.9	27.5

Note: Challenges are ordered in terms of the % of all respondents regarding the challenges as being very important or rather important (i.e. in the same way as in Table 7 to facilitate comparisons between the two tables).

Source: Applica-Ismeri Europa analysis of consultation responses

This conclusion is reinforced if respondents are sub-divided more finely in terms of their experience of the different Funds (or programmes in the case of EaSI). For examples, those with experience of the FEAD as well as the EGF regarded the Funds or programmes as being more successful in promoting social inclusion than other respondents (Table 9). In addition, those with experience of the EGF also regarded them as being more successful in reducing regional disparities, promoting economic growth and supporting education and training - all challenges which the EGF is particularly directed at tackling - than others. Equally, those with experience of the FEAD and, to a lesser extent, the EaSI, have a lesser favourable view than others of

the success of the Funds in reducing regional disparities, promoting economic growth, fostering research and innovation, promoting the transition to a low carbon economy and generally in tackling the challenges which they are not directly concerned with.

The responses to Q31 by country indicate differences in national perceptions of the degree of success of cohesion policy in addressing the different challenges (Table 10).

**Table 10 - Q31 To what extent do the current programmes/funds successfully address these challenges by country - % of respondents replying largely or fairly largely**

Country	Economic growth in the EU	Regional disparities	Side-effects of globalisation	Unempl, job quality, labour mobility	Social inclusion and poverty	Common values	Low carbon econ, environ. protection	Research and innovation	Transition to digital economy	Sustainable transport and mobility	Territorial cooperation	Education and training	Institutional m quality, admin. capacity	Sound econ. Governance, reforms	Average
Luxembourg	66.7	62.5	33.3	44.4	44.4	44.4	55.6	66.7	55.6	66.7	100.0	66.7	55.6	33.3	56.9
Romania	65.8	57.1	28.6	56.3	59.3	49.1	52.5	64.6	61.1	64.6	64.9	66.4	58.0	38.7	56.2
Malta	80.0	60.0	60.0	40.0	40.0	40.0	80.0	60.0	60.0	40.0	60.0	60.0	60.0	40.0	55.7
Finland	53.0	76.0	36.4	66.7	51.0	36.0	68.0	74.3	63.6	48.0	74.7	61.4	32.0	32.0	55.2
Denmark	70.6	70.6	35.3	64.7	47.1	29.4	64.7	76.5	58.8	47.1	70.6	76.5	37.5	17.6	54.8
Other countries	66.0	51.0	31.3	47.9	40.4	46.7	54.2	64.6	53.2	54.2	75.0	66.7	55.3	44.7	53.7
Portugal	56.0	56.0	24.4	54.2	47.6	50.0	51.2	70.7	66.3	55.6	61.0	67.9	45.2	40.5	53.3
France	63.6	71.1	25.5	53.4	53.6	42.2	52.6	68.1	60.6	51.6	73.7	67.6	26.9	25.9	52.6
Poland	67.8	63.6	28.5	52.8	47.4	38.6	56.2	64.1	62.1	55.4	55.8	59.3	44.2	35.3	52.2
Latvia	66.2	53.7	28.2	53.7	44.1	41.4	51.8	63.4	50.5	57.0	67.0	73.5	43.1	35.1	52.1
Slovenia	50.0	42.9	14.3	48.6	45.7	41.2	48.6	68.6	57.1	62.9	80.0	76.5	44.1	41.2	51.6
Estonia	37.5	75.0	25.0	50.0	12.5	37.5	37.5	62.5	62.5	50.0	87.5	71.4	37.5	50.0	49.7
Lithuania	66.7	33.3	25.0	22.2	33.3	88.9	55.6	66.7	66.7	88.9	33.3	44.4	44.4	22.2	49.4
UK	51.6	61.3	22.6	46.9	53.1	40.6	48.4	71.0	48.4	50.0	71.0	63.3	29.0	32.3	49.3
Cyprus	75.0	50.0	25.0	25.0	25.0	50.0	50.0	50.0	75.0	75.0	50.0	50.0	50.0	25.0	48.2
Sweden	58.9	62.5	10.9	64.3	48.2	34.5	45.5	58.2	50.9	50.9	73.2	60.7	21.4	25.9	47.6
Greece	47.6	50.8	14.8	38.1	42.9	46.0	49.2	58.7	57.1	50.0	66.1	70.5	37.1	35.5	47.5
Spain	58.0	52.5	24.4	42.1	39.7	44.3	43.0	59.6	55.4	42.6	59.2	56.5	31.7	30.9	45.7
Netherlands	63.9	59.4	27.7	55.7	34.0	33.0	53.1	71.1	46.9	37.1	57.3	39.2	16.5	24.0	44.2
Croatia	50.0	52.3	20.5	36.4	34.1	34.1	34.1	52.3	45.5	51.2	65.1	68.2	34.9	29.5	43.4
Germany	50.6	54.3	16.7	58.1	37.6	33.0	37.6	66.8	33.1	35.6	66.7	60.4	21.9	13.9	41.9
Belgium	51.0	56.4	20.9	44.2	38.8	29.9	40.9	62.2	40.7	35.4	60.0	58.4	24.5	22.8	41.9
Ireland	50.0	50.0	33.3	45.5	38.5	61.5	33.3	50.0	45.5	16.7	58.3	33.3	33.3	33.3	41.6
Austria	45.5	63.6	9.3	34.5	29.6	20.0	50.9	71.4	36.4	35.2	75.0	63.6	21.8	13.0	40.7
Czech Republic	40.9	50.0	11.4	45.9	37.4	22.6	43.2	64.7	30.1	43.8	71.4	57.1	25.0	16.3	40.0
Bulgaria	45.0	28.0	17.5	42.9	32.0	37.4	22.7	44.4	37.4	50.0	57.6	52.0	38.0	26.5	38.0
Hungary	44.6	37.0	15.4	38.0	18.7	20.7	35.9	53.3	50.0	45.2	53.3	31.5	30.4	20.2	35.3
Slovakia	48.3	32.8	12.1	43.1	24.1	31.6	35.1	43.9	34.5	35.1	53.4	47.4	19.3	15.8	34.0
Italy	35.0	33.7	17.7	27.6	34.9	32.8	30.6	47.3	41.4	30.9	43.1	44.5	26.9	22.9	33.5

Note: Countries are ordered in terms of the average % of respondents considering the funds/programmes as being largely successful or fairly largely successful over all of the challenges.

Source: Applica-Ismeri Europa analysis of consultation responses

In particular, only a relatively small proportion of respondents in Italy, Slovakia, Hungary and Bulgaria considered policy to be successful to either a large extent or to a fairly large extent in meeting these challenges. On average, less than 40% were of this view and in all of these countries for nearly all of these challenges, the proportion

regarding policy as being successful was less than 50% for any of the challenges. (The exceptions are territorial cooperation in all of them except Italy and education and training in Bulgaria and research and innovation in Hungary.) All of these countries are ones which receive a relatively large amount of funding under cohesion policy. In the case of Italy, this has been true ever since the strengthening of cohesion policy in the late 1980s, though by common consent, the effects have been limited.

At the other end of the scale, a relatively large proportion of respondents viewed policy as being successful in addressing the challenges in Luxembourg, Romania, Malta, Finland and Denmark – though in Luxembourg and Malta, the number of responses was small. In three of the 5 countries, the amount of funding received is relatively small, but this is not the case in Romania (or Malta), which shows a marked contrast with Bulgaria in this respect. This is also true of Portugal, Poland, Latvia and Slovenia, where in each case over half of respondents, on average, considered policy to be largely successful or fairly largely so in addressing the challenges. It is equally the case of non-EU (i.e. other) countries – some of which may receive small amounts of funding under the policy – where respondents, on average, had a more favourable view of the success of cohesion policy than those living in the EU. There is no systematic tendency, therefore, for opinions as to the success of policy to vary with the amount of funding received.

Nevertheless, despite the difference across countries in the overall proportion of respondents having a favourable view of the success of policy, the relative proportions considering cohesion policy as successfully addressing the different challenges are similar across countries. In nearly all countries, therefore, a relatively large proportion of respondents regarded cohesion policy as being largely or fairly largely successful in fostering research and innovation, promoting regional cooperation, supporting education and training, reducing regional disparities or promoting economic growth. Equally, a relatively small proportion considered it successful in addressing the side-effect of globalisation, promoting sound economic governance or improving the quality of institutions and administrative capacity.

The same is the case for the different types of respondent, in the sense that most have a favourable view of the success of cohesion policy in addressing the former group of challenges ('research and innovation', etc.) and a less favourable one in tackling the latter three challenges (the 'side-effects of globalisation', etc.) (Table 11). Nevertheless, as in the case of different countries, the overall proportions considering cohesion policy as being successful in addressing the various challenges differ across types of respondent. 'Churches and religious communities', in particular, have a relatively unfavourable view of this and 'Regional and local authorities' and 'International and national public authorities' – the two main direct recipients of funding – have the most favourable view, significantly more so than other types of organisation.

**Table 11 - Q31 To what extent do the current programmes/funds successfully address these challenges by type of respondent**

	Economic growth in the EU	Regional disparities	Side-effects of globalisation	Unempl., job quality, labour mobility	Social inclusion and poverty	Common values	Low carbon econ, environ. protection	Research and innovation	Transition to digital economy	Sustainable transport and mobility	Territorial cooperation	Education and training	Institutional quality, admin. capacity	Sound econ. Governance, reforms	Average
Individuals	50.5	48.4	22.4	41.0	37.5	35.9	43.4	57.9	50.6	46.5	56.4	54.5	34.0	29.2	43.4
Churches, religious communities	23.3	21.7	15.0	41.0	47.5	22.0	18.3	26.7	15.3	18.6	35.0	30.0	22.0	22.4	25.6
International, national public authority	67.3	61.8	20.6	60.0	53.5	43.9	45.2	61.3	49.0	53.5	66.0	63.7	45.5	33.1	51.7
NGO, platform or network	42.6	43.1	18.7	44.8	40.3	37.1	33.2	49.7	35.4	32.5	58.0	52.3	21.4	18.9	37.7
Private enterprise	54.5	45.9	23.1	37.9	27.4	27.6	37.4	58.5	47.2	35.5	49.6	48.8	24.4	25.8	38.8
Professional consultancy, law firm	48.6	49.1	13.9	31.1	23.4	25.5	39.6	64.8	39.8	32.4	53.7	39.3	17.8	12.1	35.1
Regional or local authority	64.8	63.5	24.1	58.4	52.8	39.6	59.4	72.5	58.5	55.3	72.2	66.8	36.6	30.2	53.9
Research and academia	43.1	58.6	22.6	42.6	29.6	32.1	50.4	65.2	46.0	38.6	72.6	58.8	26.5	21.9	43.5
Trade or professional association	50.0	57.9	17.7	44.0	37.9	23.2	37.1	58.7	43.7	33.9	58.4	57.9	20.2	13.7	39.6
Other	53.0	55.3	24.8	45.4	44.8	45.9	34.5	58.0	49.2	35.4	54.2	63.1	33.7	26.9	44.6

Source: Applica-Ismeri Europa analysis of consultation responses

It is noteworthy that the view of 'Church and religious community' respondents of the relative success of policy in addressing the different challenges differs from that of most other types of organisation. In particular, policy is regarded as most successful in promoting social inclusion and combating poverty, whereas other types of respondent consider it to be less successful, or little more successful, than in respect of the other challenges. The biggest difference is for 'Professional consultancy' and 'Research and academia' respondents who regard these challenges to be among those which policy is being least successful in addressing.

Question 31 gave the opportunity for respondents to specify additional challenges that the programmes and funds were addressing and to indicate their perception of how far they are successful in doing so. As in the case of Question 29, this opportunity has been used more to send messages and to indicate priorities or objectives than to identify additional challenges. Moreover, the additional challenges specified were much the same as in Question 29.

The most common additional challenges identified by the 446 respondents that specified these were a 'Reduction in regional disparities', 'Social inclusion and anti-discrimination' and 'Simplification and expanding administrative capacity' (Table 12).

**Table 12 - Q31 To what extent do the current programmes/funds successfully address challenges – other challenges specified (Q32)**

	<b>No. of cases</b>	<b>%</b>
Demographic issues and migrants integration	22	4.9
Social inclusion and anti-discrimination	39	8.7
Education and youth	23	5.2
Improve Labour Markets	8	1.8
Support ageing and Health	15	3.4
Reduction in regional disparities	45	10.1
Promotion of culture and cultural heritage	21	4.7
Promotion of local development	16	3.6
Environment protection and energy efficiency	33	7.4
Development of rural areas	24	5.4
Urban development	9	2.0
Innovation and industrial change	14	3.1
Support for SMEs	13	2.9
Transnational cooperation	18	4.0
Identity and values	17	3.8
Security	6	1.3
Participation	21	4.7
Simplification and administrative capacity	39	8.7
Corruption prevention and transparency	7	1.6
Other	49	11.0
Not relevant	7	1.6
Total	446	100.0

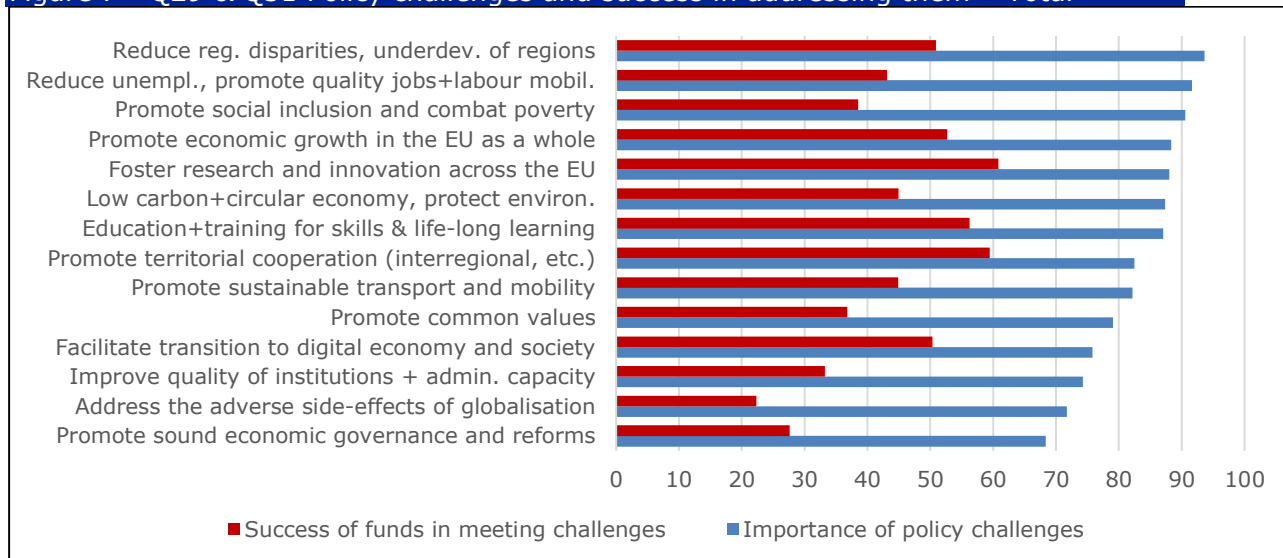
Source: Applica-Ismeri Europa analysis of consultation responses

One point to emerge from the above is that fewer respondents, irrespective of their experience of the different funds, country of residence or type of organisation considered cohesion policy to be successful 'to a large extent' or 'to a fairly large extent' in addressing the challenges listed than considered these challenges to be 'very important' or 'fairly important'. This applies to all the challenges. However, account should be taken of the fact that a significant number of respondents regarded policy to be successful 'to some extent only', which is somewhat different to the 'third level' response on the nature of the challenges of 'neither important nor unimportant'. Accordingly, taking account only of those regarding policy as being largely successful or fairly successful in addressing challenges tends to understate the proportion of respondents who considered policy to have at least some success in this regard.

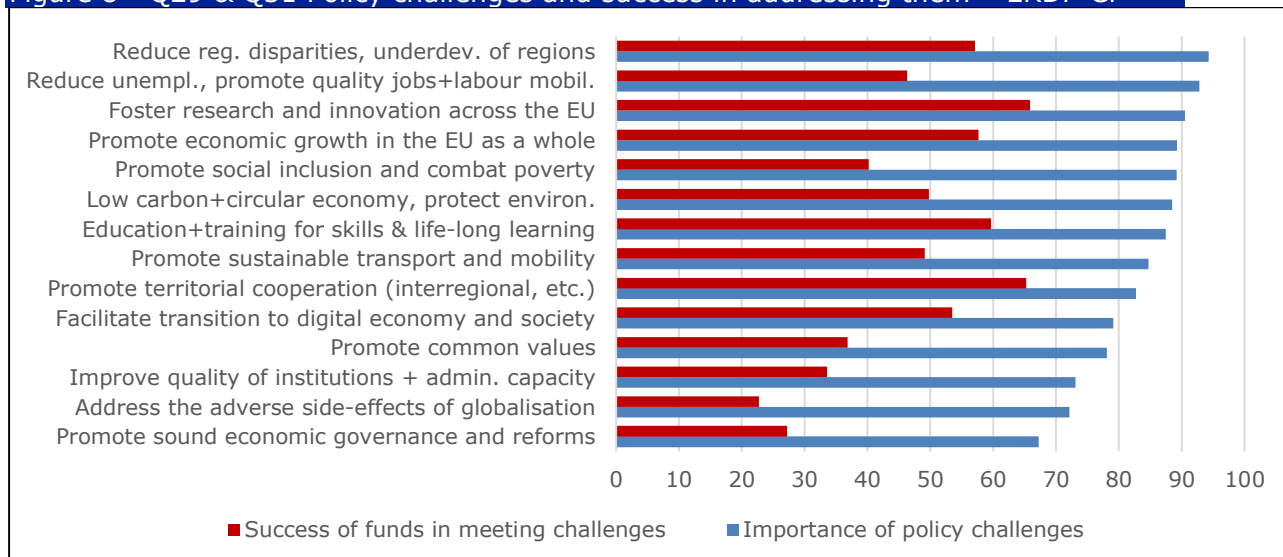
Nevertheless, keeping this point in mind, it is instructive to compare the proportion of respondents considering cohesion policy to be largely successful or fairly successful in addressing the various challenges with the proportion considering the challenges concerned to be very important or rather important for policy to address. This, therefore, should give an indication of whether and to what extent cohesion policy is perceived as successfully tackling the challenges which are seen as being most important for it to address.

What emerges from the comparison is that there is some tendency, though by no means systematic, for cohesion policy to be regarded as more successful in addressing the challenges which are considered to be more important than in addressing those which are viewed as less important. A comparatively large proportion of respondents, therefore, regarded policy as being successful in reducing regional disparities and promoting economic growth, both of which were considered to be among the most important challenges for policy to tackle (Figure 7). More strikingly, as noted above, the four challenges which policy was perceived as being least successful in addressing – promoting common values, improving the quality of institutions, addressing the adverse effects of globalisation and promoting sound economic governance – were also among the 5 which were regarded as being least important for cohesion policy to address.

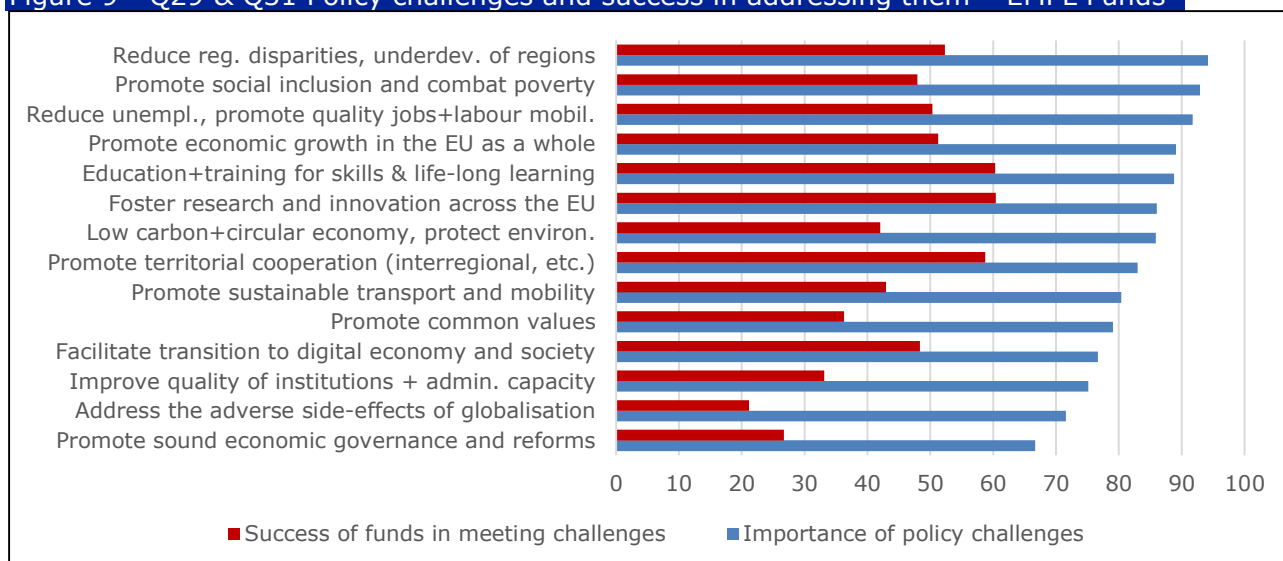
**Figure 7 - Q29 & Q31 Policy challenges and success in addressing them – Total**



**Figure 8 - Q29 & Q31 Policy challenges and success in addressing them – ERDF-CF**



**Figure 9 - Q29 & Q31 Policy challenges and success in addressing them – EMPL Funds**



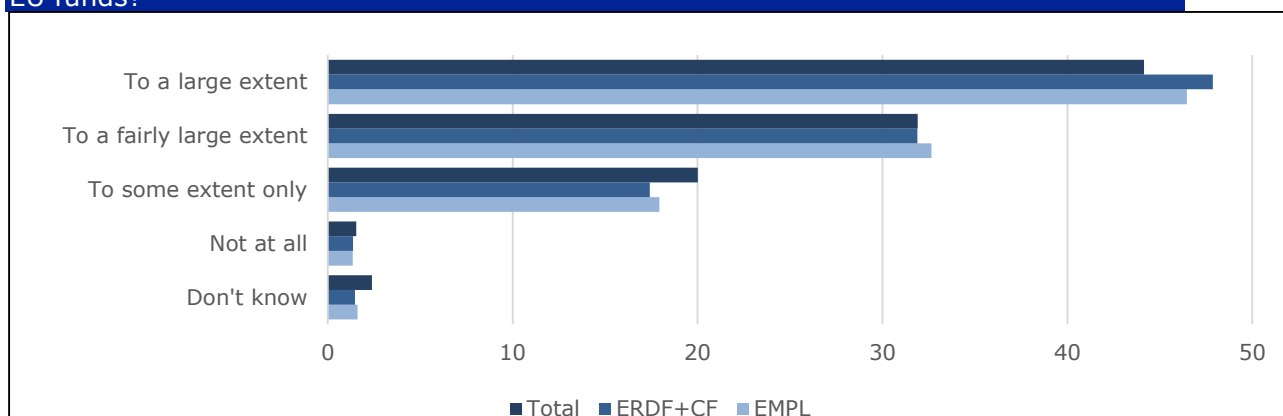
On the other hand, the two challenges which were considered to be the next least successfully addressed by cohesion policy - reducing unemployment and promoting social inclusion and reducing poverty - were regarded as among the three most important ones for policy to tackle.

Much the same pattern is evident for respondents with experience of the ERDF and CF and those with experience of the ESF and the other three funds (Figure 8 and 9).

### 3.4 The added-value of EU funding in comparison to national and local policies

Question 33 asked about the added-value of the EU Funds in relation to national and regional policies. There were 3,848 valid replies to the question. Of these, some 44% were of the view that the current programmes and funds add value to a large extent compared to what Member States could achieve at national, regional and/or local levels without such funds and another 32% indicated that they add value to a fairly large extent (Figure 10). Accordingly, over three-quarters of respondents had a favourable opinion of the Funds. Negative opinions on the added-value were expressed by far less than a quarter of respondents; 20% indicating that the Funds add value only to some extent and only 1.5% answering that they have no added-value at all. The views of respondents with experience of the ERDF and/or CF and those with experience of the ESF and the other funds were similar, though slightly more of those with experience of the ERDF and/or CF considered that the Funds or programmes added value to a large extent than those with experience of the ESF and/or other funds or programmes.

Figure 10 - Q33 To what extent do the current programmes/funds add value compared to what Member States could achieve at national, regional and/or local levels without EU funds?



Dividing respondents in more detail according to their experience of the various Funds indicates that a larger proportion of those with experience of the EaSI programme (55%) and, to a lesser extent, of the EGF considered that the Funds add value to a large extent than other respondents (Figure 10). Conversely, those with experience of the FEAD had a lower opinion than average of the added-value of the Funds (only 40% regarding them as adding value to a large extent and 26% considering that they add value only to some extent or not at all).



**Table 13 - Q33 by experience of the different Funds: % of respondents considering the programmes/funds add value to differing extents compared to national or regional policies**

	<b>ERDF-CF</b>	<b>ESF</b>	<b>EGF</b>	<b>FEAD</b>	<b>EaSI</b>
a) To a large extent	47.9	46.2	50.6	40.2	55.3
b) To a fairly large extent	31.9	33.8	32.9	29.1	27.3
c) To some extent only	17.4	17.5	12.7	25.5	13.8
d) Not at all	1.5	1.2	2.5	1.5	2.2
e) Don't know	1.4	1.3	1.3	3.6	1.5
Total	100.0	100.0	100.0	100.0	100.0
Cases*	2,866	2,225	79	333	275

\* total by fund is more than the total of valid answers as respondents could indicate experience of more than one Fund.

Source: Applica-Ismeri Europa analysis of consultation responses

There was also not much difference in the answers given by individuals and by organisations, though the latter had a slightly more favourable view than the former of the added-value of policy (Table 14).

**Table 14 - Q33 by type of respondent: % of respondents considering the programmes/funds add value to different extents compared to national or regional policies**

	<b>Individuals (%)</b>	<b>Professional capacity or organisation (%)</b>
a) To a large extent	43.6	44.6
b) To a fairly large extent	29.5	34.1
c) To some extent only	21.8	18.4
d) Not at all	2.4	0.8
e) Don't know	2.8	2.1
Total	100.0	100.0
Responses (n.)	1,803	2,045

Source: Applica-Ismeri Europa analysis of consultation responses

**Table 15 - Q33 by type of detailed respondent: % of respondents considering the programmes/funds add value to different extents compared to national or regional policies**

	<b>To a large extent</b>	<b>To a fairly large extent</b>	<b>To some extent only</b>	<b>Not at all</b>	<b>Don't know</b>	<b>Total</b>	<b>No. of cases</b>
Individuals	43.6	29.5	21.8	2.4	2.8	100	1,803
Private enterprise	35.2	36.0	25.6	0.8	2.4	100	125
Professional consultancy, law firm, self-employed consultant	38.0	26.9	30.6	3.7	0.9	100	108
Trade, business or professional association	37.5	41.4	20.3	0.8		100	128
NGO, platform or network	42.3	34.3	19.6	1.9	1.9	100	312
Research and academia	39.7	39.7	15.5	0.9	4.3	100	116
Churches and religious communities	44.3	16.4	36.1		3.3	100	61
Regional or local authority (public or mixed)	50.2	34.9	12.9	0.3	1.7	100	697
International or national public authority	50.6	36.3	12.5		0.6	100	160
Other	42.6	31.4	22.2	0.3	3.6	100	338
<b>Total</b>	<b>44.2</b>	<b>31.9</b>	<b>20.0</b>	<b>1.5</b>	<b>2.4</b>	<b>100</b>	<b>3,848</b>

Source: Applica-Ismeri Europa analysis of consultation responses

In terms of the types of organisation responding, 'Private enterprises', 'Professional consultancies and law firms', and 'Churches and religious communities' had a below average opinion of the added-value of cohesion policy, while Public authorities, both local or regional and national or international had the most positive view of this (Table

15). This is in line with the view of respondents from these different types of organisation of the relative success of policy in addressing the different challenges, as described above.

Respondents from Austria, Croatia, Romania and Italy had the least positive opinion of the added-value of cohesion policy (30% or more indicating that the Funds added value only to some extent or not at all compared to national or regional policies) (Table 16). Respondents from Denmark, Lithuania, Luxembourg, the UK, Greece, Poland and Slovenia had the most positive opinion (over 85% in each case signalling that the Funds added value to a large or fairly large extent compared to national or regional policies).

The differences in this respect are to some extent in line with those indicated above with regard to the views in the different countries on the success of the Funds in addressing the various challenges. In particular, respondents in Italy consider the Funds to be both less successful in meeting challenges and in adding value than those in all other countries, while those in Denmark (and Luxembourg) have more favourable views of both than in most other countries. However, the replies to the two questions are less in line with each other in Romania, where respondents were among the most sceptical about the added-value of the Funds but had a relatively favourable view of the success of policy in addressing the different challenges. The same is true, if to a lesser extent, of respondents from non-EU countries.

**Table 16 - Q33 by country: % of respondents considering the programmes/funds add value to different extents compared to national or regional policies**

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know	Total	No. of cases
Denmark	59	35		6		100	17
Lithuania	33	56			11	100	9
Luxembourg	56	33	11			100	9
UK	65	23	13			100	31
Greece	46	41	11	2		100	63
Poland	53	33	11	1	3	100	536
Slovenia	24	62	15			100	34
Ireland	31	54	8		8	100	13
Latvia	61	24	10	2	3	100	203
France	50	34	15	1	1	100	356
Portugal	58	26	7	4	5	100	84
Finland	55	28	15	1	1	100	100
Sweden	55	27	14		4	100	56
Malta	60	20		20		100	5
Czech Republic	31	48	18	2	2	100	131
Germany	42	37	18	1	2	100	274
Spain	49	30	18	2	1	100	239
Bulgaria	45	33	16	4	2	100	100
Hungary	48	29	20	3		100	94
Slovakia	45	32	22		2	100	60
Belgium	40	36	18	1	4	100	210
Cyprus		75		25		100	4
Estonia	50	25	25			100	8
Netherlands	36	38	19	5	2	100	98
Austria	23	46	30			100	56
Croatia	25	41	30	2	2	100	44
Other countries	29	37	20	2	12	100	51
Romania	34	30	30	4	2	100	122
Italy	36	25	35	1	3	100	841
<b>Total</b>	<b>44</b>	<b>32</b>	<b>20</b>	<b>2</b>	<b>2</b>	<b>100</b>	<b>3,848</b>

Note: Countries are ordered in terms of the % of respondents replying 'to a large extent' or 'to a fairly large extent'.

Source: Applica-Ismeri Europa analysis of consultation responses

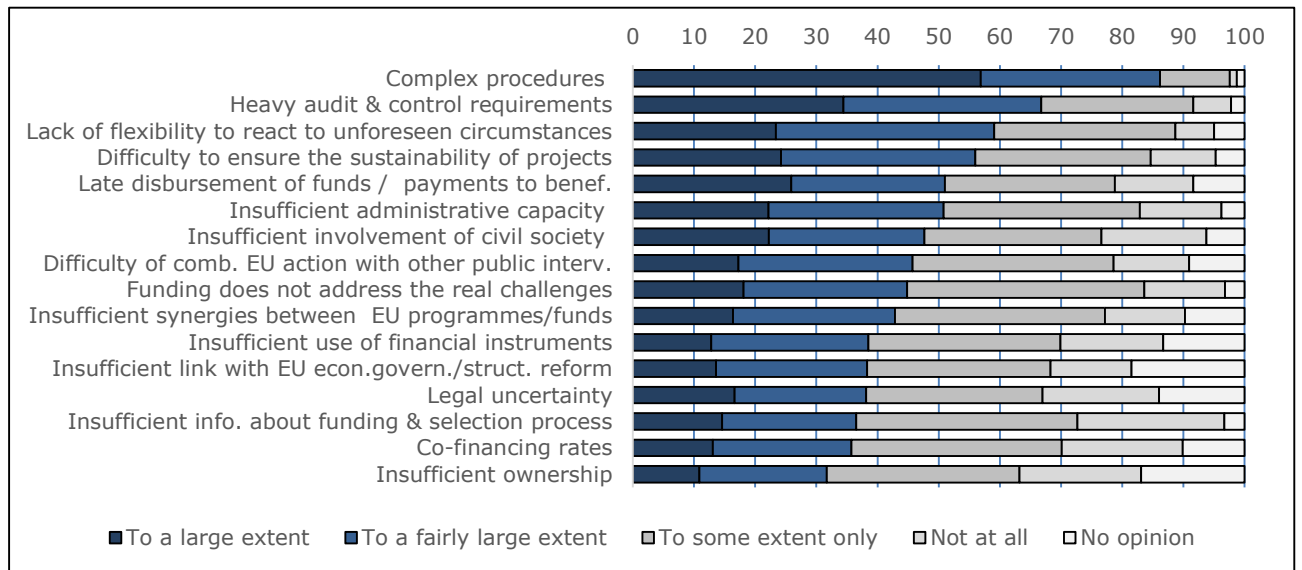
### **3.5 What obstacles prevent the achieving of the objectives**

Question 36 asked 'To what extent do you consider the following as obstacles which prevent the current programmes/funds from successfully achieving their objectives?' A number of obstacles are then listed. Some of these are, at least in principle, under the control of Member States. These include 'insufficient administrative capacity' and 'inability to ensure financial sustainability of projects'. Some, on the other hand, are under the control of the EU (or European Commission). These include 'complex procedures' and 'heavy audit and control requirements', though Member States, to some extent, have some influence over these (in the sense that in some cases, the complex procedures, audit requirements and controls are at least in part national in origin).

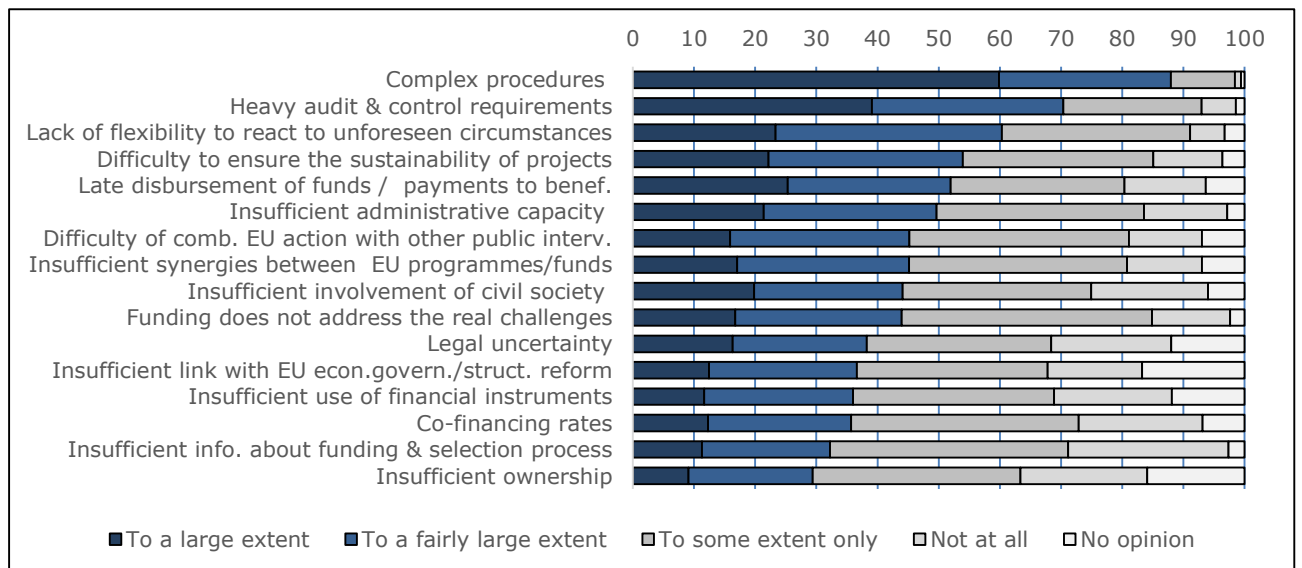
Complex procedures are seen as the most important single obstacle to cohesion policy successfully achieving its objectives. Some 58% of respondents to a large extent agreed that these are an obstacle and a further 28% (i.e. 86% in total) agreed to a fairly large extent (Figure 11). The next most important obstacle is heavy audit and control procedures with 68% agreeing to either a large or fairly large extent. This is followed by a lack of flexibility to react to unforeseen circumstances, with 60% agreeing to a large or fairly large extent that this obstructs policy. All three obstacles are to a significant extent, though not entirely, under the control of the EU. Obstacles more under the control of Member States are generally seen as being less important. Nevertheless, 57% agreed to a large or fairly large extent that the difficulty of ensuring the sustainability of projects is an obstacle to cohesion policy achieving its objectives and 52% that insufficient administrative capacity is an obstacle. At the other end of the scale, insufficient ownership of projects was regarded as the least important obstacle of those listed, with less than a third of respondents largely or fairly largely agreeing that it is important.

The opinions of respondents about the relative importance of the various obstacles identified in the questionnaire do not differ significantly between those with experience of the ERDF and/or CF and those with experience of the ESF and the other three funds (Figure 12 and 13). Overall, however, respondents with experience of the ESF attach slightly more importance to the different obstacles concerned than those with experience of the ERDF and/or CF. This is particularly the case in respect of the difficulty of ensuring the sustainability of projects (where 60% of 'ESF' respondents agreed to a large or fairly large extent that this is an obstacle as against 54% of 'ERDF' respondents). It is also the case, though to a lesser extent, in respect of late payments, insufficient administrative capacity, insufficient involvement of civil society and insufficient information on funding and the project selection process (for all of which the proportion of 'ESF' respondents regarding these as an obstacle is 4 percentage points more than for 'ERDF' respondents). All of these to a large extent are under the control of Member States, or, more precisely, Managing Authorities at regional and national level.

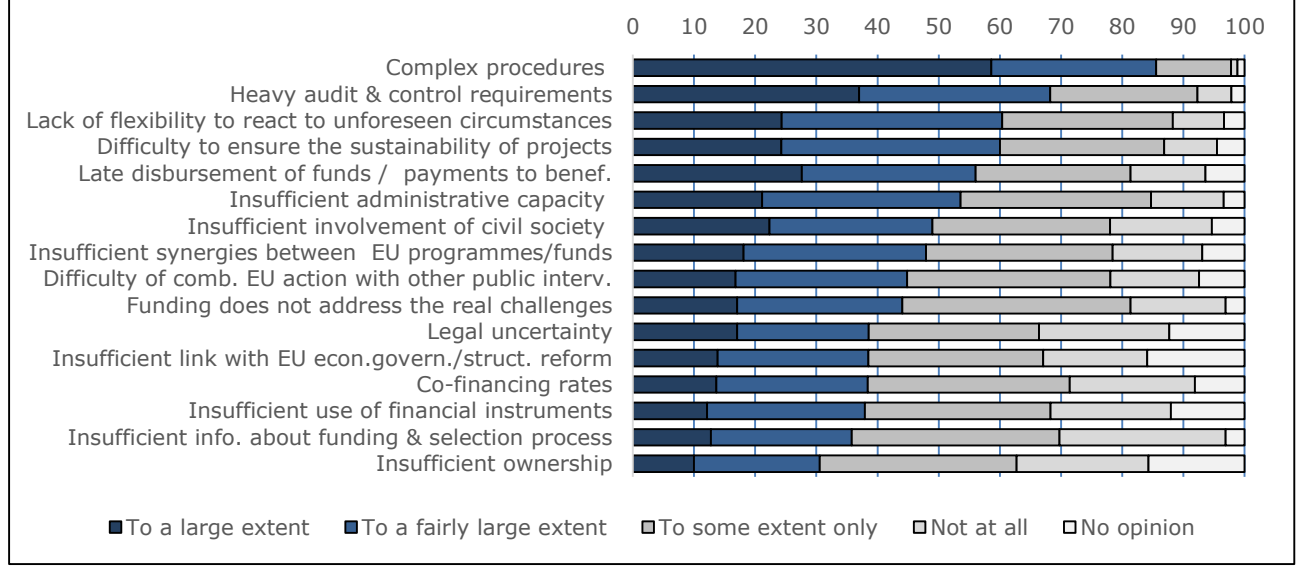
**Figure 11 - Q36 Obstacles to achieving objectives – Total (% agreeing)**



**Figure 12 - Q36 Obstacles to achieving objectives – ERDF+CF (% agreeing)**



**Figure 13 - Q36 Obstacles to achieving objectives – EMPL Funds (% agreeing)**



There are some differences in views about the importance of the various obstacles according to the experience of respondents of the different Funds or programmes. In particular, a smaller proportion of those with experience of the FEAD and EaSI attached importance to complex procedures and heavy audit requirements than those with experience of the other Funds (Table 17). Conversely, however, a significantly larger proportion of those with experience of these two Funds viewed the difficulty of ensuring the financial sustainability of projects, delays in payment, insufficient capacity to manage programmes and the insufficient involvement of civil society in programme design and implementation as important obstacles. This suggests that these two programmes operated in a somewhat different way than the other programmes or that those involved in the programmes differ.

**Table 17 - Q36 by experience of the different Funds: % of respondent agreeing to a large or fairly large extent that particular obstacles they are important**

<b>OBSTACLES</b>	<b>ERDF+ CF</b>	<b>ESF</b>	<b>FEAD</b>	<b>EGF</b>	<b>EaSI</b>
Complex procedures	88.0	88.8	72.6	89.7	73.6
Heavy audit and control	70.4	71.1	56.1	75.6	57.7
Lack of flexibility to react to unforeseen circumstances	60.4	61.6	51.3	64.1	59.9
Difficulty to ensure the financial sustainability of projects	53.9	56.6	72.8	61.5	72.4
Late disbursement of funds/delays in payments to beneficiaries	51.9	54.6	60.0	49.4	64.7
Insufficient administrative capacity to manage programmes	49.6	51.3	58.3	43.4	69.4
Insufficient involvement of civil society in design and implementation	44.1	45.5	61.3	38.5	66.2
Difficulty of combining EU action with other public interventions	45.2	44.8	43.5	46.8	46.1
Available funding does not address the real challenges	43.9	44.1	40.8	47.4	46.7
Insufficient synergies between the EU programmes/funds	45.1	46.4	49.1	59.7	55.5
Insufficient use of financial instruments	35.9	37.6	37.7	38.5	41.2
Insufficient linkages with EU economic governance and structural reforms	36.6	37.7	40.6	41.0	41.8
Legal uncertainty	38.2	39.9	32.0	37.2	35.9
Insufficient information about funding and selection process	32.2	34.3	37.6	36.4	45.2
Co-financing rates	35.7	38.3	33.6	42.3	43.5
Insufficient ownership	29.4	30.5	28.3	27.3	35.1

Note: Countries are ordered in terms of the % of total respondents agreeing 'to a large extent' or 'to a fairly large extent'.

Source: Applica-Ismeri Europa analysis of consultation responses

Although opinions are to a large extent similar between different types of respondent as to the relative importance of the different obstacles, there are also a few differences. While individuals and respondents from nearly all types of organisation considered complex procedures to be the most important obstacle to cohesion policy achieving its objectives (in the sense that a larger proportion than for the other obstacles agreed to a large or fairly large extent that this is an obstacle), this is not the case for 'Churches and religious communities'. 'Regional or local authorities' and 'Business and trade associations', in particular, regarded complex procedures as the main obstacle (Table 18). For most types of organisation, again excluding 'Churches and religious communities', heavy audit and control requirements are the second most important obstacle. For 'Churches and religious communities', the insufficient involvement of civil society is the main obstacle, followed by the difficulty of ensuring the financial sustainability of projects. At the other end of the scale, the insufficient ownership of projects is regarded by respondents from most types of organisation as the least important obstacle.

**Table 18 - Q36 % of respondents agreeing to a large or fairly large extent that various obstacles are important by type of respondent**

	Individual	Churches and religious communities	International or national public authority	NGO, platform or network	Private enterprise	Professional consultancy, law firm....	Regional or local authority (public or mixed)	Research and academia	Trade, business or professional association	Other
Complex procedures	83.9	60.3	88.1	84.7	84.9	90.5	92.2	86.1	93.8	85.8
Heavy audit and control requirements	62.7	43.9	66	67.1	66.9	76	79.9	64.9	78.9	74.5
Available funding does not address the real challenges	45.4	39.3	36.6	54.9	46.7	51.4	41.4	49.6	36.5	37.5
Insufficient administrative capacity to manage programmes	53.5	63.2	40.1	55	52.1	66.3	43.5	51.3	51.2	54.1
Insufficient information about funding and selection process	41.2	40.4	23.6	41.6	41.2	36.2	23.4	32.2	33.6	29.1
Lack of flexibility to react to unforeseen circumstances	58.6	35.7	52.8	59.5	57.6	64.4	62.8	59.6	65.6	57.9
Difficulty of combining EU action with other public interventions	47.6	37.5	45	45.6	51.7	45.3	43.9	43.9	46	37.8
Insufficient synergies between the EU programmes/funds	42.5	32.7	47.5	55.3	41.2	41	48.1	49.6	49.2	39.9
Difficulty to ensure the financial sustainability of projects	59.4	70.7	52.5	66.6	51.7	56.2	43	66.7	52.4	62.1
Insufficient use of financial instruments	41	38.6	22	38.7	42.7	41.9	30.4	31.6	36.8	33.2
Co-financing rates	34.4	28.1	25.6	53.1	39	31.7	34.8	49.1	36.6	39.2
Late disbursement of funds/delays in payments	50	68.4	37.3	66.4	53.8	59.4	53.6	44.2	57.7	53.5
Insufficient linkages with EU governance and structural reforms	41.1	31.6	25	42.8	37.3	44.3	30	25.4	38.4	32.1
Legal uncertainty	38.5	28.6	29.4	37.6	30.5	43.8	42.9	16.7	39.5	36.5
Insufficient ownership	36.8	21.4	26.1	30.1	29.3	34.9	25.3	16.1	20.8	25.3
Insufficient involvement of civil society in design and implementation	52.7	73.2	26.9	64.2	43.2	59.4	32.8	37.2	36.9	42

Source: Applica-Ismeri Europa analysis of consultation responses

In 492 cases, respondents also identified other obstacles which can prevent the programmes and funds achieving their objectives. These in many cases were much the same as the obstacles listed in the questionnaire but phrased in a slightly different way. A few, however, were additional. These included, in particular, corruption and a lack of transparency in managing the Funds, a lack of strategy and priority setting in their allocation and a lack of integration of the Funds.

### **3.6 What would help to simplify and reduce administrative burdens**

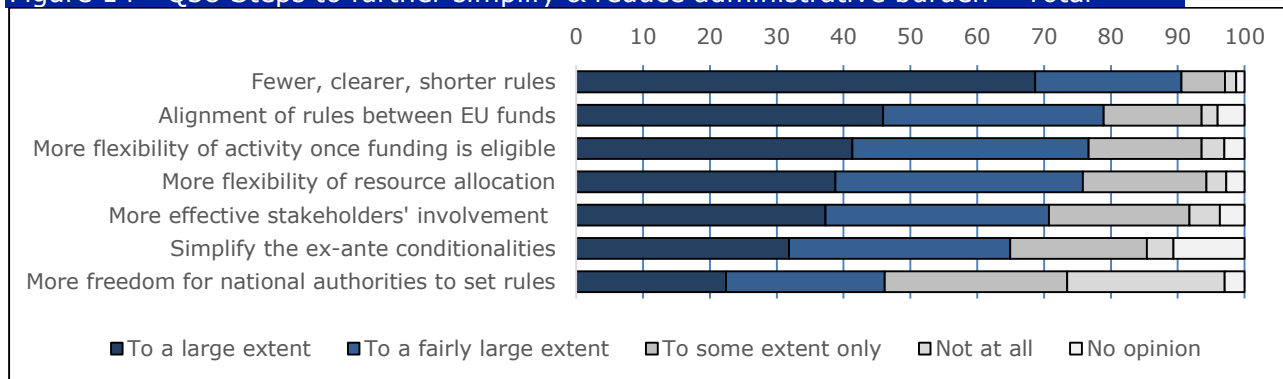
Question 38 asked 'To what extent would these steps (i.e. those listed in the question) help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?'. The most frequent choice of 'steps' among the options given in the questionnaire, was 'Fewer, clearer, shorter rules', 69% of the respondents indicating that this would help to simplify and reduce administrative burdens 'to a large extent', while another 22% considered that it would reduce them 'to a fairly large extent' (Figure 14). Only 8% of respondents thought that this step would reduce them only to some extent or not at all.

The second more frequent choice among the options was 'alignment of rules between EU funds', with 79% of respondents regarding this as a step which would help to

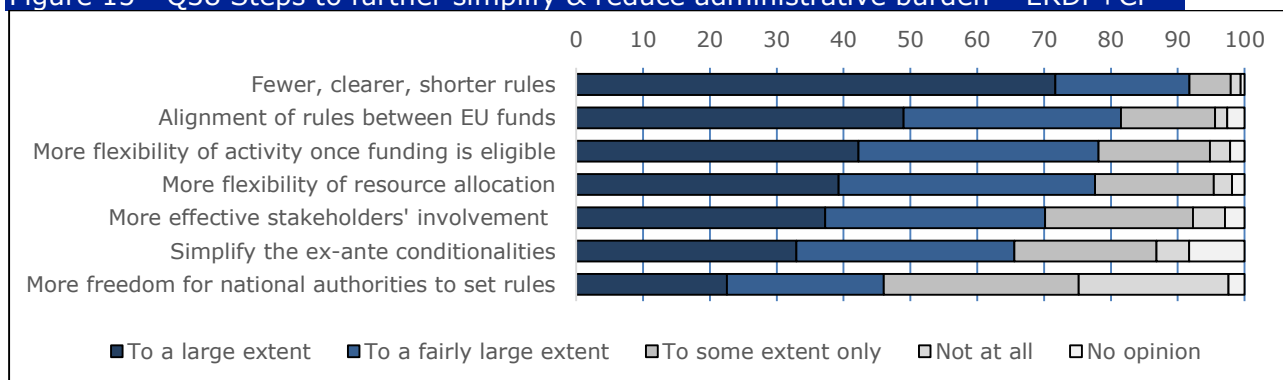
simplify and reduce administrative burdens either to a large extent or to a fairly large extent.

The least frequent choice, interestingly, was 'more freedom for national authorities to set rules', which over half of respondents thought would help to simplify and reduce burden only to some extent or not at all.

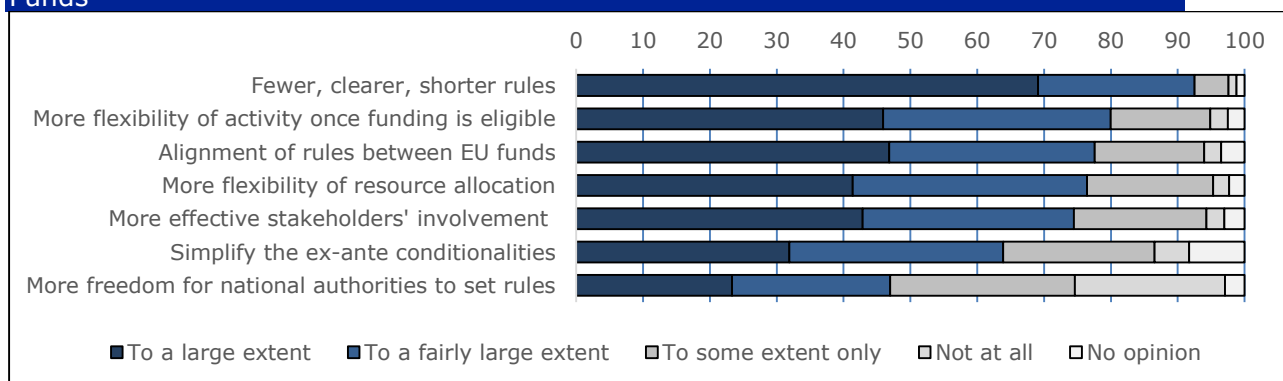
**Figure 14 - Q38 Steps to further simplify & reduce administrative burden – Total**



**Figure 15 - Q38 Steps to further simplify & reduce administrative burden – ERDF+CF**



**Figure 16 - Q38 Steps to further simplify & reduce administrative burden – EMPL Funds**



The views on the relative importance of the different steps of respondents with experience of the ERDF and/or CF are again much the same as those of respondents with experience of the ESF and/or the other three funds (Figure 15 and 16). The main difference, though small, is that a larger proportion of 'ERDF' respondents considered that aligning the rules between Funds was important than did 'ESF' respondents. Conversely, more respondents in the 'ESF' group regarded the more effective involvement of stakeholders to be important than in the 'ERDF' one. For both groups, more freedom for national authorities to set rules was considered by some way as the least important step.

Sub-dividing respondents more finely in terms of their experience of the different funds or programmes once again shows more of a difference. In particular, while there

is common agreement that fewer, clearer and shorter rules are the most important step, respondents with experience of the FEAD and EaSI attached less importance than others to the alignment of rules between funds, more flexibility to allocate resources and the simplification of ex ante conditionalities (Table 19). Conversely, they attached more importance to stakeholders being more effectively involved, whereas those with experience of the EGF regarded this as being much less important than other respondents and giving more freedom to national authorities to set rules as more important. Even for this group, however, this step was considered the least important of those listed in the questionnaire.

**Table 19 - Q38 by experience of the different Funds: % of respondents considering steps would simplify and reduce administrative burdens to a large or fairly large extent**

<b>SIMPLIFICATION NEEDS</b>	<b>ERDF+ CF</b>	<b>ESF</b>	<b>FEAD</b>	<b>EGF</b>	<b>EaSI</b>
Fewer, clearer, shorter rules	91.8	92.5	94.7	94.9	89.6
Alignment of rules between EU funds	81.5	80.6	64.0	79.5	68.1
More flexibility of activity once funding is eligible	78.2	79.7	82.6	79.5	79.6
More flexibility of resource allocation to respond to unexpected needs	77.6	78.6	67.6	83.3	67.2
More effective stakeholder involvement	70.2	72.6	83.1	60.3	83.9
Simplify ex-ante conditionalities	65.5	66.8	52.5	67.9	52.4
More freedom for national authorities to set rules	46.0	48.2	44.2	55.1	37.5

Note: Countries are ordered in terms of the % of respondents agreeing 'to a large extent' or 'to a fairly large extent'.

Source: Applica-Ismeri Europa analysis of consultation responses

In most cases, similar opinions were also expressed by different types of respondent as to the relative importance of the various steps (Table 20). In particular, individuals and respondents from all types of organisation considered 'fewer, clearer and shorter rules' to be the main step, in the sense that a larger proportion thought that this would reduce administrative burdens than for the other steps. In addition, respondents from most types of organisation regarded giving more freedom to national authorities to set rules as the least important step of the ones specified.

**Table 20 - Q38 % of respondents considering steps would simplify and reduce administrative burdens to a large or fairly large extent by type of respondent**

	<b>Individual</b>	<b>Churches and religious communities</b>	<b>International or national public authority</b>	<b>NGO, platform or network</b>	<b>Private enterprise</b>	<b>Professional consultancy, law firm...</b>	<b>Regional or local authority</b>	<b>Research and academia</b>	<b>Trade, business or professional association</b>	<b>Other</b>
Alignment of rules between EU funds	78.9	53.6	72.8	83.2	70.9	78.5	83.8	78.3	79	71.4
Fewer, clearer, shorter rules	89.1	89.5	90.7	91.6	89.7	89.8	96.4	93	94.4	92.6
More freedom for national authorities to set rules	40.6	38.6	63	35	40.7	37.4	55.3	52.6	54.8	54.8
More flexibility of activity once funding is eligible	71.6	86	75.2	82.4	84.5	74.8	86	87.8	83.2	83.9
More flexibility of resource allocation	71.1	52.6	76.5	79.4	77.4	65	84.3	82.6	83.9	82.2
Simplify ex-ante conditionalities	61.1	35.1	68.3	60.1	68.1	59.8	72.1	60.2	67.7	67.3
More effective stakeholder involvement	71.3	78.6	58.1	86.4	69	76.4	64.9	71.3	79	74.2

Source: Applica-Ismeri Europa analysis of consultation responses



In 462 cases, respondents identified other steps as being important in simplifying and reducing administrative burdens in addition to those listed in the questionnaire. The most frequently mentioned actions were the 'simplification of rules', which, in practice, is similar to 'fewer, clearer and shorter rules' listed in the questionnaire, the 'harmonisation of rules and tools', which in some degree combines a few of the steps listed, and 'coordination among actors', which is a slightly different action to those listed. Other actions suggested were 'improved administrative capacity', 'changes in the system of controls' and 'more flexibility in the management of the funds'.

#### 4 ANALYSIS OF OPEN QUESTIONS

The questionnaire for the consultation included four open questions, each of them allowing a maximum length of reply of 1,500 characters (around half page). Three open questions were on specific issues:

- the added value of cohesion policy in comparison to national policies (no. 34),
- the principal objectives of cohesion policy (no. 35),
- the synergies between programmes or funds (no. 40).

In each case, respondents were asked to indicate to which policies, programmes and/or funds the response related. The fourth open question (no. 42) was a general one enabling respondents to add any further points or information they wished to.

The analysis of the open questions is intended to summarise both the main points made and the issues covered.

The number of replies received which were relevant and could be analysed varied from 2,170 to the first question above to 602 to the open question (Table 21). Given this large number and the limited time available to review them, the summary relies on combining the actual reading of the replies with computerised text analysis. More specifically, the approach involves, first, analysing all the replies to each of the open questions using computer-assisted methods and, secondly, examining in-depth a sample of the replies guided by the results of this analysis<sup>1</sup>.

Table 21 shows the number of replies analysed in each open question. Some replies were not included in the analysis because they were not usable (for instance, not readable or without a clear meaning or referring to previous answers).

**Table 21 - Number of replies to open questions**

	Open questions			
	Q 34	Q 35	Q 40	Q 42
Total replies	2,441	1,885	1,742	647
Replies analysed	2,170	1,647	1,441	602

Note: The replies received that were not analysed were unreadable, without a clear meaning or not relevant in that they did not relate to the question.

Source: Applica-Ismeri Europa analysis of consultation responses

##### 4.1 Preliminary remarks

Before presenting the results of the analysis, it should be noted that in replying to the open questions, many respondents took the opportunity to give a general point of view on cohesion policy or to comment on particular issues irrespective of whether they related to question asked. As a result, respondents often repeated the same ideas in different replies so that the responses were similar. This partly explains why the number of replies progressively declines as questions are answered, in that respondents considered that they had already made the point they wished to make in replying to the first or second question. In some cases, they explicitly stated that this was the case.

<sup>1</sup> The approach to the analysis of open questions is described in more detail in the methodological annex.

From the analysis of responses, a number of interest groups are evident, in that the points raised are similar but expressed in a different way. Accordingly, they cannot really be labelled as 'campaigns'. The interest groups which are most apparent relate to ETC and cross-border cooperation, the Leader initiative (though it is not directly relevant to the consultation), Community-Led Local Development (CLLD), and social and inclusion policy.

In addition, some responses raised a number of different points and in a summary analysis, it is difficult to cover all the different dimensions of a reply, especially when using computer-assisted methods. The analysis, therefore, focuses on the most frequent and significant points made.

It should also be noted that many replies reveal an evident desire to communicate with the Commission and to debate and exchange opinions with policy-makers.

#### **4.2 Outline of analysis**

In the following four sections, the main themes covered by the responses to the four open questions are described, each section contains:

- a) a brief introduction outlining the main results from examining the replies to the question concerned;
- b) a graph indicating the main themes to emerge from the computer assisted analysis;
- c) a description of each theme, combining the information from the computer-assisted analysis with that from a direct reading of a sample of replies.

##### **How to read the graphs indicating the main themes**

In the computer-assisted analysis, the common themes of the replies are identified as clusters or combinations of words. The graph shows the themes covered in the replies from an analysis of combinations of words. This is done through factorial analysis, which creates synthetic combinations of the most used sequence of words and summarises them in few variables. The two variables which best summarise the words contained in the replies are used as the two axes in the graph.

The two axes do not, therefore, depict two traditional quantitative variables but two series of interlinked concepts and enable the relative semantic 'distance' between the themes in terms of the meaning to be visualised. For instance, an axis might go from the 'social' dimension of development at one end to the 'economic' dimension at the other, or another from how to implement cohesion policy to what to implement. The size of the circle in the graphs indicates the number of replies, which relate to the theme concerned.

Clearly, in this way the complexity of the replies received is simplified and only partly represented, but it allows the themes to be depicted in a two-dimensional form and provides a visual indication of the relationship between them.

#### **4.3 Analysis of the replies to Question 34**

There was a large number of (usable) replies to Question 34 (*'Please explain how the current programmes/funds can add value compared to what Member States could achieve at national, regional and/or local levels'*) and a wide range of opinions were expressed. Respondents generally recognised the added value of cohesion policy in comparison to national and regional policies, confirming the positive views indicated by the multiple-choice question (no.33).

The text analysis identified seven main themes based on the co-occurrence of particular keywords relating to the added value of cohesion policy. These themes are:

- T\_1 Common goals and rules
- T\_2 Territorial cooperation
- T\_3 Networking and exchanges
- T\_4 A more social and inclusive society
- T\_5 Policy innovation

- T\_6 Economic development and territorial cohesion
- T\_7 Financial support

Figure 17 shows these themes in a visual form, the size of each circle being proportional to the frequency of answers relating to the theme in question and the distance between the circles reflecting the closeness of the views expressed.

The circles, located on the right side of the graph (quarters 1 and 4), represent themes which relate the added-value of cohesion policy to the way that it is implemented (e.g. with common goals and rules, transnational cooperation, networking and exchanges). The circles on the left side of the graph (quarters 2 and 3), represent themes which link added-value to the specific objectives of policy, ranging from economic development and sustainable growth (quarter 2) to social aspects (quarter 3).

Figure 17 - Q34 Added value of current EU programmes/funds

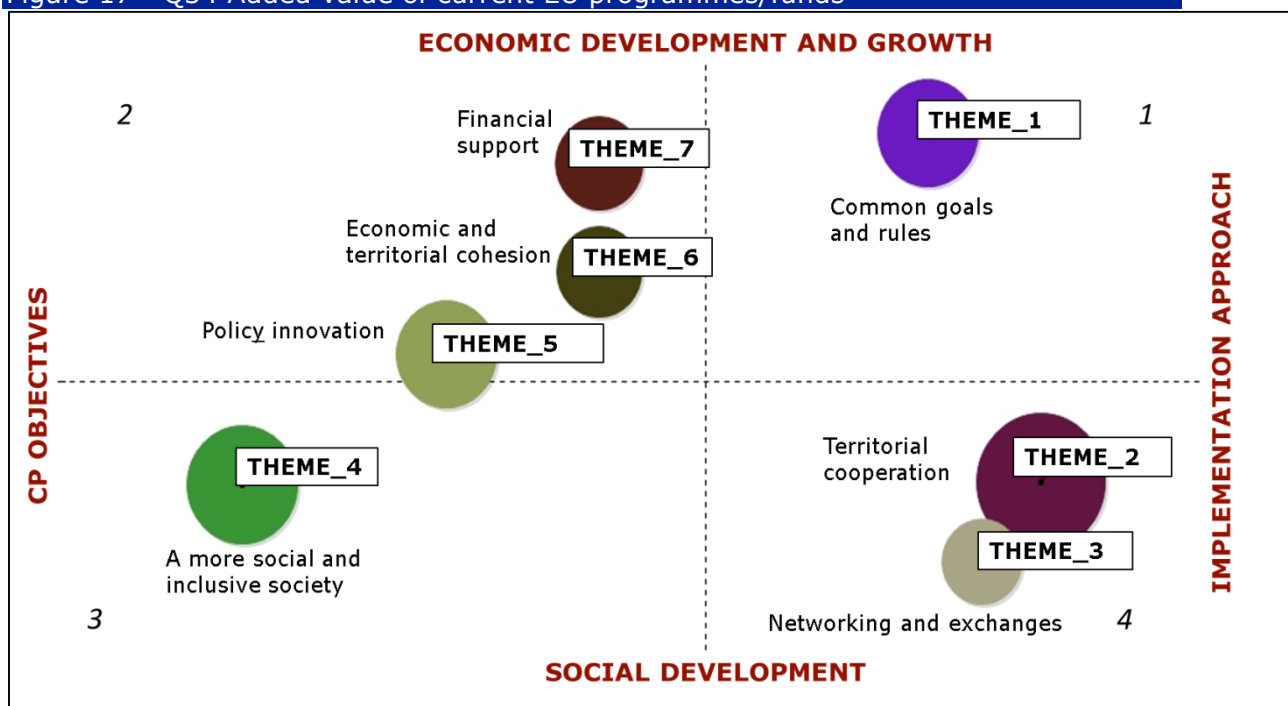
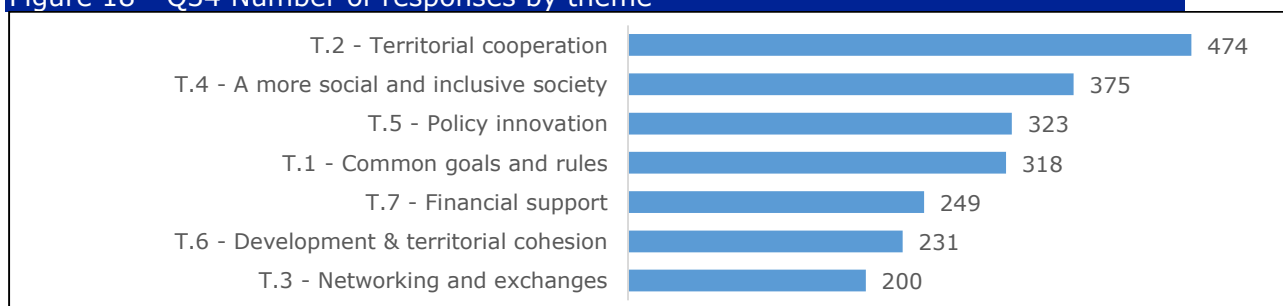


Figure 18 shows the number of responses grouped under each theme.

Figure 18 - Q34 Number of responses by theme



The themes referred to by respondents with experience of ERDF and/or CF and those with experience of the ESF and the other social funds are similar, except for 'Territorial cooperation', which is referred to significantly more by the former than by the latter, and 'Policy innovation', which is referred to more by EMPL respondents than ERDF ones (Table 22).

Table 22 - Q34 Responses by theme and experience of the EU Funds

Themes	% of total responses	
	ERDF+CF	EMPL funds
T_1 Common goals and rules	78.9	64.8

T_2 Territorial cooperation	93.2	52.3
T_3 Networking and exchanges	83.0	58.5
T_4 A more social and inclusive society	60.3	77.6
T_5 Policy innovation	80.2	84.5
T_6 Economic development and territorial cohesion	87.4	60.2
T_7 Financial support	81.5	66.3
<b>Total</b>	<b>80.6</b>	<b>66.3</b>

Source: Applica-Ismeri Europa analysis of consultation responses

The frequency with which themes are referred to does not vary greatly between types of organisation (Table 23). However, Regional and local authorities referred more than others to 'Economic and territorial cohesion' and 'Territorial cooperation', as might be expected, though NGOs also referred relatively frequently to the latter, while individuals referred more than others to 'Common goals and rules'.

**Table 23 - Q34: Respondents by theme and by type of organisation**

	% of total responses							
	T_1 Common goals and rules	T_2 Territorial cooperation	T_3 Networking and exchanges	T_4 A more social and inclusive society	T_5 Policy innovation	T_6 Economic and territorial cohesion	T_7 Financial support	Total
Individual	49.1	32.3	47.5	41.9	37.8	38.5	45.4	40.8
Type of organisation:								
Churches and religious communities	0.3	0.4	1.0	1.3	0.6	0.0	0.0	0.6
International or national public authority	4.1	7.0	1.0	6.1	3.1	7.8	6.4	5.3
NGOs, platform or network	10.4	14.3	10.0	10.7	8.4	6.5	7.2	10.2
Private enterprise	2.5	2.5	1.5	4.3	2.5	1.7	2.8	2.7
Professional consultancy, law firm, ...	4.1	2.1	4.5	1.6	5.0	2.6	2.8	3.1
Regional or local authority (public or mixed)	19.5	26.8	17.0	14.1	22.9	27.3	22.9	21.7
Research and academia	1.6	4.2	6.0	2.4	2.5	2.6	3.2	3.1
Trade, business or professional association	2.2	3.0	4.0	4.3	5.0	6.1	4.0	3.9
Other	6.3	7.4	7.5	13.3	12.4	6.9	5.2	8.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

The specific points covered under each of these themes are summarised below.

***T\_1 Common goals and rules: the added value of cohesion policy is linked to promoting effective and efficient public investment.***

This theme includes answers focusing on the rules and procedures of ESI Funds. According to respondents, the added-value of cohesion policy lies in the set of common objectives and rules that requires high institutional standards (transparency, evidence-based policies) and which leads to the investment financed being more efficient and effective than for national or regional policies.

Many respondents also argue that cohesion policy has strengthened the institutional capacity of the bodies responsible for managing the funds and that the ESI Fund programmes are, in general, a good example of planning, management and control of public resources.

*'Cohesion policy promotes through its rules a level of efficiency and effectiveness of investments higher than many Member States could achieve on their own, which also has positive effects on the management of national funds.'*

However, many respondents equally state that cohesion policy would have been much more effective and efficient if rules for managing and implementing funds had been simpler and clearer. Common guidelines, simplified rules of management, reporting and control and a greater flexibility in combining and integrating different policies and means of financing, accordingly, might have had larger positive effects on regions. To this end, a number of respondents advocated that future programmes should radically

simplify procedures, facilitate access to funding for small and local players and concentrate their efforts on results.

***T\_2 Territorial cooperation: knowledge exchange between countries and regions is an important feature of cohesion policy added-value***

A large number of respondents state that transnational and cross-border cooperation initiatives are a clear example of the added-value of the cohesion policy, facilitating the transfer of knowledge and exchange of good practice and helping to reduce the gap between regional economies by allowing lagging regions to tap into measures applied in more developed ones. They are also said to promote joint initiatives to address common challenges (energy security, climate change adaptation and mitigation, water management and safeguarding biodiversity), support investment in areas that have significant cross-border spill-over effects (such as innovation and sustainability) and facilitate common infrastructure and public services (health, emergency services). It is argued that in many cases these initiatives would not have been taken without EU support (*'without the Peace Programme there would be no opportunity for cross border and cross community engagement programmes to take place'*).

***T\_3 Networking and exchanges: added-value is also linked to the exchange of good practice within countries***

According to respondents, EU added-value derives from opportunities for cooperation and partnership, as well as the exchange of good practice within EU programmes

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*'Added-value can be found in the exchange and sharing of good practice among different regions and countries.'*

---

Networking and exchanges are, therefore, seen not only to stem from transnational and cross-border cooperation but also more generally from programmes carried out in different regions within countries (resulting in a *'rise in project quality, networking, and capitalisation of exemplary projects'*).

***T\_4 A more social and inclusive society: the contribution to social integration and a more inclusive Europe is considered an important feature of cohesion policy added-value***

Many respondents refer to the ESI Funds helping to reduce unemployment, promote high-quality jobs and support worker mobility. (*'More people can benefit from support than without EU funds. Employment is increased through co-financing for people to start their own business.'*)

Cohesion policy and the additional resources provided have made it possible to carry out numerous social initiatives across the EU, so helping to combat poverty and to support people with disabilities and those at risk of social exclusion. ESI Funds, it is argued, have also contributed to the spread of common values, such as equality and non-discrimination, while in education, they have supported the development of scientific infrastructure, traineeships and the growth of student numbers.

***T\_5 Policy innovation: an essential feature of EU added-value is related to the support given to policy experimentation and innovation***

According to respondents, ESI Funds have made it possible to implement innovative and experimental initiatives that could not have been supported to the same extent by national policy alone.

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*'ESI Funds are more than a mere financial compensation policy; they are an important impulse for new policy approaches'. and 'through their innovative approaches, their coherence, their operating methods, their governance methods, the Cohesion Funds raise the standards of public policies to high levels, including for France'*.

---

Reference to innovative policy experiments is made in relation to both the ESF, in respect of labour market and social inclusion measures, and the ERDF, in areas such as urban development, research and infrastructure. In a number of cases, respondents cite specific initiatives undertaken at regional or national level.

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*'ESI Funds can make it possible to implement innovative territorial projects.'* and there is *'the possibility to test innovative approaches and new concepts (...) in particular in the area of labour market policy and the inclusion of disadvantaged target-groups in the VET system'*.

---

#### **T\_6 Economic and territorial cohesion: added-value also stems from cohesion policy reducing regional disparities and facilitating convergence**

Many respondents refer to the contribution that the EU funding made to mitigating the negative effects of the global economic and financial crisis, which would have been significantly more serious without EU support.

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*'The lack of cohesion policy funds would mean a drastic inhibition of public investment, thereby slowing economic development and inhibiting the cohesion process'*.

---

Since the crisis, cohesion policy is held to have helped ensure budgetary stability, support public investment, generate economic growth and restore the confidence of private investors (*'adaptation of European policies to real national needs following the economic crisis of recent years'*). It is also argued to have been the most important means of supporting the economic and social development of European regions and of undertaking initiatives aimed at meeting local needs. A number of respondents pointed out, in addition, that at a time of growing euro-scepticism, cohesion policy is a fundamental demonstration of EU added-value.

#### **T\_7 Financial support: EU added-value is related as well to the leverage effect of cohesion policy on public and private investment**

According to numerous respondents, added-value is seen in the financial support that cohesion policy gives to regional and national policies, that the funding for national policies would have been much smaller in many cases without the support provided.

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*'It seems to me that Poland would not be able to make such a financial effort to carry out so many infrastructural and social investments if it did not receive assistance under the assistance programmes'*

---

Respondents referred to various policy areas where this is the case.

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*'Environmental and climate measures are almost entirely financed from the structural funds in Hungary'; and 'European co-financing makes it possible to meet different objectives - training, infrastructure, research - that national or local policies alone could not have supported'*.

---

### **4.4 Analysis of the replies to Question 35**

There were 1,647 usable replies to Question 35 (*Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable?*) which referred to a wide range of objectives. Most of them, however, related to policy areas and aims that cohesion policy already addresses.

The automated text analysis identified six broad themes from the co-occurrence of keywords

- T\_1 Environment, energy, sustainable urban development
- T\_2 Territorial competitiveness: SMEs and tourism
- T\_3 Combating poverty and promoting social inclusion
- T\_4 Education and employment
- T\_5 Administrative simplification
- T\_6 Transregional cooperation

These are displayed in Figure 19, which is constructed in the same way as Figure 17 above with the circles proportional to the number of replies referring to the theme concerned. The circles in the top part (quarters 1 and 2) are topics relating to economic development and sustainable growth and are mainly linked to the ERDF and the CF (the environment, energy, urban development, support for SMEs, etc.). Those in the bottom part on the right side (quarter 4), relate to social and education objectives, mainly addressed by the EMPL funds. The circle at the mid-left groups replies relating to transregional cooperation. Theme 4, located at the bottom left of the chart, groups responses that fall outside the scope of Q35, which focus on the need for administrative simplification rather than on the objectives of cohesion policy programmes as such.

**Figure 19 - Q35 Need for modifying (or adding) objectives of the programmes/funds**

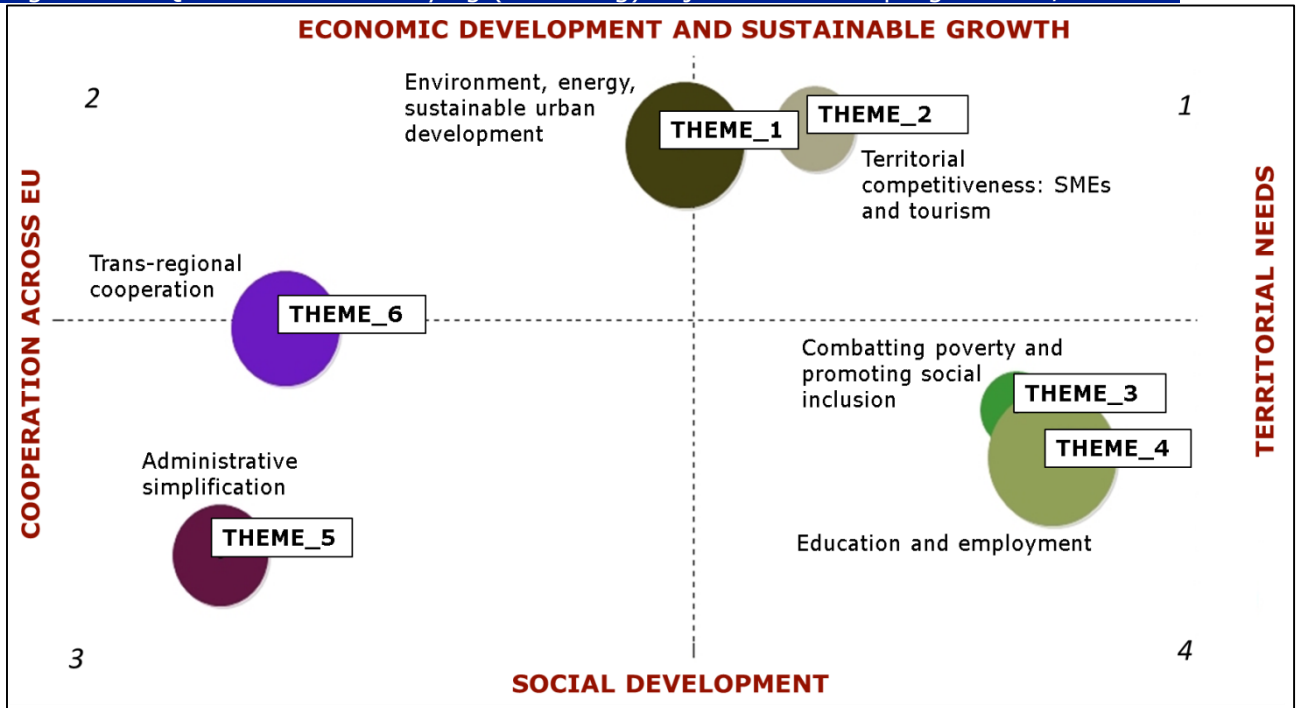
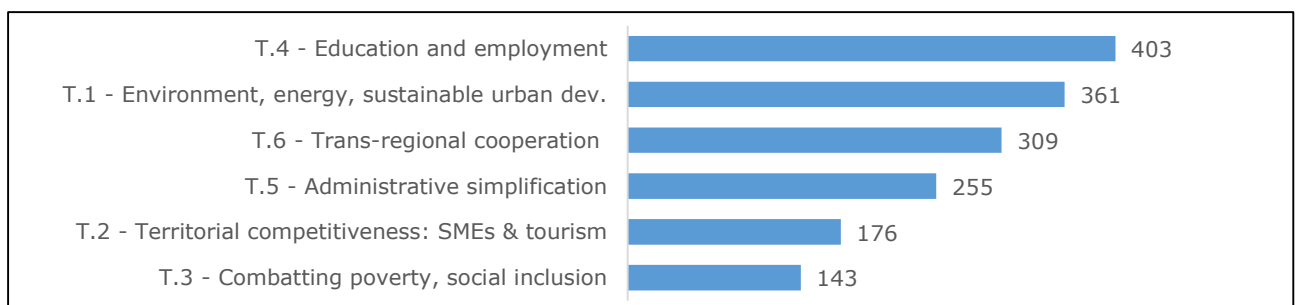


Figure 20 shows the number of responses relating to each broad theme.

**Figure 20 - Q35 Number of responses by theme**



As would be expected, respondents referring to 'Education and employment' were mainly those with experience of the EMPL funds those referring to 'Environment, energy, sustainable urban development' and 'Territorial competitiveness, SMEs and tourism' mainly those with ERDF/CF experience (Table 24).

**Table 24 - Q35 Responses by theme and experience of the EU Funds**

Themes	% of total respondents	
	ERDF/ CF	EMPL funds
T_1 Environment, energy, sustainable urban development	91.4	66.2
T_2 Territorial competitiveness (SMEs, tourism)	90.9	60.8
T_3 Combating poverty and promoting social inclusion	69.9	70.6
T_4 Education and employment	73.2	84.9
T_5 Administrative simplification	80.0	62.4
T_6 Trans-regional cooperation	89.0	52.8
<b>Total</b>	<b>82.8</b>	<b>67.5</b>

Source: Applica-Ismeri Europa analysis of consultation responses

A disproportionate number of respondents from regional or local authorities referred to 'The Environment, energy, sustainable urban development', while the same was true of individuals and NGOs in respect of 'Combating poverty and promoting social inclusion' (Table 25).

**Table 25 - Q35: Respondents by theme and type of organisation**

	%						
	T_1 Environment, energy, sustainable urban development	T_2 Territorial competitiveness (SMEs, tourism)	T_3 Combating poverty and promoting social inclusion	T_4 Education and employment	T_5 Administrative simplification	T_6 Trans-regional cooperation	Total
Individual	26,6	46,6	49,7	44,7	41,6	39,2	39,8
Type of organisation:							
Churches and religious communities	0,8	0,0	2,1	0,5	0,8	0,3	0,7
International or national public authority	10,2	3,4	5,6	3,2	4,3	3,9	5,3
NGOs, platform or network	13,9	6,8	15,4	10,7	10,2	11,3	11,4
Private enterprise	3,3	4,0	1,4	2,0	2,4	1,0	2,3
Professional consultancy, law firm, ...	1,9	2,3	2,1	2,5	5,1	3,9	3,0
Regional or local authority (public or mixed)	31,9	18,8	8,4	17,1	18,8	27,2	21,9
Research and academia	2,5	5,7	4,2	3,2	5,1	2,3	3,5
Trade, business or professional association	4,2	6,3	4,9	4,7	2,4	3,2	4,1
Other	4,7	6,3	6,3	11,4	9,4	7,8	8,0
<b>Total</b>	<b>100,0</b>	<b>100,0</b>	<b>100,0</b>	<b>100,0</b>	<b>100,0</b>	<b>100,0</b>	<b>100,0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

The points raised in the replies are summarised below.

### ***T\_1 The environment, energy, sustainable urban development***

The replies grouped under this theme mainly focus on issues relating to environmental sustainability. According to respondents, cohesion policy in future should put more emphasis on objectives such as climate change mitigation and adaptation, energy transition, biodiversity, sustainable use of natural resources and environmental protection and remediation. Research and innovation policies, it is argued, could strongly contribute to achieving these goals. EU funding, it is also argued, should be more focused on these objectives through a stronger concentration on them, through multi-fund programmes and through a wider deployment of integrated investment at local level. According to some, cities could play a key role in pursuing these aims and more attention should be paid to the urban dimension of development

*'The urbanisation trend of recent decades has made cities the key players in meeting the EU's economic, social and environmental challenges'.*

### ***T\_2 Territorial competitiveness: SMEs and tourism***

According to many respondents, tourism is one of the main levers for achieving economic growth, employment and social development at local level. In consequence,



more emphasis should be put on supporting tourism in the future programming period (especially nature and cultural tourism and environmentally and socially responsible tourism) by seeing it as a stand-alone intervention priority of cohesion policy.

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*'Tourism activity creates many different levels of employment and contributes widely to European GDP. Tourism generates income that can be used on a national and local level to better education, improve infrastructure, fund conservation efforts and promote more responsible tourism'.*

---

Respondents also identify support of innovation in SMEs (including in crafts and creative industries) as a factor for boosting territorial competitiveness (*'SMEs are seen as the backbone of the European economy'*).

---

*'It makes sense to define strategic goals and challenges beyond 2020 ...and to gear the programmes towards these goals – for example, responding to demographic change and climate change and promoting energy transition. A strong SME focus is desirable'.*

---

Accordingly, more targeted support of SMEs is advocated. In addition, there is a call for a more integrated policy approach to increase synergies between cohesion policy funds as well as between them and other EU programmes and initiatives.

### **T\_3 Combating poverty and promoting social inclusion**

A number of respondents call for the strengthening of ESF and FEAD support and funding to create a more inclusive society in the next programming period. Within the ESF, there were calls for the share of funding for initiatives to reduce poverty to be increased (to more than 20%) and a greater attention to be given to support of migrants and refugees and to their social integration

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*'In order to ensure upward social convergence and the implementation of the Pillar of Social Rights, at least 25% of the current Structural Funds resources must continue to be earmarked for the ESF.'*

---

The FEAD, it is argued, should be renewed in the next period and should increasingly promote measures for social inclusion. The FEAD and ESF should also be more closely linked in order to implement the European Pillar of Social Rights successfully.

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*'The strict demarcation between ESF and FEAD should be abolished because they are in no way adequate to the ...specific support needs of the target groups'.*

---

### **T\_4 Education and employment**

Many and various suggestions are made in respect of employment, education and training measures and target groups (in particular, migrants, prisoners, disadvantaged young people, single mothers with young children and older people). According to respondents, ESF support should be multi-stage and comprehensive and should be able to go beyond the time-frame of a single programme. In addition, a number of initiatives supported by the ESF, such as the Youth Guarantee, should, it is argued, be reviewed to make them less restrictive and open to more broadly-defined target groups.

---

*'In programmes addressed to young people, e.g. in the Youth Guarantee or the current Knowledge-Education-Development programme, which directly refers to the Guarantee, the target-group should be extended to all people under 30 instead of being limited to the so-called NEET youth'.*

---

### **T\_5 Administrative simplification**

As noted above, responses under this theme focus on the need to overcome the administrative and management issues that limit the effectiveness and efficiency of cohesion policy funds rather than providing suggestions relating to objectives.

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There should be *'Real simplification (so that) the content of projects become the core of EU policies and the link between managing authorities and territory/beneficiaries becomes*

*stronger, resulting in less time and resources being spent on procedural and administrative burdens’.*

---

Respondents highlight specific issues such as too much bureaucracy, the complexity of administrative and technical requirements, cumbersome procedures for managing and implementing funds and the lack of homogeneity of the rules of different Funds. These obstacles, coupled with delays and uncertainty about financial commitments, it is argued make it difficult for smaller organisations in particular to access EU funding.

Accordingly, there are calls for audit and control requirements to be kept as simple as possible to reduce costs and allow beneficiaries to focus fully on carrying out their projects. Examples of suggestions for the next programming period include: a greater use of simplified cost options and lump sums, exemptions of ESI Funds from state aid rules, reduction in control layers (e.g. a ‘single audit’ approach and controls proportional to the project size).

*‘Some changes are needed in order to simplify administrative processes connected with the implementation of concrete projects. Other things we recommend to change include the following: better control, greater transparency and digitalisation of processes’.*

---

### **T\_6 Trans-regional cooperation**

Many respondents stated that cross-border cooperation programmes have significant added-value in all EU Member-States and this should be taken into account explicitly in the future design of cohesion policy.

*‘The debate on the future of cross-border cooperation should therefore be separated from a discussion on the cohesion funds that aim to strengthen only the regions with the lowest GDP’.*

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Accordingly, these programmes, it is argued, should have greater strategic and financial importance in the next programming period. It is additionally argued that Interreg programmes should not focus on specific themes (such as innovation) but need to be more flexible to make it possible to respond to emerging trans-regional challenges (e.g. common public services, transport, energy transition and climate challenges). In the same vein, there are calls for a more ‘bottom-up’ approach to be adopted for future programmes and for regions to be given greater flexibility in designing initiatives adapted to common cross-border needs while preserving the concentration of funding on a limited number of objectives

*‘Assuming the broadest possible choice of thematic objectives, we support the maintenance of thematic concentration for Interreg programmes in order to maximize their effects, taking into account their limited budgets’.*

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### **4.5 Analysis of the replies to Question 40**

There were 1,441 usable replies to Question 40 (*How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication?*) which again put forward a range of proposals.

The text analysis identified six broad themes:

- T\_1 Merge ESI Funds or programmes
- T\_2 Increase synergies by harmonising rules of ESI Funds and of directly managed EU support
- T\_3 Combine strategically ESI Funds in programmes/projects
- T\_4 Promote the integration of ESI Funds in relation to priority themes of EU common interest
- T\_5 Merge Funds/programmes so long as it contributes to simplification
- T\_6 Merging Funds/programmes not as relevant as simplification

These themes are shown in Figure 21 which is constructed in the same way as described above.

Figure 21 - Q40 Programmes/Funds: How could synergies be further strengthened?

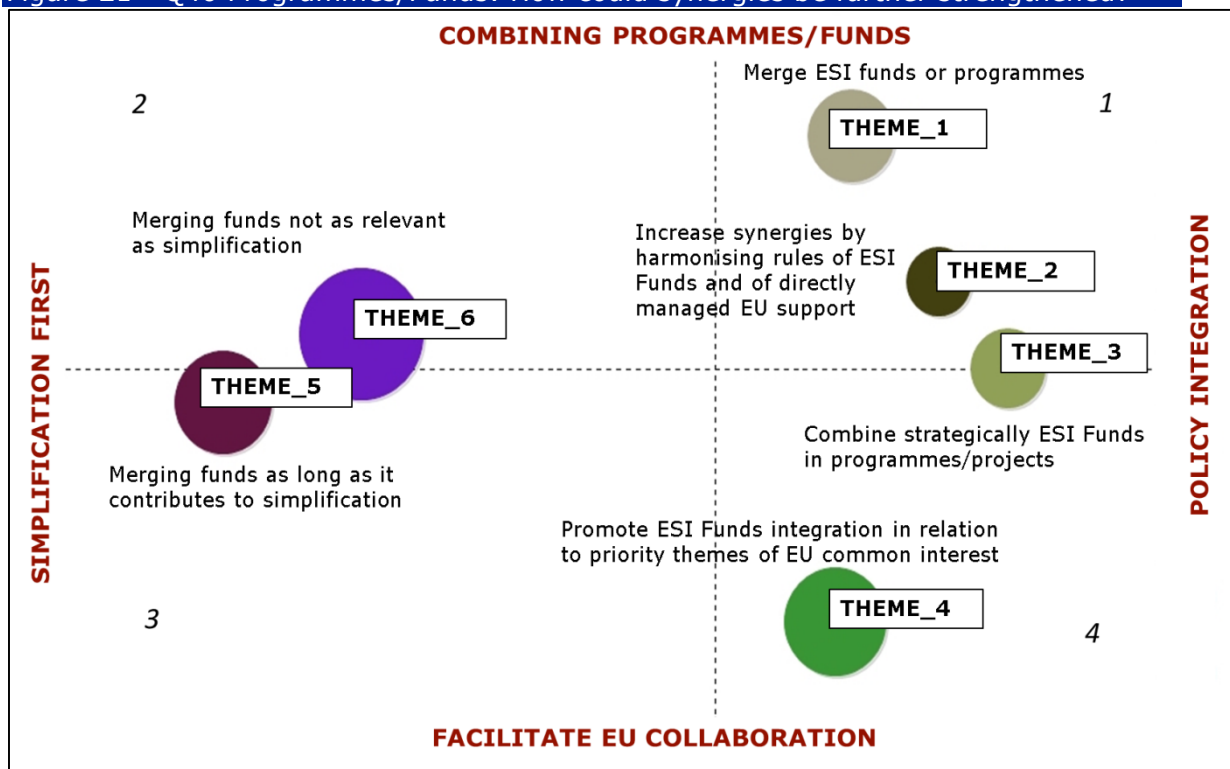
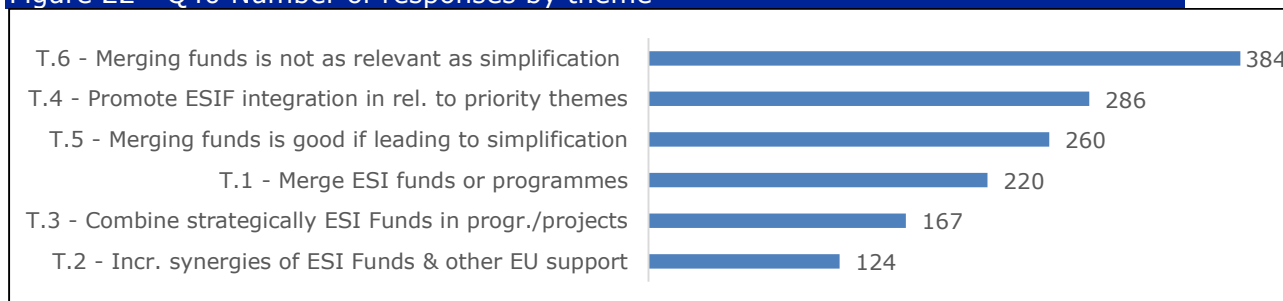


Figure 22 shows the number of responses by theme, indicating that the largest number of responses were from those emphasising the importance of simplification above trying to increase synergies.

Figure 22 - Q40 Number of responses by theme



There were only relatively small differences between the themes referred to by respondents with ERDF/CF experience and those referred to by ones with experience of the ESF and other social funds (Table 26).

Table 26 - Q40: Responses by theme and experience of the EU Funds

Themes	% on total replies	
	ERDF+C F	EMPL funds
T_1 Merge ESI funds or programmes	89.7	69.5
T_2 Increase synergies by harmonising rules of ESIF and of directly managed EU support	77.8	67.4
T_3 Combine strategically ESI Funds in programmes/projects	76.5	64.4
T_4 Promote ESIF integration in relation to priority themes of EU common interest	82.4	65.5
T_5 Merging funds/programmes as long as it contributes to simplification	88.7	72.4
T_6 Merging funds/programmes not as relevant as simplification	81.1	74.8
<b>Total</b>	<b>83.0</b>	<b>69.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

Equally, there are no big differences between types of organisation in terms of the themes referred to in their replies to this question (Table 27).

Table 27 - Q40 Respondents by theme and by type of organisation

	%						Total
	T_1 Merge ESI funds or programmes	T_2 Increase synergies by harmonising rules of ESIF	T_3 Combine strategically ESI Funds in programmes / projects	T_4 Promote ESI Funds integration in relation to priority themes of EU common interest	T_5 Merging funds long as it contributes to simplification	T_6 Merging funds not as relevant as simplification	
Individual	28.3	46.0	44.3	39.4	34.2	44.7	38.9
Type of organisation:							
Churches and religious communities	0.6	0.8	0.4	0.0	0.0	0.0	0.3
International or national public authority	9.0	5.0	3.8	7.7	4.7	2.9	5.6
NGOs, platform or network	14.5	8.0	14.4	8.5	9.7	9.7	11.2
Private enterprise	2.3	2.7	1.9	2.8	2.3	1.9	2.3
Professional consultancy, law firm, ...	2.6	3.8	3.0	2.8	3.1	1.0	2.8
Regional or local authority	27.3	18.4	17.8	20.4	31.1	26.7	23.9
Research and academia	4.5	1.9	3.0	4.2	2.7	1.5	3.0
Trade, business or professional association	5.1	5.4	4.2	4.2	4.7	3.4	4.6
Other	5.8	8.0	7.2	9.9	7.4	8.3	7.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

Details of the suggestions made under each theme are set out below.

### **T\_1 Merge ESI Funds or programmes**

A large number of respondents call for the different cohesion policy funds to be merged as the surest way to strengthen synergies and avoid duplication and overlaps. This is particularly the case for funds pursuing the same objectives, such as the ERDF and CF and the ESF and the other funds targeted at tackling social issues and which in both cases are managed by the same DG.

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*'it is advisable to aggregate funds and instruments that are similar in content or focus on the same target-group. It is desirable to merge human resources funds/instruments, i.e. ESF, YEI, FEAD, EGF, AMIF, and EaSI into one broadly focused ESF Fund'.*

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Some respondents also suggest merging the ESF and ERDF into a single fund with common principles and regulations. They argue that the existing differences in regulations has hindered effective synergy being achieved in their operation.

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*'A good solution would be to combine the ERDF and the ESF into a single fund with one common set of principles. In the current perspective, both funds have separate rules and principles and, although some programmes are two-funded, different rules must be applied to different funds. ....This gives the impression of a lack of coordination and synergy between the funds'.*

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### **T\_2 Increase synergies by harmonising the rules and procedures of the ESI Funds and of directly managed EU support**

The responses grouped under this theme and the following one have many features in common (accordingly they are shown close to each other in Figure 5 above). They argue for synergies between the Funds being achieved through their strategic and operational integration into programmes and projects at regional and local level. Those included under Theme 2 also address the issue of promoting greater synergy between the ESI Funds and other EU funds, programmes and initiatives. There are, therefore, calls for the design and implementation of a common policy framework covering all EU growth initiatives and for the establishment of common goals and rules

for both the ESI Funds and initiatives, such as Life, Horizon 2020, COSME and Erasmus as well as Easi.

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*'Synergies would only be possible if the participation rules, costs, reporting requirements and project selection criteria were the same for the different programmes, for example ERDF and Horizon2020. If the rules are different, considering that the deadlines and timing of evaluation and approval of the projects are very different, it is impossible to have true coordination'. and 'the linkage with programmes such as Horizon 2020 or ERASMUS must....be made much easier by applying similar procedures and rules'.*

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In the case of research and innovation support, for example, it is argued that more synergies should be stimulated between ESI Funds, the Framework Programme for Research and the European Fund for Strategic Investments (EFSI).

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*'Adapt the (ESI Fund) criteria to Horizon 2020/FP9 to facilitate co-financing or cross-application transfer'; 'create synergies (...) giving the possibility to use funding from these different sources within the same project, or in subsequent projects that complement each other'.*

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### **T\_3 Combine strategically ESI Funds in programmes/projects**

The responses under this theme emphasise the need for strengthening coordination between the institutions managing and implementing the ESI Funds at EU, national and regional levels without merging the funds as such. It is argued that more effective forms of cooperation and coordination should be identified between the Commission DGs responsible for the different ESI Funds as well as between national and/or regional Managing Authorities.

Many respondents identified the differences and misalignment between ESI Fund regulations as the main obstacle preventing their integration and, accordingly, the harmonisation of regulations as the first step towards increasing synergies between the use of the Funds.

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*'Merging funds/programmes would not be necessary...greater integration of individual programmes could be achieved with the same rules for all Cohesion funds'. and 'A limited set of common rules would help beneficiaries to access the funds, promote synergies between funds and programmes and act as incentives for integrated approaches'.*

---

Many respondents also recommended that the ESI Funds be strategically combined through the wider use of multi-fund programmes and projects (*'We consider the grouping or merging of funds to be undesirable, whereas it would be appropriate to encourage multi-fund programmes'*). To this end, there were many calls for encouraging a wider use of integrated tools in the future programmes.

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*'We believe that developing multi-fund programmes with simple and harmonised rules would make the use of funds more effective. We also believe that various integrated tools supported by ESI Funds (CLLD, ITI, JAP) could be combined to create a single tool.' and 'it must be ensured that European funds can be used on a cross-fund basis to tackle the key challenges in Member-States. In this regard, tools for decentralised management such as ITI, CLLD and regionalised sub-budgets are needed'.*

---

### **T\_4 Promote ESI Fund integration in relation to priority themes of EU common interest**

The responses under Theme 4 are closely linked with those under the previous theme in calling for greater synergy between Funds without combining them. (*'It would be desirable not to unify, but coordinate programmes in all phases of programming, management and implementation.'*) It is argued that an important issue for the next programming period is to encourage wider collaboration at EU and exchanges of experience between Managing Authorities of different programmes.

Culture, tourism and the environment are identified as areas in which the creation of interregional partnerships would be desirable, along with the formulation of strategies

that integrate the sustainable development measures financed by the ERDF with those supporting employment and training under the ESF. It is pointed out that cross-border, transnational and interregional programmes are already a good example of how to create synergies between different regions and countries.

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*'Achieving synergy effects will also be favoured by supporting cross-border cooperation with particular emphasis on macro-regional strategies'. 'Macro-regional strategies can help to avoid overlaps and to create synergies'.*

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#### **T\_5 Merging funds/programmes as long as it contributes to simplification**

A number of respondents express support for merging Funds and programmes so long as this leads to greater simplification of management and implementation procedures.

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*'The overlap of programme areas is not a problem, what causes the problem is that audit is very difficult to arrange across the programme areas'. and 'Yes, there could be a merger of programmes/funds, but the important thing is to simplify management in Member-States by keeping clear the objectives, the economic resources and the fields of application'.*

---

According to many of those concerned, reducing overlaps is not a priority (*'generally overlap or duplication is very rare. It is not a big problem'*) but simplifying the regulations and procedures is.

#### **T\_6 Merging funds/programmes not as relevant as simplification**

The responses grouped under Theme 6 go one step further in rejecting the need to merge Funds and programmes (*'the merger of funds does not seem necessary to us'*), while emphasising the need for simplification. According to these, each ESI Fund has its own peculiarities and different purposes (*'I do not think it is necessary to group programmes because they fulfil different objectives'*). So instead of integrating the ESI Funds, it is argued that the focus should be on simplifying and standardising the regulations for managing and implementing the different Funds to facilitate their joint use.

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*'Merging is not necessary, but linking should be strengthened and simplified'. 'Under no circumstances should the funds be merged, but it is important to create common, simple rules and clear structures.'*

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### **4.6 Analysis of the replies to Question 42**

Question 42 was a completely open one (*If you wish to add further information – within the scope of this questionnaire – please feel free to do so here*). There were 602 usable replies putting forward a variety of different proposals for the future of cohesion policy.

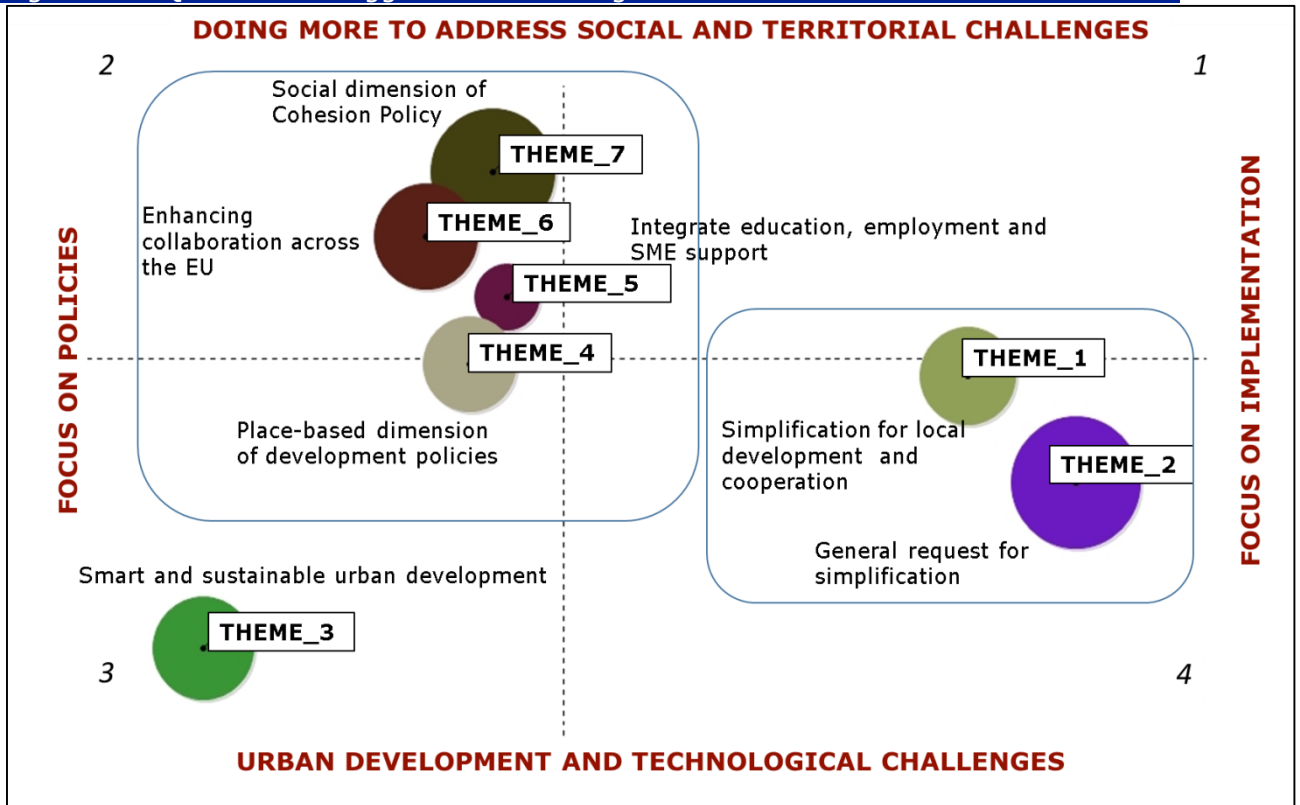
The text analysis identified 7 broad themes:

- T\_1 Simplification for local development and cooperation
- T\_2 General request for simplification
- T\_3 Smart and sustainable urban development
- T\_4 Place-based dimension of development policies
- T\_5 Integration of education, employment and SME support
- T\_6 Enhancing collaboration across the EU
- T\_7 Social dimension of cohesion policy

These themes can be further combined into three groups (or macro-themes). The first group (Themes 1 and 2) contains requests for simplification of the regulations, the second (Themes 4, 5, 6, 7) requests for a strengthening of the territorial and social dimensions of cohesion policy, the third (Theme 3), proposals for smart and sustainable urban development.

Figure 23 depicts the Themes and groups, with again the size of each circle being proportional to the frequency of the replies concerned and the distance between circles reflecting the nearness of the views expressed under the different themes.

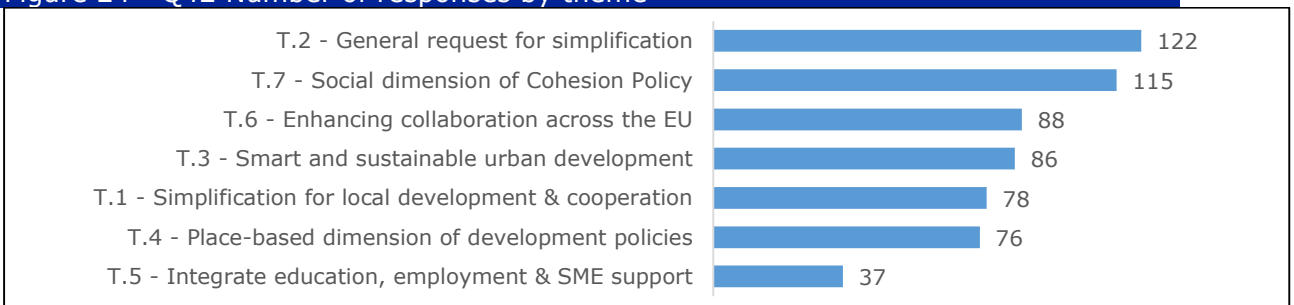
Figure 23 - Q42 Further suggestions for change



Replies clustered under the first macro-theme, in the bottom-right of the figure, focus on the need to streamline rules and procedures, which is considered necessary to improve the efficiency and effectiveness of cohesion policy. Replies under the second macro-theme, in the top left of the figure, call for the strengthening, both strategically and financially, of cohesion policy so as better to address local, social and territorial needs. Replies under the third macro-theme, in the bottom-left of the figure, argue for an increased focus on urban issues in future policy. These broad themes are separately distinguished to highlight the specific points being made, but in many cases they are interlinked. For example, there is widespread reference to technological and social issues in many of the replies as well as calls for simplification.

Figure 24 shows the number of responses by theme, highlighting the relatively large number of replies calling for simplification.

Figure 24 - Q42 Number of responses by theme



The breakdown of respondents by experience of the different Funds indicates that among those submitting replies relating to the place-based dimension of development policies, there is a relatively large proportion with ERDF/CF experience, as might be expected, though also among replies on the need for simplification (Table 28). Conversely, there was a relatively large number of respondents with experience of the EMPL funds among those calling for the integration of education, employment and SME support as well as for the strengthening of the social dimension of policy, again as might be expected.

**Table 28 - Q42 Responses by theme and experience of the EU Funds**

Themes	% of total replies	
	ERDF/CF	EMPL funds
T_1 Simplification for local development and cooperation	78.2	52.6
T_2 General need for simplification	81.1	60.7
T_3 Smart and sustainable urban development	80.2	60.5
T_4 Place-based dimension of development policies	82.9	67.1
T_5 Integrate education, employment and SME support	70.3	73.0
T_6 Enhancing collaboration across the EU	73.9	58.0
T_7 Social dimension of EU policy	80.0	71.3
<b>Total</b>	<b>78.9</b>	<b>62.8</b>

Source: Applica-Ismeri Europa analysis of consultation responses

Table 29 shows the distribution of replies by theme and type of organisation. It indicates that individuals are disproportionately represented among the respondents calling for simplification, NGOs among those advocating the strengthening of the social dimension of policy and international and national authorities among those emphasising the need for development policies to be place-based.

**Table 29 - Q42 Respondents by theme and by type of organisation**

	T_1 Simpl. for local development & cooperation	T_2 General need for simplification	sustainable urban development	dimension of development policies	education, employment & SME support	T_6 Enh. collaboration across UE	T_7 Social dimension of EU policy	Total
Individual	32.1	50.0	26.7	32.9	37.8	33.0	32.2	35.5
Type of organisation:								
Churches & religious communities	2.6	1.6	0.0	0.0	0.0	2.3	0.9	1.2
International or national public authority	2.6	5.7	8.1	10.5	5.4	3.4	2.6	5.3
NGOs, platform or network	15.4	6.6	14.0	18.4	10.8	19.3	23.5	15.6
Private enterprise	5.1	0.8	3.5	2.6	2.7	4.5	1.7	2.8
Professional consultancy, law firm,	3.8	4.1	3.5	2.6	8.1	0.0	3.5	3.3
Regional or local authority	17.9	23.8	25.6	17.1	16.2	21.6	23.5	21.6
Research and academia	1.3	0.0	5.8	2.6	5.4	2.3	1.7	2.3
Trade, business or professional association	5.1	1.6	4.7	2.6	2.7	2.3	5.2	3.5
Other	14.1	5.7	8.1	10.5	10.8	11.4	5.2	8.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: Applica-Ismeri Europa analysis of consultation responses

The specific points made in responses to the question are summarised below.

### ***T\_1 & T\_2 Need for streamlining and simplifying administrative requirements***

Many responses pointed to the excessive complexity of ESI Funds procedures and the bureaucracy surrounding them which, they argue, adversely affects the effectiveness of programmes.

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*'It is essential to start the work of simplification: managers can no longer assume the legal uncertainty that hangs over them because of the controls and audits that are killing cohesion policy.'*

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There are, therefore, calls for regulations to be simplified and for more flexibility in implementing policy in the next programming period. Excessive auditing and too many controls are argued to be a particular problems in respect of a small projects or small OPs (*'Avoiding multiple audits of small projects respecting the principle of proportionality'*). It is also argued that the frequent and substantial changes in EU regulations across programming cycles add to such problems.

Accordingly, the focus should be more on results than on administrative aspects, as detailed controls on small amounts of funding do not make sense and tend, unjustifiably, to delay the implementation of programmes.



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*'Focus on results not cost! Accounts should be similar to usual business accounts ... especially for small projects, this is central, otherwise administration will be too expensive'.*

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### **T\_3 Smart and sustainable urban development**

A number of responses highlighted the major importance of the urban dimension in local and regional development and the need to focus policy on this in future years.

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*'As part of the programming of the future cohesion policy, it should be borne in mind that the main drivers of development in the European Union are cities and metropolises that create real added value for Europe. Their particular importance is visible in such areas of development as the digital revolution, globalisation, demographic change, social inclusion, economic cohesion and climate change.'*

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It is, therefore, argued that, after 2020, cohesion policy should pay greater attention to urban planning and aspects which can increase the attractiveness of cities as well as their economic potential. Such aspects include greener mobility, sports facilities, culture and tourist services and energy efficiency, including, in particular, in respect of buildings.

However, a number of respondents recognise that cities and metropolitan areas cannot prosper at the expense of surrounding rural areas. Accordingly, particular attention should be given to infrastructure connecting urban and rural areas if balanced development is to be achieved and depopulation avoided.

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*(There is a need for) 'a better coupling of territorial models, which (connect) the metropolitan to the rural areas and the small cities, with the ecosystems and therefore with biophysical services'.*

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There are, therefore, calls for more funding to go to this area in the next generation of EU programmes.

### **T\_4 to T\_7 Doing more to address local, social and territorial challenges**

The replies grouped under these themes emphasise the role of cohesion policy in building more democratic, prosperous, inclusive and resilient societies throughout the EU and not only in less developed regions. According to the respondents concerned, cohesion policy should maintain the current strategic framework and should continue to be the main public investment policy in the next programming period. The current configuration of Funds, geographical coverage and the core principles (such as shared management, partnership and multilevel governance) can be maintained, but the share of cohesion policy in the future EU Budget should be increased or at least kept unchanged. At the same time, information, and publicity, on the projects supported should improve to assure more transparency and make people more aware of the EU added-value which is generated. These various themes have many elements in common and are distinguished mainly by the degree of focus on specific policy issues.

Replies under Theme 4 emphasise the need for the further strengthening of the place-based dimension of development policies. In the next programming period, it is argued, there should be greater flexibility in priority setting and resource allocation in order to promote 'smart strategies' targeted at tackling different territorial needs.

Many respondents also call for more consideration of sub-regional disparities in the planning and implementation of cohesion policy at national and regional level and, accordingly, for the greater involvement of local governments and more decentralisation of measures. Future cohesion policy, it is argued, should, therefore, promote a wider use of integrated tools (such as CLLD and I) to support development initiatives that are more in line with the local needs of peripheral and disadvantaged areas within a region.

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*'Cohesion policy should maintain its long-term investment character post-2020, while increasing funds for less developed regions in the EU. This will achieve true convergence within the EU. It is necessary to use the funds in the target areas in an integrated way in*

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*order to achieve added value from the investments Existing instruments and opportunities for implementing an integrated territorial development approach should be built on, with a view to exploiting ...local potential. We believe that a new approach must be applied to the structuring and functioning of the European funds towards decentralisation and the empowerment of local communities.'*

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Replies under Theme 5 focus on the need to strengthen cohesion policy support for education and employment by integrating them with more and effective measures for the creation of SMEs and their development. According to a number of respondents, future cohesion policy should give more attention to addressing the needs of young people by implementing innovative initiatives to allow them to exploit fully the opportunities provided by the ESI Funds.

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*'interventions on youth training should be strengthened, creating new job opportunities through a close link between education, training and the labour market'. and 'European funds limit the ability of young people to obtain support. We should think of a less complex way to enable young people to participate...we can think of projects to finance entrepreneurs who can help young people realise their projects in companies already in operation, a kind of collaborative partnership that allows them to learn how to collaborate without being a burden'.*

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SME development is also seen as a means of countering the growing depopulation of certain areas, which is widespread in many regions and which some respondents consider to be a major challenge for future cohesion policy.

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*'We ask the EU to ensure that future cohesion policy contains...priority axes and specific funding for NUTS 3 areas with serious problems of ageing and depopulation'.*

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Replies under Theme 6 focus on the need for enhancing collaboration across the EU to tackle common challenges such as climate change, research and innovation, education and the preservation of the cultural heritage. To this end, cohesion policy, it is argued, should promote networking and cooperation between different countries and regions. The share of the programme budget that, under ERDF rules, can be spent outside a region should also be increased<sup>2</sup>. Related to this, many respondents underlined the positive economic and social impact of ETC funding on cross-border regions. Accordingly, there are calls for cohesion policy to facilitate and expand interregional cooperation at cross-border or transnational level post-2020. More financial resources should, therefore, be devoted to this aspect and interregional initiatives should go beyond policy learning and exchange of best practice to supporting regions to undertake joint projects.

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*'It seems important to stress that cohesion policy through European cooperation programmes, such as INTERREG, contributes significantly to territorial development. Cooperation is a vehicle for innovation, experimentation, exchange of practices and concrete links between different regions.'*

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Replies under Theme 7 focus on the social dimension of EU policy, arguing that cohesion policy should take the principles defined in the new European Pillar of Social Rights as a guideline for the next programming period. Many of them also advocate increasing the ESF, FEAD and EGF budgets available for social inclusion and combating poverty and discrimination. In particular, it is argued that ESF should continue to cover all EU regions and should be allocated at least 30% of the total ESI Funds available.

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*'The MFF has to allocate adequate financial resources, including through the ESI Funds,...to the European Pillar of Social Rights (EPSR) and to promote better employment conditions and social protection for persons with disabilities. Fundamental rights, including women's rights, have to be visible in headings in the future MFF and receive strong financial support. The current ESI Funds include positive provisions which have increased their impact on*

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<sup>2</sup> Article 70.2 of Regulation (EU) no. 1303/2013

*reducing disparities and inequalities. These provisions (ex-ante conditionalities on disability, deinstitutionalisation, partnership, technical assistance for partners) should be maintained and strengthened. The EPSR should represent the policy framework for design and allocation of all EU Funds, not only the ESF’.*

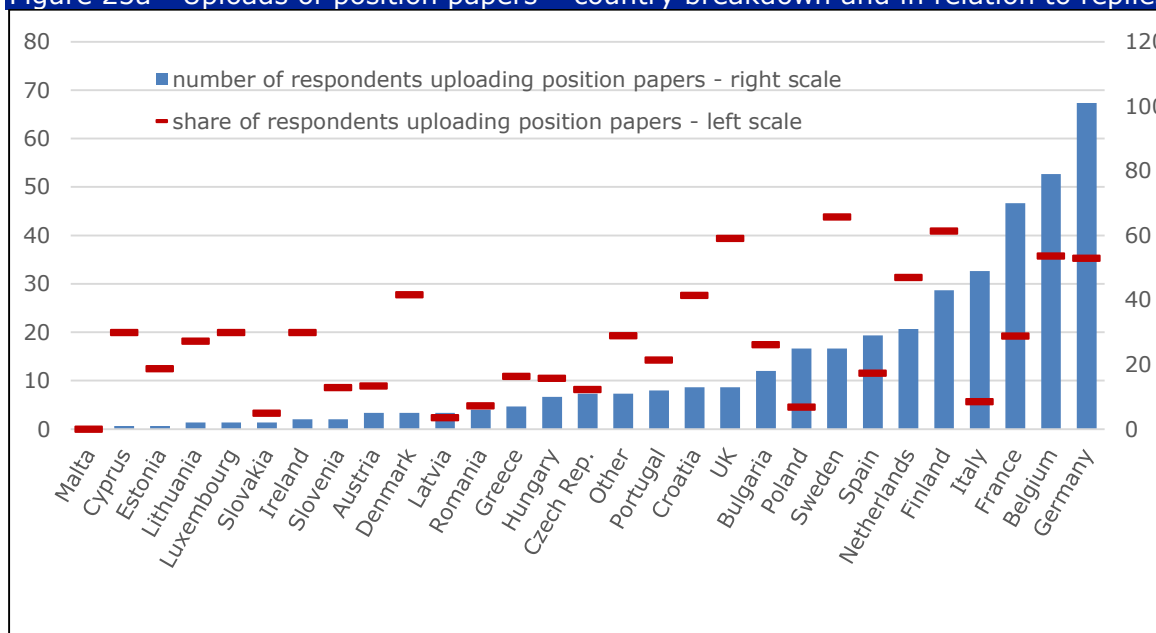
## 5 ANALYSIS OF POSITION PAPERS

Under Question 41 of the survey, respondents had the possibility of uploading a position paper better to express their opinion. Overall 676 documents were uploaded by 582 different respondents, 15% of all those who participated in the consultation, a number of respondents uploading more than one paper<sup>3</sup>.

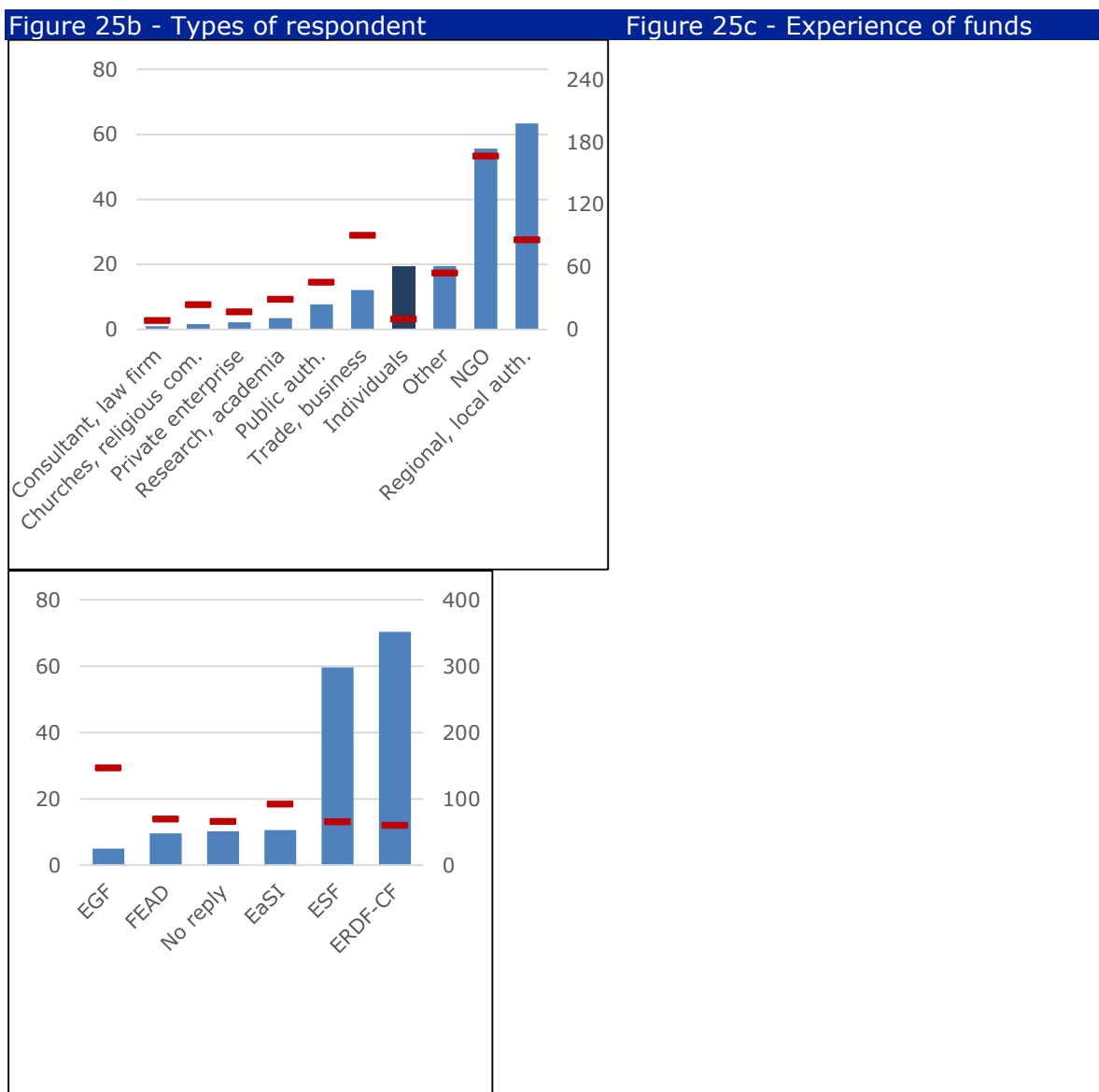
### 5.1 The Respondents uploading papers

The papers uploaded were geographically distributed unequally across the EU, over half of them coming from respondents in four countries: Germany, Belgium, France and Italy. The number of uploads in relation to the number of questionnaires completed was relatively large in Germany and Belgium but relatively small in Italy where the number of completed questionnaires was much larger than in any other country. The rate of upload, defined in this way, was highest in Sweden followed by Finland and the UK (Figure 25a). It was particularly low in Malta, Latvia, Slovakia, Romania and Poland as well as Italy.

Figure 25a - Uploads of position papers – country breakdown and in relation to replies



<sup>3</sup> In more detail, 520 individuals uploaded one paper, 42 two papers, 13 three papers, one four papers and 6 five papers.



The vast majority – nearly 90% - of the papers uploaded were from individuals responding in their professional capacity or on behalf of organisations; mainly regional or local authorities and NGOs. Over half of the NGOs replying to the questionnaire uploaded a position paper, while almost 30% of local and regional authorities did so (Figure 25b). There was no marked difference in the proportion of respondents uploading papers between those with experience of the ERDF and/or the CF and those with experience of the ESF and/or the other social funds. However, a much larger proportion of those with EGF experience submitted position papers than other respondents and the proportion was also relatively large for those with EaSI experience (Figure 25c).

## 5.2 The main views expressed in the papers

This section summarises the main points made in the papers uploaded<sup>4</sup>. It should be noted at the onset that, in general, the papers had a clear link with the main issues covered by the consultation and which were developed in some detail in the reflection papers published by the Commission, especially that on the future of EU finances. The summary of the position papers set out below is organised around the topics and themes covered by the reflection papers.

<sup>4</sup> The approach to the analysis of the open questions is set out in the methodological annex.

It should also be noted that the position papers are very different in scope and size. Some propose investment priorities for the EU as a whole, others focus on their own area and needs, or more precisely that of the organisation they represent. Some adopt a broad approach and set out long-term strategies, others call for very specific and sometimes small investment projects to meet local needs.

### **Objective of cohesion policy post-2020**

For the majority of respondents from all of the different types of organisation, the fundamental and original objective of cohesion policy should continue to consist of reducing disparities between regions and of promoting economic, social and territorial cohesion across the EU. As imbalances between and within Member States persist, this objective, it is argued, remains valid and should be pursued by a modernised and reinforced cohesion policy. A number of respondents, mainly regional and local authorities from the Northern European countries, specify that the policy should continue to support all European regions not just the less developed.

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*'Cohesion policy has been the European Union's core instrument in bringing about an integrated and multi-level approach to addressing inequalities between and within its regions and Member States, acting as a vital counterbalance to attitudes of mutual mistrust and disillusionment.'*

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### **Eligibility**

A number of papers mainly from public authorities propose extending the indicators used to determine the eligibility for funding beyond GDP or GNP per head in the future. Among these, some propose including indicators reflecting the social and environmental situation as well as the economic situation in regions or the main challenges facing them, such as unemployment, low levels of education or an ageing population or new developments, such as migration. However, the papers generally do not propose any specific way of combining these indicators into an overall index for determining eligibility for funding or the weight that should be attached to social or environmental as opposed to economic indicators, though a few draw attention to the fact that changes in the eligibility criterion to cover more factors could result in a smaller allocation of funding to the less developed regions. According to most papers, these should continue to be the main target group and should, therefore, receive adequate funding. There is, consequently, it is argued, a need to think carefully about the consequences of revising the eligibility criterion before making any change.

### **Shared management versus centralised management**

Virtually all the papers expressing opinion on this issue strongly support the shared management principle based on multi-level governance. More centralisation is not generally seen as an option, a 'transversal' opinion expressed by respondents from all the different types of organisation and in all Member States. According to the papers, the main argument in favour of multi-level governance is that decentralised structures '*protect the territorial dimension of the policy and ensure a more solid link between territories and the EU*'. It is considered that bottom-up approaches and shared management structures are more suitable for addressing local needs than centralised structures and that they bring the policy closer to the people.

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*'Shared management based on operational programmes should be the core governance method for cohesion policy delivery.'*

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There are strong calls for making the participation of partners, such as economic and social or local communities, more effective in ESI Fund programming and implementation. Virtually all papers submitted by public authorities, as well as from trade and business organisations and NGOs support a more meaningful application of the partnership principle. Many respondents from NGOs and civil society networks advocated a stronger involvement of civil society in the planning and management of ESI funds. In some cases, a call was made for the Code of Conduct of Partnership to be included in cohesion policy regulations.

### **Link with the EU Semester and economic governance**

As noted above, the consensus is that cohesion policy should remain a territorial development policy to help above all to strengthen economic, social and territorial cohesion. The link with the EU Semester and economic governance established in the current programming period is generally seen by trade unions, business organisations and NGOs but also by national and regional authorities as being positive, though some changes are suggested in a number of the papers. In particular, macroeconomic conditionality is criticised by some respondents in Italy (public authorities and national trade organisations, in particular) and Poland (national authorities) on the grounds that the sanctions applicable in response to non-compliance with economic governance procedures almost certainly affect the outcomes of cohesion policy. The sanctions, it is argued, are likely to penalise regional or local authorities, which are not responsible for non-compliance, with the less developed regions, which are most dependent on ESI funding, most affected. It is argued, in addition, that the possibility of financial sanctions creates a climate of uncertainty, which in itself is a factor inhibiting investment. A number of papers propose incentive based-systems instead of penalties, which could take the form of an 'award mechanism' for Member States that establish clear links between cohesion policy and national reforms.

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*'Create incentives to do better, not penalties. In this direction, the introduction of reward mechanisms to be linked to appropriate flexibility measures is desirable.'*

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### **Thematic concentration and ex-ante conditionality**

A large number of papers, mainly from authorities managing regional and Interreg programmes view stronger thematic concentration as an important means of increasing efficiency because it is more likely to create the critical mass that is needed 'to make a bigger step forward'. There are only a few papers from regional authorities expressing support for less thematic concentration and the abolition of quotas in this respect.

Ex-ante conditionality is seen by a range of respondents from public authorities to trade and business organisations and NGOs as having helped to avoid dispersion of resources as well as linking cohesion policy objectives more closely to national strategies and structural reforms.

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*'Ex-ante conditionalities should remain the essential tool to create an optimum environment for the investment process.'*

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It is, therefore, argued that it should remain in the post-2020 period, especially since, as some papers note, resources are likely to be smaller. In a few cases, it is suggested mainly by NGOs representing environmental and social interests, that it should be used more extensively by introducing it, for example, to encourage the shift to cleaner energy and the approval of national authorities, of an Energy Poverty Action Plan. Some papers, on the other hand, call for less conditionality in the next period as it constrains how funding can be used.

### **Investment priorities**

#### *Research, Innovation and SME support*

Support to innovation should remain a major priority in the post-2020 period according to the majority of papers from a range of organisations, since it is one of the areas in which cohesion policy is adding most value. Some suggest that there should be more focus on multidisciplinary collaboration between enterprises, universities and research centres. In addition, a number emphasise that projects with higher levels of risk and uncertainty of results should be the main target for support.

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*'The Union needs a flexible and modern policy consistent with both the Treaty objectives and the new challenges, such as the need for structural transformation that boosts economic productivity and innovation while remaining inclusive for all citizens and regions.'*

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It is also emphasised that in the more developed regions in particular the main priorities of investment after 2020 should be innovation, SME support and the low-carbon economy. At the same time, it is stressed that project applications for enterprises should be made easier e.g. by creating joint calls for proposals.

Many papers too from all types of organisation, while seeing financial instruments as complementary to grants and other forms of subsidy to support enterprises and innovation, warned against too strong a reliance on them for providing support. In particular, their use, it is argued, should be based on specific territorial needs and some regional authorities, accordingly, viewed setting any minimum share for them as inappropriate.

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*'Grants should constitute the primary support mechanism in the case of cohesion policy, while the financial instruments should represent a supplementary form of financing investments. Some areas should continue to be reserved solely for grants.'*

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A few papers, from Bulgarian respondents, in particular, highlighted the need for changing the definition of SMEs as the current one is too restrictive, arguing that the definition should go beyond the number of people employed (i.e. less than 250) and include other criteria set out in Article 2 of the Annex of Recommendation 2003/361/EC<sup>5</sup>. Some papers also propose remove the rule excluding enterprises with public participation of over 25% from the non-eligibility criteria set out in the regulation.

#### *ICT / Digital Infrastructure and 'smart city' development*

Because of its importance for regional development, papers from public authorities, trade and business organisation, NGOs and enterprises suggest allocating more resources to support of digitalisation. For the sparsely populated areas in the north of Finland and Sweden as well as Norway, digital infrastructure, it is argued, should be an absolute priority for investment. One paper suggests that, given its importance, ICT should perhaps become a transversal priority included in all thematic objectives.

According to a number of papers, mainly from regional authorities and some NGOs, digitalisation should also be a priority in urban development, the current set-up tending to direct funding towards traditional spending categories and failing to support the development of smart cities sufficiently. It is also argued that access to, and use of, the latest generation of ICT should become a horizontal priority in urban spending and a minimum level should be set for funding allocated to digital measures. Some papers from Finland refer explicitly to the Six City Strategy–Open and Smart service (6Aika) in the Helsinki-Uusimaa region as an example of good practice, the objective being to strengthen Finnish competitiveness by using the country's six largest cities as centres for innovation and experimentation.

#### *The environment and Energy efficiency*

According to many papers, from enterprises, trade and business organisations and NGOs, environmental sustainability should continue to be a cross-cutting theme in the next programming period and further measures should be introduced to ensure that strategic climate impact assessments for each programme are carried out.

A few papers recommend increasing the funding going to loans and other financial instruments for energy efficiency projects and to provide increased support for innovative ones. Some call for more help to be given to clean energy conversion of housing (e.g. through the Energy Citizens Facility) and for small projects to receive more advanced technical assistance.

#### *Poverty and Social exclusion*

Many papers – mainly from NGOs – emphasise that social values are fundamental to the European project, that all EU citizens should have equal rights and opportunities

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<sup>5</sup> An annual turnover not exceeding EUR 50 million and an annual balance sheet total not exceeding EUR 43 million.

and more importance should be attached to the social dimension in the future. Papers in many cases call for efforts to be increased to combat poverty and to make this a strong(er) priority for investment. Some papers propose allocating *ad hoc* transversal resources to combating poverty and social exclusion (at least 25% of cohesion policy funding). A few also suggest that the Pillar of Social Rights should be more integrated into cohesion policy objectives.

### **Cooperation between regions**

#### *ETC and regional cooperation*

The importance of European Territorial Cooperation (ETC) is highlighted by a number of papers as a means of promoting cohesion and mutual understanding across the EU with a strong effect on the lives of people in border regions. This view was expressed (and repeated via multiple uploads of papers), in particular, by authorities managing Interreg programmes, largely in the Nordic countries.

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*'Cross-border cooperation as instituted by the EU cohesion policy has also encouraged an integrated approach to addressing common challenges and underexploited potentials that embeds the notion of sustainable development.'*

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Among these, some papers also call for the architecture of ETC programmes to be simplified and better coordinated to avoid programme overlaps and to increase transparency, including for beneficiaries. A number of concrete proposals for improving the management of ETC in the post-2020 are made, consisting of involving more regional and local authorities in the conception phase, using funding primarily for border regions, taking due account of the size and structure of programmes, acknowledging the importance of people-to-people interaction and of small-scale projects and simplifying and standardising regulations.

Calls are also made for more opportunity for cooperation between regions in general across Europe regardless of whether they are physically adjacent or not. Regional cooperation is seen as a precondition for innovation in the high tech sector in particular because knowledge spill-overs and cross-fertilisation of ideas are key drivers of this. To this end, it is argued, that there should be more possibilities for collaboration between clusters, knowledge hubs and smart cities across Europe in order to share knowledge.

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*'Opportunities for cooperation between regions in two or more countries should be extended, regardless of whether these regions are physically adjacent. More opportunities for international/regional cooperation offer regions the chance to find the best partner in all EU Member States.'*

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#### *Smart Specialisation*

According to papers from public authorities, enterprises, trade and business associations and NGOs, in particular, there is also a need for more cooperation between regions to implement smart specialisation strategies more effectively across the EU. The view expressed is that *'smart specialisation has generated the most added value as a mechanism for inter-regional collaboration, co-creation and co-investment'*. Policy in the next period should, therefore, go further in this direction. It is argued in addition that the positive results achieved so far make smart specialisation a useful means of tackling at the regional level the main challenges of future years, such as energy transition, the circular economy and adaptation to climate change. A few papers suggest as well making smart specialisation a broader framework for investment by combining the ESI Funds with other EU initiative such as Horizon 2020 and the Urban Agenda.

#### *Community-led local development*

A number of local authorities call for more community-led local development (CLLD) by boosting integrated territorial investment (ITI). This measure, they argue, has ensured that local needs are better met. They suggest using community-led actions



specifically to respond to climate change since this is one of the biggest challenges in the coming decades and to promote the wider use of CLLD – which is optional in the current period and then only for the ERDF – in the post-2020 period.

### **Result orientation**

Only a relatively few papers covered the issue of result orientation but all of those that did were in favour of a strong(er) result-oriented policy after 2020, emphasising the need to set clear objectives, define and select appropriate indicators to measure progress in achieving them and to undertake relevant evaluations. They call for the results of evaluations to be disseminated more widely, in addition to examples of good practice. Some also suggest according a prominent role to qualitative evaluations and not just quantitative ones. A number call for the indicator system to be revised and for a clearer link established between output and result indicators in particular. A few also call for the electronic monitoring system to be simplified, especially for small-scale projects, and for there to be a stronger focus on results.

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*'The strategy should be mission-focused, and thus go a step further than merely identifying relevant themes or topics. This should help clarify what the contribution of the individual instruments and levels is to the relevant challenge, thus making the whole process more result-oriented as well.'*

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### **Management of funds**

#### *Harmonisation of ESIF regulations versus merging funds*

Many position papers mainly from public authorities involved in the management of ESI Funds, but also trade and business organisations and NGOs, discuss the way cohesion policy rules are set and implemented. Those expressing a view consider that the funding instruments available are adequate and so there is no need to create new funds. However, there are many calls for the way funding is organised to be changed, proposals ranging from regulations to be harmonised across Funds to the creation of a single Fund merging all of the current ones.

Those calling for more harmonisation of rules recognise that each Fund is pursuing its own specific objective but contributes at the same time to the achievement of the objectives of other Funds. The existence of different Funds is, therefore, seen as being justified but there is a need for better coordination between them and for harmonisation of the underlying regulations. The multi-fund approach used in the current programming period, it is argued, has given rise to difficulties of coordination because of the differences in regulations between Funds...

Some of those calling for a single regulation for all ESI Funds or for a single integrated Fund recognise that this might imply a significant organisational restructuring at EU level since at the moment the Funds are managed by different DGs.

#### *Create synergies with other funds*

There is a strong call from a large number of respondents from all types of organisation and from different countries for better coordination of the ESI Funds with the other EU funding instruments to increase clarity and transparency, to avoid overlaps and to achieve synergies. It is, therefore, argued that regulations should be harmonised across the board, including those relating to state aid, and should be the same everywhere.

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*'By focusing on European priorities and synergy it is furthermore envisaged that complementarity is achieved between the instruments in aiming for common goals, resulting in the prevention of fragmentation and avoidance of overlap. This approach aims at improved coherence, not only between the various European Structural and Investment Funds, but also with other instruments such as the EU Framework Programme for Research and Innovation (from 2020 FP9) and the European Fund for Strategic Investments (EFSI).'*

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Some papers point, in particular, to the need to streamline the funding instruments that are targeted at the same policy area or social group. This, it is argued, would help

to increase transparency and make the funding possibilities and the application procedures clearer for beneficiaries. The ESF and the FEAD are mentioned specifically in this respect in a number of cases, on the grounds that merging the latter into the former, or at least harmonising the procedures, would greatly help to increase clarity.

Other papers, including, in particular, from universities, enterprises and trade and business organisations, call for a better integration of ESI Funds with Horizon 2020 (which will become the 9<sup>th</sup> Framework Programme after 2020). A few suggest using some of the Horizon 2020 instruments for the management of the ESI Funds. Others propose to extend the Seal of Excellence<sup>6</sup> to research projects financed by the ESI Funds, as it recognises the high value of particular proposals. However, there are also some papers arguing against pushing integration between the ESI Funds and Horizon 2020 too far, emphasising the different nature and objectives of the two.

#### *Co-financing*

National co-financing is usually considered crucial for building a sense of ownership and responsibility among those spending the Funds, which encourages them to do so more effectively. Only a few papers, however, mainly from EU15 countries, endorse this view. A number of papers from public authorities, especially in Member States hit particularly hard by the economic and financial crisis, for which fiscal consolidation measures have been particularly severe, suggest excluding the national co-financing share of funding from the total of public expenditure when assessing budgetary compliance with the stability pact.

### ***Simplification of procedures and regulations, less control, more trust and partnership***

#### *Control and audits*

Many papers from a respondents from a wide range of organisations, from public authorities to trade associations and enterprises, criticise what they call an excessive focus on audit and control in the management of cohesion policy. This, some of them argue, *'has held back attempts to focus on outcomes and undermined the achievement of strategic objectives, so reducing the impact of the Funds'*. There is, accordingly, a widespread call for simplification, for fewer and less onerous controls and for more trust. The excessive controls and audit procedures imposed are seen as working against the effective application of the subsidiarity, proportionality and partnership principles, causing delays in programme implementation and increasing transaction costs<sup>7</sup>.

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*'Cohesion policy must be simplified and improved based on increased trust between the levels of government implementing the funds and a more flexible and differentiated approach.'*

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In consequence, some papers from regional authorities and NGOs propose the application of the 'single audit principle' (at least in specific circumstances, such as for small size projects) in order to avoid duplication of checks and unnecessary delays. A few also suggest shifting towards performance-based auditing which focuses on the results achieved rather than on the process involved in project implementation as such.

In addition, a number of papers from regional and national authorities, largely from northern EU15 countries, suggest applying a differentiated approach according to the principle of proportionality and varying the controls applied in relation to the size and nature of the projects funded and the experience (and quality) of the Managing Authority concerned. For countries or programmes fulfilling certain criteria, procedures

<sup>6</sup> The Seal of Excellence is the high-quality label awarded to projects submitted to Horizon 2020 which were deemed to deserve funding but did not receive it due to budget limits.

<sup>7</sup> A number of papers refer to the Final conclusion and recommendations of the High Level Group on Simplification for post 2020, a study commissioned by the EU Commission and published in July 2017, [http://ec.europa.eu/regional\\_policy/it/policy/how/improving-investment/high-level-group-simplification/](http://ec.europa.eu/regional_policy/it/policy/how/improving-investment/high-level-group-simplification/).

could be simplified or made lighter. The criteria concerned could take account not only of the size of the programmes but also of other aspects such as administrative capacity, the type of intervention and the national co-financing rate.

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As one paper argues: *'Above all, it is the administrative burden associated with reporting and control which must be reduced and simplified by both the European Commission and the Managing Authorities. This should be done in accordance with the principle of proportionality, where the size and the scope of the project determine the level of accounting.'*

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Some papers, largely from regional authorities, express concern about the use of the error rate to determine the controls imposed and label the current regulation as being 'disproportionate' because it can block an entire programme (i.e. if the error rate is more than 2% of controlled expenditure). They argue that it would be useful to introduce a clearer differentiation between fraud and error by punishing those cases where there is fraud, while adopting a more flexible approach towards errors which may simply be due to missing documents or changing rules or guidelines. A further proposal is to raise the error rate which instigates controls to, say, 5%.

#### *Simplified cost options*

Some papers from a mix of respondents (from regional authorities, trade and business organisations and NGOs) agree that the introduction of simplified cost options has been effective in easing the payment process and a number of these for its use to be extended to all Funds, a few suggesting making it compulsory for projects under a certain size.

#### *Simplification of regulations*

A great many papers call for regulations to be simplified, especially those from national and regional authorities. They argue that regulations should fix the essential framework but Member States should be given flexibility to adapt how they apply this to their specific national and regional needs. Some also argue that partnership agreements with the Commission should focus on the overall strategy without being concerned with the detailed content of programmes.

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*'This is necessary to reinforce trust between all actors involved in cohesion policy delivery (programming, implementation and financial settlement). The lack of confidence leads to excessive legislation, multiplication of guidelines, bloated programming documents and fear of audits. It creates inconsistencies in EU regulations and over-interpretation by Commission services and leads to gold-plating.'*

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There are also calls for requirements in respect of Operational Programmes (OPs) to be simplified, to be more concise and focused mainly on the intervention logic and the indicators selected to measure results and progress in implementation. There are equally calls for reporting requirements to be simplified and the degree of detail generally in the main programming documents to be reduced.

In addition, many of the national and regional authorities submitting papers advocate more flexibility in the use of the funding received, arguing that the (reallocation of funding, in particular, should be made quicker and easier through simplified amending procedures in order to be able to react more promptly to changes in socio-economic circumstances.

Calls for simplification also extend to the regulations governing financial instruments. While respondents generally accept that controls are necessary to ensure transparency and accountability, they argue that the present complexity of the rules has inhibiting effects. They suggest too that such rules need to be more flexible so that the instruments can be more easily combined with other means of support available at the EU and national level.

A number of papers from the EU12 note that participation of these countries in Horizon 2020 is falling short, largely because of the complexity of the administrative

procedures involved, and that participation in the post-2020 period is likely to be equally low if there are no changes in this respect. Concrete proposals include simplifying project management structures, reducing the size of research projects (i.e. encouraging smaller-scale ones) and increasing flexibility by assigning a larger role to ESFRI (European Strategy Forum on Research Infrastructure) in planning and coordination. There are also calls for a better balance between basic and applied research and promoting excellence in low-performing countries as a means of increasing the participation of EU12 countries.

### ***Communication and dissemination***

Many of the papers emphasise the need for better communication not only about EU policy objectives and outcomes but also about the role of the EU in improving people's daily lives. Cohesion policy, it is argued, is not just an investment policy but a means for 'holding countries and regions together'. Accordingly, a number of the papers call for the values of the EU in respect of security, solidarity, freedom, democracy, freedom of movement, 'unity in diversity' and social protection, and the achievements in these regards, to be more clearly and more forcefully articulated.

## METHODOLOGICAL ANNEX

### ***Approach to the analysis of open questions***

Computer-assisted analysis enables the main issues addressed by the replies to be identified using a statistical algorithm which checks the frequency of use of different words and the associations between them, which, accordingly, identifies the most frequent phrases. From this, therefore, the most important issues covered can be identified and the further analysis of the 'co-occurrence' of words and phrases across the replies indicates their overall importance in absolute and relative terms. The main steps undertaken during the analysis are described below in more detail.

The first step was to build an appropriate database of the texts of the replies (which is called a 'corpus'). For the analysis of the four open questions, four different corpuses were built and they were related to the dimensions of interest:

- a) whether the response comes from an individual or is submitted on behalf of an organisation;
- b) if the latter, the type of organisation concerned;
- c) the country which the response comes from;
- d) the Funds which the respondent has experience of.

The second step was to process the corpuses (or databases) to make them ready for analysis. This involved verifying that the words are being properly detected and resolving issues to do with proper nouns, multi-words, acronyms and so on. It also involved removing replies such as 'n.a.', 'no', 'yes', 'don't know' and 'no comment'.

The third step was to analyse the global characteristics of the replies to check their complexity and their particular features (number of respondents who answered each question, number of words used and the frequency of use) and to see whether they are suitable for statistical processing, which the software being used finds them to be.

The fourth step was to carry out a multidimensional statistical analysis. This involved initially selecting of key-words and excluding common words relating to the title of the consultation or which are not relevant to the analysis. The multidimensional analysis consisted of: a) a concordance analysis to identify how each key word is connected to other words, b) a specificity analysis to identify the words which are typical, or exclusive and c) a thematic clustering to indicate the most frequent co-occurrence of keywords. Such a clustering made it possible to identify the themes emerging from the replies by country, type of respondent and so on.

By following these steps, the computer-assisted analysis made it possible to pick out: 1) the most frequent topics or themes highlighted in the replies to the open questions and the types of respondent associated with them; 2) the combinations of these topics or themes in clusters and, consequently, the implicit logic connecting them; 3) the types of respondent most responsible for each cluster and the extent to which clusters can be associated with specific types of respondent.

### ***In-depth investigation of a sample of replies to open questions***

A sample of open questions was also analysed 'manually', following the approach recommended in Toolbox 55 of the Better Regulations Guidelines. Since the maximum number of replies to open questions is 2,353 (Q34) and the suggested rule for sampling recommends examining the square root of  $\sqrt{N+2}$  - where N is the number of replies - a sample of around 50 questionnaires was taken in respect of each question. The selection of the sample took account of the type of respondent but also the results of the computer-assisted analysis, and in particular the results of the cluster analysis, in order to go into these results in more detail. Accordingly, the manual analysis focused on the themes, which emerge from the computer-assisted analysis in order to uncover more about the themes in question, what is being said about them, in what context, the arguments relating to them and so on.

### ***Approach to the analysis of position papers***

The summary of the position papers is based on summaries of individual papers produced by the team using the template set out below.

#### *Template*

A. The document is concerned with highlighting the reply to one or several of the closed and open questions in the questionnaire or with developing the rationale and reasons for the answer(s) given

Indicate the Question concerned (indicate number): [\_\_\_\_]

Additional points made (if any) on top of survey reply (100 words):

[\_\_\_\_\_]

B. The document is about something other than the questions in the survey

Q1: Funds concerned by position paper: ERDF, CF, ESF, EGF, FEAD, EaSI

Q2: Topic concerned by position paper: Economic and suitable development, Employment, skills and education, Social inclusion, Other (if other Topic than listed, please specify)

Q3: Theme concerned by position paper: Policy challenges; How the current programmes/funds have addressed the challenges; Added value of policy; Suggestion to modify/add objectives to the programme/fund; Obstacles to achievement of objectives; Simplification of policy/reduction of administrative burden; Strengthen synergies among programmes/funds to avoid overlaps/duplication; Other (if other Theme than listed, please specify)

Summary of position (200 words):

[\_\_\_\_\_]

Any point worth mentioning in summary (e.g. interesting quotation, best practice, etc.):

[\_\_\_\_\_]

The information extracted in this way from each paper provided the basis for organising the overall summary of the position papers according to the frequency of themes covered.

Overall 676 documents were uploaded. Since this was substantially more than the 200 papers which were required to be analysed<sup>8</sup> a selection needed to be made of which ones to be read in detail. The first step of the selection process consisted of excluding invalid uploads such as CV's, images and Excel files and identifying the papers that were uploaded several times<sup>9</sup> in order to ensure that they are included only once, if at all, in the sample. For respondents that attached more than one document, the focus was in priority on the first uploaded paper.

The sampling procedure then consisted of distinguishing between individuals replying in their personal capacity and those replying on behalf of an organisation. Just 61 of the former type of individual out of the 1,851 who completed a questionnaire uploaded a position paper (and two of these uploaded several papers). Since the number is small relative to the total replying, all the papers concerned were considered for detailed analysis. Removing duplicates and invalid uploads has left 27 different papers from individuals in the sample of 200 (Table A1).

The criteria applied to select the papers uploaded by respondents in a professional capacity or on behalf of an organisation depended on the total number uploaded by each type of organisation and the breakdown by country. In more detail, if the total number of papers uploaded by a type of organisation (across all countries) was less than 28 (an arbitrary maximum which has been set), all papers were included in the sample. This was the case for papers uploaded on behalf of 'Churches and religious communities' (3 papers excluding duplicates), 'International or national public

<sup>8</sup> According to the Terms of References for the study.

<sup>9</sup> Of the 676 uploaded documents 199 were duplicates of altogether 51 papers that were, accordingly, uploaded almost four times on average.

authorities' (22 papers), 'Private enterprises' (6 papers), 'Professional consultancies, law firms and self-employed consultants' (3 papers) and 'Research and academia' (10 papers).

For the remaining types of organisation, a selection needed to be made. The rule applied consisted of selecting every second paper uploaded for each country and each type of organisation. This rule produced 61 'NGO' papers, 73 papers from 'Regional or local authorities', 17 papers from 'Trade, business or professional associations' and 15 papers from other organisations.

In all, 237 papers were selected for detailed analysis in this way. These cover individuals, the different types of organisation and the different countries in a reasonably balanced way and cover 76 % of all papers uploaded (Table A1). The remaining papers were read transversally but the main messages had been identified from the detailed reading of the 237 papers and no major additional points needed to be added to the summary.

**Table A1 Breakdown of respondents uploading position papers and sampling of those to read in detail by type of organisation and country**

	Individuals	Churches and religious communities International or national public authority	NGO, platform or network	Private enterprise	Professional consultancy, law firm,...	Regional or local authority	Research and academia	Trade, business or professional association	Other	Total number of papers
<b>Austria</b>			1			4				5
detailed reading			1			2				3
additional duplicates covered			0			0				0
Coverage (%)			100			50				60
<b>Belgium</b>	6	2	43		2	9	2	9	6	79
detailed reading	1	2	17		2	4	1	4	2	33
additional duplicates covered	5	0	7		0	1	1	1	2	17
Coverage (%)	100	100	56		100	56	100	56	67	63
<b>Bulgaria</b>	2	1	13	1				1		18
detailed reading	2	1	4	1				1		9
additional duplicates covered	0	0	7	0						7
Coverage (%)	100	100	85	100						89
<b>Croatia</b>	2		10	1						13
detailed reading	1		1	1						3
additional duplicates covered	0		8	0						8
invalid/corrupted files	1									1
Coverage (%)	100		90	100						92
<b>Cyprus</b>			1							1
detailed reading			0							0
additional duplicates covered			1							1
Coverage (%)			100							100
<b>Czech Republic</b>	2	1	1			4	3			11
detailed reading	2	1	0			2	3			8
additional duplicates covered	0	0	1			0	0			1
Coverage (%)	100	100	100			50	100			82
<b>Denmark</b>	1	1				3				5
detailed reading	1	1				2				4
additional duplicates covered	0	0				0				0
Coverage (%)	100	100				67				80

	Individuals	Churches and religious communities	International or national public authority	NGO, platform or network	Private enterprise	Professional consultancy, law firm,...	Regional or local authority	Research and academia	Trade, business or professional association	Other	Total number of papers
<b>Estonia</b>				1							1
detailed reading				1							1
additional duplicates covered				0							0
Coverage (%)				100							100
<b>Finland</b>	5		2	12			20			4	43
detailed reading	2		2	0			4			0	8
additional duplicates covered	3		0	11			12			4	30
invalid/corrupted files				1							1
Coverage (%)	100		100	100			80			100	91
<b>France</b>	2		1	16			33		7	11	70
detailed reading	0		1	9			13		3	1	27
additional duplicates covered	2		0	1			6		1	7	17
Coverage (%)	100		100	63			58		57	73	63
<b>Germany</b>	4	2	2	12			58	2	8	13	101
detailed reading	2	1	1	5			17	2	3	3	34
additional duplicates covered	2	1	1	2			24	0	1	6	37
Coverage (%)	100	100	100	58			71	100	50	69	70
<b>Greece</b>	2			2			1			2	7
detailed reading	0			2			1			0	3
additional duplicates covered	1			0			0			2	3
invalid/corrupted files	1										1
Coverage (%)	100			100			100			100	100
<b>Hungary</b>	1			7	1		1				10
detailed reading	1			2	1		1				5
additional duplicates covered	0			2	0		0				2
Coverage (%)	100			57	100		100				70
<b>Ireland</b>			1	2							3
detailed reading			1	2							3
additional duplicates covered			0	0							0
Coverage (%)			100	100							100
<b>Italy</b>	3	2	1	19			7		9	8	49
detailed reading	2	1	1	2			3		3	1	13
additional duplicates covered	1	1	0	13			1		4	5	25
invalid/corrupted files										1	1
Coverage (%)	100	100	100	79			57		78	88	80
<b>Latvia</b>	1		3							1	5
detailed reading	1		3							0	4
additional duplicates covered	0		0							1	1
Coverage (%)	100		100							100	100
<b>Lithuania</b>	1		1								2
detailed reading	0		1								1
additional duplicates covered	1		0								1
Coverage (%)	100		100								100
<b>Luxembourg</b>	1		1								2



	Individuals	Churches and religious communities International or national public authority	NGO, platform or network	Private enterprise	Professional consultancy, law firm,...	Regional or local authority	Research and academia	Trade, business or professional association	Other	Total number of papers
detailed reading	1		1							2
additional duplicates covered	0		0							0
Coverage (%)	100		100							100
<b>Netherlands</b>	13		2	5	1	7	2		1	31
detailed reading	2		1	2	1	1	2		0	9
additional duplicates covered	11		1	1	0	6	0		1	20
Coverage (%)	100		100	60	100	100	100		100	94
<b>Poland</b>	6		1	4	1	12			1	25
detailed reading	3		1	2	1	4			1	12
additional duplicates covered	3		0	0	0	2			0	5
Coverage (%)	100		100	50	100	50			100	68
<b>Portugal</b>	2			5	1	1	2		1	12
detailed reading	2			1	0	1	2		1	7
additional duplicates covered	0			3	1	0	0		0	4
invalid/corrupted files				1						1
Coverage (%)	100			100	100	100			100	100
<b>Romania</b>	3			2					1	6
detailed reading	3			1					1	5
additional duplicates covered	0			0					0	0
Coverage (%)	100			50					100	83
<b>Slovak Republic</b>	1		1			1				3
detailed reading	1		1			1				3
additional duplicates covered	0		0			0				0
Coverage (%)	100		100			100				100
<b>Slovenia</b>			1			1				2
detailed reading			1			1				2
additional duplicates covered			0			0				0
Coverage (%)			100			100				100
<b>Spain</b>	2			4		14		2	7	29
detailed reading	0			2		6		1	2	11
additional duplicates covered	1			0		2		0	2	5
invalid/corrupted files	1									1
Coverage (%)	100			50		57		50	57	59
<b>Sweden</b>	1	1		4		16	1	2		25
detailed reading	0	1		1		5	1	2		10
additional duplicates covered	1	0		2		7	0	0		10
Coverage (%)	100	100		75		75	100	100		80
<b>UK</b>			2	6		3			2	13
detailed reading			2	4		2			1	9
additional duplicates covered			0	1		0			1	2
Coverage (%)			100	83		67			100	85
<b>Other</b>				4	1	2	1		3	11
detailed reading				2	1	2	1		2	8
additional duplicates covered				2	0	0	0			2

	Individuals	Churches and religious communities	International or national public authority	NGO, platform or network	Private enterprise	Professional consultancy, law firm,...	Regional or local authority	Research and academia	Trade, business or professional association	Other	Total number of papers
Coverage (%)				100	100		100	100			91
<b>Total papers</b>	<b>61</b>	<b>5</b>	<b>24</b>	<b>174</b>	<b>7</b>	<b>3</b>	<b>198</b>	<b>11</b>	<b>38</b>	<b>61</b>	<b>582</b>
<b>detailed reading</b>	<b>27</b>	<b>3</b>	<b>22</b>	<b>61</b>	<b>6</b>	<b>3</b>	<b>73</b>	<b>10</b>	<b>17</b>	<b>15</b>	<b>237</b>
<b>additional duplicates covered</b>	<b>31</b>	<b>2</b>	<b>2</b>	<b>62</b>	<b>1</b>	<b>0</b>	<b>61</b>	<b>1</b>	<b>7</b>	<b>31</b>	<b>198</b>
<b>invalid/corrupted files</b>	<b>3</b>			<b>2</b>							<b>5</b>
<b>Coverage (%)</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>72</b>	<b>100</b>	<b>100</b>	<b>68</b>	<b>100</b>	<b>63</b>	<b>75</b>	<b>76</b>

Note: 'detailed reading' cover the 'unique' uploads plus one copy of the duplicates; 'additional duplicates covered' refers to the documents which were uploaded more than once but which are already included in the sample; 'Coverage' is the share of documents uploaded once plus the duplicates in relation to the total number of papers uploaded.

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