



QUESTIONNAIRE SUMMARY: PROJECT AND EGTC PERSPECTIVE

This document is a working document prepared by the CoR administration based on questionnaire contributions submitted by implementation experts. The document has not been endorsed politically by the organisers of the event but will inform the final report on the outcomes of the workshop and future work on simplification of ETC.

The document does not represent the views of the organisers of the event.

The workshop is organised in accordance with the Chatham House rules; i.e. no personalised recording of information.

The follow document is the summarised list of **Project Perspective and EGTC Perspective** responses to the questionnaire **Simplification of European Territorial Cooperation (ETC) in the post-2020 programming period**. 19 responses were received from a range of stakeholders from across the EU, including project managers, beneficiaries and EGTCs.

Key	Description
Problem	The perceived problem that participants faced, in relation to the listed topic
Solutions	What would be a suitable solution?
I.	Solution as: changes of the Legal Base/Regulation/delegating/implementing acts
II.	Solution as: changes in the application of the existing rules
III.	Solution as: other measures

MANAGING AUTHORITY

Support from the Managing Authority

Problem: A common problem was the requirement to involve the MA, due to of the lack of clarity in terms of rules and levels of interpretation and enforcement from the MA. It is related to how the MS perceive the rules and regulations and how the EU has defined certain matters. As stated, other participants expressed limited or no issues with the MA. This is down to lack of familiarity of rules from different MA.

Solutions:

I. The one suggestion for this was for there to be a common project leaders' guide for MAs and funding mechanism stability, which does not change every 6 months (local) and every 7 years (on EU level), which has serious implications for the familiarity of rules for project leaders.

II. Of the two responses, simplification is the key desire here; with a more hands off and trusting approach from the EU and national level when it comes to multiple source funding.

III. Of the three responses, the desire for more universally coherent guidance was universally expressed. It was suggested that such would be aided more regular meetings.

Support in case of unforeseen events

Problem: Of the four relevant responses to problems, there was no consistent response. The responses were as follows: lack of flexibility, lack of preparedness, a lot of paperwork in this circumstance and the over-involvement of the JS, compared to the MA.

Solutions:

I. The one response here expressed the desire for more flexibility of rules.

II. The one response here expressed for, in cases of unanimity, the main project partner should request approval of an unforeseen event directly to JS.

III. The one response here desired JS staff to be better trained.

First level control (FLC)

Problem: Those that found FLC "most complex", mostly expressed the issue of complexity of rules for the FLC to be well versed in INTERREG. Also highlighted is that there are different rules/requirements, across borders, for the appointment of FLC.

Solution:

I. The one response of this field desired that the FLC either be removed altogether or make FLC responsible for quality of their control, in case of audit

II. The one response to this field desired greater harmonisation, particularly in the interpretation by different programmes of EU eligibility regulations.

III. Both responses to this field advocated for better training of FLC.

PREPARATION OF THE PROJECTS

Find reliable partners

Problem: The major concern in relation to reliable partners, predominately, is know-how, awareness and experience of INTERREG projects. Those that have had bad experiences with EU funded projects are put off. Much more about individuals involved, rather than the organisations that contribute to a successful project. Specific challenge with non-EU members' involvement, as partners. Project complexity is also argued to dissuade new potential partners.

Solutions:

I. The one response to this desired a simplification of rules and reduce co-financing rates, to encourage new partners to join and be encouraged to become involved in INTERREG funded projects

II. There were no responses in this field.

III. Of the six responses to this question, a common desire was for a method of generating awareness for potential partners who are interested, in existing projects and for partners who wish to become involved in projects for the first time. One such suggestion an online official yearbook of projects and institutions.



Language and cultural barrier

Problem: Of those that expressed a problem, two noted the lack of a suitable lingua franca (English) and too many languages simultaneously making it too hard to work on. Another complained about the overreliance on English-only procedures and the lack of multilingualism in procedures.

Solutions:

- I.** The one response here advocated for projects tackling language and cultural barriers, even if they are not really, as such, innovative.
- II.** The one response to this field, related to the issue of lack of multilingualism in the procedure desired the radical reorganisation of the IATE base.
- III.** The two response to this, both related to there being too many languages at play simultaneously, expressed choosing one language as a lingua franca (here, English)

APPLICATION PROCEDURE

Questions of eligibility

Problem: Between MS, eligibility is questioned, related to how EU regulations are interpreted and understood by MA between MS, from programme to programme. Clarity and the significance of the perception of certain rules not consistent between MA in different MS.

Solutions:

- I.** The one response to this field suggested a central reference document with all regulations
- II.** The two responses here called for clarity/simplification and comparative harmonisation.
- III.** The two responses to this field called for clearer defined status the eligibility of potential partners, based on their relevancy.

Priority Axes

Problem: Four respondents said there is a lack of clarity in terminology and these are open to interpretation. Please note that the broadness of these terms has been seen as a plus by one other participant. Another participant noted the radical changes in funding rules and regulations with every 7 year period.

Solution:

- I.** The two responses here called for (I) clear regulations and (II) more stability in the legal framework, going through every 7 year period.
- II.** There were no responses to this field
- III.** There were three responses to this field. There focused on more assistance for project applicants and participants, for instance technical and the continuation of territorial facilitators.

Documents required for application

Problem: Some participants believe that the process of documentation is not complex (three), while others feel it is more complex (four), however, all of those who responded agree that the procedure is long and the levels of documentation required is demanding (seven).

Solution:

I. The two responses call for the simplification of the procedure, by (I) centralising or (II) removing certain currently required aspects.

II. The one response to this field called for one, centralised funding application.

III. The one response here calls for a simplified application package.

Timing of selection procedure

Problem: The main problem, that participants had, was that the procedure lasts too long (six).

Solution:

I. The one response to this field desired more standard "typical" calendars for all programmes.

II. The one response to this field calls for the deletion of the several-phases selection procedure.

III. The four responses here desired for the procedure to be sped up; with two participants calling for a two-step application/evaluation process.

AWARDING PROJECTS

Information provided to rejected projects

Problem: The responses we received (four) all had an issue with clarity and complexity in the responses they received.

Solution:

I. No responses for the field were received.

II. No responses for this field were received.

III. Of the responses (four) received, three called for more clarity and less complexity in reasons for rejection and one called for guidance on how to write a good project.

Transparency on the project selection

Problem: One participant highlighted the issue of being an LP and not being aware of the quality standard. One stated there was no transparency in relation to the actual selection process but two others state that, as a programme it operates transparently because of the use of monitoring committees.

Solution:

I. There were no responses to this field.

II. There were no responses to this field.

III. Of the three responses to this field, two called for feedback to aid future applications.

MANAGEMENT OF PROJECTS

Co-financing

Problem: Comparatively, between MS, co-financing opportunities are unequal and dependant on the programme. Some are harder to find co-financing in than others. One participant expressed concern relating to how go about planning for co-financing, in a budget plan.

Solutions:

I. There were no responses to this field.

II. There were no responses to this field.

III. The two responses to this field expressed the following: (I) Increase intervention rates with better quality projects. (II) foresee case in budget plan.

Bureaucracy related to project management

Problem: The main problem that participants faced was the high levels of paper work (eight). This being time and resource consuming. Some participants (two) noted the redundancy of certain elements of the application, such as FLC and SYNERGIE.

I. The two responses to this field suggested (I) using only the IOLF system, as this is more centralised, and (II) deleting FLC altogether, as suggested by others under *First level control*.

II. The two responses to this field suggested as much simplification as possible, in areas such rates for overheads and admin costs, and (II) ensuring one full-time employee committed to administrative management of the project, in the lead partner.

III. The two responses in this field both suggested respect and flexibility with minor budgetary expenses and changes.

VAT rules

Problem: The main problem found for participants was the complexity of VAT rules (two). One response was relating to the specific example of rules related to EU-Switzerland partnership.

Solutions:

I. The one response here called for more understandable rules, in specific relation to EU-Switzerland trade

II. There were no responses to this field.

III. The two responses here desired (I) VAT regulation guidelines for EU/third countries and (II) clarity from programmes about procedures to be respected when referring projects to complex EU/national regulations.

Procurement rules and procedures

Problem: The main feedback here was associated with the link between national and EU level rules and the fact that much of the problems are more associated with the national context. Three participants noted the clarity of EU regulations on the matter, despite there being a distance between local legislation and cases foreseen in budget accounting on iOLF.

Solutions:

I. There were no valid responses to this field.

II. There were no responses to this field.

III. There were two responses to this field. They suggested (I) overcoming the distance between local legislation and EU expectations and (II) the provision of a list of values and what procurement activities should accompany them.

Eligibility costs

Problem: All the problems brought up here are specific problems requiring specific solutions and there are no overarching problems, apart from the general suggestion that many things need to be clarified/simplified.

Solutions:

I. The two responses here, although on different specific problems, called for greater clarity on specific rules and with regard to having centralised reference documents

II. There were no responses to this field

III. The one response here calls for more clarification, specifically on the matter of 20% budget allocation for non-eligible areas, which tends to be misinterpreted.

Exchange rate

Problem: There is a problem, for a number of the participants (three), in the fluctuating exchange rate that means non-Eurozone projects partner comment on having found themselves losing time, in recalculating amounts and losing money. Another point made by a participant is that the rules on exchange rate violate the principal of real costs.

Solutions:

I. The two responses here suggest, generally simplification, with one specifically suggesting the removal of Article 28 of Regulation (EC) No 1299/2013 (or instead emphasised) and the other suggested the need to recalculate amounts, related to currencies is something that can be spared.

II. There were no responses to this field.

III. The one response to this field called for applying the same exchange rate to the date of payment by the programme.

Payment of reported costs

Problem: Two issues are apparent here. Firstly a number of participants noted that the time between submission and payment were too long (three). Secondly, two participants noted that delays and lateness can be an issue.

Solutions:

I. There were no responses to this field.

II. The one response to this field called for less rules or more personnel for management authorities, to allow quicker carrying out of controls.

III. The one response to this field suggested reducing complexity in reporting systems to allow programmes to pay applicants as quickly as possible.

State aid rules

Problem: The overwhelming issue for participants here was that complexity and lack of clarity was causing uncertainty (seven).

Solutions:

I. The two responses here both suggested that INTERREG programmes should be excluded from state aid rules.

II. There were no responses to this field.

III. Of the three responses here, two called for clearer information in manuals and advice given from MA. The other participant called for more guidance and technical assistance.

Simplified cost options

Problem: In the comments in this field, most complemented the improvement of simplified cost options, with it being a step forward since the previous INTERREG funding periods (six); particularly in relation to the clarity and practicality of overheads (two).

Solutions:

I. The one response to this field desired clear descriptions.

II. There were no responses to this field.

III. There were two responses to this field. One called for audit staff to have the same interpretation of simplification rules throughout the whole programming period. The other called for more informative/training sessions for relevant staff of MA/JS and beneficiaries.

Cooperation with national authorities/local authorities

Problem: There is no consistent problem for participants here. The three responses received can be summarised as follows: (I) it is hard to trace back where funds come from and there can, therefore, be budgetary misunderstandings. (II) It is difficult to explain the concrete benefits of INTERREG or such a partnership. (III) There are discrepancies about how cooperation with national/local authorities works in different MS.

Solutions:

I. There were no responses to this field.

II. There were no responses to this field.

III. There were no responses to this field.

Link between national/regional and EU regulations and legislation

Problem: The main problem highlighted is the uneven application of rules, between MS (four). Another issue one participant highlighted is complexity in applicants being the ones to check they are adhering to regulations.

Solutions:

I. The one response to this field called clarification, in regards to EU regulations to allow for a more even interpretation between MS.

II. The one response to this field called for unnecessary complication of rules at national levels to be avoided.

III. The one response to this field desired the provision of simple guidelines in programmes, rather than the requirement of applicants needing to refer to lengthy regulations.



Rules set by the programme

Problem: It is highlighted by two participants that the hierarchy of rules are a major, positive step forward. Problems associated with this include (I) overzealous interpretation of EU regulations and (II) changing rules throughout the reporting procedure.

Solutions:

I. The one response here suggested clarifying EU regulations to reduce uncertainty and build consensus between GDs.

II. There were no responses to this field.

III. The one response to this field desired simplification of EU terms, to reduce unnecessary additional requirements for applications.

Gold plating by Member States

Problem: The main problem felt was the uneven interpretation of EU regulations across borders, put down as broader administrative practises (five).

Solutions:

I. Of the two responses, both suggested clarification of EU regulations, with one of these highlighting that this should be done parallel to regulations of fewer subjects.

II. The one response to this field suggested that a consistent approach among the officers in charge of implementing the regulations at stake.

III. There were no responses to this field.

REPORTING AND FOLLOW-UP

Online reporting systems

Problem: An issue highlighted by many participants is that the system, although complemented for its simplicity, is not especially user friendly or intuitive (four).

Solutions:

I. There were no responses to this field.

II. The one response to this field desired an improvement on systems at an EU level, so they become as usable as mainstream software/apps and include more direct import/export abilities.

III. There were four responses to this field. All suggested different solutions. They were: (I) develop a comprehensive specific accountancy app for EU supported projects, (II) provide a more flexible system, which allows LP access to partners' reports before they are submitted to FLC, (III) development more intuitive and easier to use platform, usable before start of programme period and (IV) simplify the best online reporting and monitoring systems and apply these to all programmes.

Visibility of the projects

Problem: Three broadly related issues were clear from the different three of the responses received. These were: (I) the budget does not leave much for marketing, (II) partners are generally left to market the project on their own and (III) many care more about the an issue than the project itself. All of these challenge the EU's and the project's visibility.

Solutions:

I. There were two responses to this field. These were: (I) include more parameters to evaluate the dissemination and communication strategy of projects and (II) both participants suggested more scope for social media usage and encouraged adoption in projects; with suggested mandatory usage and a social media specific budget allocation.

II. There was one response to this field and the participant here suggested an increased interpretation budget to reach a greater audience.

III. There were three responses to this field. These were: (I) make sure eligibility issues match the needs and interests of the territory/population, (II) provide more guidance on communication/dissemination management of projects, even in application stage of projects and, (III) programmes can do more to promote their most successful projects, in simple, yet identifiable ways.

Share of time dedicated to administrative requirements

Problem: All participants, who responded to this field, agree that the administrative burden is too high (nine), with many stating that it was at such a level that it substantially detracted from time and/or financial resources (five).

Solution:

I. There was one response to this field that highlighted the issue of it being about internal procedures than EU procedures.

II. There was one response to this field that suggested each lead partner have one full-time employee dedicated to the administrative management of the project and to ensure that the programmes trust the applicants.

III. There were three responses to this field. These were (I) reduce the administrative burden, (II) simplify reporting and evidence-generating activities and (III) have a fully functioning procedure on iOLF, from the first reporting period.

Reporting procedure

Problem: Two participants noted that a problem has been in report outputs have been untimely/late. The other responses received noted the following: (I) issues of continuous change in reporting procedure in the three reporting periods and (II) having to comply with rules that participants have not really mastered is complex. One participant noted the improved flexibility of the reporting procedure.

Solutions:

I. The one response to this field called for the FLC to be deleted.

II. The one response to this field called for better harmonisation between programmes.

III. There were two responses to this field. One suggested that projects should be able to set their own reporting periods to avoid holiday periods, such as Christmas and during the summer months. The other suggested there be a fully functioning procedure on iOLF, from the first reporting period.

OTHER COMPLEXITY ISSUES

Others



The following are the additional problems, as individually highlighted by participants who responded to this field.

Response 1

Problem: The split between financial year and accounting year is artificial and will lead to errors and confusion. The accounting and financial year should be the same.

Solutions:

- I. There was no response to this field.
- II. There was no response to this field.
- III. There was no response to this field.

Response 2

Problem: Intercultural issues: they should be much more taken into consideration in the submission procedure. The German, French and especially the Swiss partners do not behave similarly and have very different agendas and act differently so as to deadlines. Moreover, linguistic barriers, different academic calendars greatly hamper a normal flow of information and communication. Every demand from the Common Technical Secretariat should be translated into French and German so that the lead partner does not have to realise this translation requirement, running the risk that some information is wrongly translated by the lead partner.

Solutions:

- I. There was no response to this field.
- II. There was no response to this field.
- III. There was no response to this field.

Response 3

Problem: Trying to control how partners incurred expenditure: Even though they were aware of the rules and training was provided, sometimes expenditure wasn't carried out properly. By the time it comes into Lead Partner as a claim, someone has incurred the expenditure and it cannot be funded due to non-conformity with the rules.

Solutions:

- I. There was no response to this field.
- II. There was no response to this field.
- III. More guidance, technical assistance

Response 3

Problem: Timing of deadlines for reporting (INTERREG Europe Call 1): 1st July and 1st January are very critical periods since they overlap with holidays.

Solutions:

- I. There was no response to this field.
- II. There was no response to this field.
- III. Solutions have already been implemented for the second call.



EUROPEAN GROUPING OF TERRITORIAL COOPERATION AND ACCESS TO EU FUNDING

Please note that, given the limited responses to the questionnaire of EGTC Platform, the following has been prepared.

Members of the EGTC Platform have, over the last two years informed us about difficulties accessing EU funding and being considered as non-eligible in certain EU programmes, which is in direct contrast to the Article 7.3 of the EGTC Regulation.

The reasons that are often given to them are that they do not represent different Member States, that their staff is not recognised or there is simply lack of knowledge in the EU programmes about what an EGTC is, which leads to them not being considered eligible.

The CoR has been informed about problems of eligibility or lack of knowledge in the following EU programmes; Fifth Interreg VB Northwest Europe, Connecting Europe Facility, Urban Innovative Action, URBACT and Horizon 2020, however the list likely does not end here.

The EGTC Regulation envisaged EGTCs as natural entities to implement and manage EU funded programmes and should not be denied participation on grounds of non-eligibility.

The argument that the EGTCs do not represent multiple Member States is incorrect as the very nature of an EGTC is to represent multiple Member States, functioning as a single legal entity which removes many administrative obstacles and simplifies the work of local and regional administrations working on cross-border projects and it thus an ideal entity to implement EU funded projects;

The EGTC Regulation is deliberately flexible, which allows local and regional authorities to establish EGTCs as appropriate for the local conditions. This also includes different staffing policies, with some of them having their own staff, with others delegating staff from local and regional administrations. This arrangement should not stand in the way of their eligibility. Especially as some of the Programmes were flexible enough to accept such working methods as eligible expenses,

The Article 3 of the EGTC Regulation also identifies different entities that can take part in an EGTC. EGTCs should not be disqualified from participating in EU programmes based on the fact that entities other than public authorities can participate as members; as an EGTC is always guided by public interest and never private interests.

The results of the questionnaires show that in certain cases, the EU programmes showed a considerable flexibility and willingness to adapt to EGTC needs and specificities, and we warmly welcome their commitment, which we would like to see happen in all EU funded programmes.