FOLLOW-UP PROVIDED BY THE EUROPEAN COMMISSION
TO THE OPINIONS OF THE
EUROPEAN COMMITTEE OF THE REGIONS
PLENARY SESSION OF FEBRUARY 2021
94th REPORT
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| **6.** | **Restart of Cultural and Creative Sectors**  
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| **8.** | **A new ERA for Research and Innovation**  
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<td>5. calls on the European Commission, as the institution in charge of monitoring the implementation of EU legislation, and more importantly the Member States and regions with legislative powers, to coordinate the transposition of directives with the neighbouring states and regions, so that new legal barriers and administrative disparities do not arise as a consequence of a lack of coordination; at the same time, calls on the Member States and regions with legislative powers to examine their national or regional legal frameworks with regard to their impact on border areas;</td>
<td>The Commission has introduced a Territorial Impact Assessment in the Better Regulation Package to assess the impact of new legislative proposals on different types of territories (including border regions) and mitigate possible negative effects as far as possible. The ‘Border Focal Point’ (see point 10 below), will, among others, provide support to Member States and other key players to address legal and administrative border issues in the regions, notably relating to the transposition of EU directives or coordination requirements. It will also help in increasing awareness of the effects the differing transposition of EU Directives may have on border regions.</td>
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<td>7. calls on the European Commission to take a cross-cutting view of the situation of the border regions when drawing up its policies and designate Cross-border Contact Points in all DGs that could potentially deal with cross-border issues, especially in the fields of environment, emergency services, risk management, transport, healthcare, education, spatial planning digitalisation, communication, culture, tourism, economic development and employment. New and revised EU legislation should consider the provision of CPS in these</td>
<td>In its Communication ‘Boosting growth and cohesion in EU border regions’ adopted in 2017, the Commission proposed a set of actions to enhance the competitive and cohesive situation of border regions, notably by addressing some of the legal and administrative barriers currently hampering closer cooperation and interaction. The implementation of these actions is promoted across the Commission and Union policies by the ‘Border Focal Point’ – established with the purpose of addressing any relevant cross border dimension of a horizontal</td>
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1 Communication ‘Boosting growth and cohesion in EU border regions’ (full reference in footnote 5), p. 6 and section 3.2.
2 Policy fields identified by the ESPON Analysis where most CPS are established.
relevant sectors, with the aim of supporting their implementation; and/or sectoral nature with all concerned Commission services. Those cover all the fields identified in Committee’s opinion.

| 8. calls on Member States, and regions with legislative powers to establish stable, permanent, cross-administration national cross-border contact points, which would exchange experiences and discuss challenges the Local and regional authorities (LRAs) are facing on a particular border, coordinate the implementation of EU legislation and work on the systematic removal of border obstacles (also in relation to establishing and providing CPS). These contact points could be the same bodies proposed in the ECBM Regulation, if these are set up in the region in question, but would hold wider responsibilities. The aforementioned contact points should appoint a person in charge with fluency in the official languages of the border regions. The work of these contact points should lead to the removal of obstacles identified by local and regional actors. They could evaluate the situations in border regions and propose joint approaches and actions that would lead to better services for citizens, by optimising the use of available resources on both sides of the border and setting up coordination mechanisms with the cross-border programmes and other EU programmes. The EU Border Focal Point should provide coordination and methodological support, as well as facilitating the exchange of good practices between border regions in Europe; | The Border Focal Point promotes the identification and the exchange of good practices in many ways: commissioning dedicated analysis and studies (i.e. on cross border rail connections), developing recommendations and guidance (i.e. on cross border healthcare), providing technical/legal support (i.e. ‘b-solutions’ initiative), and disseminating good practices (through conferences, workshops and an on-line platform).

The European Cross-border mechanism (ECBM) proposal foresees the creation of national contact points that would contribute to the points indicated in the opinion of the Committee. |

| 11. believes that the EU should support a coordinated approach at the borders when it comes to implementation of EU legislation. In cases where that was not successful and when national laws do not allow for cooperation, the EU should provide for a European solution/framework to be chosen by CPS providers; | The correct transposition of EU Directives by neighbouring Member States may result in differing rules (e.g. minimum standards or periods) thus creating legal obstacles in border regions. The issue of barriers linked to differences in national legal frameworks and in administrative cultures is difficult for the programmes to address alone (as they required decisions beyond programme and project |
13. reiterates that the analysis of existing border obstacles carried out by the European Commission within the cross-border review and the consequent b-solutions projects clearly demonstrate the need for a legal instrument on the ground. In more than one-third of the 43 analysed b-solutions, the ECBM would be a suitable tool that would help resolve the obstacles. Notably in those cases where the proposed solution would require amendment to the currently applicable legal or administrative framework on one side of the border;

14. in this context calls on local and regional stakeholders to strengthen their capacities so they are able to play a stronger and more effective role as "initiators" of solutions under the proposed ECBM. For the mechanism to be implemented correctly, LRAs must be able to understand obstacles sufficiently and thus be capable of clearly defining workable legal or administrative solutions;

18. proposes to the EC, interested Member States, regions with legislative powers and cross-border structures at local and regional level to test applying the principles and procedures of the proposed ECBM on concrete projects to gain a better understanding of how this instrument could apply to specific conditions and could be helpful in overcoming existing legal and administrative obstacles. Many cross-border areas have in the past acted as laboratories of cross-border cooperation and produced positive results in solving cross-border issues;

In order to address existing legal and administrative cross border obstacles, the Commission launched with the Assembly of European Border Regions the initiative ‘b-solutions’ aimed at supporting local and regional authorities in border areas to solve identified obstacles to the implementation of cross border actions. The support consists mainly in technical assistance by a legal expert of the required competence. A first compendium describing 43 cases was published.\(^4\)

As described above, the Commission launched the initiative ‘b-solutions’ that brings the possibility to work on pilot innovative solutions for cross-border obstacles. Furthermore, the inclusion of the Interreg-specific Objective 1 ‘Better Cooperation Governance’ in the proposal for a European Territorial Cooperation (ETC) regulation for the 2021-2027 programme period creates the opportunity for Member States and regions to explore innovative solutions for cross-border obstacles. The Commission is encouraging Interreg programmes to use this opportunity to address also cross border obstacles.


23. calls for the development of cross-border public services to be mentioned as an eligible activity in Cohesion Policy, specifically within the Interreg programme (without this entailing any reduction in other items under the programme), as well as in other financial instruments covered by the forthcoming Multiannual Financial Framework and the Next Generation EU recovery instrument in response to the COVID-19 pandemic. To make funding programmes more attractive, the administrative burden of applying for and settling accounts for such funding must also be reduced; While specific eligibility rules are established at the level of individual Interreg programmes, the Commission clearly promoted the development of cross border public services in the Border Orientation Papers submitted to programmes authorities in 2019. Article 4(2) of the European Territorial Cooperation Regulation for the programming period 2021-2027 clearly allows the European Regional Development Fund (ERDF) to support, under Interreg programmes, the ‘sharing of facilities and of human resources’. Moreover, in the 2021-2027 period, the European Territorial Cooperation Regulation includes a new Interreg-specific objective aimed at improving the governance of cooperation and programmes can allocate up to 20% of the ERDF budget to related actions. One of the actions thereunder is to ‘enhance efficient public administration by promoting legal and administrative cooperation and cooperation between citizens, civil society actors and institutions, in particular, with a view to resolving legal and other obstacles in border regions’.

24. demands all managing authorities in border regions to finance cross-border operations/actions/projects within their mainstream regional programmes (ERDF and ESF) in order to complement and deepen the action of the INTERREG programmes; In the 2021-2027 period, there is an obligation of all cohesion policy programmes under the Investment for jobs and growth goal to set out interregional cooperation actions ‘with beneficiaries located in at least one other Member State’. This means ensuring that actions and investments, which have a higher EU benefit when implemented jointly should be promoted. This objective can be reached through, for instance, synergies and alignment with the priorities of the macro-regional strategies and sea-basin strategies/initiatives and investments in cross-border services or infrastructures.

25. underlines the importance of the Interreg programme for cross-border regions over the past 30 years. Interreg has backed the cooperation that has enabled the administrations and authorities of the different cross-border regions to draw closer together and enter into dialogue, pushed the limits of cross-border cooperation and has supported projects that have had direct results in the creation of cross-border public services;
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<th>33. calls for support for cross-border connectivity.</th>
<th>To encourage sustainable mobility and economic development in the border regions, the Commission published in 2018 a ‘Comprehensive analysis of the existing cross border rail transport connections and missing links on the internal EU borders’. The study provides an inventory and proposes recommendations how to smoothen the implementation of cross border railway connections. Furthermore, a study mapping the existing cross-border public transport services is ongoing. This will identify recurrent legal and administrative obstacles faced by such services, as well as solutions for those obstacles. This is meant to serve as a tool for promoters of future or enhance cross-border public transport services.</th>
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<td>In some border regions, citizens face practical difficulties in accessing the other side of the border, owing either to natural barriers (mountains or rivers) which do not have connecting infrastructure such as a road or a bridge between the two sides, or to a lack of suitable regular public transport services. Facilitating connectivity would increase exchanges, leading to greater integration of citizens in border regions;</td>
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<td>38. calls on border regions, and specifically Euroregions, working communities, European Groupings of Territorial Cooperation (EGTCs) and other cross-border structures to consult their citizens on the services they find to be lacking or those that could be improved in their region and to address these needs and potentially design new or improved cross-border services of common interest;</td>
<td>To support local and regional authorities and relevant stakeholders in understanding, developing and improving cross border public services, the Commission will carry out in 2021 a dedicated study on cross border public services which builds upon the one produced by European Spatial Planning Observation Network (ESPON) in 2018. Results are expected in 2022.</td>
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<td>41. reiterates opportunities Member States have missed during the recent pandemic of COVID-19 when they instinctively and unilaterally closed borders, without thinking of combining efforts at the EU internal borders and providing healthcare and emergency services to citizens living in the bordering regions. By working together, and sharing expertise and resources, the crisis could have been better addressed. This should, however, be seen as a lesson which once again proves the need for cross-border public services and coordinated European approaches to common interest.</td>
<td>In order to draw lessons and provide recommendations in case of future crises, the Commission commissioned a study on the impact of the COVID-19 measures along EU internal borders on cross-border communities at large (businesses, workers, citizens). The report was published in February 2021 and includes 20 case studies.</td>
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7. [https://www.espon.eu/CPS](https://www.espon.eu/CPS)

problems. It should be stressed that cross-border cooperation in the field of health and emergency services, even outside of times of crisis, is very important for providing the public with good care and should be particularly encouraged;
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<td>1. observes that the COVID-19 pandemic demonstrates the importance and the vulnerability of our food systems in Europe, and highlights the need for resilient, sovereign food systems in which the economic viability of rural territories is essential;</td>
<td>The Farm to Fork Strategy(^1) states that our food system must become more sustainable and resilient. The strategy includes actions to promote the global transition. Trade is part of the equation on food security, for which there is an agreed international definition. The ongoing COVID-19 health crisis shows that the EU’s food supply chain is overall resilient to large-scale disruption, and that the baseline conditions to deal with crises are solid. However, while the EU’s food supply chain was overall resilient, some specific sectors, products, and groups of workers suffered from higher levels of pressure from the crisis due to the disappearance of large sections of key demand sources, in particular from restaurants, hotels, and catering, as well as to mobility restrictions and to new sanitary requirements.</td>
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<td>8. considers that livestock farmers' quality of life and animal welfare go hand in hand and deserve an alternative approach to livestock farming, in which farmers no longer sell at a loss and where they respect their animals;</td>
<td>The forthcoming review of the animal welfare legislation will look at the legislative gaps identified in 2012 and at any new gaps that could emerge from the ongoing evaluation of the rules in force. In addition to the above, the Farm to Fork strategy commits the Commission to explore options for animal welfare labelling to address the increasing demand of today’s consumers. Further actions in this area will elaborate on the findings of the evaluation of the EU strategy for protection and</td>
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<td>9.</td>
<td>points out that many specialised farms with heavy purchases of inputs (oil, fertilisers, pesticides, antibiotics, etc.) are more economically vulnerable due to their higher production costs, dependence on upstream firms and greater exposure to economic risks;</td>
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<td>12.</td>
<td>points out that the proposal to significantly reduce the use of chemical fertilisers and pesticides and antibiotics and to increase ecological focus areas…</td>
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<td>15.</td>
<td>stresses the need to see waste as resources, for example, reclaimed water, with its essential nutrient inputs, for irrigating areas where there is a shortage, or cereal straw residue that is processed to become a productive asset for livestock farming, green building or mulch;</td>
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<td>16.</td>
<td>stresses that agroecology reduces the carbon footprint of agriculture, fosters the recovery of biodiversity, ensures or restores the fertility of soil, prevents air and water pollution, increases the economic resilience of farms, and guarantees healthy and accessible food;</td>
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<td>welfare of animals (2012-2015) in terms of consumers’ awareness and demand for information.</td>
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<td>One of the key objectives of the future common agricultural policy (CAP) is to increase competitiveness and agricultural productivity in a sustainable way to meet the challenges of higher demand in a resource-constrained and climate uncertain world.</td>
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<td>As stated in the Farm to Fork Strategy, the Commission will take additional action to reduce the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030, and will act to reduce nutrient losses from fertilisers by at least 50%, while ensuring that there is no deterioration in soil fertility.</td>
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<td>In 2020, the EU adopted new rules that establish the minimum requirements to allow the safe use of treated urban wastewater in agricultural irrigation. With the Water Reuse Regulation(^2), not only will farmers be able to count on more predictable water supplies but technology providers will have new investment opportunities.</td>
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<td>The Commission agrees that sustainable agricultural practices such as precision agriculture, agroecology (including organic farming), carbon farming and agro-forestry, are win-win and profitable strategies for farmers to tackle climate change, protect the environment and preserve biodiversity. The Commission has stressed in the Biodiversity Strategy to 2030(^3) that agroecology can provide healthy food while maintaining productivity, increase soil fertility and biodiversity, and reduce the footprint of food production. Organic farming</td>
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\(^3\) COM(2020) 380 final.
in particular holds great potential for farmers and consumers alike. The sector creates jobs and attracts young farmers.

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<th>21. notes that agroecology develops farms that are on a human scale and as free range as possible, and which aim for self-sufficiency in feeding their animals;</th>
<th>Special attention is paid to human and social stakes of sustainable agriculture in the Farm to Fork Strategy: The considerations of workers’ social protection, working and housing conditions as well as protection of health and safety will play a major role in building fair, strong and sustainable food systems. The Commission is also committed to reduce the dependency on critical feed materials.</th>
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<td>22. notes that agroecology involves more: a. small and medium-sized farms that will help stop the decline in agricultural jobs and start to help young farmers get established again,</td>
<td>Agroecology and farm size are not necessarily linked. For instance, organic farms are bigger than conventional farms on average. Special attention is paid for small and medium enterprises, the CAP reform proposals have several provisions supporting smaller farms.</td>
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| 23. considers that digitalisation can make certain production and marketing practices easier; notes, however, that widespread development of automated and smart agricultural machinery raises the question of data sovereignty, which the farmers may not be able to maintain control over; takes the view that farmers should not outsource the specific knowledge relating to their farms and should retain the right to repair their machinery | The Commission points out that the aspects raised in paragraph 23 related to data and digitalisation in agriculture are not specific to agroecology. The Commission is aware that data ‘ownership’ access and reuse rights along the agri-food value chain are aspects that deserve attention. The Commission – as announced in its Data Strategy\(^4\) and reconfirmed at the agricultural council in December 2020 – confirms its commitment to review the experiences gained with the Code of Conduct of agricultural data sharing by contractual agreement in collaboration with stakeholders and Member States.

In its data strategy, the Commission also announced it may approach questions related to intellectual property rights (IPR), trade secrets and the clarification of rights on co-generated data (i.e. data which has been created by more than one player) in the context of the planned Data Act, which aims to create a fair data economy. |

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27. notes that agroecology, being based on an ecosystem of small and medium-sized farms, cannot be developed if CAP direct payments are still allocated per hectare and not per person active on the farm;  
38. proposes a gradual shift from a basic payment per hectare to a basic payment linked to the number of people working on the farm and for direct payments to be funnelled as a matter of priority to small and medium-sized farms and agro-ecological practices;  

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<th>27. notes that agroecology, being based on an ecosystem of small and medium-sized farms, cannot be developed if CAP direct payments are still allocated per hectare and not per person active on the farm;</th>
<th>As illustrated by the list of examples of agricultural practices that can be supported by eco-schemes published by the Commission, and as proven by the experience with agri-environmental measures, payments per hectare can be used efficiently to support farmers in adopting agroecology and other practices in favour of environment and climate.</th>
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<td>30. notes that public research must step up its support for agroecology;</td>
<td>The Commission has and is supporting research on ecological approaches, including agroecology and organic farming, since before Horizon 2020. ‘Ecological approaches from farm to landscape’ are one of the five priorities of the strategic approach to EU agri-cultural research and innovation (2016). Under Horizon 2020, the Commission has invested €240 million in research projects relevant for agroecology. The Commission will continue to step up its support to R&amp;I (Research and Innovation) on agroecology under the new R&amp;I Framework Programme Horizon Europe (2021-2027). This will include a partnership with the Member States on ‘Accelerating farming systems transition: agroecology living labs and research infrastructures’. The planned Horizon Europe mission ‘Caring for Soil is Caring for Life’ will accelerate the uptake of agroecology by creating the necessary knowledge and providing ready-to-use solutions for sustainable soil management as an enabler for agroecological farming practices. Besides, the Commission will continue to fund</td>
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33. proposes that the future CAP should further promote agroecological practices such as:
   a) crop diversification, which makes farms less vulnerable to natural or sectoral hazards,
   b) long crop rotations and plant associations that share the agronomic benefits,
   c) trees, hedges, ponds and stony habitats around/in plots,
   d) cultivating leguminous plants which naturally incorporate nitrogen into the soil,
   e) mixing species and varieties in the same plot,
   f) good and constant soil cover which prevents erosion,
   g) farmers reclaiming local farmer-saved seeds and local animal breeds that are better adapted to the soil, climate, etc.,
   h) mixed crop-livestock farming,
   i) replacing the chemical approach to crops with the integrated management approach;

The future CAP as proposed by the Commission contains elements, which will require or will be able to support all of the nine practices listed under this point. Member States will choose how and to what extent to support these practices through their CAP Strategic Plans on the basis of an assessment of needs (anchored in thorough analysis). They will do so in response to the CAP’s specific objectives and in light of the recommendations made by the Commission in December 2020.\(^7\)

34. calls, in light of the proposals it made in its opinion on the CAP, for the eco-schemes in the next CAP to incorporate the quantified objectives of the Farm to Fork (F2F) strategy: reducing nutrient losses by at least 50%, fertiliser use by at least 20%, the use and risk of chemical pesticides by 50% and antimicrobials by 50%, and achieving 10% ecological focus areas and 25% of land under organic farming;

In its recommendations of December 2020\(^8\), the Commission requested Member States to set ‘national values’ (national targets) in their CAP Strategic Plans against the EU-level targets referred to here by the Committee. A range of future CAP tools (as well as tools outside the CAP) can help achieve these national targets – including, but not limited to, eco-schemes.

37. reinforcement of conditionality by inclusion respect for the rights of agricultural workers (introducing the concept of social

The inclusion of social conditionality has been raised by the European Parliament in the on-going negotiations of the new post 2020 CAP proposals.

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\(^7\) see Communication COM(2020) 846 final and related staff working documents.

\(^8\) see Communication COM(2020) 846 final.
A task force (involving the Commission, Parliament and Council) is analysing the options in this respect in margin of the Trilogue meetings on the CAP reforms.

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| 40. recommends that, in order to promote the agroecological transition, the Member States introduce a system of bonuses and penalties as part of the eco-schemes of the new common agricultural policy: for example, a bonus for increasing crop diversification, financed by a penalty on chemical fertilisers and pesticides and antibiotics, or a bonus for grazing livestock, financed by a greenhouse gas penalty proportional to the number of ruminants reared; | The Commission published a non-exhaustive list of potential agricultural practices<sup>9</sup> that the eco-schemes could support in the future common agricultural policy (CAP). The list of potential agricultural practices includes organic farming practices and agroecology such as crop rotation with leguminous crops or low intensity grass-based livestock system. This list also recalls the target to reduce by 50% the overall use and risk of chemical pesticides and reduce use by 50% of more hazardous pesticides by 2030. Moreover, management techniques play a key role in the emission of greenhouse gases. |

| 42. recommends that measures under the second pillar of the CAP should prioritise [..] d. organic and local catering, | The concept of ‘local’ is a very complex one and simple recommendations to prioritise local over non-local does not guarantee an improved climate/environmental sustainability performance. This being said, the Commission will analyse how best to enhance resilience of regional and local food systems. The Commission will in particular facilitate the broadening of the supply of suitable high-quality and locally-adapted plant reproductive material to support adaptation in agriculture. As part of the Organic Action Plan<sup>10</sup>, it will also stimulate a greater uptake of organics in public canteens and as part of EU school scheme, engage with Member States to identify ways to increase further the distribution of organic products in schools. |

| 46. proposes that ruminant farming should move towards permanent grazing, except when wintering; | The Commission is of the opinion that there is no one-solution approach. The Commission will develop with Member States an integrated nutrient |

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<sup>10</sup> COM(2021) 141 final.
management action plan to address nutrient pollution at source and increase the sustainability of the livestock sector. The Commission will also work with Member States to extend the application of precise fertilisation techniques and sustainable agricultural practices, notably in hotspot areas of intensive livestock farming and of recycling of organic waste into renewable fertilisers. This will be done by means of measures, which Member States will include in their CAP Strategic Plans such as the Farm Sustainability Tool for nutrient management, investments, advisory services and of EU space technologies (Copernicus, Galileo).

| 47. calls for industrialised off-land farming of monogastric animals (pigs, poultry), which produces many negative externalities in terms of public health and the environment, to evolve fully or partially into free-range farming with a limit on the number of animals per building and per hectare of feeding surface area; | The Commission will act to reduce nutrient losses by at least 50%, while ensuring that there is no deterioration in soil fertility. This will reduce the use of fertilisers by at least 20% by 2030. This will be achieved by implementing and enforcing the relevant environmental and climate legislation in full, by identifying with Member States the nutrient load reductions needed to achieve these goals, applying balanced fertilisation and sustainable nutrient management and by managing nitrogen and phosphorus better throughout their lifecycle. 

The Commission will develop with Member States an integrated nutrient management action plan to address nutrient pollution at source and increase the sustainability of the livestock sector. The Commission will also work with Member States to extend the application of precise fertilisation techniques and sustainable agricultural practices, notably in hotspot areas of intensive livestock farming and of recycling of organic waste into renewable fertilisers. The Commission will ensure that the CAP Strategic plans are assessed against robust climate and environmental criteria. These plans should lead to a higher uptake of sustainable practices such as precision agriculture, organic farming, |
48. calls for an end to cage rearing, as called for in a recent citizens’ initiative and as it urged in its opinion on the CAP; In its Farm to Fork Strategy, the Commission has planned a review of the animal welfare framework by 2023. The Commission will consider this specific matter, also raised by the European Citizens’ Initiative ‘End the Cage Age’.

49. suggests, in the interests of animal welfare, developing on-farm slaughter and small local abattoirs; The Commission has recently proposed an additional possibility to allow hygienic slaughter on the farm under certain conditions. It will apply as of the middle of 2021. Small local slaughterhouses are already allowed, subject to approval by competent authorities, which can adapt the EU food hygiene requirements when situated in regions that are subject to special geographic constraints and, in other cases, as regards the construction, layout and equipment of establishments.

52. also recommends clear, mandatory labelling of the husbandry method, covering the animal’s lifecycle, including its transport, such that producers can obtain recognition of improvements in their practices and consumers can choose products in line with their wishes, along the lines of European egg labelling; Some aspects of this recommendation will be assessed in the Commission’s revision of EU marketing standards for agricultural products. In addition, a subgroup on animal welfare labelling has been established under the EU Animal Welfare Platform. The Commission will also launch a study to collect information on the current labelling schemes with animal welfare claims, and the lessons that can be drawn from their experiences. The Commission will consider options for animal welfare labelling in the review of the animal welfare framework.

Based on this, the Commission will consider which options are the most appropriate in the future.

53. recommends that the new law on sustainable food systems announced in the F2F The Farm to Fork Strategy acknowledges the need to shift to healthier and more sustainable diets. It

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11 See https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12772-Revision-of-EU-marketing-standards-for-agricultural-products
strategy should establish a legal framework obliging the EU to begin a genuine agro-ecological transition that shifts demand for food by providing an environment conducive to dietary changes, curbs the increase in obesity, reduces meat consumption, shortens supply chains and drastically reduces food waste; sets forward a number of actions that will together support this transition. In particular, the Commission will propose by 2023 a legislative framework for sustainable food systems.

The Commission is also undertaking a review of the EU promotion programme for agricultural products, with a view to enhancing its contribution to sustainable production and consumption, and in line with the shift to a more plant-based diet, with less red and processed meat and more fruit and vegetables.

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<tr>
<th>56. calls on the European Commission to propose a new European directive on agricultural soils to halt the decrease in their organic matter content, stop erosion and prioritise soil life in agricultural practices;</th>
<th>The Commission has committed in its Biodiversity Strategy for 2030, that it will ‘put forward a proposal for legally binding EU nature restoration targets in 2021 to restore degraded ecosystems, in particular those with the most potential to capture and store carbon’ specifying that ‘the impact assessment will also look at the possibility of an EU-wide methodology to map, assess and achieve good condition of ecosystems so they can deliver benefits such as [...] soil health’. Soil health for all ecosystems, including agro-ecosystems, requires among others an adequate content of organic matter and soil biodiversity and the prevention of erosion.</th>
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<td>57. recommends strengthening the water directives by excluding derogations (Nitrates Directive);</td>
<td>The upcoming Commission Zero Pollution Action Plan for water air and soil will emphasise the importance of full implementation of water legislation and the mainstreaming of water objectives in other legislation to reduce pressures and increased investment towards the Zero Pollution Ambition. A derogation to the maximum amount of nitrogen set in the Nitrates Directive(^\text{12}) is granted by the Commission only when it is scientifically demonstrated that this would not prejudice the achievements of its water quality objectives nor lead to additional pollution. A derogation decision</td>
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therefore includes specific conditions, which go beyond the requirements that are in the National Action Programme.

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<tr>
<th>59. in line with its opinion on agricultural genetic resources, calls for new European legislation on seeds to enable the use and marketing of farmer-saved seeds, in particular by making the changes proposed in the new Organic Farming Regulation for inclusion in the organic seed database;</th>
<th>In the Biodiversity Strategy to 2030, the Commission stressed that the decline of genetic diversity must be reversed, including by facilitating the use of traditional varieties of crops and breeds. This would also bring health benefits through more varied and nutritious diets. The Commission is considering the revision of marketing rules for traditional crop varieties in order to contribute to their conservation and sustainable use. The Commission will also take measures to facilitate the registration of seed varieties, including for organic farming, and to ensure easier market access for traditional and locally adapted varieties. As part of new Organic Action Plan the Commission intends to earmark funding to support the preservation and use of genetic resources, pre-breeding and breeding activities, and the availability of organic seeds, and to contribute to the development of organic heterogeneous plant reproductive material and plant varieties suitable for organic production. It also plans to strengthen farm advisory services, notably as part of Agricultural Knowledge and Innovation System (AKIS), to promote knowledge exchange of material suitable for the organic farming.</th>
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<tr>
<td>60. calls for EU legislation to exclude genetically modified or mutagenic seeds, in order to promote biodiversity;</td>
<td>EU legislation ensures that the development of modern biotechnology, and more specifically of genetically modified organisms (GMOs), takes place in safe conditions. Suitable measures can be put in place to ensure coexistence of GMOs with conventional and organic crops. A Commission study regarding the status of new genomic techniques under Union law, as</td>
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The study assessed the status of these techniques, and outlined their potential contributions to the objectives of the Green Deal as well as relevant concerns. The Commission will base any potential policy action in the field on the outcome of the study.

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<tr>
<th>62. in order to guarantee the right to agro-ecological food for the whole population, recommends measures such as: a. reducing VAT on organic, local and seasonal products, b. &quot;local&quot; meal vouchers for such products, c. a significant percentage of organic, local and seasonal products in mass catering;</th>
<th>In the context of the Farm to Fork Strategy, the Commission is preparing a framework for sustainability labelling that will better address the concern. Fiscal policy is Member States’ matter and it is not in the remit of the Commission. As announced in the Farm to Fork Strategy, tax incentives should also drive the transition to a sustainable food system and encourage consumers to choose sustainable and healthy diets. The Commission’s proposal on VAT rates (currently being discussed in the Council) could allow Member States to make more targeted use of rates, for instance to support greater consumption of fruit and vegetables while respecting the principle of fiscal neutrality. EU tax systems should also aim to ensure that the price of different foods reflects their real costs in terms of use of finite natural resources, pollution, greenhouse gas emissions and other environmental externalities. Finally, the Commission has adopted a new Organic Action Plan(^\text{15}) that addresses the whole value chain and proposes a number of concrete actions to boost consumption and support the achievement of 25% of agricultural area under organic farming by 2030. Many of the actions are in line with the suggestions by the Committee.</th>
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<tr>
<td>64. calls for the EU to stop importing agricultural products that do not comply with</td>
<td>As announced in the Green Deal(^\text{16}) and Farm to Fork Strategy, the EU is committed to raise</td>
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\(^{14}\) SWD(2021) 92 final.  
European social and environmental production standards, including those set out in the Farm to Fork strategy, and that are in unfair competition with European production (…) and exporting surpluses at prices below European production costs, often to the detriment of producers in third countries; environmental standards globally, and to ensure that all agrifood products that are placed on the European market fully comply with relevant EU regulations and standards. Any proposal in this regard will have to comply with the EU’s international obligations, including those under World Trade Organization (WTO) rules. The Communication on the EU Trade Policy Review – An Open, Sustainable and Assertive Trade Policy\(^{17}\) – will support the green transition and promote responsible and sustainable value chains. It should contribute to enhance cooperation to obtain ambitious commitments from third countries in key areas such as animal welfare, the use of pesticides and the fight against antimicrobial resistance. Export subsidies are no longer used in the CAP so there is no instrument that could potentially compensate for price differences between the EU internal prices and world market prices. In fact, EU internal prices reflect the world prices for agricultural products. Most support granted to EU farmers is in the form of non-trade distorting income support so impact on third country producers is minimal. 65. recommends, as it did in its opinion on the CAP, introducing new multilateral and bilateral agricultural trade rules that are fairer and more solidarity-based, and incorporate the agro-ecological approach; As mentioned in the Farm to Fork Strategy, through its external policies, including international cooperation and trade policy, the EU will pursue the development of Green Alliances on sustainable food systems with all its partners in bilateral, regional and multilateral fora. EU trade policy should contribute to enhance cooperation with and to obtain ambitious commitments from third countries in key areas such as animal welfare, the use of pesticides and the fight against antimicrobial resistance. On the multilateral front, there is currently divergence of views among WTO Members on the

\(^{17}\) COM(2021) 66 final.
way forward on the substantive elements of the agricultural negotiations. Revision of current substantive rules or introduction of new rules does not seem likely in the near future. However, future negotiations on the rules on domestic support under the Agreement on Agriculture should take into account the environmental sustainability aspects in line with EU’s ambitions under the Green Deal and the Farm to Fork as well as indicated in the EU Trade Policy Review.

66. calls for more support to be given at European level to independent public research in agro-ecology/agroforestry and participatory research with farmer-researchers, including in the field of social science studying the dynamics of socio-technical transition; welcomes the Commission's initiative to promote and coordinate a network of agro-ecological experiments;

The candidate R&I partnership that the Commission is proposing under Horizon Europe under the title ‘Accelerating farming systems transition: agroecology living labs and research infrastructures’ will aim to accelerate the transition towards sustainable, climate and ecosystem-friendly farming practices by:

- enabling to better grasp short to long-term agroecological processes from farm to landscape levels through novel methods;
- creating spaces for real-life experimentation where innovative practices will be co-developed with farmers and other partners; and
- creating knowledge sharing and networking mechanisms favouring quick adoption of agroecology across, and strengthening the European agroecology research and innovation ecosystem.

The partnership is planned to be co-funded with the Member States and Associated Countries who wish to support it, and be launched in 2023-2024. Dialogue initiated by the Commission with Member States and Associated Countries on the governance of the partnership has led to the establishment of a new Working Group on Agroecology under the SCAR (Standing Committee on Agricultural Research) to develop the partnership proposal. 22 countries have nominated representatives to the Working Group.
so far.
### Points of the European Committee of the Regions opinion considered essential

1. welcomes the 8th Environment Action Programme (EAP), which defines a strategic approach for environment and climate policies to 2030 and keeps a long-term vision for 2050 for living well within the planetary boundaries with a focus on better implementation and monitoring; calls for the EAP to have a strong complementary role to the European Green Deal and to support the EU’s green recovery;

### European Commission position

The Commission’s proposal for an 8th Environment Action Programme¹ (EAP) reflects the new political context in which the European Green Deal already outlines the EU’s environmental and climate objectives. In this context, its added value, though slightly different from its predecessor, is multifold.

Through the 8th EAP, the Council and the European Parliament are invited to endorse the overarching objectives of the European Green Deal: climate neutrality, adaptation to climate change, protecting and restoring biodiversity, circular economy and zero pollution ambition.

It provides a stable political framework until 2030, beyond the mandate of the current Commission. It constitutes an opportunity for the three institutions to confirm their commitment to accelerate the Union’s transition to a climate-neutral, resource-efficient, clean and circular economy in a just and inclusive way and to achieve the Sustainable Development Goals. By 2050, we want to ensure wellbeing for all, while staying within the planetary boundaries.

With climate and environment policies being at the centre of the Green Deal, there is a need to measure progress in a comprehensive way towards the Union’s environmental and climate objectives for the purpose of strategic political communication.

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¹ COM(2021) 652 final.
The proposal for the 8th EAP announces a ‘new monitoring mechanism’ to track the evolution on the 2030 and 2050 objectives, and, if necessary, adapt the course of action.

On 17 February 2021, it was launched a targeted consultation process with a view of choosing headline indicators for strategic political communication by end 2021.

2. argues that the EAP should aim to increase the connection between environment policy and health. A healthy living approach needs to be at the basis of all EU policies promoting human health, a healthy planet, a healthy economy and a healthy society with opportunities for all;

The 8th EAP proposal promotes a regenerative economy which gives back more to the planet than it takes. This is an explicit recognition that human wellbeing and prosperity depend on the healthy ecosystems within which we operate.

This term is used so as to underline that not only should human activity not harm the environment, in line with the European Green Deal’s oath to ‘do no harm’, but that it should also regenerate the natural environment and the ecosystems upon which our and future generations’ wellbeing depend.

In addition, the 8th EAP proposal sets out thematic priority objectives in line with the European Green Deal, among them the zero pollution ambition for a toxic-free environment, which explicitly identifies the protection of the health and well-being of citizens from environment-related risks as part of this ambition. As announced by the European Green Deal, the Commission will present a Zero Pollution Action Plan on air, water and soil, to better monitor, report, prevent and remedy pollution from air, water, soil, and consumer products. The Action Plan should be adopted in second quarter of 2021.

As part of the work on the 8th EAP monitoring mechanism, the European Environment Agency and the European Chemicals Agency will support the Commission in improving the availability and relevance of data, for example concerning the links between environment, social and health policies.

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<td>3. considers that the &quot;do not harm&quot; principle, as well as being a healthy living approach, should guide the recovery and resilience plans to ensure policy integration and coherence;</td>
<td>By promoting enabling conditions such as policy integration and policy coherence for sustainability, the European Green Deal’s ‘do no harm’ oath or modern governance tools, the 8th EAP supports not only EU but also Member States’ efforts to integrate environment, climate and broader sustainability considerations into other policies as well as their implementation. The oath to ‘do no harm’ is also at the heart of the Recovery and Resilience Fund: the investments made by Member States as a part of the Recovery and Resilience Plans must avoid any negative impact on the EU’s climate and environmental objectives.</td>
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<td>4. calls for strengthening the cooperation between the European Commission and the Committee of the Regions (CoR), in the framework of the Technical Platform for Cooperation on the Environment and calls for the inclusion of the platform in the EAP;</td>
<td>The Commission thanks the Committee for the good cooperation in the frame of the technical platform. The Commission is open to further enhancing cooperation with the Committee and is already undertaking discussions in this regard. It will jointly be decided what the structure of the cooperation will look like as it recognises the important role that local and regional authorities have in handling and executing most environmental strategies on the ground.</td>
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<td>5. calls for the EU to promote a holistic place-based and area-oriented approach taking into account the specific challenges and strengths of all typologies of communities such as urban and rural, but also coastal, mountain, island, archipelagic and outermost areas and considering the interactions between communities and their surrounding areas, in particular hinterlands of urban areas;</td>
<td>In its proposal, the Commission explicitly recognises that reaching the 8th EAP’s priority objectives will require mobilising broad support and encouraging cooperation in the development and implementation of strategies, policies or legislation related to the 8th EAP amongst national, regional and local authorities, in urban and rural areas. Cohesion policy offers a place-based policy framework for integrated regional development focusing on the identification of particular strengths and development needs of each territory. This approach of cohesion policy creates better conditions for sound implementation of the investments on the ground through mobilisation of national, regional and local players, as well as</td>
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<td>6. calls for a well-functioning multi-level governance framework and encourages all the levels of governance to promote cross-administrative, interregional, intermunicipal and cross-border cooperation to implement the 8th EAP;</td>
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<td>7. calls for the full integration of environment</td>
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and climate policies, and policies that enable a circular economy, into the budgetary, economic and social actions of the EU and reminds that the green recovery efforts should take into consideration territorial disparities and challenges and ensure that no community is left behind.

civil society, thus ensuring ownership of objectives and achievements.

The enablers proposed in Article 3 of the 8th EAP are an expression of the commitment not only of the Commission, but between all three institutions to implement policies and governance principles that make it possible to reach the 2030 priority objectives and 2050 vision. These principles are addressed to all levels of governance.

Eurostat’s Regional Yearbook also contains a chapter on the Environment and already provides a highly granular overview over the situation on regional level.

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<th>8. urges that no precedent be set for future EAPs by the fact that the 8th EAP includes no measures; underlines that the Green Deal provides measures only till 2024 and calls for a mid-term clarification;</th>
<th>Over the years EAPs have changed their form (not all had annexes) and timelines (not all covered 10 years). It allows the legislators to form this programme to adapt it as well as possible to the current needs and situation.</th>
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<tr>
<td>Article 192(3) of the 8th EAP foresees the setting of priority objectives, which is achieved in the current proposal and which leaves a margin of interpretation for the rest of the programme. Due to this legal base, the proposal for an EAP is fully in line with the Treaty on the Functioning of the European Union.</td>
<td>Article 192(3) of the 8th EAP foresees the setting of priority objectives, which is achieved in the current proposal and which leaves a margin of interpretation for the rest of the programme. Due to this legal base, the proposal for an EAP is fully in line with the Treaty on the Functioning of the European Union.</td>
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<td>In the present context, with an ambitious and generally agreed European Green Deal and many ongoing negotiations on specific strategies and legal acts, the proposal for an 8th EAP represents the approach which best supports our common goal: accelerate the green transition on the ground.</td>
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<td>The Commission agrees with the need to take stock in 2024 with a view to informing the next political mandate and allow the next Commission to make informed choices about environment and climate policies.</td>
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<td>Article 4 of the proposal foresees regular progress reports based on the new monitoring mechanism,</td>
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which will also feed into the 2025 State of the Environment Report.

In line with its right of initiative, the Commission will, by 31 March 2029, carry out an evaluation of the 8th EAP, and submit a report to the European Parliament and the Council, accompanied, if the Commission deems appropriate, by a legislative proposal for the next EAP.
### Points of the European Committee of the Regions opinion considered essential

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<th>Number</th>
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<tr>
<td>1.</td>
<td>advocates for the recognition of and respect for the crucial role local and regional authorities (LRAs), and Member States, play in the EU’s main policies, and also in the realm of skills, as owners of the relevant infrastructure, as beneficiaries of EU Funds and of national and regional support, and also as the main gateways to local and regional communities. At the same time, regrets the lack of recognition of this role in the current European Commission Communications;</td>
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<td>10.</td>
<td>asks the Commission to revise the approach set out in the communication and take into account the major role LRAs play in supporting and developing skills-related infrastructure in most Member States […]</td>
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<td>3.</td>
<td>welcomes with interest the launch of the European Pact promoting joint action to maximise the impact of investment in upgrading existing skills (upskilling) and training in new skills (reskilling). Local and regional authorities must be part of this Pact, working together and making a clear commitment to training for everyone of working age throughout the European Union;</td>
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### European Commission position

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<td>The Commission fully recognises the need to involve local and regional authorities in skills, education and training policies. Adopted in July 2020, the European Skills Agenda(^1) highlights that ‘most responsibilities for skills policies remain at the national, regional and local level’ and that ‘lifelong learning for all must become a reality in Europe, in each Member State and in each region’. The regional dimension is highlighted throughout the European Skills Agenda, in terms of challenges (e.g. regions particularly hit by the shift to a low carbon society and economy) and responses, notably as regards the Pact for Skills and the objective to conclude regional skills partnerships as well as other flagship actions (e.g. skills intelligence at regional level, regional dimension of national skills strategies).</td>
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<tr>
<td>Within the Pact for Skills, the Commission promotes the major catalyst role regional and local authorities and bodies play in the skills partnerships. To this end, it will explore ways for cooperation with the Committee to increase the involvement of regional and local organizations, thereby underlining the regional dimension of the Pact for Skills.</td>
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4. suggests that regional territorial strategies and Green-Deal-related pacts should refer to the skills policy and investments that the region needs. There is also a need for a better understanding of regional skills-related needs and opportunities, analysed for each sector concerned, emphasising low carbon technologies and sustainability, but in particular car manufacturing, construction, building services, the design and creative industries, pharmaceutics, ITC and the food sector;

The European Skills Agenda emphasises the need for skills intelligence at regional level (Action 2) and for regional skills partnerships (Action 1), among other to better accompany the green transition in particular regions.

The importance of upskilling and reskilling for the green transition is also promoted via the New Industrial Strategy for Europe\(^2\), which will be updated, and the SME Strategy for a sustainable and digital Europe\(^3\). Both strategies underline the importance of the Pact for Skills, recognising the local/ regional dimension of the green transition. Furthermore, they encourage Member States and regions to use EU funding in developing skills for smart specialisation, industrial transition and entrepreneurship.

5. highlights that, in most Member States, LRAs play a major role in funding education and developing skills-related policies. The Commission should take steps to build direct links with LRAs interested in fast-tracking of EU funds in the form of pilot projects, the formulation of local and regional strategies and action plans, and increased financing for new initiatives, so that actions can be carried out, even if there are no partnership agreements in the medium turn;

EU funds and programmes envisage calls for projects and partnerships, not related to partnership agreements, for which local and regional authorities (LRAs) may apply for funding pilots or preparatory work.

In November 2020, the Commission and the Committee concluded a Joint Action Plan\(^4\) to strengthen collaboration on education and other priority areas. The Action Plan will also help provide information to LRAs on opportunities available to benefit from EU funding.

On the same date, the Commission services (DG EMPL) and the Committee agreed on a joint document on enhanced cooperation\(^5\), where skills are among the priority areas. Local actors will support the implementation of the Skills Agenda thorough targeted actions. In addition, the document put forward the concept of

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\(^2\) Commission Communication A New Industrial Strategy for Europe; COM(2020) 102 final

\(^3\) Commission Communication An SME Strategy for a sustainable and digital Europe; COM(2020) 103 final
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A103%3AFIN

\(^4\) Joint Action Plan between CoR and DG EAC, DG RTD, and IRC:

\(^5\) CoR - DG EMPL joint document: Areas for enhanced cooperation:
European local Job Fairs’. The Committee and Commission services are currently working on the design of these events, which will serve *inter alia* to: show-case existing EU services for job seekers at local, national and EU levels; and present new trends in skills and employment at local and EU levels.

6. notes that, during the current pandemic, most education systems have responded quickly and flexibly to new challenges, and some Member States have rapidly accelerated the digitalisation of education. While there are real success stories in the regions, the Committee of the Regions suggests focusing on:

a. equal access to the new forms of education and training for all, with a special focus on the most vulnerable children and adolescents,

b. removing obstacles in the area of the language, including the language rights of ethnic minorities and the language rights of deaf people, as well as people with hard of hearing using sign language,

c. ensuring that the new initiatives and forms of education have had a positive impact on access to education and training for all, reducing the digital divide and accessibility deficit, so that all people have full access to collaborative tools, regardless of where they are,

d. promoting digital connectivity, particularly in areas with low population density, including technology and educational materials and tools that facilitates access to digital education;

The Digital Education Action Plan⁶, announced in the European Skills Agenda (Action 6) and launched on 30 September 2020, envisages a number of actions to achieve an inclusive and accessible digital education in Europe. They include, among others:

- support to connectivity in schools (under the Connecting Europe Facility⁷);
- strategic dialogue with Member States on the enabling factors of digital education, to tackle connectivity and equipment gaps, digital inclusion and digital pedagogy.

Governments together with stakeholders should foster inclusive education across all sectors of education and training in accordance with the commitments of Member States and the EU towards the implementation of the United Nations Convention on the Rights of Persons with Disabilities and the European Child Guarantee.

On 9 March 2021, the Commission presented the ‘Digital Decade’ communication⁸ that translates the EU’s digital ambitions for 2030 into concrete objectives. They evolve around four cardinal points:

1) digitally skilled citizens and highly skilled digital professionals - by 2030, at least 80% of all adults should have basic digital skills, and there should be 20 million employed information and

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⁶ COM(2020) 624 final.
communication technologies (ICT) specialists in the EU – while more women should take up such jobs;

2) secure, performant and sustainable digital infrastructures – by 2030, all EU households should have gigabit connectivity and all populated areas should be covered by 5G; the production of cutting-edge and sustainable semiconductors in Europe should be 20% of world production; 10,000 climate neutral highly secure edge nodes should be deployed in the EU; and Europe should have its first quantum computer;

3) digital transformation of businesses - by 2030, three out of four companies should use cloud computing services, big data and artificial intelligence; more than 90% of small and medium-sized enterprises (SMEs) should reach at least a basic level of digital intensity; and the number of EU unicorns should double;

4) digitalisation of public services - by 2030, all key public services should be available online; all citizens will have access to their e-medical records; and 80% citizens should use an eID solution.

In the same Communication, the Commission refers to universal digital education and skills for people to take an active part in society and in democratic processes as well as to universal access to internet services as principles that could be included in a possible set of digital principles and rights. The Commission will propose to include such a set of principles and rights in an interinstitutional solemn declaration between the European Commission, the European Parliament and the Council. The Commission hopes to achieve decisive progress with the other institutions on such declaration by the end of 2021.

The Commission is currently preparing the implementation of a preparatory action on
‘Increasing accessibility to educational tools in areas and communities with low connectivity or access to technologies’. The action aims at enhancing inclusion and reducing the digital gap affecting pupils from remote areas and communities with low connectivity, such as mountain areas, rural areas, islands or deltas by developing a strategy to increase access to digital education in the European remote areas and communities that mostly need such support, and through deployment actions in primary, secondary and vocational schools to implement and test some of the most suitable technical solutions to reduce the digital gap.

8. notes that LRAs are facing new challenges, in particular with the COVID-19 pandemic. However, many new initiatives emerge also every day, as a reply to these challenges. The digitalisation of education and local business are the most prominent examples. The Commission should analyse whether it can set up a European platform with a selection of best practices, which would be accessible to LRAs and which would support the development of adaptation and resilience strategies and action plans, inspiring new local and regional initiatives. Any such initiative would be welcomed and supported by the Committee of the Regions and its members;

The planned Digital Skills and Jobs Platform is expected to be a one-stop-shop for local, regional, national and EU digital skills initiatives, training courses, best-practices, training resources, skills intelligence etc. The platform also is intended to link the 25 national Digital Skills and Jobs Coalitions together. The LRAs will be welcome to share their initiatives on this platform.

The Commission has also already set up a specific website with available online learning resources. It has also mobilised the existing community platforms, which have proven to be a powerful online tool in such circumstances: eTwinning (for school collaborative projects), EPALE (for adult learning professionals) and the School Education Gateway (for school education professionals) with online courses and surveys on ‘online teaching and learning’.

In addition, the new European Education Area Platform will be designed as a public gateway to provide information and access to actions, instruments and services, as well as to support cooperation and exchanges. This also includes showcasing success stories and good practices at

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9  [https://ec.europa.eu/education/resources-and-tools/coronavirus-online-learning-resources_en](https://ec.europa.eu/education/resources-and-tools/coronavirus-online-learning-resources_en)

10 See the links here: [eTwinning](https://etwinning.net/); [EPALE](https://epale.eu/); [School and Education Gateway](https://schooleducationgateway.eu/).
As part of the Digital Education Action Plan, the Commission is setting up a Digital Education Hub. The Hub will facilitate the exchange of experience and good practice on the enabling factors of digital education; link national, regional, and local digital education initiatives and strategies. This will allow best practices to be showcased and emerge through the Digital Education Hub.

13. [...] Moreover, the CoR calls for a review of the European Framework for Quality and Effective Apprenticeships in order to ensure high quality, diversified and tailor-made apprenticeships; [...] The Commission will report on the implementation of the 2018 Council Recommendation on a European Framework for Quality and Effective Apprenticeships in the course of 2021. The report will feed into the ongoing activities and support services related to the quality of apprenticeships.

14. [...] the Committee of the Regions reiterates its demand for a more regional focus when assessing progress on the implementation of the new Skills Agenda and VET policy.

As set out above, the European Skills Agenda explicitly underlines the role and relevance of the regional level in its actions (see reply to point 1).

Any assessment of the progress on the implementation of the European Skills Agenda will therefore also need to take into account the regional dimension of activities and outcomes.

The Council Recommendation on vocational education and training (VET) for sustainable competitiveness, social fairness and resilience\textsuperscript{11}, adopted in November 2020, expressly recommends Member States to promote skills partnerships at regional level (point 22), establishes the Centres of Vocational Excellence, which have a strong regional dimension, and consistently associates the national and the regional level in pursuing quality assurance, namely in principle 21.

\textsuperscript{11} Council Recommendation of 24 November 2020 on vocational education and training (VET) for sustainable competitiveness, social fairness and resilience 2020/C 417/01

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020H1202%2801%29
| 17. | is in favour of speeding up the implementation of a European Education Area to guarantee high-quality education for all. The EU should encourage, support and supplement cooperation and exchanges between education systems and different curricula based on citizens' needs, in line with the division of competences, the subsidiarity principle, and the prohibition on harmonisation in this field; | The Commission’s first priority in the field of education is to achieve the European Education Area by 2025. The Commission will work closely with the Member States and stakeholders to set up a cooperation framework that enables to meet this ambition, in line with the 18 February 2021 Council Resolution on a strategic framework for European cooperation in education and training (ET) towards the European Education Area and beyond (2021-2030). |
| 18. | Stresses that there is a risk that the green transition and the pandemic will have a more detrimental effect on minorities, women, children, adolescents, youth and people from disadvantaged communities, especially in remote, sparsely populated or mountainous regions where the population faces greater barriers and difficulties in accessing quality training and education. These issues should be tackled in a way that is evidence-based and that addresses the specific needs of these groups in all regions; to this end, we propose including people with disabilities as one of the groups particularly badly affected by the problems described; | The Commission recognises the risks mentioned by the Committee, particularly for specific disadvantaged groups. The European Skills Agenda, which is aimed at supporting people through the green and digital transitions and ensuring a prompt recovery from the COVID-19 crisis, emphasises the need for ‘providing equal access to additional up-skilling opportunities for all people, regardless of gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation and including low-qualified/skilled adults and people with a migrant background’, adding that ‘all territories should be covered, from big cities to rural, coastal or remote areas across the whole EU’. It expressly envisages monitoring progress towards achieving its four targets for disadvantaged groups, including persons with disabilities. |
| 20. | points out that public universities should be prioritised in order to boost local and regional initiatives, and that public and private investment should be found to promote new skills-related opportunities, while local and regional research in this field should focus on the uptake of new skills in all European | Through the higher education dimension of the European Education Area and Erasmus+, higher education institutions from all across Europe – including public ones – and their linkages with local and regional ecosystems are supported, for example through the European Universities initiative. |

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The European Skills Agenda presents under Action 12 several measures that could unlock private and public investment in skills-related opportunities, including a revision of the fiscal frameworks favourable to investments in skills, enhanced human capital reporting (skills as an asset), better statistics and innovative financing mechanisms.

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<th>Region</th>
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<td>21.</td>
<td>would stress that European cooperation on skills and vocational training should have a local and regional focus, aimed at LRAs and at stabilising access to schools and training providers. Such platforms should not focus purely on Member States and those already involved;</td>
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<td>22.</td>
<td>warmly welcomes the fact that the Action 7 of the Skills Agenda introduces the promotion of entrepreneurial opportunities yielded by the social economy, such as helping local communities, striking local green deals and activating vulnerable groups. In this regard, we recommend closer involvement of local and regional authorities in drafting the Social Economy Action Plan announced by the European Commission for 2021;</td>
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The European Skills Agenda underlines in its actions the role and relevance of the regional and local levels (see reply to points 1 and 14).

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<th>Region</th>
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<td></td>
<td>The Commission is involving closely all types of stakeholders in the preparation of the Social Economy Action Plan (SEAP). Notably through:</td>
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<td>- the public consultation on the action plan on the implementation of the European Pillar of Social Rights;</td>
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<td>- the SEAP ‘roadmap’ has been published on the ‘Have your say’ website of the Commission for feedback until 26 April 2021;</td>
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<td>- the expert group on the social economy and social enterprises (GECES) that comprises representatives from Member States, local authorities and stakeholders;</td>
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<td>- the European Social Economy Summit taking place in May 2021. On this occasion, a session will be organised in collaboration with the Committee on ‘Supporting social economy and social enterprises: can local and regional authorities make a difference?’;</td>
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<td></td>
<td>- the European Social Economy Regions (ESER) project and ESER missions launched by the European Commission.</td>
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13 https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12743-Social-Economy-Action-Plan
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<th>Finally, the Commission has encouraged the Committee to adopt an opinion on the SEAP.</th>
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<td>25. underlines that there is a need for a critical mass in terms of funding and support for recovery, resilience-building and new skills related to education and training in all regions, including the training of teachers and trainers, in all areas and at all levels of education; with this in mind, insists that the budget of those EU programmes directly investing in education and skills, especially Erasmus+ and ESF+, should not be cut.</td>
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<td>The European Skills Agenda recognises the need to unlock ambitious investment and urges Member States to seize the make use of funding possibilities under the temporary recovery instrument, Next Generation EU, and the new Multi-annual Financial Framework (MFF). The Commission welcomes the political agreement on the new MFF reached in December 2020 setting the budget for European Social Fund Plus (ESF+) at €88 billion and Erasmus+ at €26.2 billion. Moreover, the Commission will help intensify work on investment as part of the European Education Area. This will include fostering debate at high-level political fora, such as joint exchanges between EU finance ministers and EU education ministers, as well as with other institutions, such as the European Investment Bank and the European Parliament. At technical level, an expert group on quality investment in education and training will support this process, helping to maintain focus on national and regional investment. The Commission will also provide specific support to local, regional and national authorities to facilitate mutual learning, analysis and sharing of good practices on investment in education infrastructure. Moreover, the Recovery and Resilience Facility is a unique opportunity for EU countries to boost digital skills and connectivity through reforms and investments in education and in society at large. At least 20% of all national investments under the facility are required to go to digital – including digital skills.</td>
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### Points of the European Committee of the Regions opinion considered essential

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<th>Points</th>
<th>European Commission position</th>
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<td>3. highlights the important role of regional and local authorities in the fields of employment, training, education and youth policies, and suggest that partnerships in all phases of the Youth Guarantee should include local and regional authorities. [...]</td>
<td>The Council Recommendation of 30 October 2020 on a ‘Bridge to Jobs – Reinforcing the Youth Guarantee’ recommends that Youth Guarantee schemes be organised in accordance with national, regional and local circumstances, and that they pay particular attention to regional labour market specificities. The participation of local and regional authorities will be crucial, taking into account that the recommendation also considers partnerships as an important crosscutting enabler in the Youth Guarantee implementation.</td>
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| 7. [...] stresses the importance of recommending the use of technologies that are used by young people themselves as well as measurable objectives, thus incentivising Youth Guarantee providers to increase the effectiveness and efficiency of their outreach strategies. Furthermore, believes that the young people that benefit from this scheme should be made aware that it is a European initiative – something that many of the current beneficiaries are not aware of; | The Commission agrees with the need to step up communication to young people by using suitable communications tools, and to make young people aware that the Youth Guarantee is a European initiative. The reinforced Youth Guarantee recommends that Member States ‘adopt modern, youth-friendly and local information channels and outreach schemes for awareness-raising activities, using digital and non-digital opportunities’ and ‘use recognisable visual style for all communication’. The Commission will pay particular attention to the youth as target audience in its communication campaign linked to the European Pillar of Social Rights Action Plan. Specific messages on the Youth Employment Support (YES) package will |

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8. […] insists, however, on the need to promote language skills as a priority so as to increase young people’s chances of integrating into the labour market, especially in those regions where language skills are particularly important, such as cross-border regions and regions with a tourism orientated economy, and finds it regrettable that this has not been included in the new proposal;

The Council Recommendation on ‘A Bridge to Jobs – Reinforcing the Youth Guarantee’ recommends to use competence frameworks, assessment and self-assessment tools to identify the skills needs of the participants and to ensure that the preparatory phase facilitates upskilling and re-skilling accordingly. This can, where appropriate, include language skills.

9. considers it essential to define clear and precise binding criteria regarding the quality of the Youth Guarantee offers of employment, education, training, and apprenticeships. […]

The reinforced Youth Guarantee reinforces the quality dimension of Youth Guarantee offers. The quality of job offers is strengthened by making a link to Principle 4 of the European Pillar of Social Rights, which should ensure e.g. decent working conditions and access to social protection for young people. Apprenticeship offers should be linked to the European Framework for Quality and Effective Apprenticeships of 2018, and traineeship offers to the Council Recommendation on a Quality Framework for Traineeships, adopted in 2014.

Monitoring is a way to enhance quality of Youth Guarantee offers. The Youth Guarantee monitoring is based on a detailed Indicator Framework, and the Commission is working continuously to improve this monitoring. The reinforced Youth Guarantee puts more emphasis on enriching follow-up data, which is important to capture whether labour market integration was successful.

To this end, the Commission provides guidance to the Member States on how to assess quality. For example, the guidelines\(^2\) developed by the Commission together with the International Labour Organization (ILO) capture key quality dimensions for job offers, including earnings and access to social protection. These guidelines are meant to be used as a checklist, or a monitoring tool, but also as a basis for developing quality indicators to

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| 10. stresses the importance of promoting labour mobility through the reinforced Youth Guarantee, between Member States and between regions, given the important role that migration plays in shaping labour market opportunities; therefore finds it regrettable that this provision, which existed in the original Youth Guarantee, has not been retained in the new proposal, even though many countries have complemented their Youth Guarantees with regional or international mobility programmes, also advocates linking the Youth Guarantee with quality traineeships and the European Solidarity Corps; | The Commission recalls that the freedom of movement is one of the fundamental principles of the European Union and one of the four freedoms enjoyed by all EU citizens. Many services and schemes exist which encourage people to move and work within the Union (for example EURES, Erasmus+ and the European Solidarity Corps). Whilst the vast majority of offers in the Youth Guarantee schemes are offers in the national and local labour markets and whilst the reinforced Youth Guarantee pays particular attention in offering young NEETs (neither in employment nor in education or training) perspectives in the country and region they live, including remote and rural areas, cross-border Youth Guarantee offers remain fully possible. |
| 12. recommends the promotion of social dialogue at regional and local level to create better outcomes for unemployed young people, thus fostering more inclusive economic growth, especially in remote and isolated areas, and to create effective strategies for just transition plans at the local and regional level; | The Commission strongly supports Social Dialogue. Whilst it is for the Member States to set the legal and institutional framework for social dialogue at national level, Article 152 of the Treaty on the Functioning of the European Union commits the Union and the Member States to promote social dialogue at both European and national levels. The European Pillar of Social Rights Action Plan makes a call to reinforce social dialogue at national and EU level, and announces the Commission’s intention to present an initiative to support social dialogue at EU and national level in 2022. The Territorial Just Transition Plans will be designed and implemented in the context of the EU’s cohesion policy, in which partnership with stakeholders, notably social partners, is an established principle and practice. |
| 13. […] insists on the need to significantly increase the financial support for those With its Youth Employment Support (YES) initiative and reiterated in the European Pillar of |  |

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4 Communication from the Commission to the European parliament, the Council, the European Economic And Social Committee and the Committee Of The Regions youth employment support: a bridge to jobs for the next generation COM(2020) 276 final.
Member States and regions, especially those experiencing high levels of unemployment and poverty – such as less developed regions, deindustrialised regions, peripheral regions and outermost regions – which, in addition to having high rates of youth unemployment, are currently under severe budgetary constraints, in order to address the unequal effectiveness of the Youth Guarantee across the European Union; regrets that EU funding for youth employment can no longer be targeted on a regional basis through the Youth Employment Initiative and insists that national governments allocate funding for youth employment to regions where it is most needed whilst ensuring that EU funds do not replace national funding for youth employment measures;

Social Rights Action Plan, the Commission called on Member States to dedicate at least €22 billion of European and national funding to youth employment support.

As regards the European Social Fund Plus (ESF+), the European Parliament and the Council agreed that all Member States will be required to allocate an appropriate amount of their ESF+ resources under shared management to targeted actions and structural reforms supporting young people.

In order to address the specific needs, the appropriate amount will take into account relevant European Semester Country-Specific Recommendations and Eurostat data. Member States and outermost regions having an average NEET rate (15-29) for the years 2017-2019 above the EU average will be required to programme at least 12.5% of their ESF+ resources under shared management to support youth employment. The ESF+ Regulation allows Member States from targeting their available ESF+ resources for youth employment to regions struggling with high youth unemployment and inactivity levels.

The Commission also encourages Member States to pay special attention to young people entering the labour market, by creating quality employment opportunities, and supporting adequate offer of apprenticeships and strengthening vocational education and training (VET) as part of their national plans for the Recovery and Resilience Facility (RRF).

16. believes that many LRAs are not fully aware of all the channels EU support for combating youth unemployment can reach them. Calls therefore on the European Commission, in partnership with the CoR to organise an information session to remedy this situation. The outcome of the exercise could be published on the website of the CoR, for all

The Commission agrees that information on EU level support for youth employment should reach also local and regional authorities. The Commission intends to organise a joint session in the framework of the European Week of Regions and Cities, and will contact the Committee to this effect.

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5 The EU average NEET rate for years 2017-2019 is 13.1%.
interested stakeholders to access;

| 17. [...] highlights that the practice of unpaid ALMP and open labour market traineeships and apprenticeships can lead to the replacement of standard jobs, constitutes a form of exploitation which violates young people's rights and reduces opportunities for young people from poorer socio-economic backgrounds; therefore supports the European Parliament in its efforts to enforce fair remuneration and access to social protection for traineeships and apprenticeships on the open labour market and in ALMPs to ensure young people can access quality opportunities; |
| The reinforced Youth Guarantee links the quality of the offer to the Council Recommendation on a Quality Framework for Traineeships and the Council Recommendation on a European Framework for Quality and Effective Apprenticeships. The former contains 22 quality elements that are directly transposable into national legislation or social partner agreements. These include a requirement for learning objectives, mentoring and increased transparency on whether an allowance or compensation is applicable, as well as the likelihood of being hired after the traineeship. The aim is to allow for an informed decision from the part of the candidate. The Commission announced in the European Pillar of Social Rights Action Plan a review of the Quality Framework for Traineeships, notably as regards working conditions. The latter envisages that ‘Apprentices should be paid or otherwise compensated, in line with national or sectoral requirements or collective agreements where they exist, and taking into account arrangements on cost-sharing between employers and public authorities’.

| 21. [...] the proposal could be even stronger in its denunciation of other kinds of job market discrimination, such as discrimination based on ethnicity, race, sexual orientation or discrimination against migrants; |
| The reinforced Youth Guarantee is more inclusive than ever. It highlights the needs of young people who are at a disadvantage and addresses the barriers and factors of disadvantage of the individual. For example, it recommends person-centred counselling that pays due attention to gender bias and other forms of discrimination. Discrimination touches people beyond young populations, both in the labour market and in the society and it needs to be tackled with suitable instruments. For example, the Council Directive 2000/78/EC\(^7\) prohibits discrimination in employment and occupation, OJ L 303, 2.12.2000, p. 16–22. |

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employment and occupation on the grounds of religion or belief, disability, age or sexual orientation. In 2019, the Commission launched an awareness raising campaign on anti-discrimination in the workplace to remedy the lack of awareness of the rights, possibilities and obligations set out in EU anti-discrimination law.

The Strategy for the Rights of Persons with Disabilities 2021-2030, adopted on 3 March 2021, addresses inequalities in employment and calls Member States to set targets for increasing the employment rate of persons with disabilities and reducing employment rate gaps between persons with and without disabilities.

This Disability Rights Strategy is part of a series of Commission initiatives to build a Union of Equality and to fight more efficiently against discrimination. This series also includes Communications on Gender Equality Strategy 2020-2025, the EU Anti-racism Action Plan 2020-2025, LGBTIQ+ Equality Strategy 2020-2025 and the EU Roma Strategic Framework for Equality, Inclusion and participation. All these Communications promote and strengthen equality, including for the youth, through hundreds of concrete actions and measures. Collectively, they put forward a strategic frame for mainstreaming non-discrimination, equality and diversity aspect into all EU policies.

As for the situation outside the labour market, already in 2008, the Commission presented a proposal for a directive on implementing the

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8 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Union of Equality Strategy for the Rights of Persons with Disabilities 2021-2030.
9 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Union of Equality: Gender Equality Strategy 2020-2025. 5.3.2020.
10 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Union of equality: EU anti-racism action plan 2020-2025. 16.9.2020.
12 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. 7.10.2020.
principle of equal treatment outside the labour market, irrespective of religion or belief, disability, age or sexual orientation\textsuperscript{13}, which aims at extending protection against discrimination through a horizontal approach. Once adopted\textsuperscript{14}, the Directive would protect non-discriminatory access to education, social protection and goods and services.

24. [...] however, insists on the need to put more emphasis on the merits of vocational guidance as a useful means in this regard;

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<th>24. [...] however, insists on the need to put more emphasis on the merits of vocational guidance as a useful means in this regard;</th>
<th>The reinforced Youth Guarantee recommends to step up counselling, guidance and mentoring, to offer a more holistic response to the young individuals. Several actions support guidance policy and practice at national level. The 2020 Commission study on lifelong guidance\textsuperscript{15} indicates factors that make lifelong guidance systems effective, key guidance trends and innovative practices, and launched the new Europass, the European Portal for lifelong learning and career management, which includes also information on lifelong guidance. Furthermore, the European Centre for the Development of Vocational Training (CEDEFOP) recently launched the European Inventory on lifelong guidance, which contains detailed information on national lifelong guidance systems.</th>
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<td>27. recommends making full use of the possibilities of the new programme on social change and innovation in order to gather examples of good practice on Youth Guarantee schemes at national, regional, and local level;</td>
<td>The Employment and Social Innovation (EaSI) programme as a strand of the ESF+ indeed allows for sharing good practice on Youth Guarantee schemes at national, regional and local level, which the Commission does on a regular basis. For example, EaSI funds are used for the activities of the European Network of Public Employment Services (PES), often directed at sharing good practices in supporting young unemployed persons.</td>
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\textsuperscript{13}Proposal for a Council Directive on implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation. 2.7.2008.

\textsuperscript{14}The adoption of the Directive, requesting unanimity, is blocked in the Council. The Commission continues to support the Council and its presidencies by all its means to have the Directive adopted. Filling in the persisting legal gap in the EU’s anti-discrimination legislation, corresponding to the proposed directive, remains a top priority of the Commission.

\textsuperscript{15}https://ec.europa.eu/social/main.jsp?catId=738\&langId=en\&pubId=8284\&furtherPubs=yes
28. recommends enhancing the evaluation of all measures taken under the Youth Guarantee schemes, so that more evidence-based policies and measures can be developed on the basis of what works, where and why, thus ensuring an effective and efficient use of resources; The Commission encourages Member States to evaluate the Youth Guarantee measures taken at national, regional and local level. The EU funding side is closely monitored via the ESF monitoring committees and annual implementation reports and regularly evaluated. Also the support to youth employment by the Youth Employment Initiative and the European Social Fund was recently evaluated\textsuperscript{16}. These evaluations have been used extensively, including for the preparation of the Commission’s proposal for the reinforced Youth Guarantee.

| 31. underlines that, in order to effectively address youth employment in light of the pandemic, the Reinforced Youth Guarantee should be complemented by the prolongation and extension of the temporary Support to mitigate Unemployment Risks in an Emergency (SURE), by the inclusion of youth employment measures in National Recovery and Resilience Plans, particularly the creation of quality employment opportunities for young people, and by an explicit mention of better social protection coverage for youth and the combatting of precarious youth employment in the upcoming Action Plan for the implementation of the European Pillar of Social Rights; and warns against policies that seek to promote youth employment by undermining young people’s rights to fair remuneration and access to social protection as part of the recovery. | Regarding the possibility of prolonging the availability of Support to mitigate Unemployment Risks in an Emergency (SURE), the Commission would like to recall that the instrument will remain available at least until the end of 2022. Its lending capacity of €100 billion has not yet been reached. The European Pillar of Social Rights Action Plan widely addresses the situation of young people in the labour market. This is reflected in the various EU funding instruments, such as the ESF+ and the RRF. As stated above, the Commission encourages Member States to include youth employment measures into their national Recovery and Resilience Plans (RRPs). The Regulation\textsuperscript{17} requires RRP to cover policies on children and youth as one of its six pillars and to contribute to the implementation of the European Pillar of Social Rights, including through the promotion of policies for children and the youth. In addition, Member States should ensure, in their RRP, consistency with their national implementation plans of the Youth Guarantee as well as the priorities set out in |

\textsuperscript{16} Evaluation of ESF support to youth employment: [https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8307&preview=cHJldkVtcGxQb3J0YWwhMjAxMjAyMTVwcmV2aWV3](https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8307&preview=cHJldkVtcGxQb3J0YWwhMjAxMjAyMTVwcmV2aWV3)

the Commission communication on Youth Employment Support\textsuperscript{18} and the Council Recommendation on Reinforcing the Youth Guarantee, of which quality employment for youth is one. The recent Commission Recommendation on an effective active support to employment following the COVID-19 crisis (EASE)\textsuperscript{19} further highlights this priority.

New resources from the Next Generation EU are available as of this year. In particular, the ‘Recovery Assistance for Cohesion and the Territories of Europe’ (REACT-EU) programme will provide €47.5 billion in the form of grants, which can also be used to re-finance short-time work schemes and similar measures supporting (youth) employment.

\textsuperscript{18} Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Youth Employment Support: a Bridge to Jobs for the Next Generation, 01.07.2020.

\textsuperscript{19} C(2021) 1372 final.
5. proposes a continuous dialogue with CCS organisations so that easily usable support systems can be developed, resulting in a mobilisation that fosters innovation and education, within a dynamic territorial ecosystem: by establishing ad hoc funds for setting up networks, building up dedicated channels and IT platforms to host profiles of artists, associations, etc. to help them operate internationally (as is the case with Europass), and facilitating the publication of all calls, measures and specific actions enabling individual artists and professionals in the sector to more easily access and make use of them, bearing in mind that the CCS mainly hire self-employed and precarious workers and mainly involve small and medium-sized enterprises (SMEs), both commercial and non-profit;

6. points to the need to better inform cities and regions of the measures and initiatives put in place for the CCS in the EU, establishing during this period greater monitoring of the CCS at local and regional level and a fair distribution of the direct funding allocated to the sector, as grassroots institutions are more in tune with the basic structures. One starting point could be the existing platform https://creativesunite.eu;

A study on the status and working conditions of artists and cultural and creative professionals has been published\(^1\) in November 2020. It highlights issues faced by this workforce (e.g. complicated work status with vulnerable self-employed or workers subject to irregular contracts, irregular and low average income, less access to social security). Through the 2018 New European Agenda for Culture\(^2\), the Commission committed to strengthen the dialogue with the cultural sector. The structured dialogue, which has been running since 2015, provides a framework for discussions between EU civil society and the Commission. It aims to strengthen the advocacy capacity of the cultural sector in policy debates on culture at European level, while encouraging these organisations to work in a more collaborative way. Cultural stakeholders meet within the Voices of Culture facility.

Besides, the Commission is developing a funding guide that will provide tailored guidance about EU financing which the cultural and creative sectors could benefit in the period 2021-2027. In addition to Creative Europe, the only EU programme specifically supporting cultural and creative sectors, other programmes and funding streams can also support cultural and creative sectors. These include, among others, Horizon Europe;

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\(^1\) [https://ec.europa.eu/culture/news/study-artists-working-conditions-published](https://ec.europa.eu/culture/news/study-artists-working-conditions-published)

Citizens, Equality, Rights and Values Programme; Erasmus+; Cohesion Policy Funds; Invest EU or the Recovery and Resilience Facility.

The 2021-2027 Creative Europe Programme will continue to support European professional networks as important partners for the Commission for continuous policy-development. During the pandemic, dialogue with these networks has been essential to evaluate the impact on the cultural and creative sectors and elaborate where action at European level is possible. Creative Europe will also continue funding cooperation projects, and the Commission intends to raise the share of EU funding in co-financing such projects with national authorities, in particular for smaller projects, in order to make the programme more accessible especially for smaller organisations. In particular, these projects, but also the platform and mobility action, directly and indirectly benefit artists and culture professionals.

Another support tool is the ‘Creatives Unite’ Platform. The platform was set up in 2020 with the help of the Commission and the European Parliament Pilot project ‘FLIP (Finance, Learning, Innovation and Patenting for Cultural and Creative Industries (CCIs))’ and is managed by the European Creative Hubs Network. The Creatives Unite platform offers a common space for all cultural and creative sectors in Europe and beyond to share their initiatives and actions in response to the COVID-19 crisis.

The platform has been very well received by the sectors, with over 33 000 users since its launch at the beginning of May 2020, with around 750 published posts on the platform. The platform can be searched by Sector, Action and Area, including a search by country. A weekly social media campaign ‘Creatives Unite Features’ highlights particularly interesting posts and contributions.

3 https://creativeflip.creativehubs.net/
4 http://creativehubs.net/
8. reaffirms that "culture must lie at the heart of the EU’s international relations, and that alternative forms and approaches to international diplomacy have emerged, including cultural diplomacy". Further argues that European cultural diplomacy should focus on promoting Europe and its Member States, including through educational and cultural exchanges, reaching out to the public and to third countries, and thus helping to promote a positive image of Europe and its Member States. In order to retain the leading position of Europe's diverse forms of cultural expression in the post-COVID era, a paradigm shift is needed in which awareness is increased even more not only of what we already have and what we must promote, including by alternative and virtual means, but above all of what we still have to produce across all of the arts. The COVID-19 pandemic has made us understand the importance of strengthening and developing the EU's cultural diplomacy and of being able to compete by offering a greater range of cultural products and more innovation on the world stage, which has seen new powers emerge, including in the cultural sphere;

The New European Agenda for Culture highlights the importance of culture in international relations. The 2021-2027 Creative Europe programme, aligned with this Agenda, specifically sets out to develop this international dimension. Further, negotiations with non-EU countries to continue or start participating in the programme will be launched as soon as the programme is adopted.

More generally, the Commission promotes solidarity and fair international relations in the field of culture, notably through its strategy for international cultural relations. The ambitions of the latter is not only to promote Europe's diverse forms of cultural expression, but also to unlock the potential of culture and creativity for sustainable social and economic development, in cooperation with a wide range of third countries. Initiatives such as the preparatory action ‘European Spaces of Culture’ implemented by the EU National Institutes for Culture (EUNIC) and the Cultural Relations Platform funded by the Partnership Instrument contribute to these objectives.

10. would like to see the promotion of EU calls for proposals to reward projects that promote the social role of art, experimentation, and innovation in contemporary visual arts, aimed at the regeneration of peripheral or dysfunctional urban areas, schools, hospitals, shelters and prisons, by giving awards to artists and creative professionals for the realisation of a large-scale European cultural project, which, on the one hand, embraces contemporary art and, on the other, produces output that can connect, in an original, innovative and sensitive way, with its intended audience, with the community, thus helping to develop new models for quality of life.

The 2021-2027 Creative Europe programme, alongside the New European Agenda for Culture, stresses the importance of the social role of culture. Calls for proposals, in particular for cross-border cooperation projects, will allow organisations to apply for projects that promote the role of art in favour of social cohesion. Further, the cross-sectoral strand of the programme specifically sets out the possibility to promote policy cooperation and policy development with regard to social inclusion.

The Cohesion Policy 2021-2027 will support arts and culture, including in the context of urban regeneration and rural development through...
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<td><strong>life;</strong></td>
<td><strong>integrated territorial strategies designed and implemented at local level.</strong></td>
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<td>11. <strong>calls for discussions with the individual Member States to ensure that tools are put in place that are able to capture the diversity of the many sub-sectors within the complex system of the CCS, not all of which can benefit from protective measures for workers;</strong></td>
<td><strong>As a reaction to the COVID-19 crisis, the Commission has been working closely with the Council and the Member States, swiftly exchanging information and discussing the effects of the pandemic on the cultural sectors as well as short, medium and long-term solutions. In order to foster exchange and better coordinate actions, the Commission has set up two online platforms, one steered by the cultural sectors themselves, ‘Creatives Unite’, and one for exchanging information between the Member States and the Commission.</strong></td>
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<td>15. <strong>points to the need to focus on sustainable cultural activities, encouraging investments without age limits in contemporary artists who generate societal value and in the public enjoyment of art, promoting its launch and revitalisation through EU programmes and facilitating access to a range of sustainable financial support instruments, such as public subsidies, venture capital and access to credit on long-term favourable repayment terms;</strong></td>
<td><strong>The Creative Europe Programme will implement its actions through grants or service contracts. Other financial support mechanisms will be available for the cultural and creative sectors in the framework of, for example, the InvestEU programme.</strong></td>
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<td>16. <strong>Recommends integrating investment from the various EU funds in culture, simplifying the procedures involved and increasing, where provided for, the possibility of co-financing to up to 80% for projects undertaken by small players, opening up the possibility of foundations, banks and institutions covering the remainder (...).</strong></td>
<td><strong>Creative Europe 2021-2027 is open to organisations active in the cultural and creative sectors. The Commission intends to raise the co-funding rate for small cooperation projects to 80%, and to a lower extent for the other categories of projects. The objective is to make the programme more accessible in particular for organisations with more limited access to own resources independently of their size.</strong></td>
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<td>19. <strong>hopes that the cultural heritage sector can always enable participation – despite the restrictions brought about by the COVID-19 pandemic – sustainability, protection and innovation, the four cornerstones on which the European Year of Cultural Heritage initiatives were designed, and that, given the crisis</strong></td>
<td><strong>The 2021-2027 Creative Europe Programme introduces a specific sectoral approach also for the cultural heritage sector to complement projects of a more horizontal nature. A specific percentage of the overall yearly budget of the culture strand will be dedicated to actions under the sectoral approach and thus contribute to more sustainable</strong></td>
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triggered by COVID-19, the increases in funds for Creative Europe will be made structural;

development in the respective sectors.

On sustainability, the Commission reminds of the new working group ‘Strengthening Cultural Heritage Resilience for Climate Change’, composed of Member States’ experts (Open Method of Coordination working group – OMC). Kicked off in January 2021, the group is identifying and exchanging good practices and innovative measures for safeguarding cultural heritage in relation to climate change. The group is also examining how cultural heritage can contribute to fighting climate change, in line with the Green Deal’s goals.

22. points out and hopes that the EU will take action to spur on the necessary cooperation between the Member States, to support, promote and revitalise the wide range of sub-sectors within the CCS which the COVID-19 pandemic has brought to a halt […]

Examples here, among so many, include: cultural heritage, both tangible, comprising the extremely complex management of monuments and archaeological sites – including underwater ones – museums, archives and libraries; and intangible – regional and local holidays, gastronomy and crafts; forms of dissemination, ranging from conferences to events such as the European capitals of culture; the performing arts and shows, music and dance, from opera and circuses to street artists; the creative industry, including film, publishing, design, advertising, and radio and television, graphics, sculpture, painting and architecture; and cultural institutions and foundations;

32. refers to the views it has previously expressed on the European Capitals of Culture initiative, which has helped to highlight the richness, diversity and common aspects of

Aside from the online platform that the Commission set up as a reaction to the COVID-19 crisis described above, the Commission has also been working closely with Member States, swiftly exchanging information and discussing the effects of the pandemic on the cultural sectors as well as short, medium and long-term solutions.

Throughout the COVID-19 crisis, the European instrument for temporary support to mitigate unemployment risks in an emergency (SURE) has been providing financial assistance to Member States for the financing of short-time work schemes and similar measures for the self-employed, including in the cultural and creative sectors. The European Social Fund and the future European Social Fund Plus can be used to support the latter, notably through investments in employment, training and social inclusion activities. The Recovery and Resilience Facility shall play a crucial role in mitigating the economic and social impact of the pandemic and making European economies and societies more sustainable and resilient. The Commission remains confident that Member States will take advantage of this important instrument also for the benefit of their cultural sectors. The Commission services also stand ready to assist Member States


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European cultures. This project and other such initiatives need to continue, and, as is the case with the European Heritage Label, their potential needs to be tapped further. In fact, it is important to develop cultural and creative knowledge especially in the younger generation, without underestimating the value of tourism and school tourism – sectors which are no less seriously affected than the CCS and which cannot operate virtually.

in formulating ambitious reforms for cultural sectors, and in leveraging synergies with relevant EU initiatives.

The Commission also works with national, regional and local authorities to share best practices on culture and regional development. Among others, an example of such work is carried out through the Action Plan which the Committee and the Commission launched in November 2020 to strengthen their collaboration.

The Commission can play an important role to help and inspire local and regional authorities to successfully integrate culture into long-term development plans and strategies, including smart specialisation strategies. Many inspiring examples of this have been given by the European Capitals of Culture programme, existing since 1985, but also by past peer-learning initiatives for local decision-makers and cultural operators financed by the Commission, such as ‘Culture for Cities and Regions’, European Creative Hubs Network’ or ‘Cultural and Creative Spaces and Cities’.

On cultural heritage, the Commission highlights the peer-learning programme for local and regional policymakers ‘Cultural Heritage in Action’, which selected and published its first catalogue of best practices in 2020, as well as the constant dialogue among heritage stakeholders that it fosters through the Expert Group on cultural heritage. The Commission also evaluated and is revising the Recommendation on the digitisation and online accessibility of cultural material and digital preservation\(^6\), on the basis of current technology trends and the needs of the sector.

Another example is the workshop on complementary sources of funding for cultural heritage, which the Commission organised on 25-26 January 2021. It gathered, EU Member States, heritage stakeholders, the expert group on

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<th>29. considers it necessary to promote throughout Europe the dissemination of artistic creation and the international promotion of artists, curators and critics, by means of calls for proposals emphasising the social role of art and involving local authorities, regions, cultural institutions in the strict sense, schools, hospitals, shelters and prisons, to act as the leaders of projects aimed at regenerating peripheral or dysfunctional urban areas and buildings. The projects should involve collaboration between European bodies from different countries and a promotion phase in several EU countries, and produce works that can connect, in an original, innovative and sensitive way, with the community, thus helping to develop new models for quality of life and constituting a timely step change towards a genuine democratisation of culture and greater public involvement;</th>
<th>cultural heritage (which includes the Committee) and representatives of European regions. This is also in line with the Action Plan referred to above. Creative Europe 2021-2027 continues to support the European Capitals of Culture and the European Heritage Label. The Commission is developing actions to further increase their visibility and promote their capacity building.</th>
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<td>35. supports the need to produce new works, but above all to use art to support social objectives that are more integrated, structured and efficient, all the more so at a time of market crises that are both systemic and due to the COVID-19 pandemic. Specifically, drawing freely on the Art Bonus scheme established by the Italian government, which has led to good practices in the area of patronage, calls for proposals and competitions could be launched to promote the acquisition of works by contemporary European artists and cultural workers by private individuals and companies, works that the purchaser would undertake to produce collaboratively with European institutions;</td>
<td>The 2021-2027 Creative Europe programme specifically promotes social inclusion. Among its objectives, the programme will co-fund projects promoting this dimension of culture. In particular in the area of cooperation projects, partnerships among a variety of institutions and organisations and also regional or local authorities can be created around such a topic of social innovation.</td>
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<td>The regulation for the 2021-2027 Creative Europe programme does not promote the acquisition of works of arts for reasons of subsidiarity.</td>
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make available to the public for a fixed period of time in museums and even as part of a tour;

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<th>33.</th>
<th>welcomes with interest the new European Bauhaus initiative announced by the President of the European Commission as part of the Renovation Wave strategy, considering it necessary to nurture a new European aesthetic based on a societal need for beauty, on the interlinkages between existing realities, regeneration and the environment, and on the development and implementation of environmentally sustainable materials, taking as an example the work done by the Superstudio Group in Milan;</th>
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<td>39.</td>
<td>reiterates to this effect its earlier call &quot;for increased investment in culture and in plans to bring aspects of cultural heritage, including those which have been neglected or abandoned, into use, under interactive and sustainable management within the new 2030 Urban Agenda, capitalising on innovative initiatives promoted by the municipalities and cooperation initiatives promoted by regional stakeholders&quot;.</td>
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The sectoral approach outlined for architecture in the 2021-2027 Creative Europe programme will allow initiatives and organisations around the topics of the New European Bauhaus to be further developed and deepened.

The Commission is also grateful for the joint event organised with the Committee on the New European Bauhaus initiative on 14 April 2021. It allowed to gather useful input from Members of the Committee to the New European Bauhaus initiative, while at the same time being an example of networking and synergetic activities with the European Capitals of Culture and Innovation Capitals. This fits in the Action Plan between the Committee and the Commission referred to above.

The Commission reminds, in this respect, the workshop on complementary sources of funding that it organised in January 2021. The workshop focused on the exchange and sharing of best practices between Member States and heritage stakeholders. Concretely, on instruments that are alternative to public funding (in view of increasing the sector’s financial sustainability) including examples from European regions.

A partnership of the Urban Agenda for the EU focuses on culture and cultural heritage. With a multilevel governance approach (European, national, regional and local levels), it is currently implementing 10 actions ranging from improving data collection, developing guidelines for the reconversion of public spaces or to support and incubate creative activities at the local level.

In the European Regional Development Fund 2021-2027 Regulations, possibilities for financing cultural heritage including within a new Specific Objective focusing on culture and tourism increased.
### N°7 A Union of Equality: EU Roma strategic framework for equality, inclusion and participation for 2020-2030

**COM(2020) 620 final**

**COR-2020-05625 – SEDEC-VII/013**

**142nd plenary session – February 2021**

**Rapporteur-General: Jácint HORVÁTH (HU/PES)**

**DG JUST – Commissioner DALLI**

<p>| Points of the European Committee of the | European Commission position |</p>
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<th>Regions opinion considered essential</th>
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<td>5. the Committee [...] notes that the commitments given on equality, social inclusion and Roma participation need to be renewed and strengthened at European, national, regional and local levels;</td>
<td>The Commission welcomes the Committee’s overall support to renewing and strengthening the commitment to Roma equality, inclusion and participation. In order to ensure effective implementation at national, regional and local levels, the Commission has adopted a proposal for a Council Recommendation, which includes measures aimed at mobilising regional and local stakeholders and involving regional and local authorities and local civil society, as part of the EU Roma strategic framework for equality, inclusion and participation. This Recommendation was formally adopted by the Council on 12 March 2021, as confirmed in an information point in the Informal video conference of Employment and Social Policy Ministers (EPSCO) on 15 March 2021; the Council text maintains the initial aims of the Commission proposal for a Council Recommendation and strongly supports the objectives set out in the Commission’s Communication for an EU Strategic Framework for Roma Equality, Inclusion and Participation.</td>
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13. the Committee emphasises [...] that the | In 2018, the Commission carried out a mid-term

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1 COM(2020) 621 final.
3 COM/2020/620 final.
Communication fails to address the experiences, both positive and negative, with the implementation of previous national Roma strategies. It draws no conclusions, contains no reference to best practices and makes no mention of any effective measures taken by Member States that could be adopted or taken up elsewhere; evaluation of the EU framework for national Roma integration strategies, covering the 2011-2017 period and assessing the relevance, coherence, effectiveness, efficiency, coordination, equity, sustainability and EU added value of the EU framework. The Commission adopted a Communication reporting on the evaluation and, at the same time, published a Staff Working Document providing more detailed analysis.

In September 2019, the Commission adopted the 2019 report on the implementation of the National Roma Integration Strategies, focusing on lessons learnt from the implementation of Roma inclusion measures and national strategies and reviewing promising measures implemented by Member States in the areas of education, employment, health and housing.

The findings outlined in these documents constitute an important basis for the policies set out in the EU Roma strategic framework and are summarised in the accompanying Staff Working Document.

17. the Committee [...] notes that the Communication does not take into account the possible lack of civil society organisations and experts, which is a major obstacle to progress in some Member States, mainly because it hampers the work of NGOs;

The Commission recognises the need to build capacity of civil society. The EU-level targets of the strategic framework aim to ensure participation of Roma non-governmental organisations (NGOs) as full members of national monitoring committees for all programmes addressing the needs of Roma, encourage participation of Roma in political life at local, regional and EU levels and capacitate and engage at least 90 NGOs in the EU-wide coordinated Roma civil monitoring.

Support for the capacity building of civil society organisations in general, including those representing Roma communities, remains a

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7 SWD(2020) 530 final.
8 The Preparatory Action Roma Civil Monitoring, funded by the European Parliament aims to build capacities of mainly Roma NGOs and support their participation in monitoring and reviewing the national Roma inclusion strategies.
priority for the Commission. The European Social Fund (ESF) provides funding for capacity building and partnerships. In addition, the EU Programme for Employment and Social Innovations (EaSI) co-funds the ROMACT programme, to build the capacity of local authorities. The EaSI programme also co-funds European Grassroots Organisation Network (ERGO Network) of Roma grassroots NGOs that builds its members’ capacity.

The Citizenship, Equality, Rights and Values Programme\(^9\), adopted on 28 April 2021, will provide funding opportunities for NGOs in the areas of non-discrimination and Roma inclusion, thus ensuring the continuation of funding under the Rights, Equality and Citizenship Programme of the 2014-2020 funding period.

18. the Committee states that national Roma strategic frameworks should contribute to implementing the EU anti-racism action plan and the European Pillar of Social Rights, and to accomplishing the United Nations 2030 Agenda and the Sustainable Development Goals […] The EU Roma strategic framework for equality, inclusion and participation contributes to the implementation of the EU anti-racism action plan 2020-2025. It is consistent with the European Pillar of Social Rights, as it is designed to increase social fairness, irrespective of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation.

The EU headline targets laid out in the EU Roma strategic framework have been designed to be achievable by 2030, in line with the Sustainable Development Goals for 2030.

20. the Committee […] urges […] the Commission to closely monitor progress at Member State level, enforce the application of the relevant EU legislation and swiftly assess the necessity for further legislation since the absence of sanctions risks delaying even further the Roma integration and inclusion process. Invites the Commission to consider the creation of a European advisory The Committee […] urges […] the Commission to closely monitor progress at Member State level, enforce the application of the relevant EU legislation and swiftly assess the necessity for further legislation since the absence of sanctions risks delaying even further the Roma integration and inclusion process. Invites the Commission to consider the creation of a European advisory

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The Committee emphasises that the objectives and measures set out in the national Roma strategic frameworks should take into account specific local and regional characteristics within Member States and disadvantaged micro-regions requiring specific measures;

the impacts of the national Roma strategic frameworks (Annex 2 of the Communication). Starting in 2022, the Commission will publish periodic monitoring reports every two years, informed by national reporting, input from civil society, and data collected through FRA surveys. The Commission will also carry out in-depth mid-term and ex-post evaluations of the EU Roma strategic framework.

The EU has binding legal instruments in place to combat discrimination against Roma and antigypsyism, including in particular the Racial Equality Directive\textsuperscript{10} and the Framework Decision on combatting Racism and Xenophobia\textsuperscript{11}, both transposed by Member States. The Commission will continue to monitor and enforce existing EU legislation and, if necessary, launch infringement proceedings. As set out in the EU Roma strategic framework and the EU anti-racism action plan, the Commission will report on the application of the Directive in 2021 and present any legislation required to address shortcomings by 2022.

To foster cooperation and the exchange of experience, the Commission will seek to strengthen the existing European Roma platform\textsuperscript{12}, which brings together national governments, the EU, international organisations and Roma civil society representatives.

The Commission recognises the need to consider regional and local characteristics. For this reason, the EU framework adopts a differentiated approach with minimum commitments for all Member States, and additional efforts based on country contexts, the size and share of the Roma community, options for data collection and use of EU funds. The portfolio of indicators is adjustable to national circumstances and the available

\begin{table}[h]
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The Committee emphasises that the objectives and measures set out in the national Roma strategic frameworks should take into account specific local and regional characteristics within Member States and disadvantaged micro-regions requiring specific measures; & the impacts of the national Roma strategic frameworks (Annex 2 of the Communication). Starting in 2022, the Commission will publish periodic monitoring reports every two years, informed by national reporting, input from civil society, and data collected through FRA surveys. The Commission will also carry out in-depth mid-term and ex-post evaluations of the EU Roma strategic framework. \\
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\textsuperscript{11} https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32008F0913

The guidelines for planning and implementing national Roma strategic frameworks (Annex 1 of the Communication) indicate that Member States should ensure that interventions take account of local conditions.

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<th>30. the Committee recommends that one objective of the framework should be the inclusion of information about Roma history and culture in primary and secondary school textbooks and that indicators should be provided to this effect;</th>
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<td>The EU Roma Strategic Framework includes the operational objective of promoting awareness of Roma history, culture, recognition and reconciliation under the specific objective of fighting and preventing antigypsyism and discrimination. A horizontal section dedicated to promoting awareness of Roma arts history and culture provides guidance to Member States on how to take adequate action in this area and specifically addresses the inclusion of the Romani language and Roma history in school curricula and textbooks for both Roma and non-Roma students. The portfolio of indicators includes related process indicators.</td>
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<th>41. the Committee suggests to stop the use of the common denominator &quot;Roma&quot;, as it fails to recognise the diversity within the population of people with Romani background. Instead proposes the adoption of the expression &quot;people with Romani identity&quot;;</th>
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<td>The Commission uses the umbrella term ‘Roma’ as introduced by the Council of Europe and adopted in the Strasbourg Declaration. In the context of the EU Roma Strategic Framework for equality, inclusion and participation and other EU policy documents, ‘Roma’ is used as an umbrella term encompassing a wide range of different people of Romani origin, such as Roma, Sinti, Kale, Romanichels and Boyash/ Rudari. It also encompasses groups such as Ashkali, Egyptians, Dom, Lom, Rom and Abdal, as well as traveller populations, including ethnic Travellers, Yenish, those designated under the administrative term ‘Gens du voyage’, as well as people who identify as Gypsies, Tsiganes or Tziganes, without denying their specificities. While the Commission is aware that applying the term ‘Roma’ to all these groups does not reflect</td>
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13 This terminology was approved as part of the Council of Europe’s Strasbourg Declaration (https://search.coe.int/cm/Pages/result_details.aspx?Reference=CM(2010)133-final) at the High-level meeting on Roma on 20 October 2010.
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<th>the cultural and language diversity among them, it considers the use of an umbrella term in policy documents and discussion justifiable to address the similar challenges in respect of equality and inclusion.</th>
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<td>46.</td>
<td>the Committee draws the attention of the governments of the Member States to the fact that local and regional authorities should be involved in drawing up national policy frameworks for Roma [...]</td>
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<td></td>
<td>The Commission fully shares the position of the Committee. As outlined in the adopted Council Recommendation, the Member States should involve regional and local authorities and local civil society in the design, implementation, monitoring and review of national strategic frameworks.</td>
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4. welcomes the new emphasis the Commission places on engaging citizens in research and innovation matters, calls for such engagement, while respecting scientific freedom, to concern all stages of framing, implementing and monitoring these policies, not being restricted to "guiding" or "informing" citizens, who – on the contrary – want to play an active part; considers that this engagement should firstly be organised at local level, and that the cities and regions are key players in facilitating and developing it, and play an important role in aligning research and innovation with the values, needs and expectations of society;

The ambition for citizen engagement in the European Research Area (ERA) is reflected in their active involvement in all stages of research and innovation (R&I), including co-designing R&I agendas, co-creating R&I contents, and co-assessing R&I outcomes.

Proposed actions could include the use of Horizon Europe Missions, currently in their preparatory and assessment phase, as well as the use of cities and regions as platforms for engagement activities.

A bottom-up approach in research and innovation is crucial, and provides a decisive contribution for making the green and digital transition a reality. Smart Specialisation approach aims at wide engagement of relevant innovation ecosystem actors at national, regional and local level, including civil society. A strong regional response to contribute to the European Research Area and to the Recovery Package, are needed more than ever.

To enhance the regional dimension of the R&I policies, the Commission has set up a double strategic collaboration with the Committee around two different instruments: the Joint Action Plan (JAP) drafted by DG R&I, JRC and DG EAC in cooperation with the Committee; and the new Knowledge Exchange Platform (KEP).

In particular, the Knowledge Exchange Platform will play a key role in aligning research and innovation with the values, needs and expectations.
of cities and regions.

The Communication adopted on 30 September 2020 ‘A new ERA for research and innovation’. It states that ‘strategic and coordinated support will also be offered to regions and cities building on successful initiatives such as the Knowledge Exchange Platform’.

The new KEP is fully aligned with and centred on the new ERA. The relaunched version aims at deepening its strategic approach (more policy oriented, linked to ERA and what it means for regions and local actors) and broadening its scope (with more tools and collaboration actions). KEP 2.0 will promote exchanges of information on a practical and factual basis. A link to the resilience and recovery package will be ensured, in addition to the Commission strategic agenda (Green Deal, digital, etc.).

The European Research Area and the European Education Area will work together to achieve a new level of ambition in which education, research and innovation are steered in the same direction to underpin knowledge as a foundation for democratic, resilient and inclusive societies.

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<th>5. welcomes the Commission's commitment to reach 3% of GDP spent on R&amp;D and to set a target of 1.25% for the public effort in 2030 (compared to the current 0.81%), but wonders how these targets can be achieved, given that the recovery plan does not provide for substantial spending on R&amp;I and, for example, moves away from the EU4Health programme proposed by the Commission;</th>
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<tr>
<td>Both EU targets are voluntary targets and should be translated into national targets and policies according to national circumstances. The 3% target has proven its role as an aspirational goal that helped sustain research and development (R&amp;D) efforts throughout crises. The target is now more critical than ever to accelerate the twin transitions, strengthen resilience and crisis preparedness, and sharpen Europe’s competitive edge. The new 1.25% EU gross domestic product (GDP) public effort target is proposed to be achieved by Member States by 2030 in an EU coordinated manner. It includes both direct R&amp;D funding and indirect R&amp;D funding through R&amp;D tax incentives, therefore aims to leverage and incentivise private investments and address public</td>
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Public R&D efforts in the EU amounted to 0.81% of GDP (in 2017). Applying the 37% growth in gross domestic expenditure on R&D (GERD) that is needed to reach the 3% target to the current level of public effort (0.81%), the result is 1.1%. The proposed EU target of 1.25% represents thus an additional increase in public efforts of ca. 10% in relation to the 1.1% figure above.

In addition, while the Recovery and Resilience Facility has not set a specific R&D investment target, initial draft Recovery and Resilience Plans show that many Member States are proposing significant R&I investment and reforms that will help contribute to boosting R&D investment in Europe.

6. regrets that, although there is a Commissioner with a single portfolio covering research, innovation, training and youth policies, it has not been possible to propose a fresh approach for a European Education and Research Area; points to the need for a cross-cutting approach to these issues, which are closely linked to regional policies; hopes that the Communication on the global approach to research, innovation, education and youth, announced by the Commission in its work programme for 2021, will move in this direction;

On 30 September 2020, the Commission adopted a package of three Communications:

(1) on achieving the European Education Area by 2025\(^1\) (which provides that all people should have the opportunity to realise their potential in a lifelong learning perspective);

(2) the Digital Education Action Plan 2021-2027\(^2\) (which seeks to foster the development of a high-performing digital education ecosystem and enhance digital skills and competences for the digital transformation), and

(3) the European Research Area for Research and Innovation\(^3\) (which allows Europe to reach its ambitious research and innovation objectives through cooperating across borders).

The package demonstrates that strengthening synergies and cooperation between education, research and innovation is a shared objective of the Commission. The effective implementation of such cooperation can significantly contribute to sustainable development and the recovery of the

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\(^1\) COM(2020) 625 final.
\(^2\) COM(2020) 624 final.
\(^3\) COM(2020) 628 final.
European economy in the aftermath of the pandemics crisis.

To ensure full synergies between the European Higher Education and Research Areas, the Commission is committed to support Member States and higher education institutions in creating a policy framework allowing for seamless and ambitious transnational cooperation between higher education institutions in Europe, building on the experiences of the European Universities alliances.

The European Universities initiative, piloted under the Erasmus programme and supported in its R&I dimension by Horizon will help empowering Universities in Europe to develop common education and R&I strategies, creating critical mass to deliver on Europe’s challenges, facilitating the sharing of capacity such as digital and knowledge infrastructures and resources through collaborative settings.

The Digital Education Action Plan (2021-2027) will support research and innovation activities also through Horizon Europe to promote understanding of emerging technologies and their applications in education as well as encourage women’s participation in STEM (science, technology, engineering and mathematics), in cooperation with the European Institute of Innovation and Technology (EIT). In the field of R&I, the aim is also to improve the attractiveness of academic and researchers’ careers, facilitate co-operation with surrounding R&I ecosystem actors and to play a key role in engaging citizens in science.

7. stresses that this communication is only a starting point, which should lead, firstly, to further tangible actions and, secondly, to the adoption of a "pact for research and innovation"; asks to be involved in the preparation of these new steps; calls for this pact to be an opportunity to protect academic and university freedoms, the freedom of

Following the adoption of the Commission communication on a New ERA for Research and Innovation in September 2020 and the Council Conclusions on the New ERA from December 2020, the first steps of the roll out of the new ERA were discussed with Member States at the European Research Area Committee (ERAC) plenary meeting in December 2020.
expression of lecturers, researchers, students and intellectuals, as well as their freedom of movement, not only within the Union, but also between the Union and all of our partner countries; considers in this regard that international cooperation policy within the ERA must comply with these same principles and is concerned by the rapid erosion of academic freedoms in many countries around the world;

13. objects, however, to a governance approach that still centres on the relationship between the Commission and the Member States, which usually makes cities and regions recipients of public policy rather than active participants in it, and which leaves the Member States to deal with local and regional issues; therefore once again calls for the full and complete recognition of cities and regions as stakeholders to be mobilised in designing, implementing, monitoring and evaluating European research and innovation policies, in keeping with the principle of "active subsidiarity";

29. considers that, in view of these factors, the full involvement of cities and regions in the ERA Forum for Transition is essential, in the light not only of the cooperation and coordination challenges to be addressed, but also of the role of local actors in implementing the transformation agenda in relation to crises and transitions;

It demonstrated broad support for establishing without delay an ERA Forum for Transition to help finalise the new ERA governance framework and jointly prepare an ERA policy agenda setting out EU priority actions to achieve the new ERA. In January 2021, the Commission established the ERA Forum for Transition in the form of an informal expert group of Member States representatives. The Committee will be involved in this Expert Group as observer.

Fundamental academic values are also high on the agenda of the Bologna Process. At the last Ministerial Conference in November 2020 in Rome, Ministers adopted a Communiqué⁴, which states their commitment to upholding institutional autonomy, academic freedom and integrity, participation of students and staff in higher education governance, and public responsibility for and of higher education.

Stakeholder involvement and buy in will be crucial. The ERA Forum is planning on engaging stakeholders in all phases of the process, and notably in April, October, and at the European R&I Days in June 2021. It will also examine other opportunities on how to engage with them throughout the process. Commission services have actively consulted R&I stakeholders during the preparation and after the adoption of the Commission’s Communication on the new ERA. In addition, Commission services are open to respond to any requests and invitations to provide information on the progress of work of the Expert Group and will welcome inputs and feedback.

The Commission has acquired an extensive experience on the engagement of the local and regional actors in the implementation of the Cohesion policy support to R&I and governance of the related smart specialisation strategies, platforms and partnerships to build on.

8. points out that proper monitoring and assessment of innovation and research is essential for effective policy implementation. Refers, in this regard, to the opinion on the Regional Innovation Scoreboard and its impact in regional place-based policies, which states that the RIS is an essential tool for comparing changes in the performance of regional innovation policies, and that its influence on regional decision-making should be boosted to improve regional innovation ecosystems and smart specialisation; A transparent monitoring system will be essential for the effective revitalisation of the ERA. The Commission and Member States need to be able to measure progress towards the new ERA, based on performance indicators assessing horizontal aspects (e.g. R&I investments and reforms, increase in the mobility of researchers) and thematic joint programming (on e.g. Green Deal).

A new Expert Group will be created and will interact with the Expert Group on the ERA Forum in view of the definition of a new, robust ERA Scoreboard. It will address the progress at EU and national level, potentially revise priorities and actions in the ERA Roadmap and provide evidence and analysis for the European Semester. The Commission has launched a study in December 2020 to assess the previous ERA monitoring system and propose adaptations. The Regional Innovation Scoreboard will be one of the key monitoring systems that will be taken into account in this analysis. The results will be available mid-2021 and will feed into reflection on a new monitoring and assessment system.

15. urges that stronger emphasis be put on the relationship between research and business while recognising the key role of local and regional authorities in developing entrepreneurial environments and facilitating connections for knowledge transfer: sponsorship of fundamental research by companies, promotion of science entrepreneurship, while adhering to transparency requirements, private investment, support for companies in developing their innovation; The EU knowledge valorisation policy fosters academia-industry interactions, promotion of standards and an intellectual property management that enables open innovation and successful entrepreneurship. In this context, a new action will promote industry-academia knowledge exchange focussing on companies’ research and innovation needs, complementing university-business collaboration.

In line with the Committee opinion, the Guiding Principles for Knowledge Valorisation and the code of practice for the smart management of intellectual property (ERA priority action 7), will be co-created with stakeholders to reflect the dynamic R&I landscape with new challenges and opportunities such as the data-driven and digital economy and the increasingly complex innovation ecosystems with a key role for local and regional
16. calls for greater clarity, in relation to the establishment of the "ERA Talent Platform", on how the Commission intends to: a) ensure continuity with the EURAXESS initiative and the Human Resources Strategy for Researchers (HRS4R), which have been developed up to now to facilitate the mobility of researchers and their career development in order to contribute to the establishment of a single market for knowledge, research and innovation and b) encourage the recognition of research staff in these initiatives and promote mechanisms to support regions committed to attracting and retaining talent, the HRS4R strategy and to support the needs of research institutions and staff;

ERA Talent Platform will build on EURAXESS and will broaden the scope of services, network, portals and tools, hence the Commission will continue to ensure the sustainability of EURAXESS activities and will support its expansion and its further development towards new features that can better reflect the needs of the labour market for researchers, such as through operating grants.

ERA Talent Platform, and the more ambitious Charter and Code for Researchers and the Human Resources Strategy for Researchers (HRS4R) are foreseen under the ERA Communication part of the toolbox of measures comprised in the enhanced European Framework for Researchers.

17. emphasises the need for the work to involve good local/regional coordination and to provide instruments enabling local or regional authorities to play a leading role, such as the Policy Support Facility, synergies between regional policy and Horizon Europe, and the Seal of Excellence. It is essential to facilitate access to information and data to enhance synergies and complementarities between European funds and allow different authorities to work in a more coordinated way;

Achieving added value through synergies between R&I-related EU funding programmes has been a key priority for the Commission. As regards the future rules for implementing operational synergies between R&I-related EU programmes, very good progress was achieved in the legislative process on facilitating and simplifying the rules in all relevant future regulations (Horizon Europe, Cohesion policy, State Aid General Block Exemption). Synergies can be implemented, including by regional managing authorities of Cohesion policy Funds’ programmes, in particular by alternative, combined, cumulative funding and transfers of resources.

As for the access to information on the Seal of Excellence, the Horizon Europe regulation foresees that the work programme shall specify calls for proposals for which ‘Seals of Excellence’ may be awarded. With prior authorisation from the applicant, information concerning the application and the evaluation may be shared with interested financing authorities, subject to the conclusion of confidentiality agreements.
The Commission is aiming to develop Policy Support Facility (PSF) work in a way that it can be as much as possible relevant for the regional level, while duly taking account the need to focus PSF resources on activities where it can be the most effective and impactful.

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<th>18. calls for clarification of the concept of excellence by clearly distinguishing between excellence in science, the excellence of impacts, which is closely linked to collaboration between science and innovation ecosystems, particularly local and regional ones, and the excellence of ecosystems themselves, through their specific areas of scientific excellence, as well as their ability to provide strategy and coordination;</th>
<th>Local and regional actors are key to ensure proper multi-level R&amp;I uptake assuming their clear responsibilities to enable the green and digital transition. Local/regional actors play a key bottom-up role, using e.g. both outcomes of R&amp;I projects as well as Cohesion policy funding, as test beds for R&amp;I experiments. In order to actively engaging regions and local authorities in the definition and the implementation of ERA, it is essential to provide them with the necessary knowledge and tools to participate in the debate, understand R&amp;I policies and dynamics and transform scientific evidence in effective policy making. In this respect, there are two ongoing and complementary initiatives: the ‘Knowledge Exchange Platform’ (KEP) and the ‘Joint Action Plan’ between DG R&amp;I, DG EAC and JRC and the Committee. The ‘Knowledge Exchange Platform’ (KEP 2.0), aims at maximising the support to an informed decision making process at regional/local level on ERA. The common denominator among all these actions is that they touch on citizens in their daily life. The Commission needs to make sure that young Europeans are aware and able to benefit from the available support and opportunities, empowering young people to embody a Europe of talent. Additionally, the Commission has introduced the ERA Hubs, new policy initiative proposed in the ERA Communication, aimed at stimulating placed-based innovation and upskilling, intra-regional and inter-regional connectivity, as well as fostering a broader transnational cooperation through the mobilisation and empowerment of</th>
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<td>19. proposes, while fully reiterating the importance of measures to support scientific excellence in the framework of Horizon Europe, in particular, to fully recognise as a complementary objective of the ERA, the availability in all EU cities and regions of high quality science that can be harnessed to boost innovation and help society and businesses meet the challenges of the Sustainable Development Goals and deal with today's crises;</td>
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national, including regional and local R&I systems, networks and actors.

It is expected, that the ERA Hubs will strengthen ecosystem actors involved in knowledge production, circulation and use, stimulate excellence as well as function as an incentive for less developed ecosystems.

21. calls for the ERA to promote the links to be developed between strategies for smart specialisation, ERA priorities and their overall implementation; also calls for the ERA to contribute to a better balance between, on the one hand, the indispensable scientific excellence and, on the other hand, the urgent need to close the research and innovation performance gap between states, regions and cities in the EU;

26. proposes moving towards partnership contracts between the regions, the Member States and the EU, to mobilise all stakeholders with the focus on shared research, innovation and higher education, digital education and skills objectives, and on plans to support smart specialisation areas, bringing all EU policies to bear, and not limited to the rules for mobilising the ERDF. This approach could be the subject of a pilot action;

30. recommends that local or regional good practices be assessed and developed when drawing up the criteria for compliance with the enabling condition for smart specialisation strategies, as laid down in the Regulation on Common Provisions for the Structural Funds. It should be pointed out that good governance of the national, regional or local smart specialisation strategy should form part of the process of drawing up the regional ERDF programmes, in which each regional and local authority must demonstrate the progress it has made

The ERA industrial technology roadmaps are promoting the links between Horizon Europe partnerships with industry and Smart Specialisation to strengthen R&I on key industrial technologies for the Green Deal, digitalisation and resilience (see point 24).

The Entrepreneurial Discovery Process (EDP), which is an integral part of the preparation of smart specialisation strategies, involves the wide mobilisation and consultation of all relevant stakeholders. The outcome of the EDP may also be relevant for other policy areas including those not funded directly by the European Regional Development Fund (ERDF).

In drafting their Smart Specialisation Strategies, Member States and regions should explore possible synergies and complementarities with Horizon Europe Strategic Programming, including missions and partnerships.

It could be expected that past experience in implementing the Smart Specialisation Strategy (S3) will help regions in assessing their compliance with the enabling condition for smart specialisation strategies, as laid down in the Common Provisions Regulation.

The Digital Education Action Plan is the result of intensive stakeholder consultation process, which included a session hosted by the Commissioner for Innovation, Research, Culture, Education and Youth Mariya Gabriel and Members of the Committee in July 2020. The Committee is also an important stakeholder for the implementation of the Digital Education Action Plan. The
on implementing its S3 strategies, including, among other things, measures for international cooperation; Commission welcomes the opinion\(^5\) adopted in the May Plenary Session on the Digital Education Action Plan and is very grateful for the collaboration with the Rapporteur Ms Coughlan and the Committee in the development of the opinion. The Commission is committed to pursue the constructive dialogue, including in the context of the Action Plan launched in November 2020 to strengthen collaboration with the Committee, as referred to above.

24. supports the Commission's aim to guide the development of common technology roadmaps with industry in order to include R&I investment programmes, but is surprised to see that they are only linked to the Member States and industry under the European partnerships planned under Horizon 2020; argues that this should be carried out while taking account of the regions' smart specialisations and the role of regional innovation ecosystems and hubs which also shape industrial value chains;

To implement the New ERA priority action 5, ‘the Commission will, in cooperation with Member States and stakeholders, support the implementation of the New Industrial Strategy by jointly developing common industrial technology roadmaps by the end of 2022 to align and link key partnerships under Horizon Europe with industrial ecosystems, so as to ensure that efforts team up and that research results are known and rolled out faster in the economy’.

Regional smart specialisation support for relevant R&I (in particular, in regions with a moderate or modest innovation performance) and EU Technology Infrastructures are important elements of those roadmaps.

28. is concerned at the limited progress made in the field of synergies, due in particular to the slow progress on State aid framework schemes, reiterates its hope that "all funding harnessed to co-finance an action or action programme under Horizon Europe will be subject to the legal rules applying to this programme, in particular those concerning State aid", and reaffirms its view of synergies as a form of willing cooperation based on the 5Cs principle (coherence, complementarity, compatibility, co-construction, recognition of local stakeholder collectives); again stresses the need for an effective co-construction approach and control of possible financial

As regards future rules for implementing operational synergies between R&I-related EU programmes, significant progress was made in the legislative process on facilitating and simplifying the rules in all relevant future regulations (Horizon Europe, Cohesion policy, State Aid General Block Exemption Regulation). The forthcoming amendment of the General Block Exemption Regulation aims to further facilitate the granting of aid for projects that meet Horizon eligibility criteria.

In essence, this means that,

- when granting State aid for Seal-of-Excellence projects, Member States will not need to

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\(^5\) SEDEC-VII/011.
transfers by the managing authority; reassess eligibility conditions already assessed at Union level in accordance with the Horizon Europe Framework programme rules prior to the awarding of the Seal of Excellence label, in particular the conditions concerning State aid;

- when granting State aid as a contribution to co-funded research and development projects, Member States will not have to reassess eligibility conditions already assessed at transnational level in accordance with Horizon Europe programme rules by independent experts prior to a research and development project's selection.

The amendment to the General Block Exemption Regulation will enter into force timely enough to apply to projects receiving funding or Seals of Excellence under Horizon Europe.

| 32. | draws attention to several pitfalls to be avoided: the discussions to be held must take into account the experience of the digital hubs or of the European Institute of Innovation and Technology (EIT), but the ERA hubs should not be limited to these reference points or confine themselves to organising an "interconnected knowledge space" centred on the exchange of good practice and the circulation of knowledge – moreover, Europe does not need a "hubs of hubs"; the ERA Hubs should not merely be a tool for reducing the innovation gap, and nor should they serve once again to highlight only the world-class university sites that are already strongly supported by the Member States and the Framework Programme; |
| 33. | proposes, instead, that groups of stakeholders, regional (or interregional) ecosystems and innovation hubs be recognised within the framework of ERA hubs if they share the following cumulative criteria: |
| | - the existence of a knowledge strategy, |
| | According to the new ERA Communication, ERA Hubs will build on existing capacities such as Digital Innovation Hubs and EIT KICs, it will link to networks such as Enterprise Europe and StartUp Europe, aiming to develop a platform for collaboration and knowledge and best practice sharing across borders, sectors and disciplines, which will facilitate cross-fertilisation and smart directionality to achieve transformative changes. ERA Hubs will not be an additional network, but it will be based on European standards of work and ethics underpinned by a European-level framework to stimulate excellence and growth. ERA Hubs concept development and compliance criteria are subject to an ongoing study that will provide evidence-based indications on the definition/ technical specifications considering various geographic/ thematic/ organisational elements etc. The compliance criteria will be fine-tuned through consultation with experts and stakeholders and also through experimentation, in a testing phase. A list of compliance criteria at this stage will pre-empt the study, the consultation |
offering an integrated approach to higher education, digital education, lifelong learning, including upskilling and reskilling, research and innovation;

- the involvement of all stakeholders, on the basis of the quadruple helix model, which emphasises the involvement of citizens and local public actors that come from a democratic system;

- the capacity for collective coordination, strategy definition and shared decision-making when it comes to adopting priorities and allocating resources;

- economic and social performance in terms of territorial impact in all areas: training, innovation, job and business creation, services provided to businesses, public services and the third sector, the contribution to transitions and social and cultural innovation, social cohesion, active citizenship and cultural creativity (e.g. using the Innovation Scoreboard);

- having smart specialisations at European and international level in areas of scientific excellence relevant to the ERA hubs, or being on a trajectory that makes it possible to reach this level quickly and credibly;

- involvement in thematic interregional or European smart specialisation networks and partnerships;

- a background of involvement in European research, training and mobility programmes for researchers and students;

34. considers that these ERA hubs should be supported directly by the EU, including in financial terms, through a partnership based on three pillars:

- recognition by the EU of these ERA hubs as important points of support for process and the testing phase ahead.

The Digital Education Action Plan puts forward an integrated approach to digital education with a lifelong learning approach with initiatives tackling upskilling and reskilling as well research and innovation. The Plan’s implementation will be monitored by the European Digital Education Hub, which will involve actors at various levels including regional and local and engage the public more closely through direct communication channels and opportunities for co-creation.
achieving the European Union's objectives and for implementing the relevant policies; this entails the ERA hubs being taken into account both in conducting the ERA Forum for Transition and in Horizon Europe strategic planning;

- European support for strengthening key support tasks (strategy, coordination, Europeanisation, internationalisation, training, talent attraction, innovation and transfers) and improved access to the various European programmes, including Horizon Europe;

- a commitment by the ERA hub stakeholders to strengthen their strategic capacity and the quality of smart specialisations, to increase their involvement in Community networks and programmes, and to develop cooperation within the European network of ERA hubs;

35. hopes that at least 50 to 100 sites in Europe can be recognised as ERA hubs and that this network will be open to a broad range of participants, in particular to emerging ecosystems in the EU-13 and the most disadvantaged regions;

36. stresses the crucial role of cities and regions as initiators and orchestrators of extensive collaboration projects for societal innovations in tackling societal challenges. ERA hubs should act as instruments in developing necessary competencies and practices in accelerating this progress;

39. calls on the Commission to explain how, in the current context and without increased support, Member States whose level of investment in R&I is below the European average could achieve the target of a 50% increase in such investment over the next five years, an objective which the Committee

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As with the other targets, this is a voluntary target. Achieving this target requires to couple national sources and EU funding with policy reforms to make those investments more efficient and quality driven.

The Commission stands ready to support Member
nevertheless supports; States through various forms, including through the Horizon Policy Support Facility, the European Semester, and the new Technical Support Instrument. The Recovery and Resilience Facility will also support R&I investment in all Member States, including those that lag behind the EU average.

41. agrees that progress on implementation of the ERA has slowed down and that there are still large disparities between countries and regions, as indicated in the 2018 ERA Progress Report. The convergence of European, national and regional research and innovation systems is inadequate, resulting in a damaging concentration of R&I sites of excellence across Europe that leaves entire regions behind. It is in addition producing an unbalanced environment for the mobility and movement of knowledge, running counter to the ERA’s policy objectives;

42. considers that these observations are widely shared and oft repeated, but that no political lessons have been drawn from them, and that the current budgetary choices, if maintained, will not make it possible to remedy these shortcomings, will ensure that all the talk about closing the innovation gap remains nothing but wishful thinking, and will render the mechanisms for spreading excellence and expanding the take-up of tools inadequate and unable to achieve the desired policy objectives.

The new ERA communication provides the policy framework for a strengthened widening component of Horizon Europe via the priority of improving access to excellence.

This package includes traditional capacity building activities such as development of new centres of excellence, networking and ERA Chairs but also dedicated innovative measures to encourage balanced brain circulation and the support of regional innovation ecosystems. The latter will be run under the label of excellence hubs and will promote the co-operation of placed based innovation ecosystems based on the quadruple helix approach with a centre of gravity in the less R&I performing countries (‘widening countries’).

Addressing the innovation divide is a priority for the ERDF which will contribute approx. €80 billion to this objective in the 2021-2027 period. Furthermore, with the Horizon Europe massive investment for the widening countries of more than €2.8 billion in this programme component, the Commission is confident that it can reduce the gap in innovation performance and success in the participation in the framework programme throughout the next programming period.

Beyond a pure project funding the Commission is also aiming at reforms of the national R&I system in these countries and improving the synergies across EU funding programmes. First signals of an improvement are already visible in the financial return to EU13 countries from the framework programme that rose from 4.1% at the end of FP7 to 5.1% at the late stage of Horizon 2020.

Similarly the relative underperformance of
proposal submission has been improved from 84% to 90% (100% equal’s average success rate of all Member States) over the same period.