Ex-post Evaluation ECO/638

ERDF and Cohesion Fund (2014-2020)

Technical annex

Table of contents

Detailed analysis of questionnaire and country visits

1. Introduction

1.1 Focus of this evaluation

The European Commission is required by Article 57 of the Common Provisions Regulation 1303/2013 (CPR) to conduct an evaluation of the European Regional Development Fund (ERDF) and Cohesion Fund[1]. The purpose of this evaluation is to assess the achievements of the operational programmes funded **during the 2014-2020 programming period**. The evaluation will examine the effectiveness, efficiency and impact of investments co-financed by the ERDF and Cohesion Fund in the 2014-2020 period, their coherence with other policies, their relevance and the EU added value. It will seek to identify factors contributing to the success or failure of these investments under different socio-economic conditions and will highlight good practices and their contribution to growth, sustainable development and job creation.

With a view to contributing an additional source of information to this evaluation, **in December 2023, the EESC Bureau requested the drafting of an evaluation report and appointed Maria del Carmen Barrera Chamorro** (Group II, Workers, representative of the UGT, Spanish General Union of Workers) **as rapporteur**.

With the aim of complementing the Commission's evaluation, the EESC's evaluation focused specifically on how the ERDF and Cohesion Fund contributed in that period to the goals of:

- Promoting social inclusion, combating poverty and any discrimination;
- Strengthening the administrative capacity of civil society organisations as beneficiaries;
- Promoting sustainable and quality employment and supporting labour mobility;
- Enhancing the competitiveness of SMEs.

1.2 Methodology and study group

The EESC's methodology is guided by the Commission's Better Regulation guidelines[2]. EESC evaluation reports use two of the three criteria mentioned in Tool 47 of the Better Regulation Toolbox[3]: effectiveness and relevance. In addition to these, the institution also evaluates the added value of civil society involvement in the policy at hand.

The three criteria can be understood as:

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[1] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32013R1303#art_57.

[2] https://commission.europa.eu/document/download/d0bbd77f-bee5-4ee5-b5c4-6110c7605476_en?filename=swd2021_305_en.pdf.

[3] https://commission.europa.eu/document/download/88ebf8bb-79c1-4cf2-975b-c643dcc766f8_en?filename=BRT-2023-Chapter%206-How%20to%20carry%20out%20an%20evaluation%20and%20a%20fitness%20check_0.pdf.

- *Effectiveness*: considers how successful EU action has been in achieving (or progressing towards) its objectives.
- *Relevance*: looks at the relationship between the needs and problems in society and the objectives of the intervention. Relevance analysis requires a consideration of how the objectives of an EU intervention correspond to wider EU policy goals and priorities.
- *Added value of civil society involvement*: assesses the level of involvement of civil society in the design, monitoring, implementation and evaluation of the EU legislation in question.

In practice, the EESC's evaluation reports provide organised civil society's input into an ongoing evaluation of the European Commission.

A study group of nine EESC members collected the views of civil society organisations as well as of public authorities through two channels: five in-person fact-finding visits in the selected countries and a targeted online questionnaire.

Besides the above-mentioned rapporteur, the **study group president** was **Konstantinos Diamantouros** (Group I, Employers, Hellenic Federation of Enterprises, SEV). The group conducted a series of in-person and online visits to five countries, chosen with a view to geographical and political diversity and the composition of the study group itself.

The full composition of the study group was as follows:

From Group I, Employers:

- Matteo Carlo Borsani – Confindustria, General Confederation of Italian Industry
- Konstantinos Diamantouros – Hellenic Federation of Enterprises, SEV
- David Sventek – Confederation of Industry of the Czech Republic
- Katrīna Zariņa – Latvian Chamber of Commerce and Industry, LCCI

From Group II, Workers:

- Maria del Carmen Barrera Chamorro – Spanish General Union of Workers, UGT
- Dominika Biegon – German Trade Union Confederation, DGB
- Rudy De Leeuw – Belgian General Federation of Labour, FGTB/ABVV
- Zoe Tzotze-Lanara – Greek General Confederation of Labour, GSEE

From Group III, Civil Society Organisations:

- Krzysztof Balon – Polish Community of Associations of Social Organisations, WRZOS
- Elena-Alexandra Calistru – Romania, Funky Citizens
- Michael McLoughlin – Youth Work Ireland
- Juraj Sipko – Institute of Economic Research, Slovak Academy of Sciences

Furthermore, the rapporteur, supported by the other 11 study group members, the EESC secretariat, and his advisor, Ioannis Grigoriadis (Associate Professor and Jean Monnet Chair of European Studies at the Department of Political Science and Public Administration, Bilkent University, and Research Fellow at the Hellenic Foundation of European and Foreign Policy, ELIAMEP) drafted a questionnaire that was made available to stakeholders throughout the duration of the country visits.

Additionally, secondary data gathered from the EESC's past work on the subject was also analysed.

1.3 **Fact-finding meetings**

The fact-finding meetings included semi-structured interviews with local civil society organisations and representatives of public authorities, generally following the thematic structure of the questionnaire. They took place in person, with some participants also attending online.

The sample of Member States was selected by the study group based on criteria adopted by the EESC Bureau on 13 December 2022. The European Commission was also informed about the sample.

The countries were selected based on:

- *political spread* e.g. high/low level of implementation, application success rates, most/least affected by the legislative proposal/programme, etc.;
- *geographical spread* i.e. by dividing the Member States into five groups and choosing one country from each group.

The EU Member States selected for this information report in which in-person or virtual fact-finding meetings took place were the following:

- **Greece (25 October 2024),**
- **Latvia (2 December 2024),**
- **Spain (11 December 2024),**
- **Poland (14 January 2025),** and
- **Romania (27 January 2025).**

1.4 **Questionnaire**

The questionnaire was created on the EU Survey online portal, using a combination of question formats (filter questions, closed and open-ended questions, a grid). The questionnaire consultation was open from 20 October 2024 to 30 January 2025.

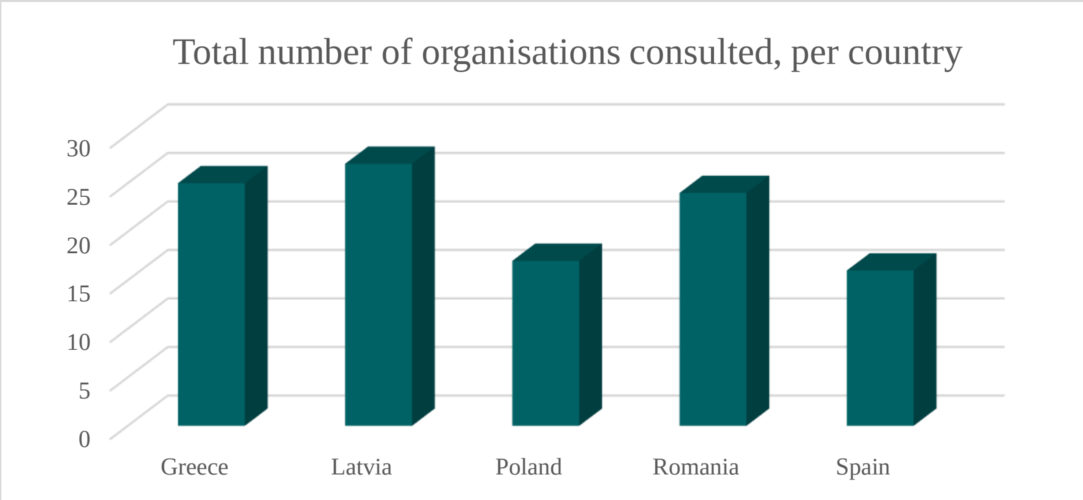
The aim of the questionnaire was to complement the information obtained from the fact-finding meetings. Composed of 15 questions (and additional sub-questions) the questionnaire was sent to organisations in the Member States that had been selected for the fact-finding meetings (and not only to the organisations participating in those meetings, but also to other relevant organisations).

Throughout this annex, we will use the questionnaire as a structuring tool, revealing the numerical breakdown of the responses to each of the questions. However, and more importantly, we will add under each question the contributions related to each topic received throughout the country visits, mentioning the countries and type of stakeholders concerned.

1.5 **Respondent breakdown**

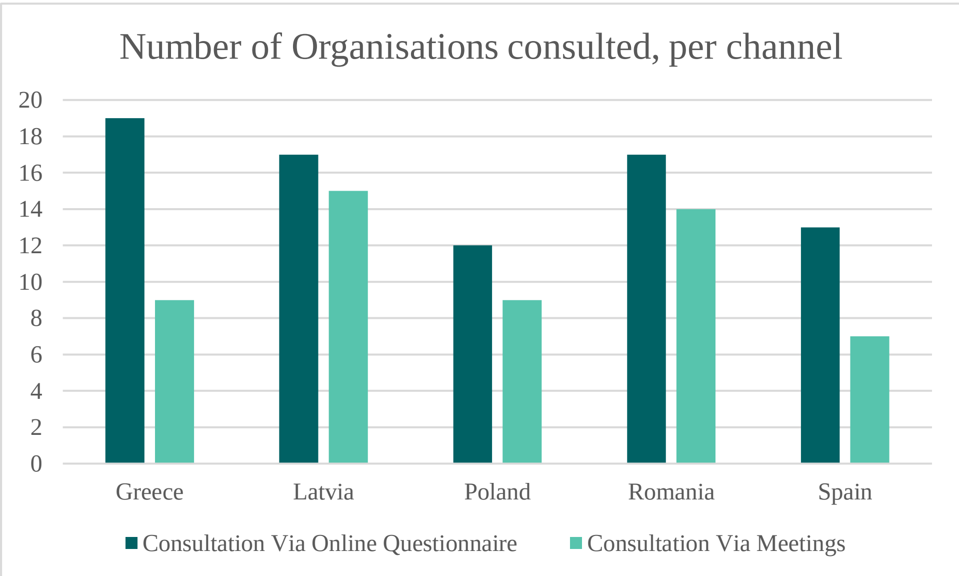
In total, *109 organisations were consulted throughout this evaluation*, from five different Member States and through two complementary methods. A full list of the participants is available at the end of this document.

Figure 1: Total number of organisations consulted



During the five fact-finding country visits, the EESC delegation consulted a total of 54 organisations (7 in Spain, 9 both in Greece and in Poland, 14 in Romania and 15 in Latvia) comprising public authorities, employer organisations, trade unions and other types of civil society organisations. It is important to note, however, that the total number of persons interviewed was higher, as on many occasions more than one representative of an organisation participated in the meeting.

Figure 2: Organisations consulted, per channel



In addition, 78 contributions were collected through the online questionnaire. Approximately half of them came from several types of civil society and private organisations, and another half from national, local and regional authorities.

Figure 3: Questionnaire respondents, per type

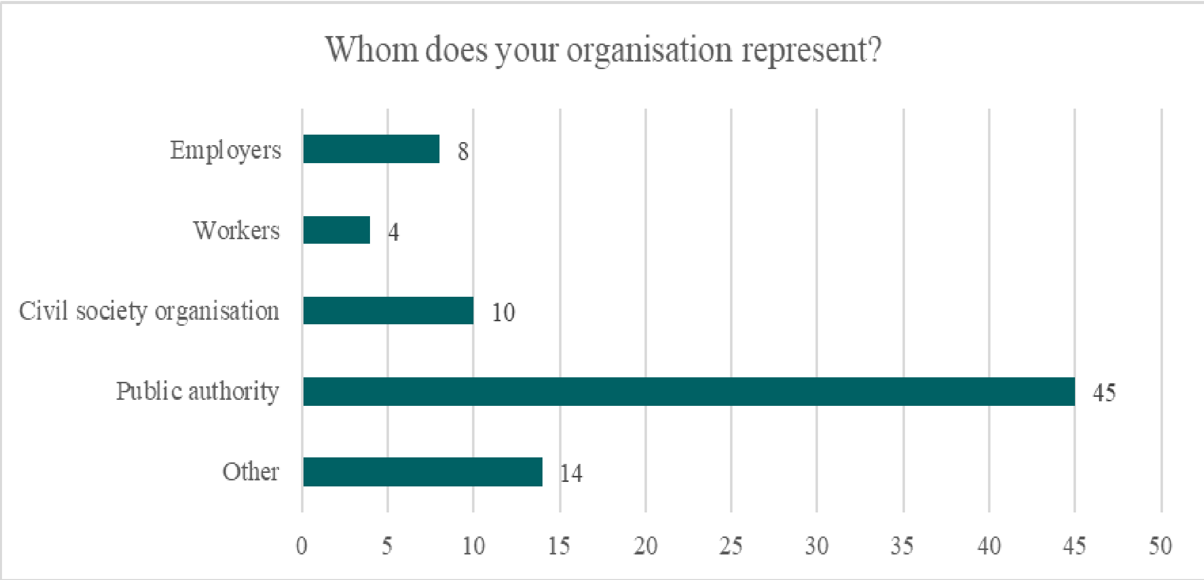
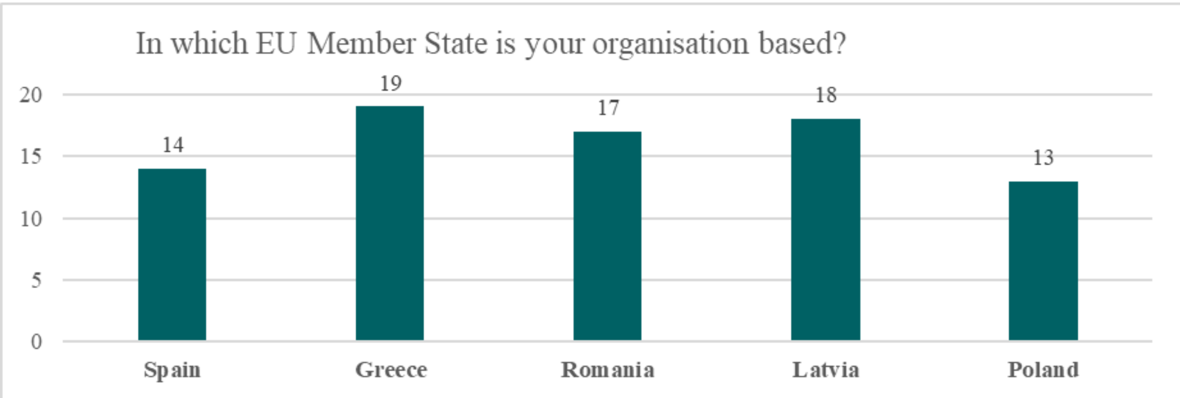


Figure 4: Questionnaire respondents, per country



2. Policy overview

2.1 The ERDF and Cohesion Fund 2014-2020

EU cohesion policy in the programme period (2014-2020) was channelled through four different funds: the European Regional Development Fund, the Cohesion Fund, the European Social Fund and the Youth Employment Initiative. The subject of the policy evaluation is the **European Regional Development Fund (ERDF)** and the **Cohesion Fund (CF)**, which represent approximately 58% and 13% respectively of the total EU cohesion policy budget [4].

Priorities

The **ERDF** financed projects in four key thematic areas:

- Innovation and research;
- Information and Communication Technologies;
- Support for small and medium-sized enterprises (SMEs);
- Promotion of the low-carbon economy[5].

The **CF** (2014-2020) set investment priorities and co-financed projects in the following four key thematic areas:

- Promotion of the low-carbon economy;
- Climate change adaptation, risk prevention and management;
- Environmental protection and conservation[6];
- Development of trans-European transport networks, removal of bottlenecks and supporting sustainable transport[7].

Moreover, the EU committed to contribute directly to the Sustainable Development Goals (SDG) of the United Nations with its cohesion policy. The ERDF and CF supported 11 out of the 17 SDGs, especially SDG – 9 Industry, innovation, infrastructure and SDG 8 – Decent work and economic growth[8].

Budget

The total budget for the ERDF (2014-2020) was around EUR 308 billion and for the CF (2014-2020) approximately EUR 72.4 billion[9].

[4] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[5] European Regional Development Fund (2014-2020) | EUR-Lex (europa.eu).

[6] Cohesion Fund (2014-20) | EUR-Lex (europa.eu).

[7] Cohesion Fund (2014-20) | EUR-Lex (europa.eu).

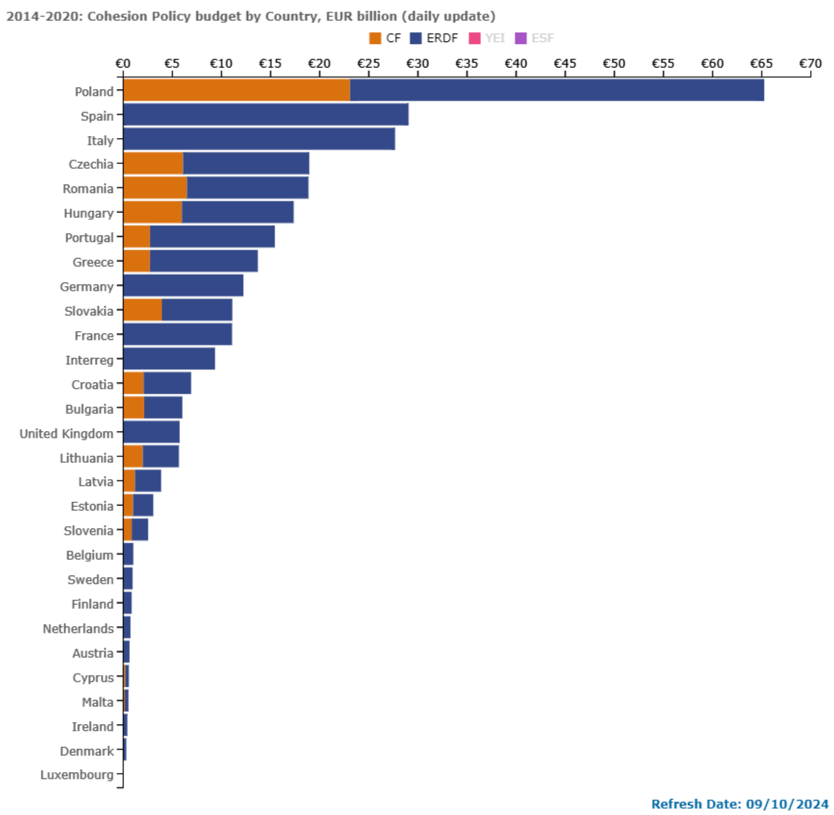
[8] Cohesion policy 2014-2020: support to the UN SDGs | Data | European Structural and Investment Funds (europa.eu).

[9] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

Budget by country

For the CF, only Member States with a per capita gross national income of less than 90% of the EU average were eligible[10]. For the programme period (2014-2020) these were Bulgaria, Croatia, Cyprus, the Czech Republic, Estonia, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia and Slovenia[11]. For the ERDF, all Member States were eligible and received some funding. In addition, the ERDF also financed interregional projects involving two or more Member States [12].

Figure 5: ERDF and Cohesion Fund budget by country in EUR billion[13]



For the ERDF, Poland was the largest recipient country (approximately EUR 49.5 billion), followed by Spain (approximately EUR 38 billion) and Italy (approximately EUR 37 billion). Small (e.g. Slovenia, Malta, Cyprus) and/or high-income countries (e.g. Sweden, Finland, Ireland, Luxembourg) were allocated fewer resources, ranging from EUR 1.7 billion to EUR 0.09 billion.

10 Cohesion Fund (2014-20) | EUR-Lex (europa.eu).

11 Inforegio – Cohesion Fund 2014-2020 (europa.eu).

12 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

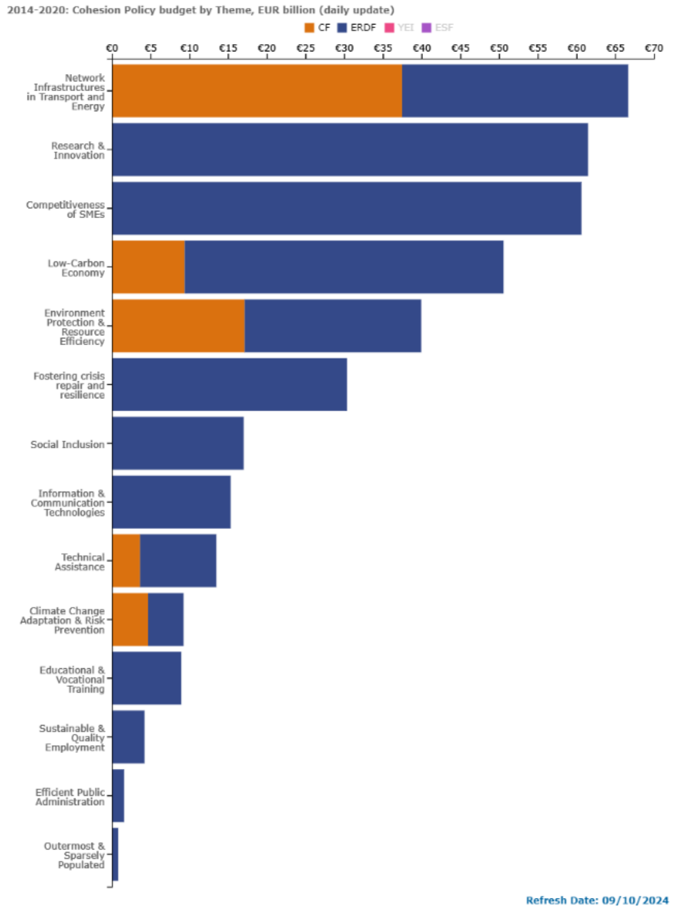
13 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

For the CF, Poland received the highest amount of all Member States (approximately 23 billion EUR), making it also the largest recipient country of the two funds combined. Poland was followed by Romania (approximately EUR 6.5 billion), Hungary and the Czech Republic (each approximately EUR 6 billion). The lowest amounts were allocated to Estonia and Slovenia (approximately EUR 1 billion)[14].

Budget by theme[15]

Overall, the ERDF funded projects in 14 different thematic areas and the CF in five. Overall, the highest amount was allocated to the area of network infrastructure in transport and energy (approximately EUR 66.7 billion).

Figure 6: ERDF and Cohesion Fund budget by theme in EUR billion[16]



For the ERDF, the highest amounts were channelled into projects promoting research and innovation (approximately EUR 61.5 billion), the competitiveness of SMEs (approximately EUR 60.6 billion) and the low-carbon economy (approximately EUR 41.2 billion). The lowest contribution was made to

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[14] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[15] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[16] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

projects related to efficient public administration (approximately EUR 1.6 billion) and outermost and sparsely populated areas (approximately EUR 829 million).

For the CF, the focus was on financing projects related to network infrastructure in transport and energy (approximately EUR 37 billion), environment protection and resource efficiency (approximately EUR 17 billion), low-carbon economy (approximately EUR 9 billion), as well as climate change adaptation and risk prevention (approximately EUR 5 billion)[17].

Funded actions and projects

For the programming period (2014-2020) a total of 335 535 projects were financed by the ERDF[18] and a total of 11 297 projects by the CF[19].

The largest project under the ERDF, with a budget of approximately EUR 304 million, financed the construction of a new road infrastructure of 18.6 km, including an overwidth for public transport and soft modes in France.

Other major projects included the construction of the Racibórz-Pszczyna Regional Road on the section running through Rybnik City (Poland), the improvement of research infrastructure in the Czech Republic, including the construction of Extreme Light Infrastructure, as well as the modernisation of the transmission system in Lower Silesia (Poland) to make it more functional and make optimal use of the Poland-Germany connection[20].

The largest project of the CF, with a budget of approximately EUR 544 million, was in the field of network infrastructure in transport and energy, financing the construction of the S7 expressway on the Koszwały-Elbląg section with a total length of 39.63 km in Gdańsk, Poland.

Other major projects included the construction of a water reservoir on the Oder River in Poland, a wastewater treatment plant in Slovakia and the extension and modernisation of water and wastewater infrastructure for the Constanţa and Ilfov regions in Romania[21].

The following sections present a brief overview of the implementation of these funds in each of the five selected Member States.

2.2 **Programme implementation in Greece**

Governance

In Greece, the objectives of the European Structural Investment Funds, including the ERDF and the CF, were implemented through seven sectoral and 13 regional operational programmes, as well as bi- and multilateral programmes involving other Member States.

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17 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

18 EU projects ERDF – European Regional Development Fund (europa.eu).

19 EU projects CF – Cohesion Fund (europa.eu).

20 EU projects ERDF – European Regional Development Fund (europa.eu).

21 EU projects CF – Cohesion Fund (europa.eu).

A common management and control system was established for managing these operational programmes.

The managing authorities were a special service under the Ministry of Economy, Development and Tourism and for regional policy, the regional governors were responsible. The Ministry of Finance had the auditing responsibilities[22].

Budget

For the programming period (2014-2020) Greece received funding from the CF (approximately EUR 3.21 billion) and the ERDF (approximately EUR 13.548 billion). Taken together, Greece was the 10th largest recipient country of the EU, with around EUR 16.76 billion[23].

[22] Management & Control System 2014-2020 for ERDF, ESF, CF OPs (espa.gr).

[23] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

Overall, the ERDF funded projects in 11 different thematic areas and the CF in five. Figure 7 shows the distribution of the ERDF and CF budget for Greece by theme[24].

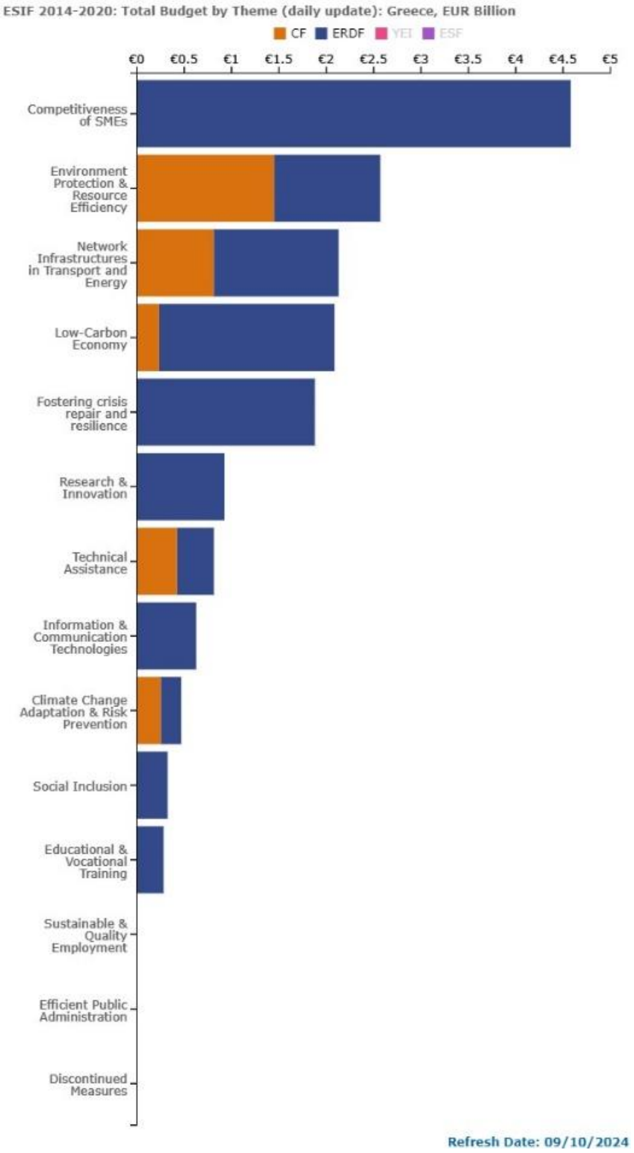

Figure 7: ERDF and Cohesion Fund budget by theme in Greece in EUR billion[25]

The largest investments were made in projects that:

- Foster the competitiveness of SMEs (approximately EUR 4.6 billion, only ERDF);
- Protect the environment and improve resource efficiency (approximately EUR 2.58 billion in total: EUR 1.46 billion from the CF and EUR 1.12 billion from the ERDF);
- Improve network infrastructure in transport and energy (approximately EUR 2.14 billion in total: EUR 1.317 billion from the ERDF and EUR 819 million from the CF);

[24] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[25] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

- Foster the low-carbon economy (approximately EUR 2.09 billion in total: EUR 1.85 billion from the ERDF and EUR 242 million from the CF)[26].

Projects

Overall, 6 371 projects were financed under the ERDF (2014-2020)[27] and 55 projects were financed in Greece with the CF (2014-2020)[28]. Projects were pursued in all districts of Greece and were especially concentrated in Attica and Central Macedonia[29].

The largest project, with a budget of approximately EUR 60 million under the ERDF, was in the field of information and communication technology for the provision of wholesale broadband services to telecom operators and upgrading and deployment of high-speed communications infrastructure in several areas of the country.

The second largest project financed, with a budget of around EUR 34 million, was the conversion of a 37.5-km-long road into a closed expressway.

In the area of social inclusion, the design construction of the hospital of Chalkida was financed with around EUR 27 million[30].

The largest project financed by the CF in the field of environmental protection and resource efficiency, with a budget of around EUR 21 million, was the design, construction, maintenance and operation of the infrastructure of the urban solid waste treatment plant in the region of Epirus.

The second largest project financed by the CF (EUR 17 million) concerned the construction of a drinking water refinery from Lake Smokovo to serve 39 settlements, as well as an external aqueduct with a total length of approximately 187 km to supply these settlements.

The largest project in the area of network infrastructure in transport and energy was financed with EUR 9.78 billion and consisted of the construction of a pedestrian and vehicle crossing in the municipality of Ampelokipoi-Menemeni. The project aimed to improve the road conditions in the area and ensure safer movement of people and smoother flow of rail traffic[31].

Main achievements

The achievements under the ERDF and CF (2014-2020) period are manifold. Some examples of achievements from fully implemented projects are listed below (in approximate numbers).

ERDF[32]:

- 475 000 firms benefited

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[26] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[27] EU projects ERDF – European Regional Development Fund (europa.eu).

[28] EU projects CF – Cohesion Fund (europa.eu).

[29] EU projects ERDF – European Regional Development Fund (europa.eu).

[30] EU projects ERDF – European Regional Development Fund (europa.eu).

[31] EU projects CF – Cohesion Fund (europa.eu).

[32] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

- 16 000 new direct jobs were created (full time equivalents)
- 20 km of railways were reconstructed
- 100 km of new roads were built
- Improved water supply for 860 000 people
- Improved forest fire protection for 166 000 people
- Improved health services for 6.2 million people

Cohesion Fund[33]:

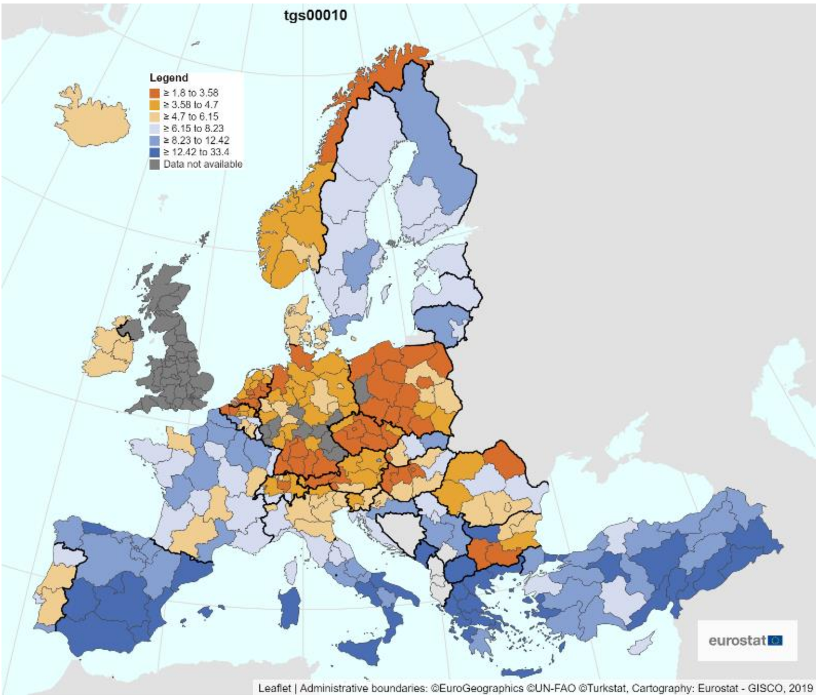
- 81 km of new roads were constructed
- Improved waste recycling (76 000 tonnes per year)
- Improved water supply for 537 000 people

Country context Greece

Following the financial crisis of 2007-2008 and the debt crisis in the subsequent years, Greece experienced a period of significant decline in GDP (per capita) and high unemployment rates. From 2014 onwards, the economy slowly recovered and improved.

In 2014, two out of Greece’s 13 regions had unemployment rates of up to 28.7%[34] and the national unemployment rate was at 26.7%[35]. After 2014, the unemployment rate dropped significantly.

Figure 8: Unemployment rate by NUTS 2 region, 2020[36]



[33] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

[34] Statistics | Eurostat (europa.eu).

[35] Unemployment, total (% of total labor force) (modeled ILO estimate) – Greece | Data (worldbank.org).

[36] Statistics | Eurostat (europa.eu).

The figure above shows the unemployment rate by NUTS 2 region for 2020. In Greece, the unemployment rate was at 15.9% for the country as a whole[37] and 21.6% in the region Dytiki Ellada, which had the highest unemployment rate[38]. However, Greece's unemployment rates remained significantly above the EU average, which was at 7% in 2020[39].

In 2014, the two regions in Greece with the lowest GDP per capita in PPS per inhabitant in % of the EU-27 average were Ipeiros (52% of the EU average) and Anatoliki Makedonia (49% of the EU average). Attiki and Notio Aigaio (81%) were the two regions with the highest GDP per capita (97% and 81% of the EU average respectively). Most of the other regions ranged between 50 and 60% of the EU average[40].

In 2020, only three regions had a GDP per capita in PPS per inhabitant above 50% of the EU average. For Anatoliki Makedonia and Ipeiros the GDP per capita dropped for both to 43% of the EU average. The highest GDP per capita remained in the region of Attiki but dropped to 85%[41].

Figure 9: GDP per capita growth (annual %) – Greece, European Union[42]

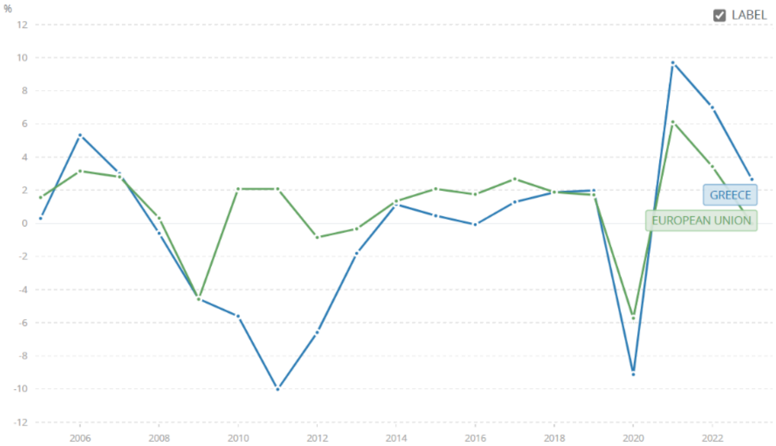


Figure 9 shows the GDP growth rate of Greece and the European Union between 2006 and 2023. After a period of negative growth rates, Greece experienced moderately positive growth rates (ranging from approximately 1.1 to 2%) between 2014 and 2019. As in the whole of the EU the Greek economy experienced a negative shock in 2020 due to the COVID-19 pandemic.

2.3 **Programme implementation in Latvia**

The general priorities of cohesion policy in Latvia were:

- Improving economic productivity, quality of innovation, research and science
- Sustainable and efficient transport infrastructure
- Sustainable use of natural and cultural resources

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37 Unemployment, total (% of total labour force) (modeled ILO estimate) – Greece | Data (worldbank.org).

38 Statistics | Eurostat (europa.eu).

39 Unemployment, total (% of total labour force) (modeled ILO estimate) – Greece, European Union | Data (worldbank.org).

40 Statistics | Eurostat (europa.eu).

41 Statistics | Eurostat (europa.eu).

42 GDP per capita growth (annual %) – Greece, European Union | Data (worldbank.org).

- High employment rate in an inclusive society
- High quality and efficiency of the education system
- Balanced and sustainable territorial development[43]

Governance

The management and audit authority for cohesion policy funds in general was the Latvian Ministry of Finance[44].

Several ministries were responsible for the ERDF:

- Ministry of Economics
- Ministry of Education and Science
- Ministry of Agriculture
- Ministry of Culture
- Ministry of Welfare
- Ministry of Transport
- Ministry of Health
- Ministry of Smart Administration and Regional Development[45]

For the CF, three ministries were involved:

- Ministry of Economics
- Ministry of Transport
- Ministry of Smart Administration and Regional Development[46]

Budget

For the programming period (2014-2020), the budget of the CF was approximately EUR 1.456 billion and of the ERDF approximately EUR 3.101 billion. Taken together, Latvia was the 17th largest recipient country in the EU with around EUR 4.557 billion[47].

Overall, the ERDF funded projects in 11 different thematic areas and the CF in four. The figure below shows the distribution of the ERDF and CF budget for Latvia by theme[48].

The largest investments were made in projects that:

- Improve the network infrastructure in transport and energy (approximately EUR 973 million in total: EUR 277 million from the ERDF and EUR 696 million from the CF);
- Foster the low-carbon economy (approximately EUR 769 million in total: EUR 342 million of ERDF and EUR 427 million from the CF);
- Protect the environment and improve resource efficiency (approximately EUR 638 million in total: EUR 226 million from the CF and EUR 413 million from the ERDF);

43 *fmprog_270115_op_eng_2.pdf.

44 *fmprog_270115_op_eng_2.pdf.

45 European Regional Development Fund – ES fondi.

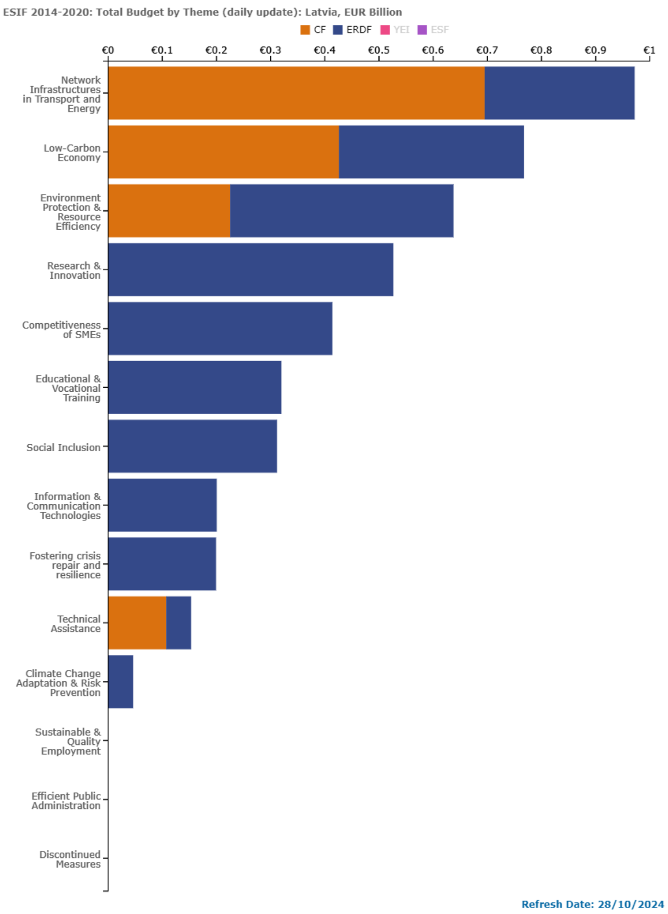
46 Cohesion Fund – ES fondi.

47 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

48 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

- Promote research and innovation (approximately EUR 527 million, ERDF only);
- Foster the competitiveness of SMEs (approximately EUR 415 million, ERDF only)[49].

Figure 10: Cohesion Fund and ERDF budget (2014-2020) by theme in EUR billion[50]



No projects were financed in the fields of sustainable & quality employment, efficient public administration and discontinued measures.

Projects

Overall, 892 projects were financed under the ERDF (2014-2020)[51] of which 184 were interregional projects, i.e. involving several Member States[52]. In Latvia, 146 projects were financed by the CF (2014-2020). Projects were implemented in all regions of the country.

The largest project funded by the ERDF was in the area of research and innovation with approximately EUR 29.742 million to modernise the research infrastructure of the University of Latvia in the fields of smart specialisation to increase its research and innovation capacity as well as its international competitiveness.

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[49] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

[50] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

[51] EU projects ERDF – European Regional Development Fund.

[52] EU projects ERDF – European Regional Development Fund.

The second largest project, financed by the ERDF was in the area of network infrastructure in transport and energy with approximately EUR 16.410 million to reconstruct national regional road P62 connecting Krāslava to Preiļi and Madona, including two bridges.

The largest project in the field of low-carbon economy had a budget of around EUR 11.796 million and financed the establishment of a network of industrial territories to promote entrepreneurship in Rēzekne municipality and Rēzekne and Viļāni districts[53].

The largest interregional project was in the field of environmental protection and resource efficiency involving the establishment of full scale mussel farming in the Baltic Sea. It had a total budget of EUR 4.651 million and, in addition to Latvia, also included Sweden, Denmark, Poland, Germany and Estonia[54].

The five largest projects financed with the CF (2014-2020) all supported projects in the area of network infrastructure in transport and energy, with a budget ranging from around EUR 14.799 million to EUR 30.388 million.

The largest project financed the improvement of the water infrastructure in the port of Liepāja, ensuring the safe movement of ships. The port is part of the TEN-T network.

Four other projects financed the reconstruction of the main national motorways A3, A12, A2 and A13[55].

Main achievements

The achievements under the ERDF and CF (2014-2020) in Latvia are manifold. Some examples of achievements from fully implemented projects are listed below (in approximate numbers).

ERDF[56]:

- 6 645 firms benefited
- 4 100 new direct jobs (full-time equivalent)
- 640 km of roads reconstructed
- 69 300 households with broadband access
- 2 100 researchers with improved infrastructure
- 87 200 people with improved flood protection
- 10 200 people with improved energy efficiency

CF[57]:

- 150 km of railways reconstructed
- 300 km of road rebuilt
- 48 700 hectares of habitats conserved

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[53] EU projects ERDF – European Regional Development Fund.

[54] Initiation of full scale mussel farming in the Baltic Sea | Kohesio.

[55] EU projects CF – Cohesion Fund.

[56] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

[57] Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

- 101 300 tonnes of waste recycled annually
- 180 200 people benefitting from improved flood protection

Country context Latvia

The figure below shows the unemployment rate in Latvia and the European Union between 2005 and 2023. The unemployment rate in Latvia peaked at 19.5% in 2010, well above the EU average. It then declined and in 2014 the unemployment rate was 10.8% – equal to the EU average. The rate declined until 2019, and then increased slightly to 8.1% in 2020. The unemployment rate then started to decrease again, reaching 6.5% in 2023 – 0.5 percentage points above the EU average[58]. The negative shock in 2020 can be explained by the impact of the COVID-19 pandemic.

In 2014, the GDP per capita in PPS per inhabitant in Latvia was at 64% of the EU-27 average. Figure 12 shows the indicator for Europe at NUTS 2 level for 2020. In that year, the value was at 72% for Latvia. This puts it at a similar level to the other Baltic States and scores slightly higher than most of the South-Eastern European countries.

Figure 13 shows the GDP growth rate of Latvia and the European Union between 2005 and 2023. After a period of negative growth between 2008 and 2010, Latvia experienced positive growth rates above the EU average between 2011 and 2018 (ranging from approximately 2.9% to 8.4%). As in the EU as a whole, the Latvian economy experienced a negative shock in 2020 due to the COVID-19 pandemic. However, the growth rates of Latvia remained above the EU average[59].

[58] Unemployment, total (% of total labour force) (modeled ILO estimate) – European Union, Latvia | Data.

[59] GDP per capita growth (annual %) – Latvia, European Union | Data.

Figure 11: Unemployment, total (% of total labour force) – European Union, Latvia, 2005-2023[60]

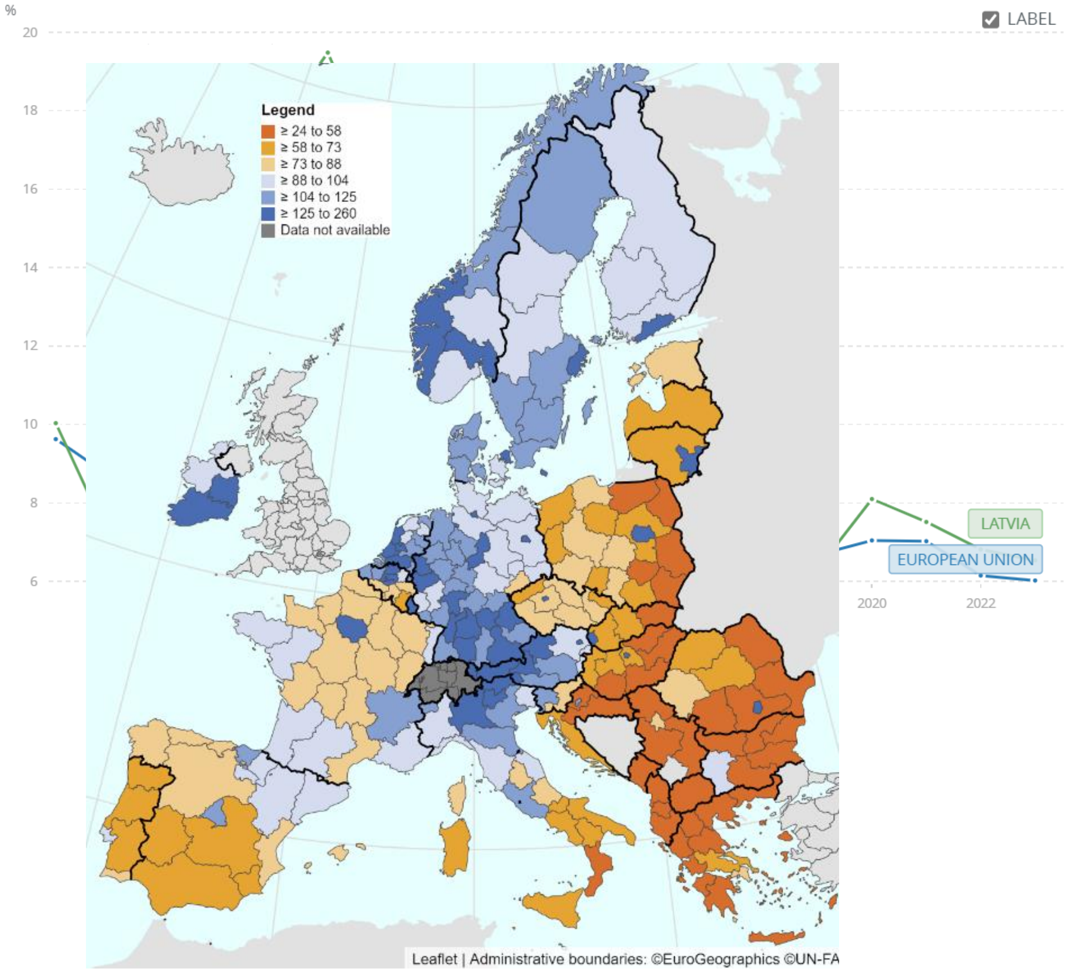
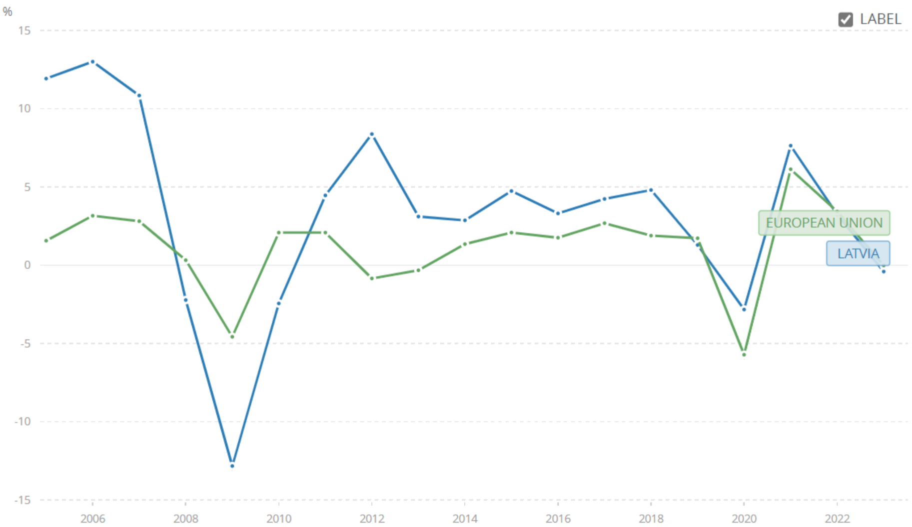


Figure 12: Regional gross domestic product (PPS per inhabitant in % of the EU-27 (from 2020) average) by NUTS 2 region, 2020[61]

Figure 13: GDP per capita growth (annual %) – Latvia, European Union, 2005-2023[62]



[60] [Unemployment, total (% of total labour force) (modeled ILO estimate) – European Union, Latvia | Data.]()

[61] [Statistics | Eurostat.]()

[62] [GDP per capita growth (annual %) – Latvia, European Union | Data.]()

2.4 **Programme implementation in Poland**

Governance

The management authority of the ERDF and CF in Poland was the **Ministry of Development Funds and Regional Policy**[63]. Projects were carried out by diverse bodies, involving public authorities from different levels of the Polish government, universities, enterprises and civil society organisations. There were several thousand different beneficiaries[64].

Budget

For the programming period (2014-2020), the budget of the CF was approximately EUR 27.223 billion and of the ERDF approximately EUR 49.512 billion[65]. Taken together, **Poland was the largest recipient EU Member State** with around EUR 76.735 billion[66].

63 European Funds 2014-2020 – Ministry of Development Funds and Regional Policy – Portal Gov.pl.

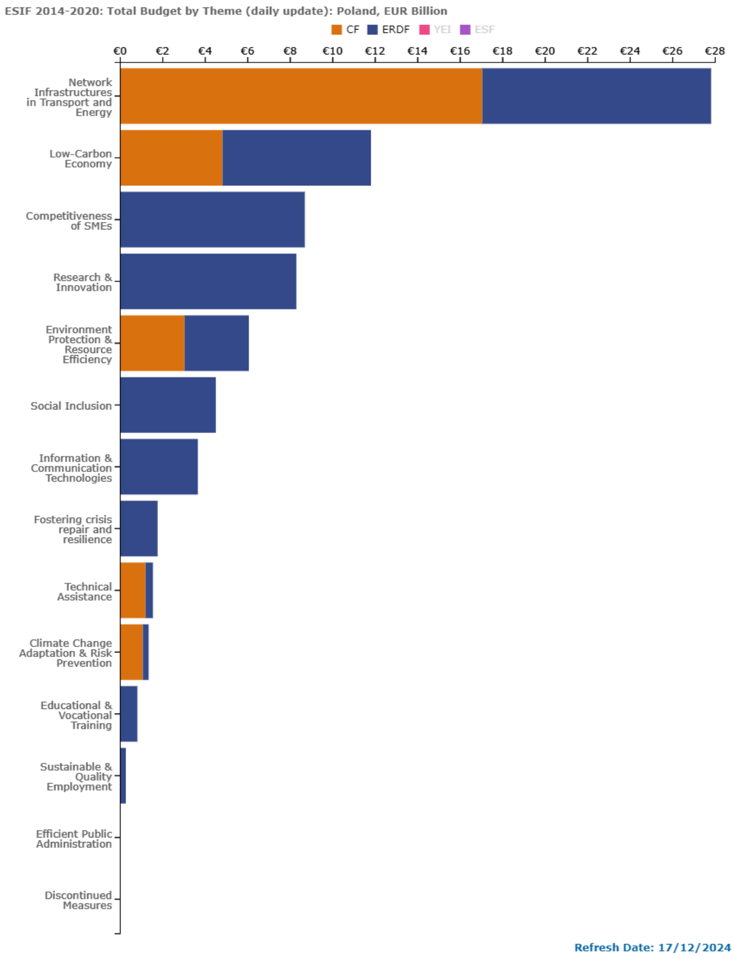
64 Beneficiaries.

65 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

66 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds (europa.eu).

Figure 14: ERDF budget (2014-2020) of Poland by theme in EUR billion[67]

Overall, the **ERDF** funded projects in **12 different thematic areas** and the **CF in five**. Figure 14 shows



the distribution of the ERDF and CF budget for Poland by theme.

The largest investments were made in projects that:

- **Improve the network infrastructure in transport and energy** (approximately EUR 27.827 billion in total: EUR 10.772 billion from the ERDF and EUR 17.055 billion from the CF);
- Foster the **low-carbon economy** (approximately EUR 11.820 billion in total: EUR 6.990 billion from the ERDF and EUR 4.829 billion from the CF);
- Foster the **competitiveness of SMEs** (approximately EUR 8.706 billion, ERDF only);
- Promote **research and innovation** (approximately EUR 8.309 billion, ERDF only);
- Protect the **environment and improve resource efficiency** (approximately EUR 6.072 billion in total: EUR 3.045 billion from the CF and EUR 3.028 billion from the ERDF)[68].

Projects

67 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

68 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

Overall, 37 468 projects were financed under the ERDF (2014-2020) of which 475 were interregional projects, i.e. involving several Member States. The CF (2014-2020) financed 1 029 projects[69].

Figure 15: Geographical distribution of projects carried out under ERDF (2014-2020)[70]

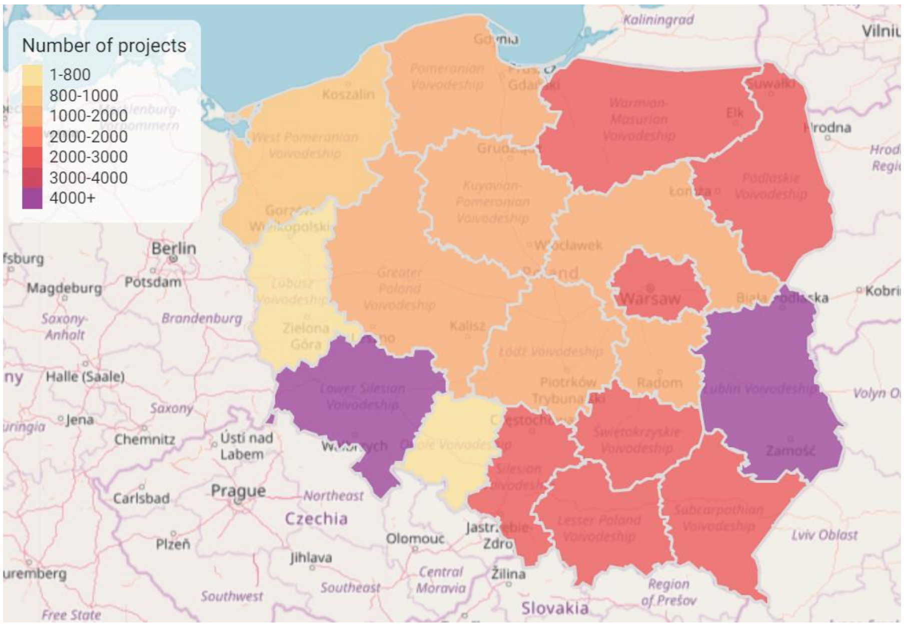


Figure 15 illustrates the geographical distribution of ERDF projects, which were carried out across all 16 provinces. The highest concentration of ERDF projects was in Lubelskie province (5 584 projects), followed by Dolnośląskie province (4 406 projects) and Śląskie province (2 935 projects). The fewest projects were carried out in Lubusz province (563 projects), Opolskie province (713 projects) and Zachodniopomorskie province (936 projects)[71].

Project details

The largest projects funded under the ERDF were in the areas of network infrastructure in transport and energy. These included the construction of an expressway between Olsztyn and Olsztynek, the construction of road bypasses in Inowrocław and Brodnica as well as the construction of the Olsztyn ring road[72].

Other big projects supported the purchase of disinfectants and personal protective equipment as a necessary action to prevent, counteract and combat COVID-19, and the development of the public transport system in Rzeszów to foster a low-carbon economy[73].

The largest interregional programmes financed under the ERDF in Poland supported sustainable and quality employment. For example, one project financed the improvement of the transport infrastructure of the Polish-Czech border region to attract more tourists and thereby indirectly increase employment in that region. The total budget of the project was approximately EUR 11.415 million[74].

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69 EU projects CF – Cohesion Fund.

70 EU projects ERDF – European Regional Development Fund.

71 EU projects ERDF – European Regional Development Fund.

72 EU projects ERDF – European Regional Development Fund.

73 EU projects ERDF – European Regional Development Fund.

74 Improving transport accessibility of the Broumov area and the Kłodzko-Wałbrzych region | Kohesio.

The largest project under the CF in Poland had a total budget of approximately EUR 544 million and financed the construction of road sections connecting Gdańsk and Elbląg, in the North of Poland. It is part of the trans-European transport networks[75].

Another large project financed a water reservoir on the Oder river in Śląskie province. Amongst other benefits, it helps improve adaptation to climate change and management of related risks, such as floods. The project had a total budget of approximately EUR 333.301 million[76].

Main achievements

The achievements under the ERDF and CF (2014-2020) in Poland are manifold. Some examples of achievements from fully implemented projects are listed below (in approximate numbers).

ERDF[77]:

- 101 238 firms benefited
- 2 193 km of roads reconstructed and 741 km newly built
- 92 new researchers (full time equivalent)
- 20 024 new direct jobs (full time equivalent)
- 2 155 029 people with improved health service
- 4 857 035 people benefitting from improved flood protection and 4 163 490 people benefitting from improved forest fire protection
- 41 846 households with improved energy efficiency
- 479 766 pupils benefitting from renovated schools

CF[78]:

- 62 km of railways reconstructed
- 1 294 km of new roads
- 1 236 332 tonnes of waste recycled annually
- 30 526 hectares of habitats conserved
- 16 368 households with improved energy efficiency

Country context Poland

Figure 16 shows the unemployment rate in Poland and the European Union between 2005 and 2023. Between 2005 and 2008 the unemployment rate in Poland was above the EU average, however, it was decreasing rapidly. After the European financial and debt crisis in 2008, the unemployment rate in Poland increased slightly, and peaked in 2013 at 10.3%. In line with the trend of the EU average the unemployment rate decreased thereafter until 2020 to 3.2%. After a slight increase in 2020 to 3.4%, the

75 Construction of the S7 expressway Gdańsk – Elbląg, section Koszwały – Elbląg | Kohesio.

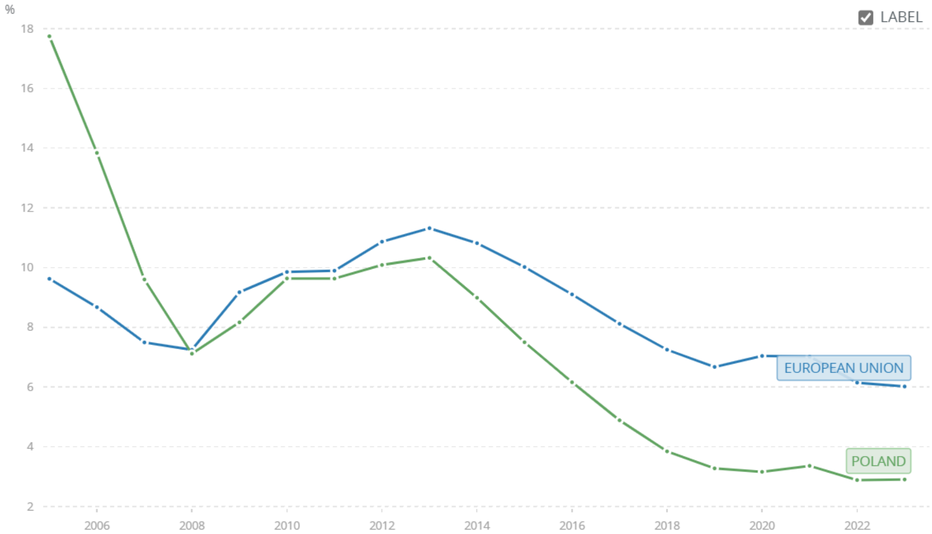
76 EU projects CF – Cohesion Fund.

77 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

78 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

unemployment rate decreased again and was at 2.9% – below the EU average of 6%. The negative shock in 2020 can be explained by the impact of the COVID-19 pandemic[79].

Figure 16: Unemployment, total (% of total labour force) – European Union, Poland, 2005-2023



Regional unemployment rates vary. In 2014, the regions with the highest unemployment rates were in Podkarpackie (14%), Świętokrzyskie (11.4%) and Kujawsko-pomorskie (10.7%). The lowest rates were recorded in the City of Warsaw (5.8%), Wielkopolskie (7.7%) and Opolskie (7.8%)[80].

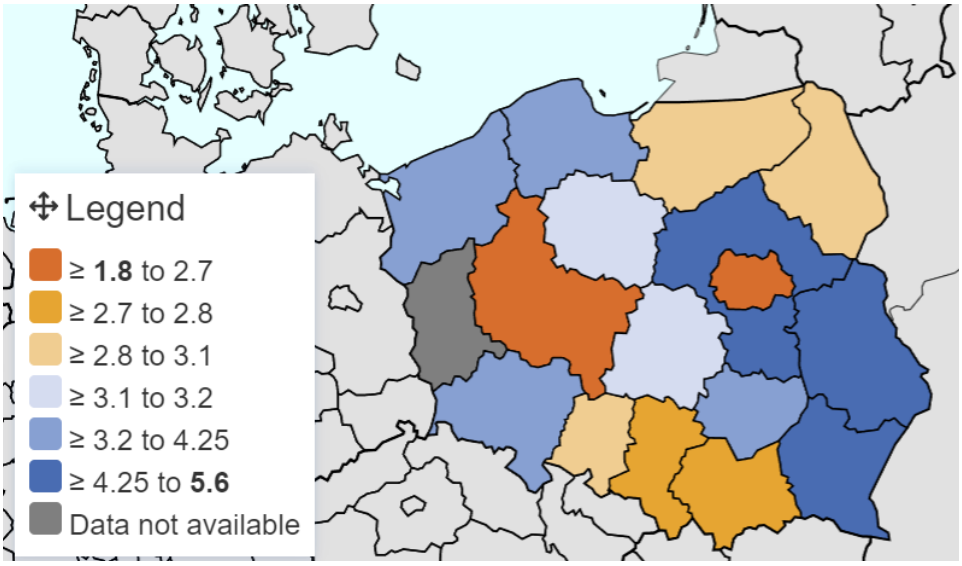
Figure 17 shows the regional unemployment rates in 2020. Compared to 2014, unemployment rates decreased significantly overall, however, the regional differences remained in a similar way. The highest unemployment rates were in Lubelskie (5.6%), Mazowieckie (4.7%) and Podkarpackie (4.3%), and the lowest in Wielkopolskie (1.8%), City of Warsaw (2.6%), Małopolskie and Śląskie (both 2.7%)[81]. The most significant change could be seen in Podkarpackie, which dropped from 14% to 4.3%.

79 Unemployment, total (% of total labour force) (modeled ILO estimate) – European Union, Poland | Data.

80 Statistics | Eurostat.

81 Statistics | Eurostat.

Figure 17: Unemployment rate in Poland by NUTS 2 region, 2020[82]



The discrepancies in the GDP per capita in PPS per inhabitant in % of the EU-27 average varies more widely between different regions compared to the unemployment rate, ranging from 47% to 147% in 2014. The two regions with the lowest GDP per capita in PPS per inhabitant in % of the EU-27 average were Lubelski (47% of the EU average), Podkarpackie (48% of the EU average), Warminsko-mazurskie and Podlaskie (both 49% of the EU average). The three regions with the highest GDP per capita were City of Warsaw (147% of the EU average), Dolnośląskie (75%) and Wielkopolskie (73%).

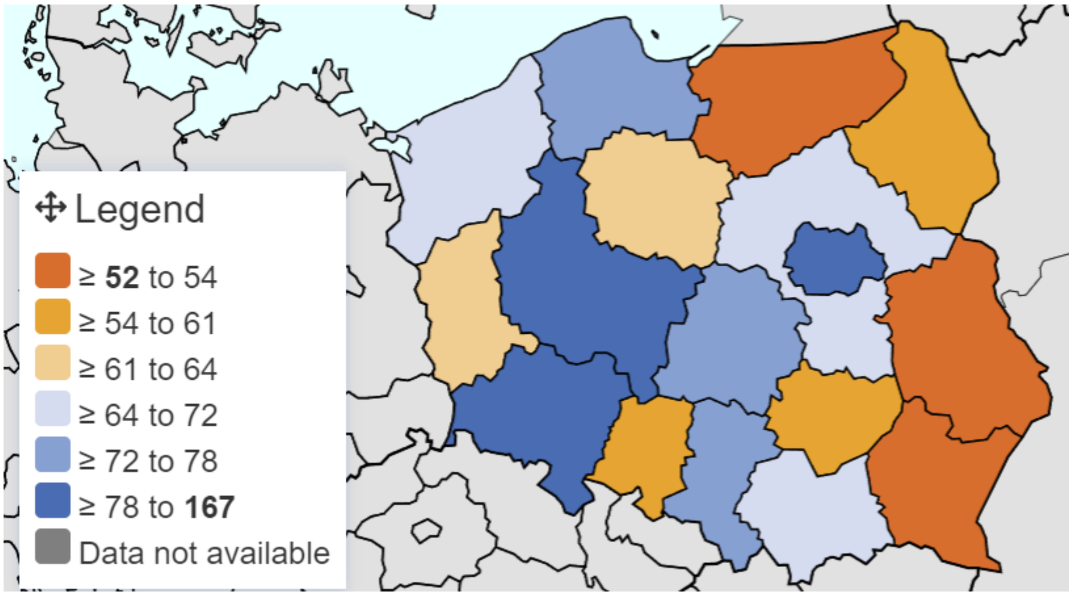
Figure 18 shows the GDP per capita in PPS per inhabitant in % of the EU-27 for 2020. Compared with 2014, the geographical distribution and ranges changed only slightly, however, all regions increased their scores. The lowest values were again recorded in Lubelskie (52% of the EU average), Warminsko-mazurskie (53%) and Podkarpackie (both 53% of the EU average). The highest were again in City of Warsaw (167% of the EU average), Dolnośląskie (84%) and Wielkopolskie (83%).

The figures demonstrate that the GDP per capita in PPS per inhabitant in % of the EU-27 in the capital area Warsaw was significantly higher than in the rest of the country for both years (2014, 2020)[83].

[82] Statistics | Eurostat.

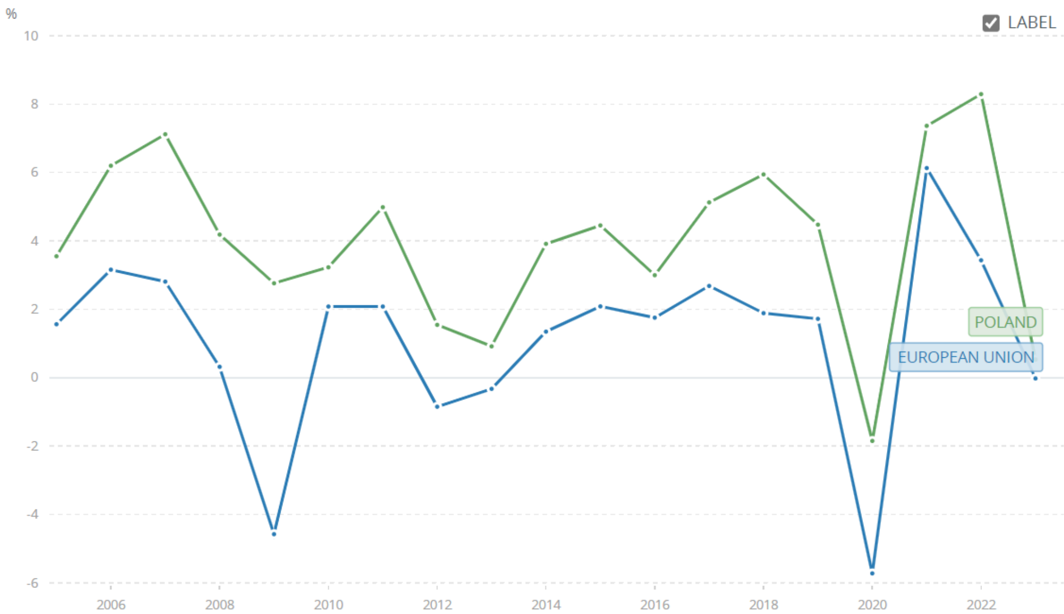
[83] Statistics | Eurostat.

Figure 18: Regional gross domestic product (PPS per inhabitant in % of the EU-27 average) in Poland by NUTS 2 region, 2020[84]



From 2006 to 2023 Poland experienced higher growth rates than the EU average. Between 2005 and 2009, Poland experienced positive growth rates fluctuating around 4%, with a range of approximately 0.9% to 7.1% between 2005 and 2019. As in the whole of the EU, Poland was hit by the impact of the COVID-19 pandemic and the growth rate dropped to -1.8%, although it was still above the EU average of -5.7%[85].

Figure 19: GDP per capita growth (annual %) – Poland, European Union, 2005-2023[86]



[84] Statistics | Eurostat.

[85] GDP per capita growth (annual %) – European Union, Poland | Data.

[86] GDP per capita growth (annual %) – European Union, Poland | Data.

2.5 **Programme implementation in Romania**

Governance

The objectives of the ERDF and CF were implemented through the following operational programmes:

- Competitiveness Operational Programme[87]
- Large Infrastructure Operational Programme[88]
- Technical Assistance Operational Programme[89]
- Regional Operational Programme[90]
- Administrative Capacity Operational Programme[91]
- Interreg VI-A Romania-Bulgaria Programme[92]
- Interreg VI-A Romania-Hungary Programme[93]

The management authority was the Ministry of Regional Development, Public Administration and European Funds[94].

Projects were carried out by diverse bodies, involving public authorities from different levels of Romanian government, universities, enterprises and civil society organisations. There were several thousand different beneficiaries[95].

Budget

For the programming period (2014-2020), the budget of the CF was approximately EUR 7.688 billion and of the ERDF approximately EUR 14.774 billion. Taken together, Romania was the fifth largest recipient country in the EU with around EUR 22.465 billion[96].

Overall, the ERDF funded projects in 12 different thematic areas and the CF in four. Figure 20 shows the distribution of the ERDF and CF budget for Romania by theme.

The largest investments were made in projects that:

- Improve the network infrastructure in transport and energy (approximately EUR 7.38 billion in total: EUR 3.139 billion from the ERDF and EUR 4.24 billion from the CF);

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87 MFE 2014-2020 – POC (2014-2020).

88 MFE 2014-2020 – POIM (2014-2020).

89 MFE 2014-2020 – POAT (2014-2020).

90 MFE 2014-2020 – POR (2014-2020).

91 MFE 2014-2020 – POCA (2014-2020).

92 MFE 2014-2020 – Romania-Bulgaria 2014-2020.

93 Inforegio – Managing authorities.

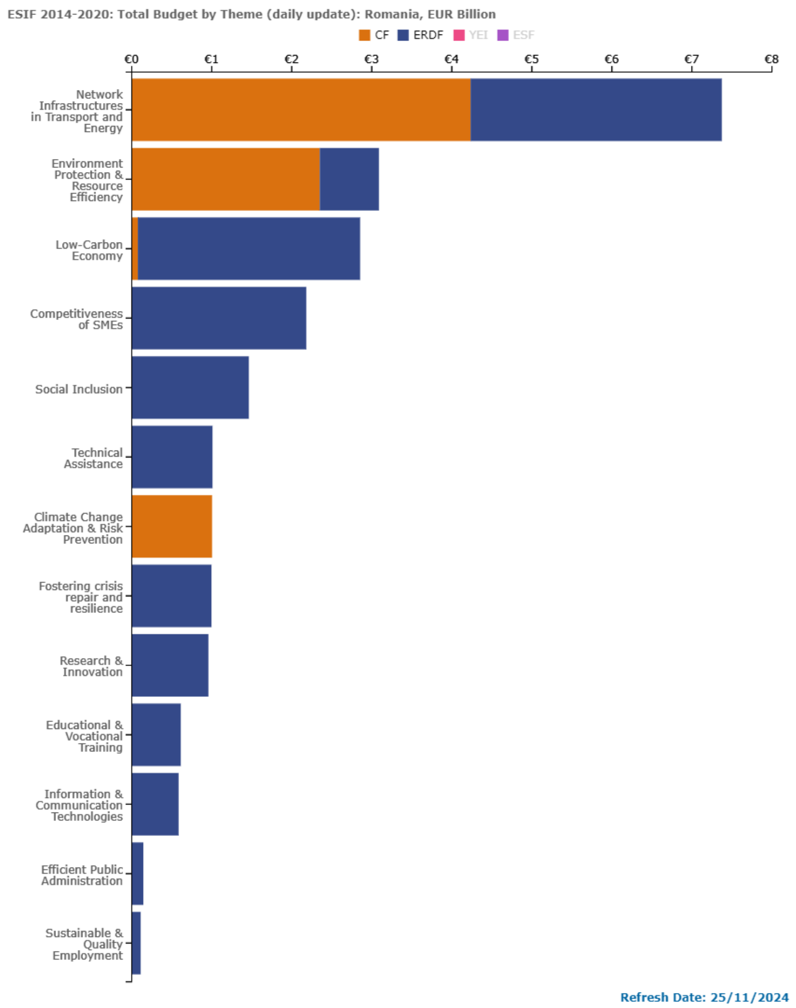
94 MFE 2014-2020.

95 Beneficiaries.

96 Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

- Protect the environment and improve resource efficiency (approximately EUR 2.86 billion in total: EUR 739 million from the CF and EUR 2.356 billion from the ERDF);
- Foster the low-carbon economy (approximately EUR 2.86 billion in total: around EUR 2.778 billion from the ERDF and EUR 82 million from the CF);
- Foster the competitiveness of SMEs (approximately EUR 415 million, ERDF only);
- Promote social inclusion (approximately EUR 1.469 billion, ERDF only)[97].

Figure 20: ERDF budget (2014-2020) of Romania by theme in EUR billion[98]



Projects

Overall, 2 294 projects were financed under the ERDF (2014-2020)[99] of which 243 were Interregional projects, i.e. involving several Member States[100]. 39 projects were financed under the CF (2014-2020)[101].

[97] Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

[98] Open Data Portal for the European Structural Investment Funds – European Commission | Cohesion Open Data.

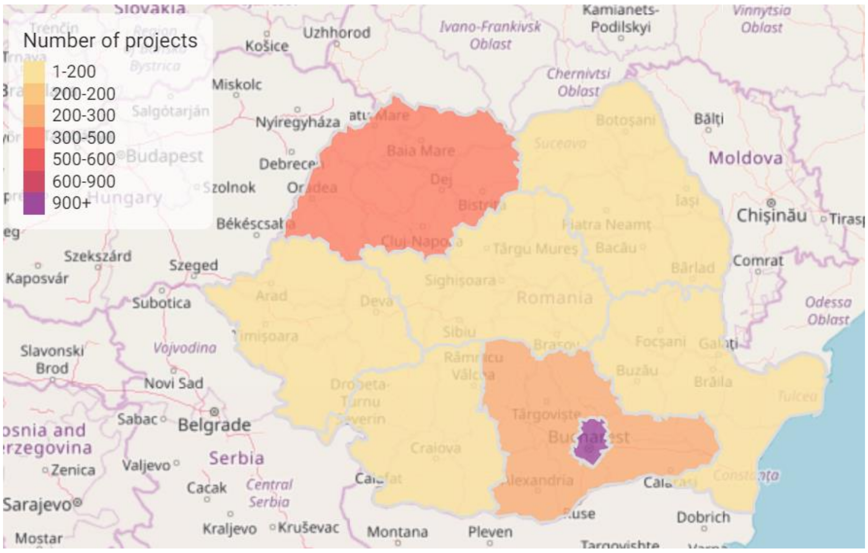
[99] EU projects ERDF – European Regional Development Fund.

[100] EU projects ERDF – European Regional Development Fund.

[101] EU projects CF – Cohesion Fund.

Figure 21 illustrates the geographical distribution of ERDF projects, which were carried out across all eight development regions. The highest concentration of projects was in Bucharest-Ilfov (1 093 projects), followed by North-West (349 projects) and South-Muntenia (218 projects). In the other regions, between 128 projects in West and 191 projects South-West Oltenia were carried out[102].

Figure 21: Geographical distribution of projects carried out under ERDF (2014-2020)[103]



The largest project financed by the ERDF in Romania had a total budget of approximately EUR 23.943 million. It financed the development of an information system to digitalise administrative government processes, with the goal of increasing efficiency and reducing fraud, tax evasion, organised crime and corruption[104].

Other major projects supported the refurbishment of an urban heating system to increase energy efficiency and comply with environmental legislation, the improvement of research infrastructure and renewal of the public transport fleet in Cluj-Napoca by purchasing electric buses[105].

The largest project under the CF modernised the water and wastewater infrastructure in Caraş-Severin County and had a total budget of approximately EUR 62 million.

Other big projects under the CF include the extension and modernisation of water supply and sewerage-wastewater systems in Botoşani county as well as strengthening disaster resilience by improving the emergency response capability[106].

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[102] EU projects ERDF – European Regional Development Fund.

[103] EU projects ERDF – European Regional Development Fund.

[104] SII ANALYTICS – Information system for the integration and operational and analytical exploitation of big data | Kohesio.

[105] EU projects ERDF – European Regional Development Fund.

[106] EU projects CF – Cohesion Fund.

The largest interregional programme financed under the ERDF in Romania improved the connection between two cities in the cross-border area of Romania and Bulgaria. It is an important transport node of the TEN-T node. The total budget was approximately EUR 7.937 million[107].

Main achievements

The achievements under the ERDF and CF (2014-2020) in Romania are manifold. Some examples of achievements from fully implemented projects are listed below (in approximate numbers).

ERDF[108]:

- 65 046 firms benefited
- 640 732 km of roads reconstructed and 479 km newly built
- 450 new researchers (full time equivalent)
- 2 155 029 people with improved health service
- 59 620 households with improved energy efficiency

CF[109]:

- 169 km of railways reconstructed
- 171 km of road rebuilt
- 1 236 332 tonnes of waste recycled annually
- 5 655 831 people benefitting from improved flood protection

Country context Romania

Figure 22 shows the unemployment rate in Romania and the European Union between 2005 and 2023. Throughout the whole period, the unemployment rate in Romania was below the EU average. After the European financial and debt crisis in 2008, the unemployment rate in Romania increased only slightly compared to the EU average, fluctuating around 7% until 2015. In line with the trend of the EU average the unemployment rate decreased to 3.9% between 2015 and 2019. The rate increased slightly in 2020 and stabilised at approximately 5.6% between 2021 and 2023, slightly below the EU average. The negative shock in 2020 can be explained by the impact of the COVID-19 pandemic[110].

Regional unemployment rates vary. In 2014, the regions with the highest unemployment rates were South-East (10.4%), Centre (9.2%) and South-Muntenia (9%). The lowest rates were recorded in North-West (3.8%), North-East (4.2%) and West (4.8%)[111].

Figure 23 shows the regional unemployment rates in 2020. Compared to 2014, unemployment rates in the different regions changed only slightly. Unemployment rates were still highest in South-East (7.4%), Centre (7.1%) and South-Muntenia (5.9%) and lowest in North-East (3%), North-West (3.8%) and West (4.6%)[112].

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107 Increasing accessibility to the TEN-T in the border area Negru – Voda - General Toshevo | Kohesio.

108 Open Data Portal for the European Structural Investment Funds - European Commission | Cohesion Open Data.

109 Open Data Portal for the European Structural Investment Funds - European Commission | Cohesion Open Data.

110 Unemployment, total (% of total labour force) (modeled ILO estimate) - European Union, Romania | Data.

111 Statistics | Eurostat.

112 Statistics | Eurostat.

The most significant changes can be noted for regions in the south of Romania, where the unemployment rate dropped between 2014 and 2020 for Bucharest-Ilfov from 7.2% to 4.7%, and for South-Muntenia from 9% to 5.9%.

Figure 22: Unemployment, total (% of total labour force) – European Union, Romania, 2005-2023[113]

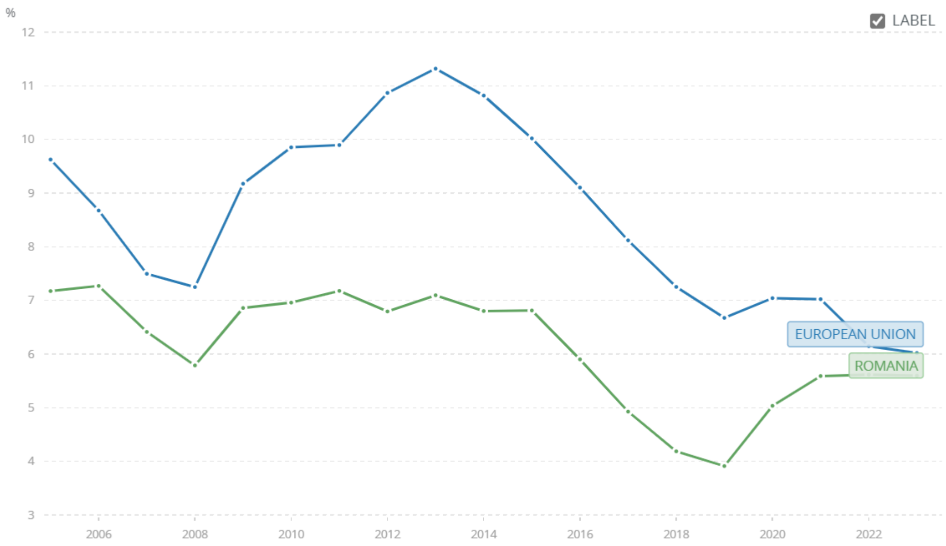
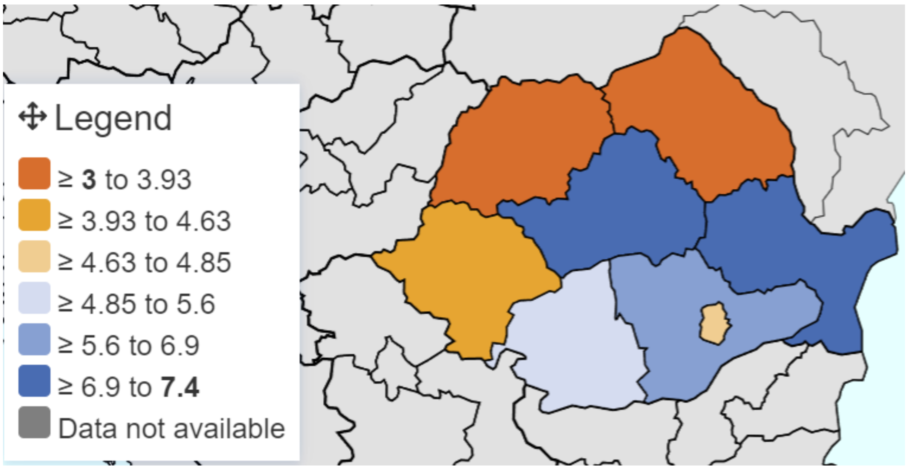


Figure 23: Unemployment rate in Romania by NUTS 2 region, 2020[114]



The discrepancy in the GDP per capita in PPS per inhabitant in % of the EU-27 average varies more widely between different regions compared to the unemployment rate, ranging from 34% to 127% in 2014. The two regions with the lowest GDP per capita in PPS per inhabitant in % of the EU-27 average were North-East (34% of the EU average), South-West Oltenia (40%) and South-Muntenia (47%). The three regions with the highest GDP per capita were Bucharest-Ilfov (127% of the EU average), West (57%) and Centre (52%)[115].

113 Unemployment, total (% of total labour force) (modeled ILO estimate) – European Union, Romania | Data.

114 Statistics | Eurostat.

115 Statistics | Eurostat.

Figure 24 shows the GDP per capita in PPS per inhabitant in % of the EU-27 for 2020. Compared with 2014, the geographical distribution and ranges changed only slightly, however, all regions increased their scores. The lowest values were again recorded in North-East (48% of the EU average), South-Muntenia (55%) and South-West Oltenia (56%). The highest were in Bucharest-Ilfov (167% of the EU average), West (73%) and Centre (69%)[116].

The figures demonstrate that the GDP per capita in PPS per inhabitant in % of the EU-27 in the capital area Bucharest-Ilfov was significantly higher than in the rest of the country for both years (2014, 2020).

Figure 24: Regional gross domestic product (PPS per inhabitant in % of the EU-27 average) in Romania by NUTS 2 region, 2020

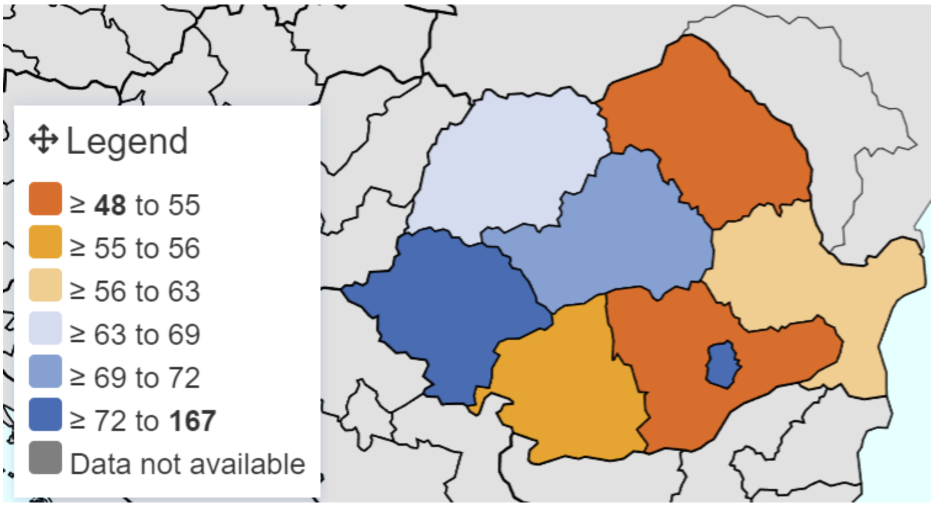
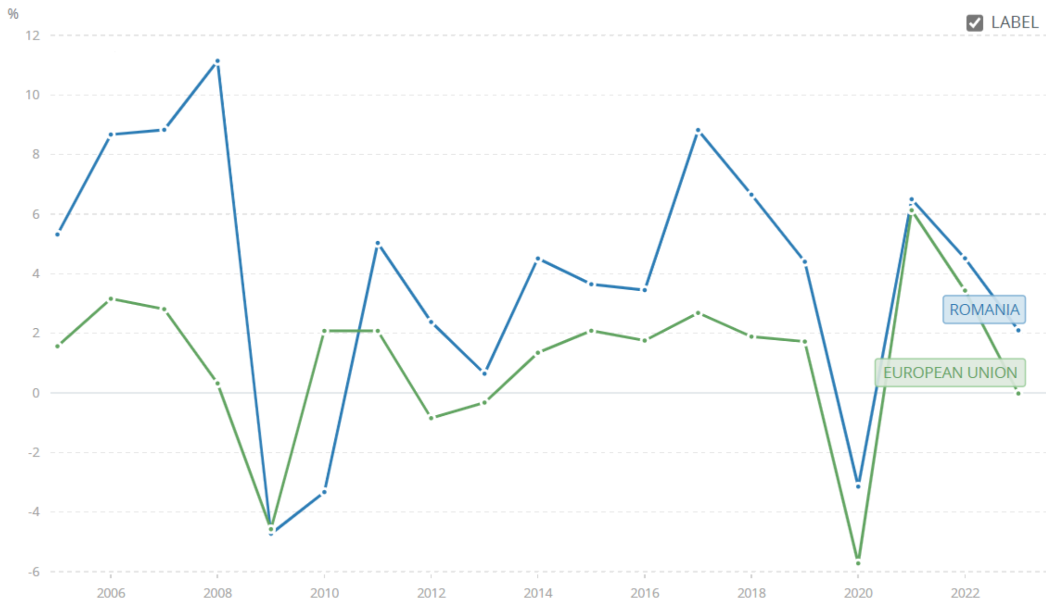


Figure 25: GDP per capita growth (annual %) – Romania, European Union, 2005-2023[117]



116 Statistics | Eurostat.

117 GDP per capita growth (annual %) – Romania, European Union | Data.

Figure 25 shows the GDP growth rate of Romania and the European Union between 2006 and 2023. After a negative shock in the growth rate in 2009, Romania experienced positive but fluctuating growth rates ranging from approximately 0.6% to 8.9% between 2011 and 2019. As in the whole of the EU, Romania was hit by the impact of the COVID-19 pandemic and the growth rate dropped to -3.1%, although it was above the EU average of -5.7%[118].

2.6 **Programme implementation in Spain**

General objectives of the ERDF in Spain included the promotion of smart, sustainable and inclusive growth, enhancing compatibility and synergies between different funds and policies, boosting sectors with high growth potential and supporting financial instruments and private investment[119].

Governance

The objectives of the ERDF were implemented through regional and multiregional operational programmes. The regional operational programmes focused on specific local needs. The regions were grouped as follows:

- Less developed regions: Extremadura;
- Regions in transition: Andalusia, the Canary Islands, Castile-la Mancha, Murcia and Melilla;
- Most developed regions: Aragon, Asturias, Balearic Islands, Cantabria, Catalonia, Castile and León, Valencia, Madrid, Galicia, Rioja, Navarre, Basque Country and Ceuta[120].

In Spain the responsible authority for the ERDF is the Directorate General for European Funds of the Ministry of Finance[121].

Projects were carried out by diverse bodies and actors and implemented in accordance with the principles of partnership and multilevel governance, and involved public authorities from the different levels of Spanish government, civil society organisations, including NGOs, equality and non-discrimination bodies[122]. There were tens of thousands of different beneficiaries[123].

Budget

118 GDP per capita growth (annual %) – Romania, European Union | Data.

119 INFORME ESTRATÉGICO 2009.

120 DGFE: Documents of each Operational Programme.

121 DGFE: European Funds.

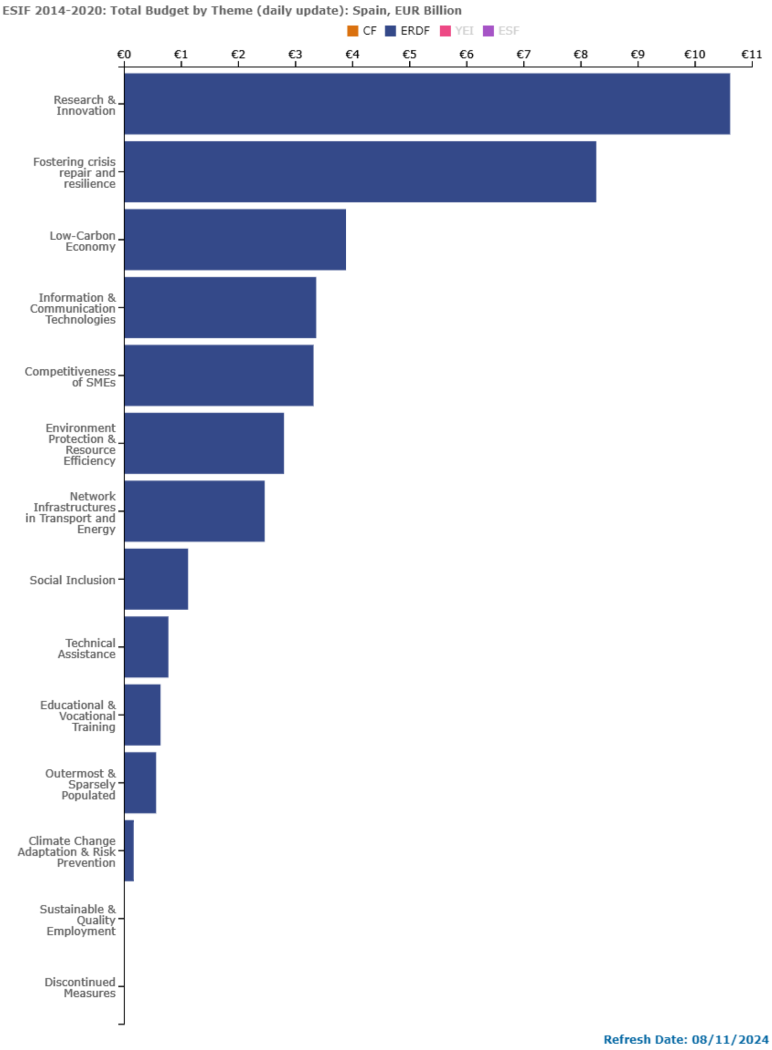
122 DGFE: Scheduling.

123 Beneficiaries.

For the programming period (2014-2020), Spain was not eligible for the CF. The budget of the ERDF was approximately EUR 38.040 billion, making it the second largest recipient country (considering both funds)[124].

Overall, the ERDF funded projects in 12 different thematic areas. Figure 26 shows the distribution of the ERDF budget for Spain by theme[125].

Figure 26: ERDF budget (2014-2020) of Spain by theme in EUR billion



The largest investments were made in projects that:

- Promote research and innovation (approximately EUR 10.621 billion);
- Foster crisis repair and resilience (approximately EUR 8.276 billion);
- Promote the low-carbon economy (approximately EUR 3.891 billion);
- Develop and improve information & communication technologies (approximately EUR 3.369 billion);

124 Open Data Portal for the European Structural Investment Funds - European Commission | Data | European Structural and Investment Funds (europa.eu).

125 Open Data Portal for the European Structural Investment Funds - European Commission | Data | European Structural and Investment Funds.

- Foster the competitiveness of SMEs (approximately EUR 3.323 billion).

No projects were financed in the fields of sustainable & quality employment and discontinued measures[126].

Projects

Overall, 80 465 projects were financed under the ERDF (2014-2020)[127] of which 501 were interregional projects, i.e. involving several Member States[128].

Figure 27 illustrates the geographical distribution of projects, which were carried out across all 17 autonomous regions. The highest concentration of projects was in Andalusia (15 345), followed by Valencia (8 829), Extremadura (8 562) and Galicia (8 120). The fewest projects were carried out in the smaller regions of La Rioja (509 projects), Cantabria (603 projects) and the Balearic Islands (1 266)[129].

Figure 27: Geographical distribution of projects carried out under ERDF (2014-2020)[130]

The largest project financed by the ERDF was in the area of the low-carbon economy, with approximately EUR 113 million. It financed the extension of a tram line in the province of Seville, serving an entire region and the largest area of industrial concentration and services in the province.

126 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

127 EU projects ERDF – European Regional Development Fund.

128 EU projects ERDF – European Regional Development Fund.

129 EU projects ERDF – European Regional Development Fund.

130 EU projects ERDF – European Regional Development Fund.

The second largest project was in the field of social inclusion, with a budget of approximately EUR 102 million. It financed measures to increase the response capacity of the public health system to the COVID-19 pandemic and was implemented throughout the entire country[131].

Other major projects include the extension of a tram line in the Bay of Cadiz, improving the quality and security of the water supply in Seville province, as well as the digital transformation of the education system in the province of Catalonia.

The largest interregional project supported the competitiveness of SMEs and consisted of creating the Creative and Cultural Industries Entrepreneurship Centre (Centro Magallanes), aimed at consolidating an entrepreneurial ecosystem that will allow the creation and communication of an innovative cultural offer. The total budget was approximately EUR 27.333 million and also included Portugal[132].

Another large interregional project promoted cycling mobility in cross-border areas, involving the regions of Navarre and the Basque Country in Spain and Nouvelle-Aquitaine in France. The project had a budget of approximately EUR 9.401 million[133].

Main achievements

The achievements under the ERDF (2014-2020) in Spain are manifold. Some examples of achievements from fully implemented projects are as follows (in approximate numbers):

- 94 900 firms benefitted
- 4 700 new direct jobs (full-time equivalent)
- 146 km of new railways
- 43 km of new or improved metro and tram lines/connections
- 22 800 people with improved flood protection
- 127 500 people with improved forest fire protection
- 13 500 researchers with improved infrastructure
- 53 200 households with improved energy efficiency[134]

Country context Spain

Spain is a country in south-western Europe with a population of around 47 million[135]. Since the financial and debt crisis in 2008, the country has suffered from a stagnating economy and high unemployment rates, which only started recovering in 2014[136].

131 SCS: Actions to increase the response capacity of the public health system to the Covid 19 pandemic | Kohesio.

132 Magallanes Centre for the Entrepreneurship of Cultural and Creative Industries | Kohesio.

133 Development of Sustainable and Cycle Mobility on Cross-Border Lands | Kohesio.

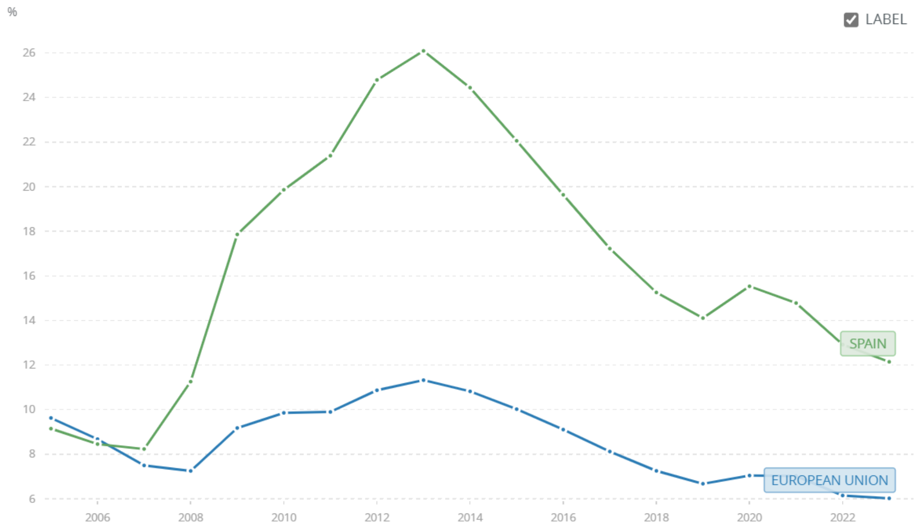
134 Open Data Portal for the European Structural Investment Funds – European Commission | Data | European Structural and Investment Funds.

135 Population: demographic situation, languages and religions.

136 Political and economic situation.

Figure 28 shows the unemployment rate in Spain and the European Union between 2005 and 2023. The unemployment rate in Spain increased significantly after the financial crisis in 2007 and peaked at 26.1% in 2013, well above the EU average of 11.3%. Between 2013 and 2019, the unemployment rate dropped significantly to 14.1%. The rate increased slightly in 2020 and declined thereafter, reaching 12.1% in 2023, around twice as high as the EU average. The negative shock in 2020 can be explained by the impact of the COVID-19 pandemic[137].

Figure 28: Unemployment, total (% of total labour force) – European Union, Spain, 2005-2023[138]



The regional unemployment rates show large disparities between regions. In 2014, the regions with the highest unemployment rates were Andalusia (34.8%), the Canary Islands (32.4%) and Ceuta (31.9%). The lowest rates were recorded in Navarre (15.7%), the Basque Country (16.3%) and Rioja (18.2%).

Figure 29 shows the regional unemployment rates in 2020. Unemployment rates were highest in Ceuta (24.5%), Melilla (23.6), the Canary Islands (22.6%) and Andalusia (22.3%) and lowest in the Basque Country (9.5%), Navarre (10.1%) and Rioja (10.8%)[139].

Canary Islands

137 [Unemployment, total (% of total labour force) (modeled ILO estimate) - European Union, Spain | Data.]

138 [Unemployment, total (% of total labour force) (modeled ILO estimate) - European Union, Spain | Data.]

139 [Statistics | Eurostat.]

Figure 29: Unemployment rate in Spain by NUTS 2 region, 2020[140]

The GDP per capita in PPS per inhabitant in % of the EU-27 average also varied widely between different regions, ranging from 63% to 124% in 2014. The regions with the lowest GDP per capita in PPS per inhabitant in % of the EU-27 average were Extremadura (63% of the EU average), Andalusia (67%) and Melilla (68%). The regions with the highest GDP per capita were Madrid (124% of the EU average), the Basque Country (118%) and Navarre (112%)[141].

Figure 30 shows the GDP per capita in PPS per inhabitant in % of the EU-27 for 2020. Compared with 2014, the geographical distribution and ranges changed only slightly. The lowest value was recorded for Melilla (61%) and the highest for Madrid (114%)[142].

Figure 30: Regional gross domestic product (PPS per inhabitant in % of the EU-27 average) in Spain by NUTS 2 region, 2020[143]

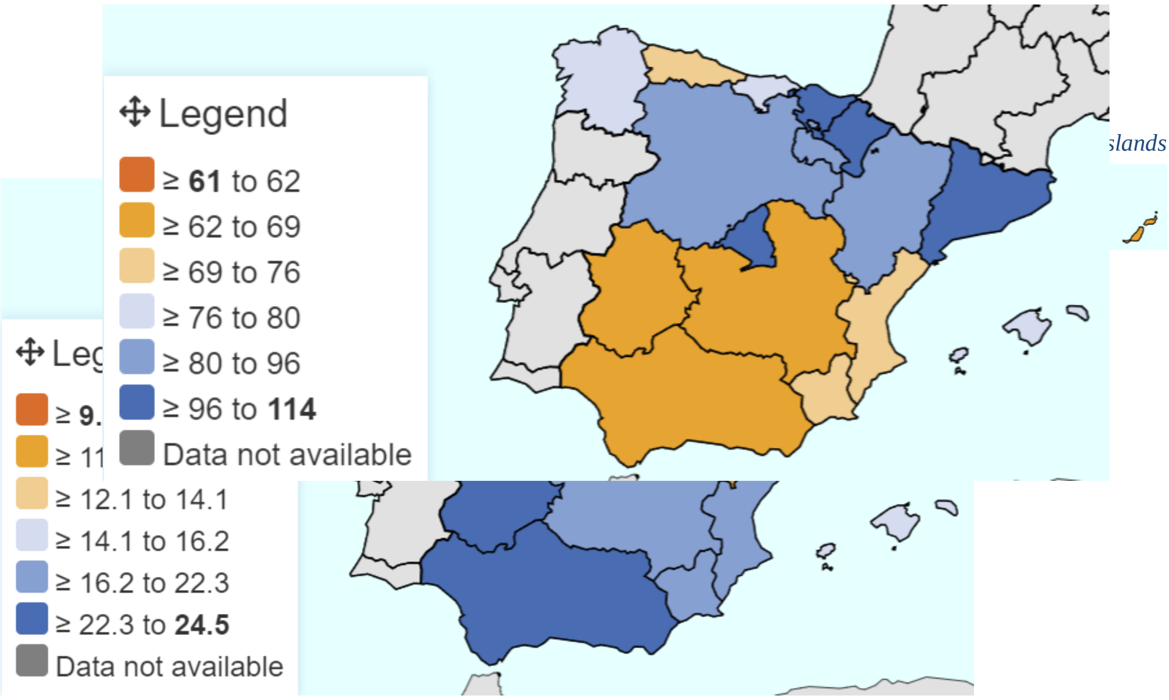


Figure 31 shows the GDP growth rate of Spain and the European Union between 2006 and 2023. After a period of negative growth rates, Spain experienced moderately positive growth rates (ranging from approximately 1.3 to 3.9%) between 2014 and 2019. The economy of Spain was highly impacted in 2020 due to the impact of the COVID-19 pandemic, with a negative growth rate of -11.6%, which was significantly below the EU average of -5.7%[144].

[140] Statistics | Eurostat.

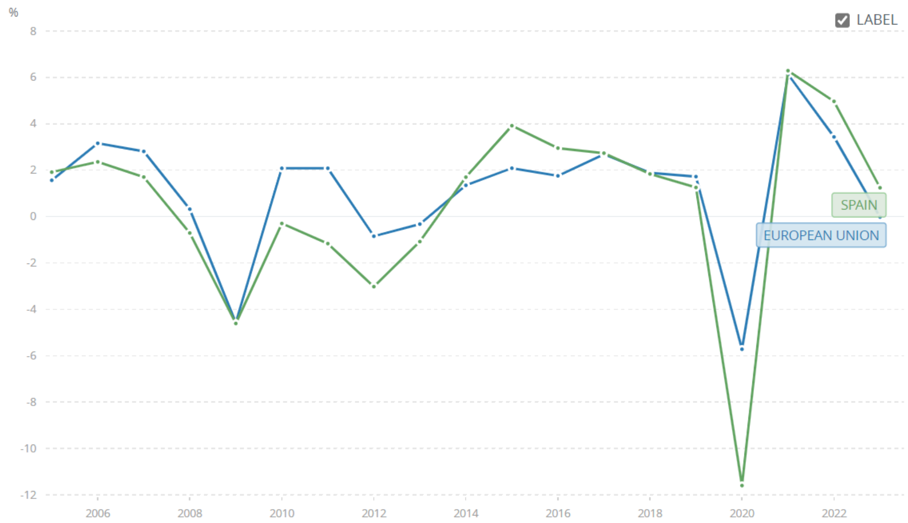
[141] Statistics | Eurostat.

[142] Statistics | Eurostat.

[143] Statistics | Eurostat.

[144] GDP per capita growth (annual %) – European Union, Spain | Data.

Figure 31: GDP per capita growth (annual %) – Spain, European Union, 2005-2023



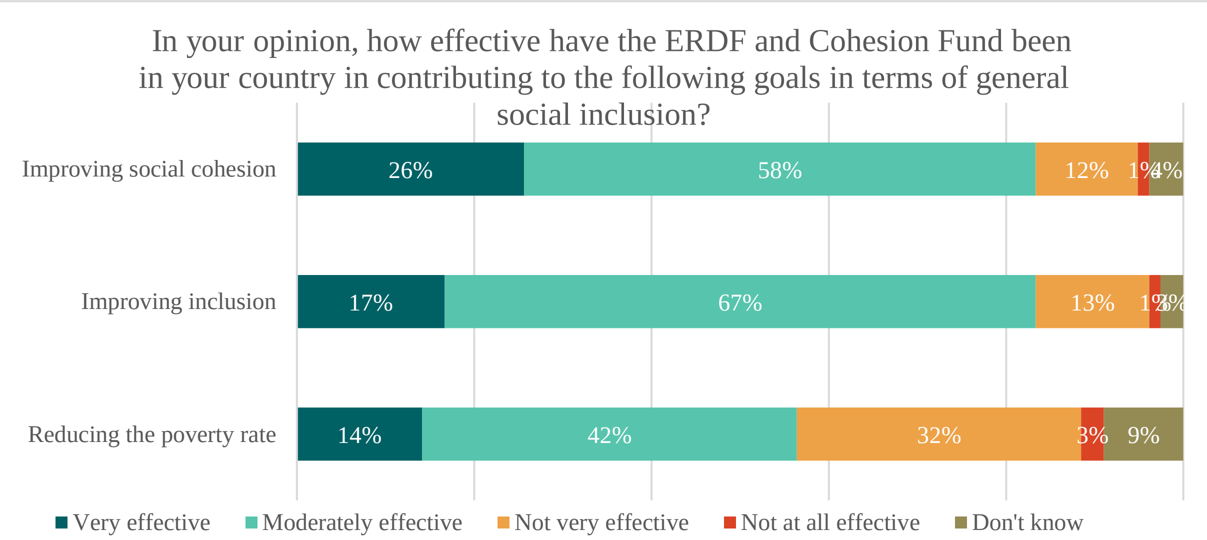
3. Primary data: findings and analysis

3.1 Effectiveness

> According to the European Commission's Better Regulation toolbox, the criterion of effectiveness *'considers how successful EU action has been in achieving or progressing towards its objectives'*.

In line with the specific focus of this evaluation, stakeholders were asked, in the questionnaire, on their **general opinion on the contribution of the ERDF and the Cohesion Fund towards social cohesion, inclusion and poverty reduction**. The dominant opinion was positive (especially concerning social cohesion and inclusion, less so regarding poverty reduction), with between 55% and 84% judging it either very or moderately effective.

***Question 1**: In your opinion, how effective have the ERDF and Cohesion Fund been in your country in contributing to the following goals in terms of general social inclusion?*



Public authority respondents had a more positive perception (93% for social cohesion, 88% for inclusion, 60% for poverty) of the impact of the funds on these goals than the other types of respondents (respectively 71%, 77%, 51%). There were no marked discrepancies between countries, with perceptions of respondents being mostly positive. Concerning the first two topics, the most positive answers could be found in Poland and, concerning poverty reduction, in Spain.

In **Greece**, it was noted that while employment opportunities have increased, social inclusion has not significantly improved. Despite economic progress in Greece, it was expressed that the current evaluation methods for the ERDF and CF's impact on social conditions are insufficient to form definitive conclusions. Furthermore, it was recognised that ERDF and CF-funded infrastructure projects have contributed to poverty reduction and social inclusion. However, the impact has been seen as limited, largely due to the prolonged economic crisis.

In **Latvia**, most consulted stakeholders agreed that the funds have significantly contributed to improving social cohesion and inclusion, with a focus on underdeveloped regions. The funds have supported infrastructure projects, such as road construction, communication networks and housing renovations, which have directly impacted regional development and reduced poverty. Key initiatives have aimed at improving living conditions, enhancing vocational education and supporting businesses, all of which contribute to reducing social disparities.

Latvian public authority representatives mentioned that ERDF investments in public infrastructure and regional development have created new jobs, fostered business development and attracted private investment, contributing to local economies and improving overall social cohesion.

During the fact-finding visit in **Poland**, it was noted that the ERDF and CF have played a significant role in promoting social cohesion. Key efforts have focused on addressing equality, non-discrimination and human rights through the projects implemented under the funds. It was expressed that the funds targeted areas with high levels of exclusion, poverty and social challenges. Polish public authority representatives further emphasised that these initiatives contributed to improved social outcomes, including increased employment, reduced poverty and enhanced access to public services.

Inclusion has also been underlined as a central focus of EU funding in Poland, with an emphasis on diversity, non-discrimination and equal opportunities. It was reported that projects promoted these principles across sectors. Efforts to integrate accessibility for individuals with special needs in infrastructure and public services were recognised, with EU funds driving improvements in urban planning and the provision of services. Polish stakeholders further emphasised that training and capacity-building efforts further supported inclusion, particularly by raising awareness of diversity and non-discrimination, thus fostering a more inclusive environment.

Regarding the reduction of poverty, Polish stakeholders expressed that the funds effectively addressed poverty by supporting social activation and providing vulnerable individuals with opportunities to access the labour market and achieve economic independence. Specific projects in the Silesian region highlighted the positive outcomes in areas with high poverty and exclusion rates, contributing to long-term poverty reduction. Infrastructure developments, such as the rebuilding of the Great Masurian Lakes route, have created economic opportunities, particularly in tourism, further driving regional poverty reduction efforts.

A representative of a **Romanian** public authority underlined that their programme was designed to support the coordination and management of European funds, specifically for the large infrastructure and competitiveness programmes. While its direct contribution to social inclusion was limited, the programme was said to have indirectly supported social inclusion by aiding the implementation of other programmes with more direct impacts in this area.

A representative of a metropolitan area advocated decentralisation in future funding programmes. While acknowledging the positive impact of the funds in large urban areas, the representative emphasised the need for future programmes to prioritise smaller towns, peri-urban and rural areas to ensure balanced development across Romania. They suggested that the focus should be on streamlining financing processes to better target local communities and ensure that urban growth benefits surrounding areas.

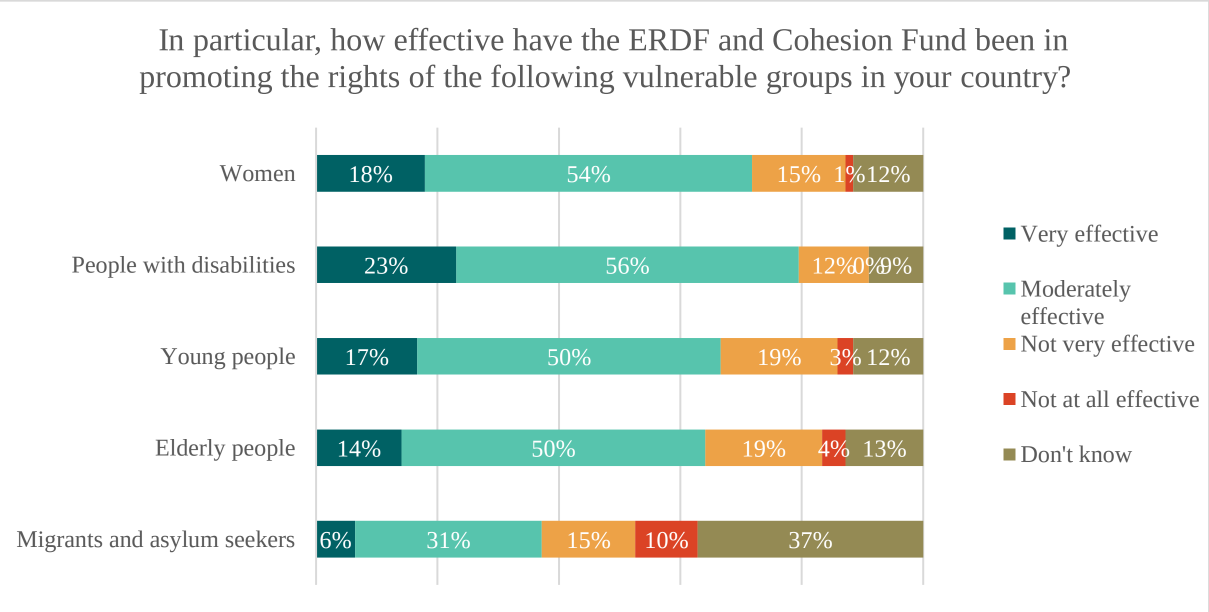
In **Spain**, public authorities noted that the ERDF did not specifically include investments in the social field among its priorities. The legislative framework for 2014-2020 focuses (and continues to do so in the 2021-2027 period) on investments in R&D&I, information and communication technologies, support for SMEs and a transition to a low-carbon economy, and additionally on investments in the field of urban development. In particular, it is in this area – urban development, included in the Spanish ERDF programming in Axis 12 – where the greatest contributions have been achieved in relation to social inclusion and the fight against discrimination (Thematic Objective 9).

In the 2007-2013 period, Spain implemented the 'Urban Initiatives' under the ERDF. An *ex-post* evaluation of the contribution of the Urban Initiatives 2007-2013 to social inclusion and equal opportunities was carried out in the 2014-2020 period. The evaluation concludes that these initiatives helped improve the opportunities in terms of inclusion and social equality of citizens residing in the beneficiary municipalities through the financing of infrastructure and equipment, as well as public services in the educational, digital, health or labour fields. The weakness lay in the continuity of the measures, which in some cases were not widespread due either to budgetary constraints on the part of the municipalities or to changes of a political nature. In cases where municipalities have maintained the continuity of the measures initially co-financed with the ERDF, they have been found to have contributed to reducing educational, health, digital and social exclusion. On the other hand, these urban strategies have contributed positively to reducing gender inequalities in the use of public space, as well as in the labour and social (leisure) environment and reducing vulnerabilities associated with geographical location, ethnicity or age.

Regarding the **effectiveness of these funds in the promotion of the rights of specific demographic groups**, approximately two thirds of the respondents had a positive perception. The outlier was the answers concerning migrants and asylum seekers (which fall more properly under the scope of the Asylum and Migration Integration Fund), where almost two out of five respondents couldn't answer.

Though the public authorities had an overall more positive perception, the differences were not significant in comparison with other types of respondents. Per country, the most positive answers came from Poland and Greece, and the most negative from Spain and, especially, Romania.

***Question 2**: In particular, how effective have the ERDF and Cohesion Fund been in promoting the rights of the following vulnerable groups in your country?*



In **Greece**, concerns were raised over the lack of a tailored programme for specific vulnerable groups, especially for self-employed people, who often face unemployment during crises.

In **Latvia**, the funds were perceived to support vulnerable groups, including people with disabilities and young people. Multiple representatives emphasised the ERDF's importance in supporting marginalised and vulnerable groups. For instance, a representative of women's rights highlighted how EU funds have been used to improve infrastructure accessibility, although she also pointed out gaps in some areas, particularly for people with disabilities. A youth representative emphasised the positive outcomes for youth entrepreneurship, which has contributed to regional development and social inclusion. Additionally, a representative of rural communities highlighted the relevance of EU funds in supporting small farmers, who are particularly vulnerable to the challenges posed by climate change and market fluctuations.

In **Poland**, it was noted that the ERDF and CF have been effective in promoting the rights of vulnerable groups through a broader focus on equality, non-discrimination and human rights, which were made part of the project criteria. These funds have supported the integration of diversity policies into projects, benefiting vulnerable groups.

Furthermore, significant efforts were said to have been made to improve accessibility for disabled individuals, particularly in infrastructure projects. These efforts have aimed to ensure that individuals with special needs are not excluded, though challenges remain in providing full accessibility in more peripheral or rural areas. Polish stakeholders generally perceived that the increased awareness among businesses, driven by EU funding requirements, has contributed to a more inclusive environment for vulnerable groups.

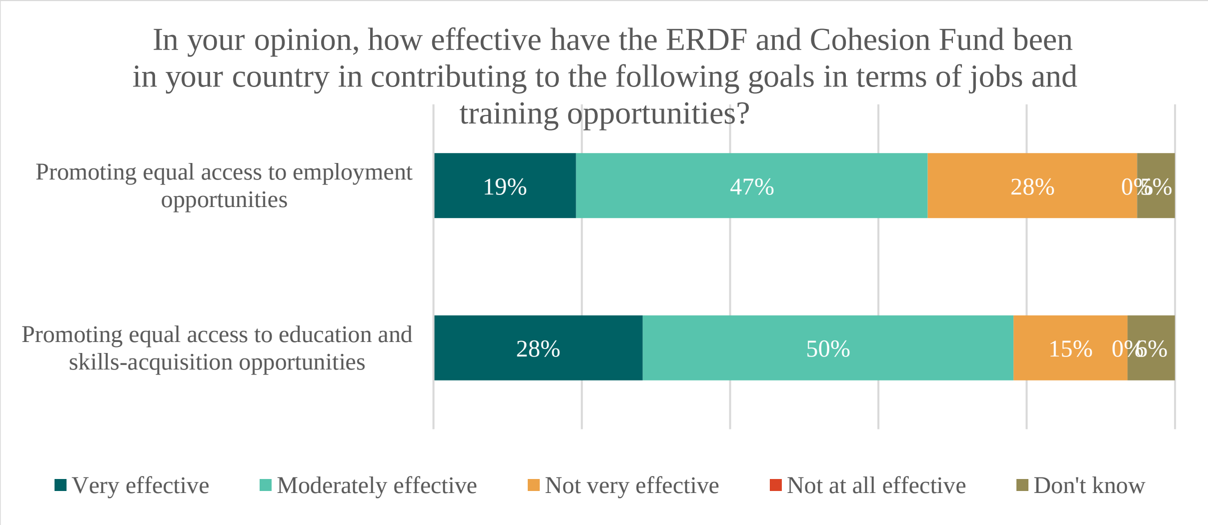
In **Romania** it was noted that while the ERDF has led to considerable results in regional development, the efficiency of its implementation has been a concern. They raised issues regarding territorial integration, pointing out that the funds should contribute to reducing territorial segregation rather than exacerbating it. Special attention needs to be given to the integration of vulnerable communities, such as the Roma, in both urban and rural areas. It was suggested that this focus on non-segregation should be considered when assessing and approving funding applications.

In **Spain**, civil society organisations noted that the ERDF should carry out more social housing projects. The ERDF funded many housing projects across Spain, however, little investment was channelled towards areas where the Roma community and migrants are concentrated. There was criticism that the ERDF has not helped to eradicate informal settlements and improve the situation of these disadvantaged neighbourhoods. When programming and urban planning are being done, it would be important to ensure that the money is channelled directly towards people who are highly vulnerable.

The **connection between the ERDF and Cohesion Fund and the job market** was the object of the third question. As in the previous two questions, the answers here were very much positive (no respondent said that the funds were not at all effective, and relatively few (28% and 15%) said it was not very effective on equal access to employment and to education and skills acquisition.

This positive-leaning perception was common across the category of stakeholder and country. As before, the country with the most positive answers was Poland.

***Question 3**: In your opinion, how effective have the ERDF and Cohesion Fund been in your country in contributing to the following goals in terms of jobs and training opportunities?*



In **Greece**, regarding the contribution to equal access to employment opportunities, representatives noted that there has been progress towards achieving employment intensity in Greece, with an increase in employment opportunities, but with less social inclusion. However, the issue of non-inclusion of vulnerable groups, like self-employed people, remains a concern.

Innovation, according to the representative from a Greek civil society organisation, is crucial in determining the necessary skills and opportunities for training in the labour market. In this regard it was underlined that the digital and green transitions have also created opportunities to develop new skills.

In **Latvia**, it was highlighted that youth employment remains a challenge, particularly for those not in school or work. It was perceived that while the ERDF does not directly target youth employment, they support infrastructure for vulnerable groups (e.g., elevators for people with disabilities, social housing projects and group homes for young people with disabilities) to improve social inclusion.

Furthermore, several representatives of Latvian beneficiaries noted that many of the job creation programmes, such as co-payment schemes, only create temporary employment, with jobs disappearing once the funding ends, undermining the long-term effectiveness and sustainability of EU investments. There was a call to shift the focus from short-term job creation schemes to long-term economic sustainability by funding programmes that promote innovation, competitiveness and skills development. An industry representative advocated increasing investments in education, particularly in critical fields.

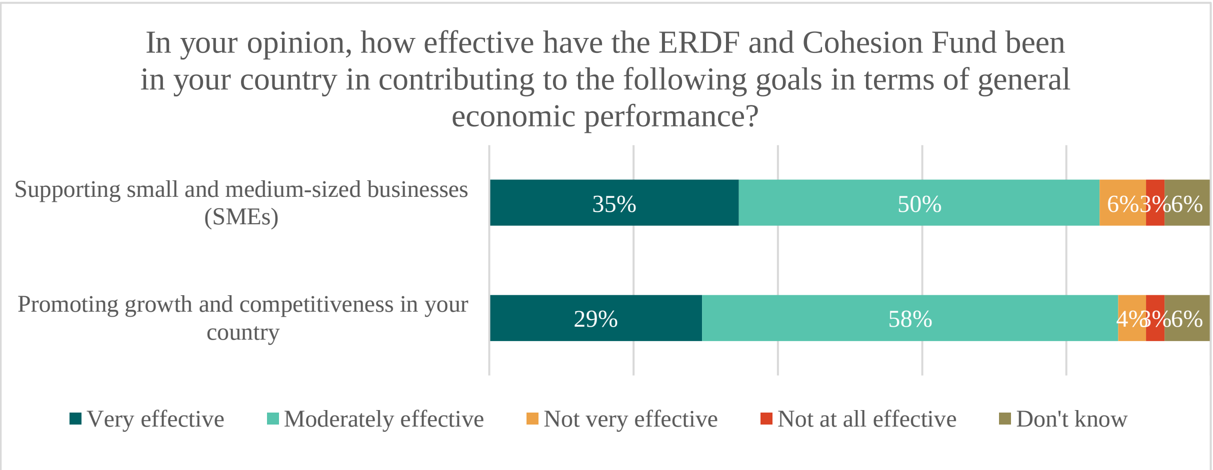
In **Poland**, an employers' representative noted that ERDF and CF initiatives led to the creation of over 100 000 companies and provided support to over one million individuals, with more than 80 000 receiving non-repayable assistance to develop their businesses. It was reported that these efforts contributed significantly to job creation, especially in regions like Silesia, targeting stable employment opportunities, particularly for people aged 20-64. Additionally, infrastructure improvements, including tourism projects, boosted local economies and created new jobs.

Regarding access to education and skill-acquisition opportunities, it was noted that the development of digital skills and the expansion of public e-services, particularly in Silesia, enhanced access to education and skill acquisition. EU funding also facilitated greater access to online learning platforms, indirectly improving educational and skill-building opportunities across various sectors like health, administration and entrepreneurship.

In **Romania,** a representative from a regional development agency discussed the ERDF's significant role in boosting Romania's economic competitiveness and job creation. The agency, which acted as an intermediary body for the regional operational programme, financed projects that enhanced regional infrastructure, notably highways and county roads. These projects contributed not only to economic growth but also to job creation, with approximately 10 000 new jobs generated in the region from 2007 to 2023. The representative stressed the importance of monitoring the sustainability of these jobs and investments to ensure long-term benefits for the region.

There was a broad consensus that **the ERDF and the CF helped both to support SMEs and to promote growth and competitiveness in the countries** covered by this evaluation. With percentages nearing (or well above, in most cases) 70% of positive answers in all countries and categories, there were no major discrepancies that could be noted. The few negative answers were more or less equally distributed among the countries.

Question 4*: In your opinion, how effective have the ERDF and Cohesion Fund been in your country in*



contributing to the following goals in terms of general economic performance?

Greek stakeholders expressed that the economic situation of SMEs remains problematic. While ERDF and CF funds have tried to support SMEs, the liquidity problem due to SMEs' inability to access bank loans has hindered progress. As a result, large companies were perceived as benefiting more from the funds in Greece.

Regarding the funds' contribution to growth and competitiveness, it was underlined that despite the funds being channelled into the economy, the overall effect on Greece's economic competitiveness has been moderate due to the prolonged crisis. Stakeholders perceived that there is still a significant lack of competitiveness in the Greek economy and more needs to be done to improve this through the ERDF and CF.

In **Latvia**, the overall effectiveness regarding SME support, growth and competitiveness was affirmed by interviewed stakeholders. Representatives expressed that the funds have supported critical infrastructure development, contributing to business growth and regional development. Investments in human capital have bolstered workforce competitiveness, aiding in balanced regional development.

A public authority representative highlighted that the business programmes, particularly those targeting SMEs, have been generally successful, though challenges persist. The programmes have facilitated growth and innovation among SMEs, with many businesses actively engaging with the available funding. However, the rapid market shifts and challenges related to procurement and supply chains posed difficulties in maintaining momentum. Despite these obstacles, the programmes have contributed positively to economic indicators. Key successes include fostering entrepreneurship and innovation, though it was noted that there is room for improvement in terms of adaptability and addressing emerging market needs.

In **Poland**, it was noted that the ERDF and CF have significantly supported SMEs, contributing to business investments, job creation and regional economic growth, particularly in Silesia. This focus was reported to have made SMEs more competitive.

Furthermore, Polish stakeholders perceived that the funds contributed to regional competitiveness through investments in digitalisation, infrastructure and clean energy initiatives. Notable projects included the expansion of public e-services and digitisation of planning and cartographic materials in Silesia. In addition, large-scale infrastructure projects, such as the rebuilding of the Great Masurian Lakes route and the Gdańsk-Warsaw rail line, along with waste management improvements, further boosted economic growth and long-term competitiveness, particularly in central and eastern Poland.

In **Romania**, the effectiveness of the ERDF and the CF funds in general has been confirmed by different representatives. A representative of a public authority stated that the ERDF and CF supported SMEs indirectly through a programme that provided technical assistance to the managing authority and intermediary bodies involved in the competitiveness programme.

Several stakeholders noted that the funds have played a crucial role in supporting Romania's development, particularly in infrastructure and regional competitiveness. While their contributions have been widely recognised, areas for improvements were also underlined to make them more effective.

A representative from a consulting company on structural funds highlighted that the ERDF and CF have primarily supported 'hard infrastructure' development in Romania. These funds were instrumental in financing large-scale projects such as highways, county roads and urban mobility initiatives. This focus on infrastructure, while essential for economic growth, was seen as more impactful in the public and private sectors rather than in human resource development.

In addition to infrastructure, it was noted that the ERDF has been crucial in supporting micro-enterprises and SMEs, fostering the creation of new businesses and internationalisation efforts. It was underlined that agencies focus on infrastructure projects aligned with broader European policies, with particular emphasis on urban areas. However, the representative underscored that the success of such projects should also be evaluated by their social impact, ensuring that citizens benefit directly from these investments.

In **Spain**, and considering that ERDF programmes grant aid to only 1% of existing SMEs in the country, it is not possible to establish a relationship at a global level between investment co-financed with ERDF and the macroeconomic variables of the sector. External factors, such as an economic or social crisis, have a greater impact on the sector, in particular on aspects such as internationalisation or innovation, than the support provided by the ERDF funding may have. An impact assessment must be carried out in order to ascertain the impact of ERDF aid on businesses. The 2021-2027 ERDF Specific Evaluation Plan for the POPE (Multiregional Operational Programme for Spain) provides for an impact assessment on a specific support programme for the internationalisation of SMEs. This is the Global Window Programme, implemented by ICEX under POPE 2014-2020. The evaluation report will be available by the end of 2025.

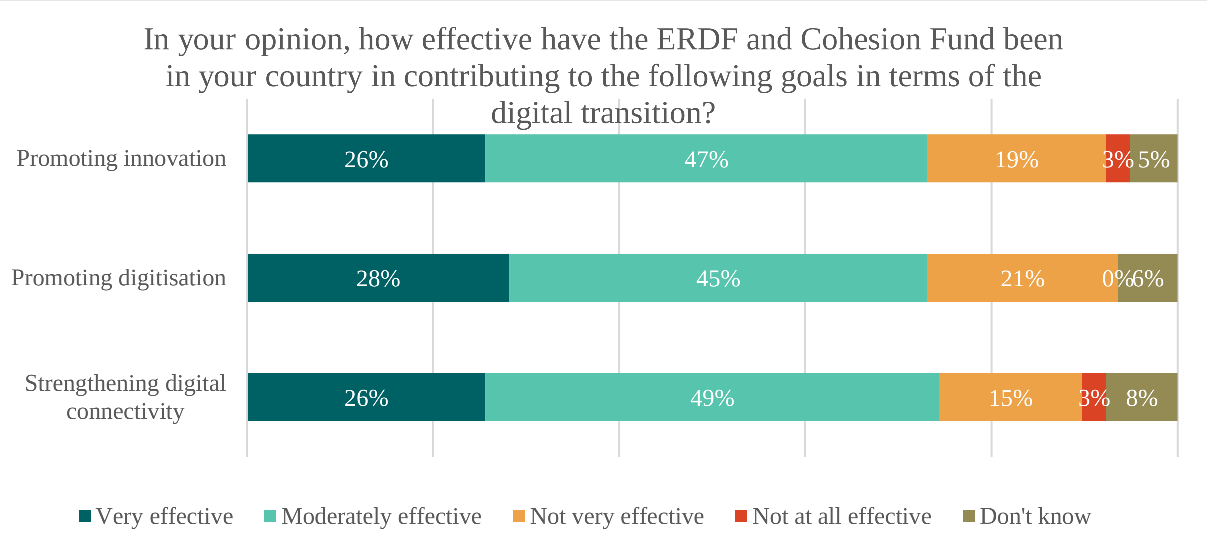
There have been no implementation problems in this area as programmed in the POPE, although difficulties were encountered in the implementation process mainly due to the following issues: complexity of achieving a productive fabric with very low budget actions in close competition, the decrease in the number of innovative SMEs in our country after the economic crisis, the difficulty in implementing financial instruments or, where appropriate, the infeasibility of doing so.

As regards the impact in terms of employment, indicator CO008 measures the increase in employment in subsidised enterprises. The figure for 2018 (data updated at closure is not yet available) was around 30 500 FTE. Specifically, a direct impact on employment can be measured through the CO25 indicator, which captures the number of researchers working on improved R&D&I infrastructures. The figure at the end of 2023 (albeit still with provisional data) amounts to 24 000 researchers related to ERDF investments.

In addition to the more standard ERDF programming aimed at SMEs, in 2014-2020 the IPYME Operational Programme (IPYME OP) was launched, with the participation of the Autonomous Communities and the AGE. The contribution to the programme was EUR 734 million, having supported the granting of 44 420 loans to 37 476 SMEs.

The views of respondents on **the contribution of the funds to the digital transition** were overwhelmingly positive. Approximately a quarter of the respondents stated that it had been very effective, and almost half that it had been moderately effective, in the promotion of innovation, digitalisation and strengthening digital connectivity. The most positive answers came from Poland and, on comparable terms, Spain and Greece, while the least positive views came from Latvia and Romania.

Question 5: *In your opinion, how effective have the ERDF and Cohesion Fund been in your country in contributing to the following goals in terms of the digital transition?*



In **Latvia**, it was reported that the funds have made significant contributions to the digital transition agenda. Funding has been directed toward projects that improve digital infrastructure, such as expanding broadband connectivity in rural areas and enhancing digital public services. In particular, the promotion of ICT tools and digital training for businesses has facilitated digital innovation across various sectors. Moreover, it was noted that projects focused on digital connectivity in rural areas have been critical in reducing the digital divide, allowing for better access to online services, education and employment opportunities. Still, concerns about the bureaucratic complexity of accessing these funds have slowed the pace at which some businesses have been able to take full advantage of the available digitalisation support.

In **Poland**, the Silesian regional representatives reported significant success in digitalisation, with the number of online services, entities supported and documents digitised far exceeding initial targets. These efforts contributed to innovation and improved digital connectivity, especially in health, administration and entrepreneurship.

Furthermore, Polish employers' representatives noted that the funds contributed significantly to the digitalisation of Poland, which was especially beneficial for the SME sector. The emphasis on improving infrastructure and investments in digitalisation is expected to foster long-term innovation and digital connectivity. Additionally, it was reported that the EU funds played a key role in improving digital services, especially during the pandemic, which helped reduce disparities between regions. However, it was highlighted that significant gaps remain, particularly in transport infrastructure.

A representative of a **Romanian** public authority highlighted that the technical assistance contributed to the digitalisation of the EU funds management system by developing and maintaining SMIS (the national system for managing EU funds). This significantly enhanced the digitalisation of the entire coordination and control system. Furthermore, the representative noted that the programme assisted the Ministry of Communications in preparing key IT projects, such as the integrated ID card system and the e-culture digital library, alongside other IT projects funded through the competitiveness programme. It was also mentioned that the COVID-19 crisis acted as an external factor that accelerated the shift towards digitalisation, leading to a greater emphasis on online activities. This transition resulted in all beneficiary communication being conducted through the IT system, significantly reducing reliance on paper.

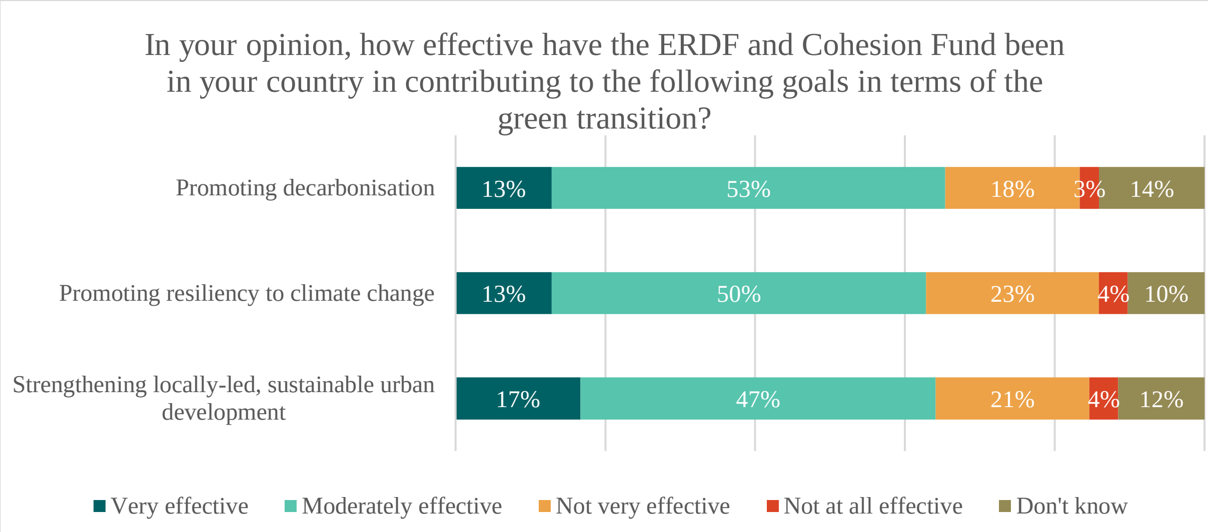
Spanish authorities noted that the investments co-financed with the ERDF in the extension of broadband infrastructure in Spain within the framework of 2014-2020 programming have had a positive impact of 3.1% of GDP in the country. Statistically significant broadband coverage has been achieved, which explains the number of existing companies in each municipality. ERDF funding has been found to be decisive in the significant increase in coverage of 100mbps in the municipalities (those that have not been the subject of POPE actions have not made investments in this area). However, it has also been found that internet use in households is not conditioned by the availability of high-speed coverage.

There have been, according to authorities, no problems in implementing the planned broadband extension operations in the 2014-2020 period and the objectives set by the related indicators have been achieved and far exceeded.

Regarding actions related to the digitalisation of administrative procedures and related to the provision of public services (education, health) it can be confirmed that the number of interactions of citizens with the administration through electronic procedures show a constant growth in our country, although it cannot be directly related to ERDF interventions. The implementation of digital health services has also been positive, as has achieving the targets of indicators of school population covered by educational electronic public services. The ERDF Evaluation Plan 2021-2027 Specific for the POPE includes an impact assessment on a specific aid programme for digitalisation in educational centres, the Connected Schools Program, implemented by the entity Red.es in the period 2014-2020. Red.es itself has already carried out an internal evaluation of this programme, which will be completed from the perspective of ERDF funding.

As regards **the contribution of the ERDF and the Cohesion Fund towards the green transition**, the questionnaire results were still positive, though less so than the ones of the previous question. Half of the respondents thought the funds had been moderately effective, and only an eighth to a sixth thought it had been very effective. One in five respondents thought it had not been very effective, while very few (up to 3 respondents out of the 78) thought it had not been effective at all.

***Question 6**: In your opinion, how effective have the ERDF and Cohesion Fund been in your country in contributing to the following goals in terms of the green transition?*



In **Greece**, a social partners' representative acknowledged that goals related to the green and digital transition have been met, with clear identification of sectors and companies that benefitted from the funds in these areas. Specifically, it was acknowledged that the funds have contributed to the green transition through infrastructure projects. However, there were concerns that the funds' impact on infrastructure has been stronger than on services.

In **Latvia**, stakeholders generally observed that the funds have been pivotal in promoting the green transition, particularly through investments in renewable energy, energy efficiency and sustainable urban development. Noteworthy contributions have included funding for energy-efficient renovations to public buildings, the installation of solar panels and the promotion of sustainable urban development strategies. However, while substantial progress has been made in decarbonisation, some representatives have pointed out that Latvia's climate policy lags behind the EU average. More flexible funding mechanisms are needed to support projects that ensure climate resilience, especially in rural areas where infrastructure is particularly vulnerable to climate change.

In **Poland**, it was reported that the EIP program played a critical role in supporting climate change adaptation and achieving cohesion policy objectives in this area. Investments in decarbonisation and green infrastructure were highlighted in the transport and energy sectors. Polish stakeholders stated that these efforts are expected to contribute to a greener Poland in the long run, especially in central and eastern regions.

Furthermore, it was noted that the EU funds had contributed to environmental sustainability through projects like photovoltaic installations and boiler replacements. These projects resulted in reduced energy costs and greater use of clean energy, aligning with the green transition goals.

A representative of a **Romanian public authority** pointed out that the programme's contribution to environmental sustainability was indirect, primarily through supporting the EU and large infrastructure programmes. Additionally, environmental considerations were incorporated into the programme's projects, particularly through responsible procurement practices.

In **Spain**, social partners highlighted that in view of increasing number of extreme events, such as climate hazards, there is a necessity of increasing the response capacity of SMEs when Cohesion Funds are reprogrammed. Such greater flexibility would likely enhance the effectiveness of cohesion policy.

According to Spanish authorities, ERDF programming for the 2014-2020 period under Thematic Objective 4 has focused mainly on actions to improve energy efficiency in buildings (public and private) and in companies, and to a lesser extent, on the generation of renewables (electrical and thermal). They have been actions developed, within the framework of the POPE, by the Institute for Diversification and Energy Saving (IDAE), which has implemented comfortably the ERDF aid of EUR 1 500 million allocated. The regional programmes have allocated around EUR 480 million to this type of investment.

The share of resources allocated to transport decarbonisation measures has been reduced. In the field of transport, bicycle lanes have been implemented in the framework of the EDUSI and in a timely manner, in regional programmes under specific objective OE 4.5.1. In total, the ERDF programming in Spain has allocated EUR 580 million for this type of sustainable mobility actions distributed between Axis 4 and 12 in several programmes.

The implementation of ERDF actions related to the low-carbon economy has faced significant difficulties, including: the lack of experience in the management of ERDF in this area, which has revealed administrative issues (lack of administrative capacity, high administrative burden on beneficiaries, difficulties in administrative procedures, difficult access to funding by communities of owners) and more technical issues (difficulty in measuring indicators); conflicts of competence between the State and the Autonomous Communities in aid for energy efficiency actions (which led to a reformulation of aid in this area and the creation of coordination mechanisms AGE-CCAA).

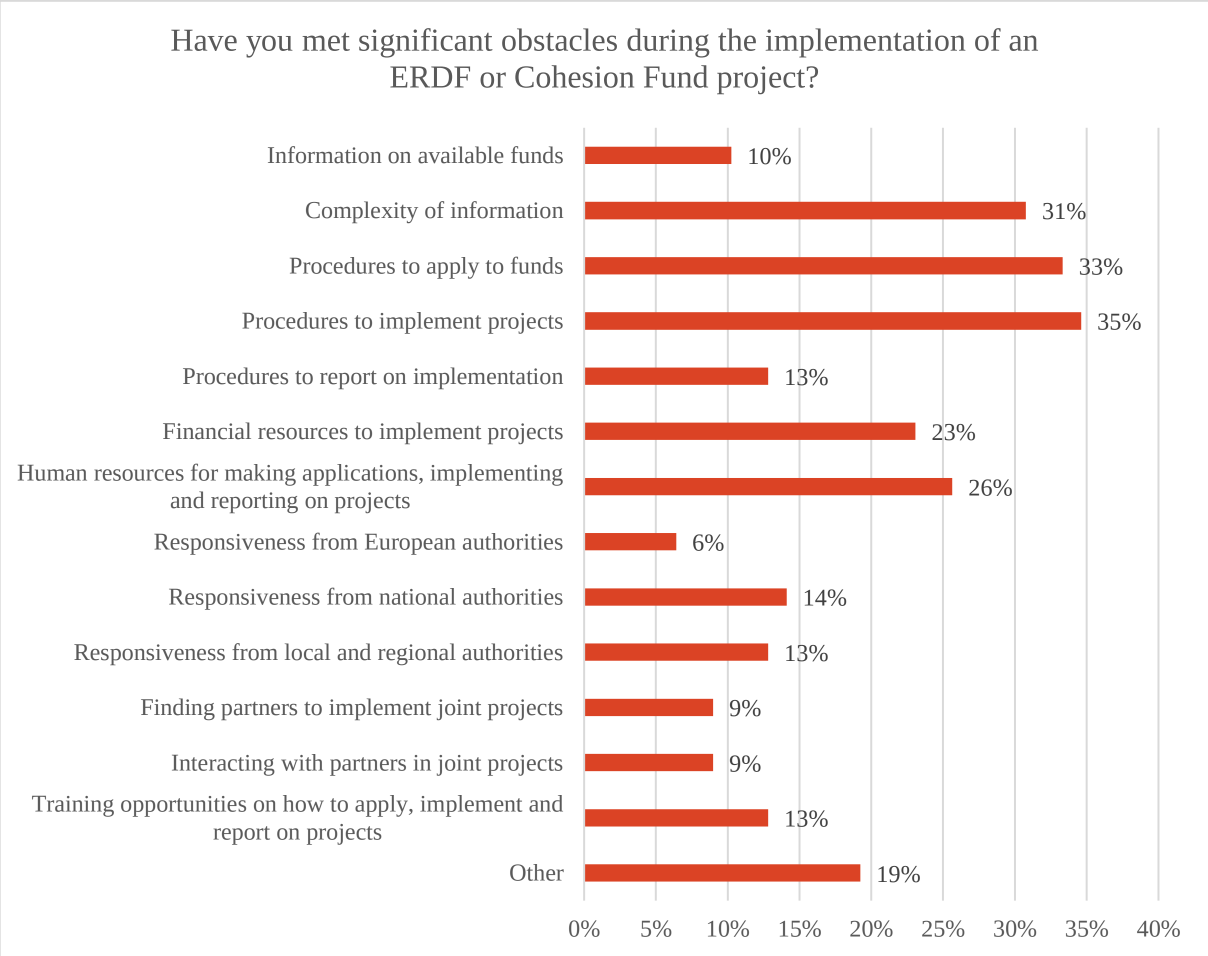
Despite this, measures have been implemented to solve the difficulties, allowing the programme to be fully implemented in the POPE, although the achievement of the indicators has undoubtedly been affected by the technical difficulties encountered in their quantification.

The effort made to implement the actions under Objective 4 in the period 2014-2020 places us at a significantly better starting point for the period 2021-2027, with lessons learned in both the administrative and technical fields.

As regards TO5 and TO6 actions, the 2014-2020 ERDF programming concentrated almost all ERDF resources on wastewater treatment, resulting from the non-compliance with the Urban Wastewater Treatment Directive. The programming of TO5 is very small for 2014-2020, only a few regional programmes have allocated resources in this area (Canary Islands, Galicia, Basque Country and Andalusia) for a total amount of ERDF aid of EUR 130 million. The 2021-2027 period opens programming to this type of action.

Stakeholders were asked to assess if they had encountered **significant obstacles in the implementation of ERDF or Cohesion Fund projects**. The complexity of information and the procedures to apply for and implement the projects, were the top three obstacles signalled by about a third of the questionnaire respondents. About a quarter furthermore signalled the own financial resources and human resources needed for the implementation.

__Question 7__: Have you met obstacles during the implementation of an ERDF or Cohesion Fund project?



From all of these categories, public authorities pointed out the aforementioned five topics as the most concerning. Organisations other than public authorities, on the other hand, scored lower in most obstacles, with the understandable difference that almost a third of them signalled the lack of responsiveness from national authorities (for comparison, 10 of the 35 civil society and other types of organisations signalled this obstacle, whereas only one in 35 complained about a lack of responsiveness from European authorities).

In Greece, the top three worries concern procedures to implement and apply for funds, and the lack of human resources. In Latvia, several obstacles were marked very high, with the lack of financial resources receiving more than half of the answers, and the complexity of information receiving more than a third. In Poland, with the exception of the general top three obstacles mentioned above, most other obstacles were significantly below the average. In Romania, besides these three obstacles, it is worth mentioning that a third of respondents signalled the lack of responsiveness of public authorities. Finally, in Spain, the procedures to apply for funds and the information on the available funds received the most critiques (around two fifths of the answers).

About a fifth of the respondents either raised additional obstacles that were not included in the list, presented clarifications on the ones raised or suggested improvements to overcome them.

Greek respondents underlined, above all, the complexity of procedures. Compliance with European and national procedures is complicated, due to different regulations and requirements. Also, delays in approvals affecting the maturity of projects: authorisations, approvals of environmental studies or public consultations, hinder implementation. Also, the projects costs increase due to increased material prices or changes in market conditions. Human resources were presented as a crucial factor. The lack of qualified staff with specific knowledge or experience in the design and implementation bodies is a severe obstacle. Conflicting legal provisions or changes in legislation create confusion and have raised objections and appeals: e.g. legal action by competitors or citizens, such as objections to tenders or appeals against decisions. Unforeseen natural conditions and disasters can delay the construction of projects. Finally, a weak system for monitoring the progress of the projects has affected their implementation. In terms of solutions, Greek respondents suggest simplifying procedures and strengthening administrative coordination, ensuring transparency in procedures and enhancing local participation. They also propose training managers involved in project management, design and implementation, to reinforce the human resources of beneficiaries. In addition, improving the monitoring of projects with modern information systems could facilitate the implementation. Finally, risk management strategies should include preventive plans to address unforeseen situations.

In **Latvia**, stakeholders reported that the COVID-19 pandemic and, later, the Russian war in Ukraine had been a major problem for the 2014-2020 programming period of EU funds. The COVID-19 pandemic caused a crisis in medical institutions and immediate additional financial resources were needed to maintain the pandemic's responsiveness and mitigate its consequences. In turn, the war caused by Russia has led to an increase in the prices of supply chains, which is still ongoing, and, as a result, additional financial resources were needed for the completion of the projects of the 2014-2020 period than initially planned, within the framework of the 2014-2020 programming period. As a result, it had not been possible to comply with the eligibility deadline for expenditure of the programming period. This could have been solved by simply extending the deadline, but this was not done, while the solutions offered by the Commission with non-functioning projects and staged projects had a significant impact on the development opportunities of future needs of the sectors, as the money was used from own funds or the next programming period of EU funds.

The implementation of EU fund projects and their requirements have become more and more complicated for all parties involved. Moreover, the use of simplified costs has not proved useful, as it has become easier only for cooperation institutions when it comes to document checks, while the burden on other parties has only increased, as the beneficiaries of financing must carry out procurements in the same way; in any case it is necessary to develop methodologies or justify the amount of the rate (for example, for personnel rates up to 20%).

In response to this, procedures should make it easy to react quickly to unplanned crises at EU institution level, and be flexible with regard to the exceptions to the arrangements defined in the regulatory framework, so that crisis situations can receive rapid and immediate support. For example, extending the programming period should be possible, as COVID and the Russian war in Ukraine were sufficient justifications for this. The conditions for EU funds should be simplified and set clear requirements. For example, if a rate of up to 20% is envisaged without justification of calculations, then it is also not required and not checked. The requirements of the cross-cutting priorities of EU funds should be simplified so that they are applicable only to projects for which it is important from the content; however, in many cases, these requirements are to be implemented in national regulatory enactments and not only in projects.

Simplified rates need to be aligned with the national budgeting process, i.e. no public authority has the financial means to cover the difference between the increased costs resulting from the procurement and the simplified cost rates or unit costs set by the authorities. There is no adequate minimum requirement for all projects below EUR 200 000. In social projects, it is precisely such small projects that are able to meet the needs of target groups and for which it is not always possible to develop needs-based simplified cost methodologies.

Another Latvian stakeholder mentioned that the frequent calls (especially at the end of the period) for amendments to the Operational Programme ‘Growth and Employment’ for 2014-2020, significantly increased the administrative burden on the Responsible Authority and reduced the operational capacity. The responsible authority had to be able to recalculate the funding within a very short period of time and, accordingly, to change the indicators set out in the Operational Programme. The frequent amendment of the Programme resulted in the fact that the responsible authority had difficulties in making timely amendments to the binding national regulatory framework, as well as creating uncertainty for the beneficiary.

Similarly, a significant administrative burden for both the beneficiaries and the managing authorities had been caused by the fulfilment and application of the cross-cutting requirements. As solutions, this stakeholder suggests examining the possibility of setting cross-cutting priority requirements in national legislation (e.g. construction legislation, etc.) outside the framework of EU funds, and/or applying them only to projects where they are directly applicable. The development of the cross-cutting priority criteria and the conditions for their application was administratively time-consuming and extremely difficult for both the responsible authorities and the beneficiaries, and hampered the availability of support to the sector. They recommended reducing the administrative burden overall for both the responsible authorities and the final beneficiaries as regards the amount of information requested.

Still with regard to Latvia, a stakeholder mentioned that European level authorities are not very responsive on specific issues – answers arrive late and mostly do not really explain how to solve the problem, leaving too much room for interpretation. Also, there is a lack of human and financial resources to implement projects on time and with the quality required by EU fund rules. They suggested that more resources (human and financial) should be appropriated for the project administration on all instances – beneficiary and managing authority – for more effectiveness and quality of implemented projects. Small countries struggle with all the requirements that should be taken to administer EU funds (for example – state aid rules, CPR rules and both of those together).

Finally, a Latvian stakeholder affirmed that civil society, especially NGOs representing vulnerable groups, are often overlooked – no access to investments, no funding for assisting and engaging vulnerable groups, and as a result, no significant changes to achieving goals in education, social cohesion, economic development or green transition. Measures are not adequate; for instance, poor families can receive support to not have to pay for disposing materials containing asbestos on roofs, but they cannot receive funding a new roof – how can a family accept that? Moreover, with regard to training for jobs, the routine selection of providers left programmes aimed at illiterate Roma go to waste, as there were no special measures in place to secure their participation, and municipalities and NGOs working with Roma were left with dozens of committed Roma people without support. The programme was deemed unsuccessful as not enough people without literacy skills wanted to apply. NGOs were not eligible for digitalisation grants either. Too few men were engaged in vast adult education programmes, too many women before retirement age were confined to their regions/homes and could not attend training, nor did they have access to hardware and software. There were also no visible linkages between investments in infrastructure and ESF activities or people’s daily concerns.

This stakeholder suggested that any ESF action should be linked to improved infrastructure works for the needs of all groups of society. Each action implemented by the government or a local authority should be planned and executed together with competent NGOs representing the target group. Funding should not be allocated to civil servants only, but also to the NGO representatives engaged. Support groups and engagement sessions with the target groups, should be run before and after the projects/programmes. Each investment in infrastructure should be planned and accompanied by ESF activities.

In **Poland**, stakeholders stressed that the multiplication of procedures (guidelines) with the simultaneous use of the 'design' language and reference to the provisions of other legal acts (without explaining them) makes this matter so complicated for an inexperienced beneficiary, that they often refrain from applying. During the negotiation of grant applications, there is a lack of flexibility in the approach to the proposals submitted, resulting in a 0-1 approach: either the proposal will be accepted or there is no funding. Some thought there was an imbalance of the parties in the audit: the inspector establishes the irregularity; the beneficiary has two options: does not agree with this statement so does not pay the penalty and turns to the court, but then interest is charged. The second way out: pays the penalty (so that interest is not charged) but then cannot claim before the court because payment of the penalty is treated as a 'confession of guilt'. In many cases, the quality of training is too low. Additional problems mentioned were the imprecise rules on state aid and the provision of own resources.

All suggestions from Polish stakeholders concerned the simplification of procedures, for example by using language understood by the average beneficiary and constructing provisions that clearly define the responsibilities and powers of the parties implementing projects. Another suggestion mentioned was enabling beneficiaries to assert their rights regarding identified irregularities by paying the amounts (no interest charged), but keeping the possibility to appeal the decision to the court.

In **Romania**, with regard to public authorities, stakeholders noted the limited financial and human resources to implement projects and interact with partners and beneficiaries. Respondents also noted that reporting was complex, with many required documents, and a demanding online procedure (for example, signing the same document several times electronically). Because pre-financing was 10%, it was difficult to pre-finance the project (ideally it would be 50-40-10% or for short projects a higher value of 70-90%, and 10% after the final reporting). Procurement can in some cases be cumbersome, and golf-plating of rules by national authorities was noted by some stakeholders. Higher pre-financing and less paperwork on the financial report was presented as possible ways out. For small amounts there should be no need to prepare purchase files (e.g. printing information in a local newspaper, or printed posters, or purchasing a domain name for the project).

Still in relation to Romania, some obstacles were pointed out concerning SMEs. The access to relevant information on calls for projects dedicated to SMEs is difficult for entrepreneurs, who are not fully aware of possible non-reimbursable funds. A stakeholder found unjustifiably high complexity of financing applications for small and medium value grants (maximum EUR 500 000 000), which leads to too high consultancy costs reported as a percentage of the grant amount. As for public authorities, beneficiaries had difficulties ensuring their own contribution, due to the low level of capitalisation of SMEs in Romania and the lack of financial support instruments. There is a risk of increasing the gap between more developed and less developed regions in the country due to the fact that calls for projects dedicated to SMEs were identical between regions and between counties (including identical evaluation grids), whereas companies in less developed regions tend to be at a disadvantage in several practical ways. Even when resorting to consulting firms for support in project application, implementation and reporting, many are not of good quality. The big delay between the submission of the financing application and the moment of signing the financing contract (in the case of many calls for projects dedicated to the private environment) also hinders implementation. Lastly, the reallocation of funds not accessed by public institutions to calls for projects dedicated to the private sector could increase usage of funds (often, SME representatives asked the authorities to reallocate the amounts not spent by public institutions to the private sector, but this was done too rarely and often too late to have enough time for implementation, especially at the end of the Multiannual Financial Framework).

Other solutions presented included partnerships between line ministries and associative structures of the private environment to increase the level of education and information of entrepreneurs on accessing non-reimbursable funds. The simplification of financing applications for calls for projects awarding grants of up to EUR 500 000 would allow SMEs to avoid the use of consultants – an example of good practices is the project implemented by Spain through the NRRP[145].

Other types of partnerships that are needed are between the government and the financial-banking system, with the involvement of the associative structures of the private environment, for the development of financial instruments to help SMEs to ensure their own contribution.

A final suggestion from Romanian stakeholders was to reconfigure the evaluation grids so that at least half of the criteria can be evaluated automatically, i.e. digitally (as has already been done in the calls for SMEs in the 2021-2027 Regional Programmes).

As for the **information gathered from country visits, the main obstacles highlighted by Greek stakeholders** during included the complexity of the application process and lack of liquidity, which discourages SMEs from applying for funding. Additionally, delays in disbursements from national authorities and the lack of tailored programs for the self-employed and other vulnerable groups were also presented as challenges.

In **Latvia**, the organisations interviewed perceived that the obstacles stem largely from the complexity of the ERDF and CF systems. The process of applying for and managing funds is bureaucratic and often time-consuming, which has discouraged some small businesses and local authorities from participating. The lack of clear guidance on how to apply and report on projects has made it harder for stakeholders to navigate the process. Additionally, it was reported that state aid regulations have created confusion, especially regarding public-private partnerships and infrastructure projects, where complex guidelines have delayed decision-making.

In **Poland**, the complexity of the application process, particularly for smaller entities, was identified as a key obstacle. The detailed requirements and lack of expertise among smaller companies were identified as barriers to participation in the funding process. Furthermore, the demand for specialised experts (e.g. auditors and financial analysts) caused delays, complicating the funding process.

From the Polish public authorities' point of view, the obstacles were mainly linked to disruptions caused by external events like the COVID-19 pandemic, the war in Ukraine and inflation, which led to supply chain issues, increased investment timelines, and rising labour and material costs. Public procurement issues, including contractor availability and challenges with procurement laws, hindered project progress and led to delays.

Suggestions gathered during the country visits included, in Greece, the simplification of the application process and programmes as a critical step to overcoming the barriers to effective implementation. There

145 https://www.bbva.com/en/es/sustainability/bbva-and-minsait-simplify-the-process-for-applying-for-next-generation-eu-funds-for-companies-smes-and-the-self-employed-in-spain/.

is also a need to enhance technical assistance to strengthen the administrative capacities of those applying for the funds, especially in civil society.

In **Latvia**, to overcome the obstacles, it was deemed essential to simplify procedures, reducing the bureaucratic complexity of applications and reporting, which would make the process more accessible for SMEs and smaller municipalities. Additionally, offering more training programs and guidance on navigating the application process, along with improving communication between local authorities and businesses, would help alleviate confusion. Streamlining state aid regulations and providing clearer guidelines for public-private projects would also facilitate easier engagement in infrastructure development. Finally, fostering partnerships between businesses, local authorities and research institutions can lead to better collaboration and more effective project implementation.

In **Poland**, it was also suggested that simplifying the application process would make the funds more accessible, especially for smaller businesses that may lack the expertise to navigate the complex system.

According to a representative of a public authority in **Romania**, no major issues were identified that reduced the programme's effectiveness. While some challenges arose during project implementation, they were successfully resolved at project level. The majority of projects were completed with a high absorption rate, and continuous support was provided to beneficiaries throughout the implementation process. The representative acknowledged that financing, particularly ensuring cash flow, was a challenge for civil society during the 2014-2020 period. However, they emphasised that they managed this issue by providing pre-financing to the organisations. They also mentioned that the flexibility mechanisms introduced by the European Commission during this period were helpful in addressing these challenges.

A representative of a trade union highlighted the lack of synergy and coordination between programming and programme implementation. This is particularly important between different programming periods, so that programmes from the previous programming period are still being monitored when the new programming period has already started, in order to ensure continuity. It is essential that programmes are monitored and verified to ensure that they meet the pre-defined objectives.

Furthermore, the representative identified problems with the implementation process, since previously defined investment priorities and objectives of the operational programmes were altered during the process. This was despite the fact that the social and economic environment had stated a clear interest in the original priorities and was following the projects accordingly. This concerned, for example, the collective dismissal funds, which had helped companies to reduce the costs of collective dismissals, especially during COVID-19. In addition, during the pandemic, funds were reallocated from infrastructure to financing the equipment needed to fight the pandemic. This changed the objectives of cohesion policy.

Several representatives pointed to problems for the social partners in accessing cohesion policy funding. Entrepreneurs struggle to access information on SME-specific funding calls. An initiative was launched by the Ministry of Investment and European Projects, and an information platform was set up; however, this platform is ineffective, since the content of the guidelines, which are several hundred pages long and written in very technical language, are not translated into a more accessible and simple way. Combined with low awareness and education on non-reimbursable funds of entrepreneurs, this makes access to non-reimbursable funds challenging. As a result, not all of the budget may be allocated, and it may be used to fund suboptimal projects. For example, in the call for projects for micro and small enterprises for the Southeast region in the current regional program the total amount of grants demanded by submitted applications reached only about 80% of the available budget.

Access to funding is further complicated by the requirement for SMEs to hire a consultant, in order to apply for European funding, regardless of the amount of funding. Moreover, the call for projects, the guidelines, the evaluation criteria and the application form of calls – and therefore also the consulting fees – are identical, even if there are large differences in the grant amounts awarded. For example, there were two calls for projects where these requirements were exactly the same, but one offered grants of up to EUR 200 000 and the other one of up to EUR 3 million. It was stated that some SMEs do not apply for EU funding, if the consultancy fees exceed 10% of the grant, as they can avoid all the reporting etc. associated with EU grants which come on top of the consultancy fees. This leads to missed opportunities for implementing valuable projects of SMEs.

It would be favourable to implement a platform, as in the case of Spain, which would eliminate the need for a consultant for small grants of up to EUR 300 000. Given the inflation in recent years, the threshold for grants supported by this platform should be raised to EUR 500 000. A representative called on the European Commission to implement such a platform and generalise it in all Member States.

In this context, another representative stressed that there should be a more coherent legislation and strategy to promote better practices. It is not just the exchange of better practices that is needed, but also recommendations on how to implement them. Such exchanges between Member States could also encourage cohesion and convergence at European level, and not just at regional level.

Another issue related to access financing is that SMEs need to demonstrate their own financial distribution, which can be challenging as they tend to have a low capitalisation in Romania. Some financial instruments dedicated to SMEs should be developed by relevant stakeholders, such as the Ministry of Finance, the Ministry of Economy, Entrepreneurship and Tourism, the Ministry of Investments and European Projects, the Association of Romanian Banks, and the Investment and Development Bank. This would help SMEs to cover their own financial contribution in such projects, and could, for example, help SMEs wishing to develop high-tech projects to access the necessary funding for being able to submit an application.

A representative of an employers' organisation for women-led SMEs pointed out that during the 2014-2020 programming period, there was a big time-lag between the submission of application and the final signing of the funding contracts. In some cases, this took 18 months or more, which led many SMEs to abandon the funding, as alternative funding solutions were found. However, improvements were noted for the current multi-annual financial framework. For example, in the South Montenegro Regional Programme, a large call for projects with a budget of more than EUR 144 million, the period between the application and the signing of the financing contract was only three months.

A trade union representative highlighted the need to update the applicants guide, which has remained largely unchanged for about 20 years, with approximately 70% of its content still the same. The guide fails to address bureaucratic inefficiencies, such as data exchange between the management authority and beneficiaries.

One representative of a non-governmental organisation suggested that some best practices from the Recovery and Resilience Facility, can be applied to cohesion policy. Specifically, operational programmes should have clearer, more coherent goals with well-defined performance criteria in terms of quantity and quality. This would help beneficiaries to better structure and consolidate their applications for funding and improve project distribution and implementation. Furthermore, the representative advocated for the implementation of a mediation body. While the need for systemic audits was recognised, it was highlighted that beneficiaries are often not well informed during the process and face budget cuts without recourse. However, it is important that beneficiaries have the opportunity to defend themselves when necessary.

Spanish stakeholders referred to the need to have a unified platform to access several funds, including, where appropriate, helpful instructions on the application process. This would make access to funds easier for smaller organisations that do not have specialised staff for external financing management. The regulatory environment is presented as increasingly complex, for example with demands on climate proofing. Instead, stakeholders ask for the simplification of applicable regulations and procedures, without compromising legal certainty and efficiency in management and control. Funds should be concentrated on fewer actions with more impact; the scope of action of each fund should be clarified to avoid distortions (synergies can be created, avoiding overlaps between funds); and, in particular, an improved connection to ESF/ESF+ is very much needed. Encouraging multi-fund national programmes could also be beneficial

The ERDF should, for example follow the process of participation and consultation carried out by the ESF/ESF+ to take into account the priorities of organised civil society, making sure to give voice to the entities that work and know the reality of the most vulnerable groups. ERDF programming should reflect the investment priorities reflected in sectoral national strategies, such as the National Roma Strategy, since the contribution to social cohesion and inclusion, in this case of the Roma population, should also fall within the remit of the ERDF (eradication of slums, improvement of disadvantaged neighbourhoods, etc.).

Finally, and concerning SMEs and micro-enterprises, information days and dissemination of funding opportunities would improve their usage of existing opportunities.

In the country visit to **Spain**, public authorities affirmed that the evaluations carried out in the 2014-2020 period have made it possible to identify the main difficulties encountered in the past programming period. Effective measures were implemented in response to them, which have finally allowed Spain to absorb all ERDF resources from 2014-2020. Among these difficulties, the most relevant concern the following issues: a very slow start to implementation due to both exogenous and endogenous causes such as a long interim period for the Spanish Government, with budgetary restrictions associated with the lack of approval of new budgets and therefore with the extension of previous budgets, the amendment of the law on public sector contracts, which had a direct impact on the contracting of investments under Axes 6, 7 and 12; the late approval of programmes and the slow process of designating intermediate bodies and management and control systems, including the development of the ERDF management IT application (Funds 2020).

Each area has, in any case, had its particularities, such as:

- Smart Specialisation Strategies (RIS3): the main difficulties experienced in its implementation resulted from the complexity in the management and justification of the ERDF implementation, slow administrative processing s and, in the period 2014-2020, the effort involved in the complexity of its conception and governance (new then), as well as the interrelationship between national and regional RIS3. Based on the experience gained from 2014-2020, a more ‘rolled-out’ implementation in this area is foreseen for the period 2021-2027, which is no longer a novelty in programming.

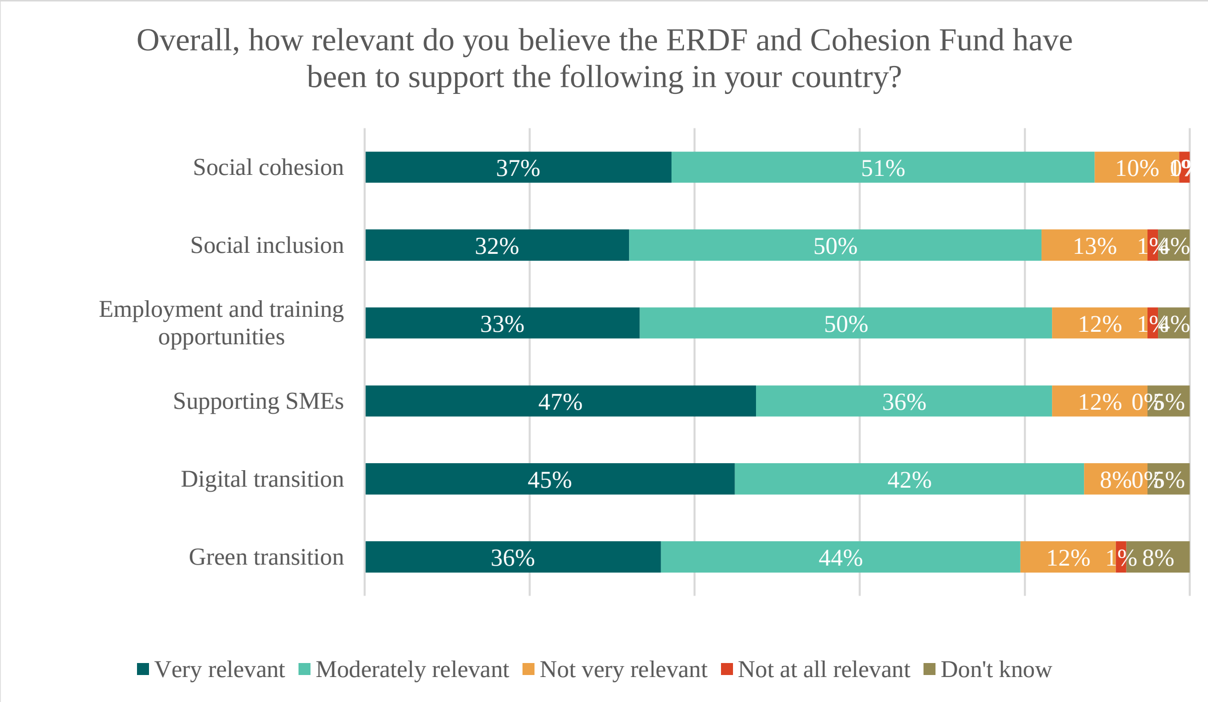
- Energy actions: the lack of experience in the management of ERDF in this area, which has revealed administrative issues (lack of administrative capacity, high administrative burden on beneficiaries, difficulties in administrative procedures, difficult access to funding by communities of owners) and more technical issues (difficulty in measuring indicators); conflicts of competence between the State and the Autonomous Communities in aid for energy efficiency actions (which led to a reformulation of aid in this area, and the creation of coordination mechanisms AGE-CCAA).
- Actions in the field of sanitation: have faced significant difficulties, mainly of an administrative-political nature (problems of approval of the general State budgets and extension of the existing ones, implementation of a new law on public sector contracts, slow designation of the intermediate bodies of the programme, as well as the late approval of the programme), although technical difficulties in measuring the corresponding output indicators have also been addressed.
- Sustainable and Integrative Urban Development Strategies: The greatest difficulties in implementing sustainable and inclusive urban development strategies (EDUSIs) lie in the complexity of their implementation: development of 173 management systems in the 2014-2020 period through manuals of procedure specific to each beneficiary local entity (light intermediate bodies), development of the common IT management tool for actions in this area (GALATEA), lack of liquidity on the part of municipalities, changes in the law on public sector contracts, or political changes after municipal elections.
- Likewise, the 2014-2020 period was marked, exceptionally, by extraordinary circumstances that were impossible to foresee, and which greatly affected ERDF programming: the health crisis caused by the COVID-19 pandemic and the war in Ukraine. The first caused a major change in programming in order to allow the health expenditure incurred through the management of the pandemic to be eligible, and to integrate REACT EU resources from the Next Generation package (which in some cases represented a higher amount than the ERDF had initially allocated for certain regions and with a very short timeframe for its implementation). The war in Ukraine significantly affected the energy and raw materials market, raising production costs and leading to delays in the implementation of certain actions.

3.2 Relevance

According to the European Commission's Better Regulation toolbox, the criterion of relevance *'looks at the relationship between the needs and problems in society and the objectives of the intervention and hence touches on aspects of design. Relevance analysis also requires a consideration of how the objectives of an EU intervention (…) correspond to wider EU policy goals and priorities.'* [146]

When asked about **how relevant the ERDF and Cohesion Fund had been in supporting the goals of supporting social cohesion, employment, SMEs and the twin transition**, the answers were overwhelmingly positive. Slight variations across country or type of organisation were not significant.

Question 8*: Overall, how relevant do you believe the ERDF and Cohesion Fund have been to support the following goals in your country?*



In **Greece**, stakeholders expressed that the ERDF and CF investments have been highly relevant in supporting SMEs, particularly in border regions, during the COVID-19 crisis. These programmes played a crucial role in providing support to businesses, helping them navigate the challenges posed by the pandemic.

Latvian representatives generally recognised the relevance of ERDF investments in key sectors like energy efficiency, education and cultural preservation. The improvements in energy efficiency in urban areas and cultural investments that have strengthened local identity and well-being were acknowledged. It was noted that these investments align with Latvia's broader goals of improving public infrastructure and preserving cultural heritage.

146 https://commission.europa.eu/document/download/88ebf8bb-79c1-4cf2-975b-c643dcc766f8_en?filename=BRT-2023-Chapter%206-How%20to%20carry%20out%20an%20evaluation%20and%20a%20fitness%20check_0.pdf#page=28&zoom=100,93,96 .

It was noted that ERDF funds have supported infrastructure for vulnerable groups, such as elevators for people with disabilities, social housing and group homes for young people with disabilities. These investments enhanced social inclusion and improved the overall relevance of the funds in addressing social challenges.

Multiple **Latvian beneficiaries** emphasised the ERDF's relevance in supporting marginalised and vulnerable groups. For instance, the representative of women's rights highlighted how EU funds have been used to improve infrastructure accessibility, although she also pointed out gaps in some areas, particularly for people with disabilities. A youth representative emphasised the positive outcomes for youth entrepreneurship, which has contributed to regional development and social inclusion. Additionally, a representative of rural communities highlighted the relevance of EU funds in supporting small farmers, who are particularly vulnerable to the challenges posed by climate change and market fluctuations.

Additionally, green transition and digitisation were underlined as key areas of relevance in **Latvia**. It was underlined that climate change is already visibly affecting cities, making it crucial to adjust infrastructure to address these impacts. This need for adaptation should drive the use of EU funds for the necessary infrastructure changes. Regarding digitisation, it was noted that there are already several ongoing projects aimed at improving digital skills, which will benefit both societal groups and businesses. Latvian public authority representatives noted that while ERDF investments do not directly target citizens, they play a key role in enhancing regional infrastructure.

It was highlighted that youth employment remains a challenge for relevance in Latvia, particularly for those not in school or work. It was noted that while the ERDF do not directly target youth employment, they support infrastructure for vulnerable groups (e.g. elevators for those with disabilities, social housing projects, and group homes for young people with disabilities) to improve social inclusion. A main concern highlighted in this regard was the retention of young people in rural areas. Ongoing problems in keeping young people in rural areas due to the lack of job creation and economic opportunities were cited. Many rural schools and cultural centres, although renovated, remain empty, reflecting the lack of engagement and the migration of people to urban areas in search of opportunities.

Latvian social partners pointed out a mismatch between programme designs (especially in green and digital transitions) and the actual needs of businesses as a significant challenge in Latvia. Some programmes fail to attract interest due to being misaligned with the current stage of business development, such as those focused on sustainability in areas where businesses are not yet mature enough.

It was noted that while the ERDF remains highly relevant for infrastructure development in Latvia, it has not sufficiently addressed the root causes of rural depopulation. It was suggested that investments need to be more targeted to fostering long-term economic opportunities in rural regions, rather than focusing solely on infrastructure. Similarly, it was argued that the ERDF's focus on short-term fixes rather than long-term systemic changes in key sectors, such as digitalisation, has limited its overall impact.

Furthermore, several representatives perceived that the ERDF has disproportionately benefited wealthier regions, with rural and marginalized areas often underserved. For instance, a representative of women's rights criticized the fact that some programmes, such as those supporting e-vehicles, largely benefit wealthier individuals, rather than addressing the pressing needs of vulnerable groups, such as those in social services or NGOs. A representative of rural communities echoed this concern by stressing that rural areas continue to suffer from a lack of economic opportunities, despite significant EU investments in infrastructure.

In **Poland**, stakeholders confirmed the overall relevance of the funds. A Polish public authority representative highlighted the relevance of the OP Smart Growth and FENG programmes, particularly through the lens of demand from SMEs and entrepreneurs. It was noted that there was high demand for products like loans for technological innovations, aimed at introducing new digital technologies and market products. However, despite the strong interest, only about a third of projects could receive support, highlighting the gap between market needs and available funding.

Regarding the impact on regional disparities, a representative emphasised the positive impact of the funds on reducing regional disparities in Poland, particularly in poorer regions like Warmińsko-Mazurski. These regions received a significant portion of EU funding for public investment, which contributed to notable economic growth. It was perceived that while the gap between rich and poor regions has decreased, it was noted that intra-regional disparities, especially within wealthier regions, may be on the rise. For continued relevance across regions, Polish stakeholders suggested that regional differentiation in fund distribution is essential, as not all regions receive equal support. There was a call for aligning funds with local needs, which are often overlooked in favour of broader national or EU-level priorities.

In **Romania**, it was emphasised that the funds were highly relevant in addressing key priorities, particularly by supporting the management of infrastructure and competitiveness programmes. This indirectly contributed to the development of these sectors.

A representative of a public authority underlined that the programmes contributed to reducing disparities by supporting the preparation of over 200 technical documents for future projects under the 2021-2027 period. These projects, totalling around EUR 4 billion, focus on areas such as urban mobility, regeneration, road infrastructure, smart facilities and tourism, with a primary focus on less developed regions. It was also expressed that the programme financed the preparation of projects for three major regional hospitals, which are now being funded, further addressing regional disparities.

A representative of a trade union stressed the importance of cohesion policy not only focusing on economic growth, but including more indicators and aspects, covering multiple areas of sustainable development. The economic and social impact of the investments from the European funds must be properly assessed, something which has been lacking.

Despite the fact that cohesion policy has had a very positive impact on the economy in recent years, it was stressed, by social partners and civil society, that this has mostly been in large regions and cities, like Bucharest-Ilfov and Cluj, and that regional disparities remain. Furthermore, it was stressed that ERDF funds should support integration rather than contribute to territorial segregation. They called for careful consideration when assessing projects, ensuring alignment with principles of non-segregation and integration, particularly for marginalised communities such as the Roma population in both urban and rural areas. In the future, it is key for cohesion policy to continue and that regional disparities are minimised, by reducing bureaucracy and increasing flexibility. Moreover, the focus should be on ensuring that projects promote inclusive development and do not inadvertently increase segregation.

In **Spain**, the ERDF and CF have been relevant in supporting key priorities in Spain, particularly in areas such as R&D&I, ICT, SME support, and the low-carbon economy, in line with European Commission recommendations and the 2020 Strategy. The ERDF programming has allocated 80% of resources to these areas, focusing on urban development and reducing funds for transport actions compared to previous periods. However, environmental concerns like biodiversity and environmental protection were less prioritised, with purification actions receiving more focus.

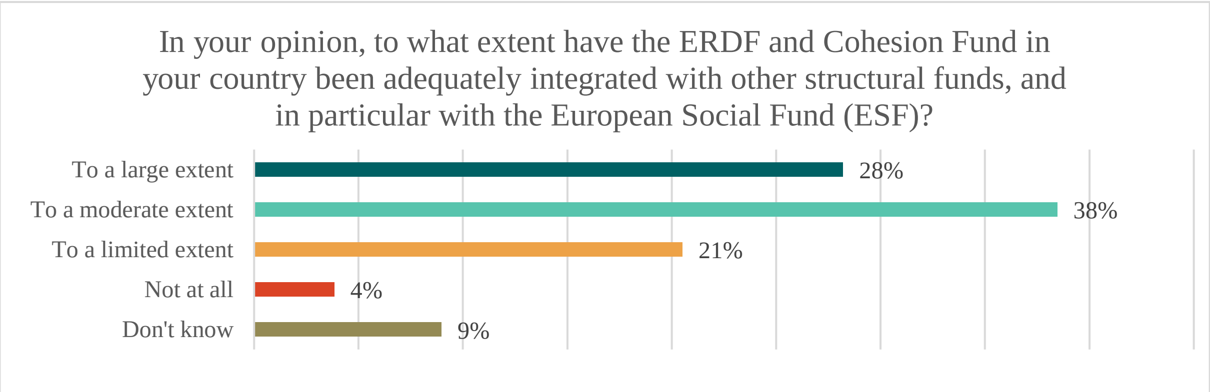
In terms of social cohesion, several representatives noted the ERDF's positive contribution through large infrastructure projects that benefit the population at large. However, assessing the direct impact on social cohesion, especially on a micro level like poverty reduction, remains challenging. One representative suggested that adding specific indicators, such as SME competitiveness, in evaluation reports, could provide a clearer picture of the impact.

There were also concerns that the ERDF's focus on social cohesion was insufficient, particularly regarding disadvantaged groups such as the Roma community. A representative suggested that the ERDF could benefit from adopting best practices from the ESF, which places a stronger emphasis on social cohesion. They proposed better targeting investments to vulnerable groups and aligning the ERDF more closely with national strategies on social cohesion and inclusion to improve its effectiveness in this area.

Coherence between the ERDF and the CF and the European Social Fund was, given the specific focus of this evaluation, a question that was also presented to stakeholders. Over a quarter of the respondents said this integration was largely successful, and almost two-fifths believed they were moderately well-integrated. Out of 78 respondents, only seven believed they were not integrated well at all.

As the answers were mostly positive across all countries, no significant discrepancies of results were found at that level. It may be more relevant to mention the fact that out of the seven negative answers, only one came from the public authorities, with the other sixcoming from non-public actors.

Question 9*: In your opinion, to what extent have the ERDF and Cohesion Fund in your country been adequately integrated with other structural funds, and in particular with the European Social Fund (ESF)?*



Greek stakeholders noted strong integration between the ERDF, CF, and ESF investments, with many programmes being interconnected. For example, while the ERDF may fund infrastructure projects like elevators for people with disabilities, the ESF supports training and upskilling for relevant personnel. However, stakeholders mentioned that the distinction between ESF and ERDF funding can be unclear in some programmes, highlighting the need for businesses and organisations to be well-informed about all available cohesion programs.

In **Latvia**, public authority representatives emphasised the complementarity of the Modernisation Fund with the ERDF for green transition initiatives. The REACT-EU investments were praised for their swift fund allocation, facilitated by amending existing regulations, which allowed for rapid deployment during the pandemic, and was well-received by healthcare providers. Latvian beneficiaries also highlighted the relevance and complementarity of the Solidarity Fund and the Recovery and Resilience Facility in addressing key issues.

Regarding the complementarity of ERDF and ESF funding, several **Latvian public authority representatives** noted the difficulty in separating the ESF and ERDF investments, as many of their projects use both funds and require collaboration with NGOs.

In **Poland**, complementarity and synergy between European funds were highlighted, especially concerning the ESF. It was noted that while the ESF focused on social inclusion projects, the ERDF and CF supported these initiatives through additional revitalisation and social activation efforts. This integrated approach ensured that the interventions were not only effective but also sustainable, creating a synergy that addressed the broader needs of the excluded groups and their reintegration into society.

Furthermore, representatives of **Polish social partners** discussed the necessity of greater flexibility between different funding sources, particularly the ERDF and the ESF. The benefits of integrating these funds were underlined, especially in projects that combine investments with upskilling and qualifications. By allowing competence programmes to be financed within investment projects, it was argued, the quality and effectiveness of these initiatives could be improved. There was a call for further integration between funds to streamline processes and enhance the overall impact.

Additionally, Polish stakeholders expressed support for a multi-fund approach**,** citing examples like the Just Transition Fund. This approach, combining multiple funding sources, is seen as a potential future direction for EU funding mechanisms.

In **Romania**, a representative of a national authority stated, regarding integration with other structural funds, that the programme ensured complementarity by preparing 270 projects in less developed regions, which could have been eligible for the regional operational programme. When funding for this programme was exhausted, the representative highlighted that a successful negotiation allowed these projects to be supported through the programme, advancing broader economic and social development objectives.

A representative from a regional development agency highlighted Romania's strategy of complementing European funds with national funds, which has been beneficial in addressing the country's considerable needs. However, the representative pointed out the challenges of overlap and inefficiencies, particularly when both governmental and European funding support similar initiatives without clear distinctions. Despite these issues, it was noted that this dual funding approach has been crucial in tackling Romania's vast development gaps.

Several representatives of civil society, private entities and social partners stressed, however, the need to align Cohesion funds and policy better with similar instruments, such as the Technical Assistance Instrument. A mechanism should be designed to extend their application effectively.

Additionally, infrastructure projects should be integrated with social services, such as those funded by the ESF, to create a more comprehensive and inclusive approach to regional development.

The representative acknowledged that while the ERDF is Romania's most generous financial instrument, it has limitations in sectors such as healthcare, education and social services, where demand far exceeds available resources. It was noted that in order to address these gaps, Romania has welcomed complementary programs and flexibility rules. Specifically, the flexibility rate for the 2021-2027 period was increased from 10% to 15%, enabling social partners to integrate both ESF+ and ERDF components in their projects. This flexibility allows for valuable synergies and fosters a more integrated approach to development. The representative emphasised the importance of linking infrastructure investments with human capital development and urged continued exploration of these synergies between funds in future financial periods.

A representative from the Romanian social development fund discussed their organisation's focus on social inclusion, cohesion, and local development in Romania through various grant schemes, including European funds (e.g. ERDF, ESF) and Norwegian grants. The representative underscored the importance of complementarity between these funding sources and emphasised the need for cross-territorial synergies, particularly when working with limited resources like the Norwegian grants.

In **Spain**, the most successful integration of the ERDF with other structural funds, particularly the ESF, has been through cross-financing allowed under Article 98(2) of the CPR. For example, local authorities could use both ERDF and ESF resources within the same strategic framework, such as in Axis 12 of the POPE, to address social inclusion and combat poverty and discrimination. However, the limitations set by Article 120 of the CPR, which restrict the European co-financing rate for operations, hinder further integration with other structural funds.

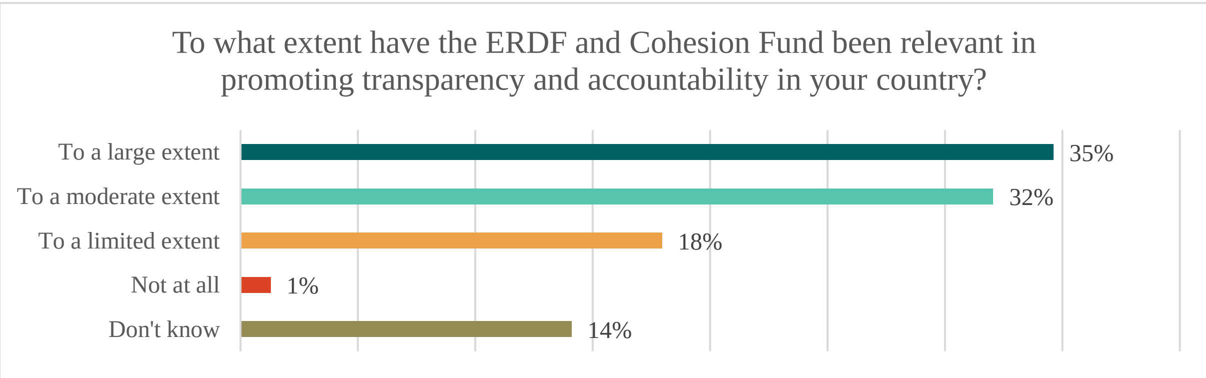
It was suggested to identify more channels through which the complementarity of the ERDF with other European Funds could be enhanced. This would significantly increase the effectiveness of the programmes. For example, in the context of SMEs, support and advice for entrepreneurs is financed by the European Social Fund and it would be beneficial to complement this by financing first investments from the ERDF. This combination is currently not in the regulations nor is it active, but it could potentially be very effective in increasing the survival of new companies. ERDF programmes should also be accompanied by policies on different levels of administration, ranging from regional to national level. Another way of enhancing complementarity would be to implement multi-fund programmes. However, it was noted that the management of such multi-fund programmes may be complex.

One representative shared positive experiences with the ESF in involving private organisations in the management and implementation of funds, suggesting that similar approaches could be beneficial for the ERDF. Best practices learnt from the ESF regarding the involvement of the private sector could be applied to the ERDF. The advantage of involving private entities is their close proximity to the economic sector and deep understanding of specific needs which facilitates the allocation of funds towards addressing specific problems. It was suggested that the experience with the ESF in engaging the private sector could offer valuable lessons for the ERDF.

A representative of a non-governmental organisation representing the Roma community, stated that there complementarity between the ERDF and other programmes, such as the ESF, needs to be improved. The lack of complementarity reduces the potential for a positive social impact. For example, if a housing project is carried out and it is planned to be complemented by social support, the social support could not be funded by the ERDF, but would need to be financed with the ESF. If the calls of the two programmes are not launched at the same time, this can present a significant barrier for implementing a social housing project.

An overwhelming (two thirds) majority of the respondents believed that **the ERDF and Cohesion Fund had been (either very or moderately) relevant in promoting transparency and accountability** in their country. Only one respondent of the 78 believed it had not been relevant at all. Public authorities were particularly positive in this regard, since half of them believed the implementation of these funds positively influenced national practices to a large extent. Across countries, the results reproduced the average answers, with Poland having the most positive answers of all: all 12 respondents affirmed this to be true, with 3 to a large extent" and 9 "to a moderate extent" answers.

***Question 10**: To what extent have the ERDF and Cohesion Fund been relevant in promoting transparency and accountability in your country?*



In **Poland**, the importance of transparency in the project selection process was highlighted. The representatives argued that involving various stakeholders in open discussions would help ensure a more transparent and inclusive approach. An employer representative advocated for incorporating competition schedules into the monitoring committee's discussions to allow for better planning and reduce suspicions of non-transparency. The need to provide region-specific information about fund allocation was underlined, as distribution varied significantly across regions during the 2014-2020 period. The importance of ensuring that smaller regions are well-informed about available funds in order to maximise the effectiveness of the funds was highlighted.

A representative of a **Romanian** national authority highlighted the fact that the programme promoted transparency and administrative responsibility. It was expressed that the management of the funds is transparent, with strong connections to beneficiaries. The programme financed several communication activities, including online campaigns and videos, to raise awareness about the use of EU funds in Romania. Additionally, a dedicated website was established to promote the programme, ensuring that most, if not all, institutions involved are well-informed and engaged.

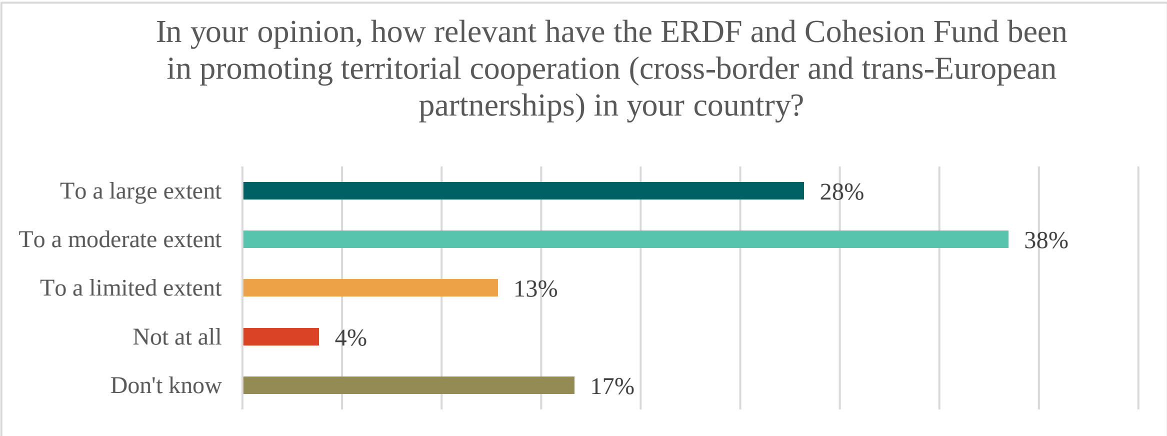
In **Spain**, a representative of a trade union noted that assessing the impact of the funds on the economy is difficult due to limited communication about how the funds are used. They underlined the need for improved transparency at all levels – European, national, local and municipal – to ensure clearer understanding of fund usage and impact.

It was reported that the ERDF and CF contributed to promoting transparency and accountability, with regulations requiring full disclosure of information about projects co-financed by European funds. Key aspects such as the publication of programs, monitoring reports, evaluations and the involvement of social representatives in monitoring committees, further supported these objectives.

It was further noted that Spanish national authorities have developed a strong evaluation culture over the past decade, with confidence in the robustness of ERDF evaluation plans. Impact assessments have become more common and are expected to increase in the 2021-2027 period. This shift in approach represents a significant change in mindset, as Spain was perceived to historically lack a strong evaluation culture outside of European funds.

Concerning the **promotion of territorial cooperation (cross-border and trans-European partnerships)**, again respondents were very positive. Approximately 30% answered ‘to a large extent’, and 40% ‘to a moderate extent’. Only three respondents (all from public authorities, of which two from Latvia and one from Greece) said it was not relevant at all. As in previous questions, Polish respondents were the most positive: out of 12 respondents, only one answered ‘don’t know’, with the remaining affirming that the funds had been relevant to either a large (5), moderate (4) or limited (only 2) extent.

Question 11*: In your opinion, how relevant have the ERDF and Cohesion Fund been in promoting territorial cooperation (cross-border and trans-European partnerships) in your country?*



In **Greece**, stakeholders in the fact-finding visit perceived that the funds have been less effective in promoting territorial cooperation, particularly in border regions that faced significant challenges in recent years. They noted that cross-border activities had almost collapsed during the COVID-19 pandemic and have yet to fully recover. Stakeholders suggested that greater emphasis should be placed on enhancing territorial cooperation to address these inefficiencies.

In **Latvia**, regarding territorial cooperation, it was underlined how the ERDF has facilitated collaboration between EU Member States in the Baltic region and beyond, aiming to foster regional integration and strengthen cooperation across borders. It was expressed that cross-border cooperation, particularly with neighbouring countries like Lithuania and Estonia, has been one of the most successful areas of investment. These collaborations often focused on infrastructure projects, such as civil defence and territorial improvement, along with training initiatives. Furthermore, the role of Interreg programs was also highlighted, which complemented ERDF funding, enabling the exchange of experiences and fostering regional cooperation across the Baltic Sea and broader EU areas.

Additionally, **Latvian public authority** representatives emphasised, that despite the challenges posed by the war and changing market conditions, the ministry continues to collaborate with municipal associations in border regions with Russia and Belarus to ensure that investments are made in these regions. It was noted that these investments are crucial, as failing to support the border regions would send a negative signal.

In **Poland**, it was expressed that the ERDF and CF have played a crucial role in promoting territorial cooperation, particularly through European Territorial Cooperation (ETC) and Interreg projects. These initiatives have facilitated the exchange of best practices and problem-solving between regions, fostering sustainable, long-term partnerships. Despite increasing challenges in preparing and implementing these projects, interest in cross-border cooperation remains high, with many partnerships continuing to lead to future collaborations.

It was noted that cross-border cooperation has been significant, particularly with Slovakia and Ukraine, though direct project implementation in these regions has been limited. Additionally, cross-border cooperation with countries in the South Baltic region, such as Estonia and Lithuania, has enabled the implementation of innovative solutions like wastewater treatment. However, a gap in cross-border initiatives remains, especially following the cessation of the Poland-Russia programme, highlighting the need for more direct community engagement across borders.

In **Romania**, cross-border funding has mainly been allocated to public bodies, and representatives of civil society and social partners were not aware of any calls for projects for social partners for cross-border projects.

A representative from a regional development agency highlighted the importance of cross-border cooperation in Romania, particularly in the Western region, which borders both Hungary (an EU Member State) and Serbia (a non-EU country). For cooperation with Hungary, ERDF-to-ERDF partnerships are used, while for Serbia, IPA-to-ERDF cooperation is applied. The representative emphasised the success of these cross-border partnerships, with longstanding collaborations continuing to thrive in new projects.

It was noted that projects in this region include both small-scale, people-to-people exchanges and larger strategic initiatives such as the development of a new airport and the partnership for the Bega River Channel, which impacts both Romania and Serbia. The representative stressed that the ERDF has been crucial in supporting these cross-border initiatives, ensuring that they respect the specific character of each collaboration. This cooperation has also extended to joint infrastructure projects, including new border crossing points and optimising human resource usage across the region.

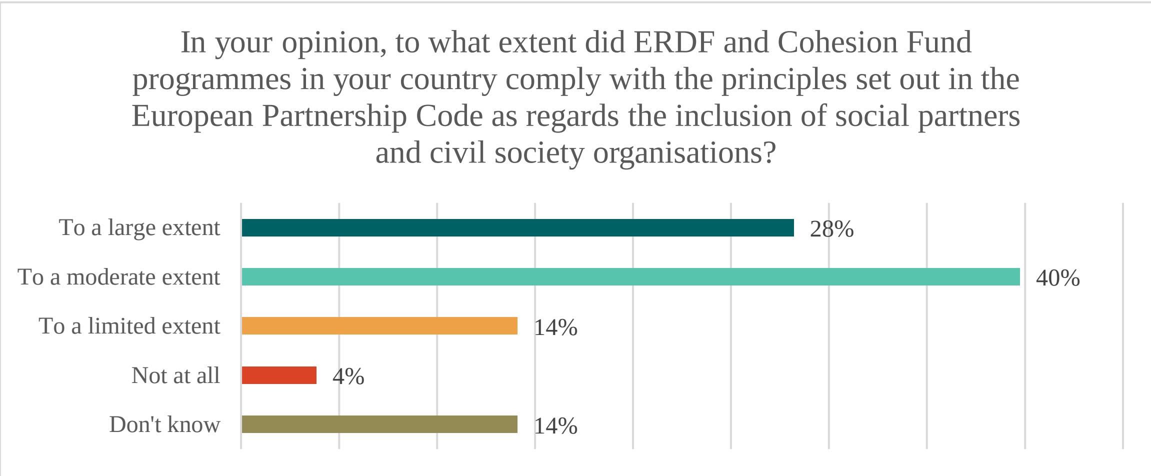
In **Spain**, stakeholders clarified that the ERDF, under the Investment for Growth and Jobs goal, does not directly support cross-border or trans-European partnerships. Instead, cooperation with neighbouring states (e.g. Portugal and France) falls under the European Territorial Cooperation goal. Cross-border partnerships, particularly European Groupings of Territorial Cooperation (EGTCs), play a key role in Interreg programs, funded by the ERDF. These partnerships focus on legal, administrative, and civil society cooperation, addressing regional needs and strengthening institutions through various projects.

3.3 Inclusion of civil society and added value

This section examines the involvement of organised civil society in the design, implementation and monitoring of the Consumer Programme 2014-2020.

Over four fifths of the respondents believed that **the ERDF and CF programmes in their country complied in some way with the principles set out in the European Partnership Code as regards the inclusion of social partners and civil society organisations**. Of the total respondents, 28% answered that this compliance was carried out to a large extent, and 40% said it was carried out to a moderate extent. Only three respondents (all from organisations that were not public authorities) said they do not comply at all. Whereas the answers were positive in all countries, Poland, Greece and Romania were the most positive.

***Question 12**: In your opinion, to what extent did ERDF and Cohesion Fund programmes in your country comply with the principles set out in the European Partnership Code as regards the inclusion of social partners and civil society organisations?*



In **Latvia**, a public authority representative noted that while the involvement of civil society organisations in the ERDF and CF processes is generally well-regulated, there are variations in effectiveness across different sectors. In areas such as welfare, where social dialogue is crucial, NGOs are essential, yet it was perceived that many representatives remain unaware of opportunities for engagement. Although progress is evident, with improved participation over time, it was acknowledged that greater awareness and involvement of NGOs could enhance the overall process.

Additionally, it was noted that the Latvian Ministry of Economy, in collaboration with partners and industry representatives, effectively adapted to external shocks like procurement issues and market changes through ongoing dialogue and feedback, enabling timely reallocations and adjustments to maintain programme effectiveness, efficiency and investment levels.

Furthermore, there was a consensus amongst **Latvian social partner representatives**, highlighting the need for simplification in processes to increase participation from businesses and municipalities in future EU funding programs.

In **Poland**, a **public authority** representative emphasised the importance of civil society's involvement, noting that Polish national legislation, particularly the Partnership Agreement, formalises this participation. It was explained that unlike other EU regulations that require monitoring committees for individual programmes, this committee, created by Polish law, brings together representatives from government, local governments and civil society organisations. This broad composition ensures that a variety of stakeholders contribute to the policy's development and implementation.

A **Polish employer representative** underlined the importance of engaging business associations in EU fund committees, particularly in shaping project selection criteria. They noted that while collecting feedback from member companies is crucial, conflicting sectoral interests often make it difficult to accommodate all opinions, necessitating a balance that serves the public interest. Furthermore, a growing awareness was observed among companies about EU funding opportunities, as more businesses seek to engage with the system. They stressed the need for stronger communication between the public sector and civil society to further enhance participation.

Additionally, a **Polish** third sector representative pointed out uneven cooperation between regions and managing authorities, particularly regarding support for functional urban areas. They stressed the need for more flexibility in funding criteria to ensure that bureaucratic barriers do not prevent eligible organisations from accessing support.

In **Romania,** a public authority representative stated that they pursued a technical assistance programme aimed at strengthening the partnership principle, with the coordination director within the ministry as the beneficiary. This project focused on organising meetings with partners and providing training. However, due to COVID, some procurement had to be cancelled, but the project was still well-received. Additionally, communication activities, such as mass media campaigns and online initiatives, were implemented to promote EU funds and showcase successful projects.

Several representatives of social partners and civil society organisations stated that public authorities in Romania are reluctant to work with civil society organisations and that there is a lack of transparency. Civil society is often only involved in project implementation or monitoring committees to meet specific requirements set out in the guidelines, resulting in short-term, unequal collaboration. This has caused a continuous distrust between civil society organisations and public authorities, which is deepening due to lack of continuous involvement. A representative of an association representing women-led SMEs in the monitoring committees stated that when they offer their help, for example by promoting the EU funding opportunities through their networks, there is a reluctancy of public authorities to collaborate and accept the help.

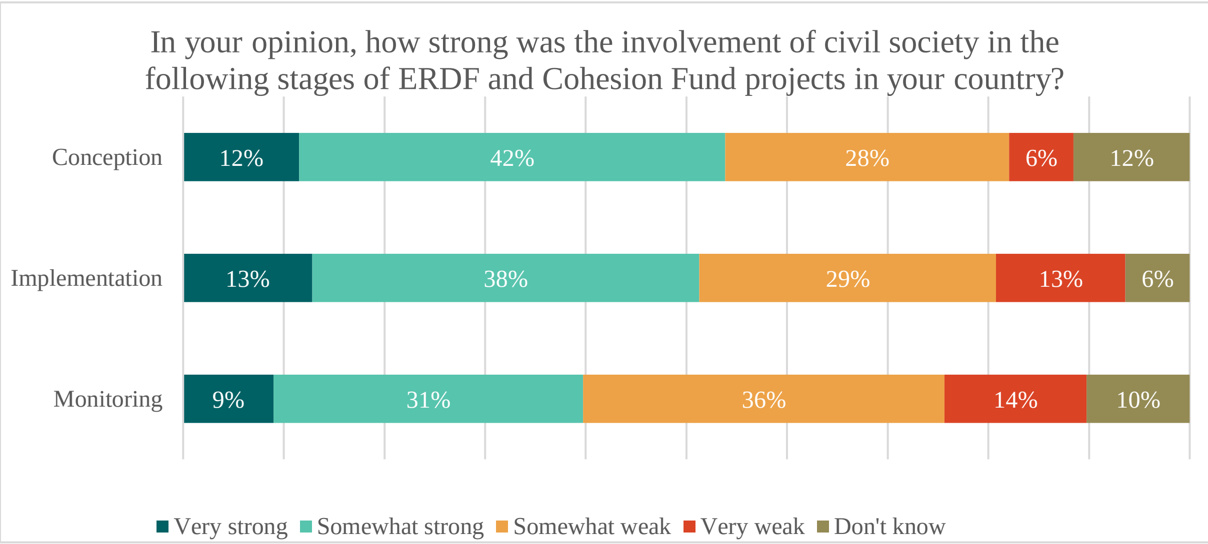
The issue of trust is also present on the side of the entrepreneurs and the social economy itself, as they do not trust the funds to solve their problems. This is caused, for example, by delays in payments, the cancellation of contracts or the complete overhaul of things within a programming period. Hence, there is a need for greater coherence and better management of the capacity of the system to deliver within the framework to which it has committed itself.

More effort is needed to encourage public authorities to work together with civil society organisations, forming cross-sectoral long-term partnerships. Only this will facilitate genuine co-creation in a collaborative manner with the different stakeholders involved.

In **Spain**, it was noted that the inclusion of social partners and civil society organisations in the ERDF and CF programs followed the principles outlined in Article 5 of the CPR, ensuring their participation in programming and implementation. However, several representatives noted challenges in actively engaging with the ERDF, citing issues such as insufficient time for meetings in the national monitoring committee. In their views, this limited their ability to review and digest shared information adequately.

On the **involvement of civil society in the several stages of ERDF and CF projects**, the answers remained positive, but much more mitigated than in previous questions. Only around a tenth of the respondents said such involvement had been very strong in the conception, implementation and monitoring phases. There is an eschew of positive answers towards the initial conception phase (42% somewhat strong) and of negative answers concerning the monitoring phase (36% somewhat weak and 14% very weak participation). Though public authorities had a slightly more positive perception, the differences between them and the rest of the respondents were not significant, meaning they shared, globally, the same views on this topic. The patterns per country observable in the previous questions remain valid in this one: Poland, Greece and Romania leaning towards a more enthusiastic perception, Latvia and Spain, though positive, more mitigated.

Question 13*: In your opinion, how strong was the involvement of civil society in the following stages of ERDF and Cohesion Fund projects in your country?*



In **Greece**, several representatives raised concerns about civil society's limited impact, suggesting their participation in programme design and partnership agreements could be more meaningful.

Furthermore, the limited cooperation with youth organisations and the lack of youth inclusion in consultations and programme design were highlighted, indicating a gap in effectively involving this group in Greece.

Several of the Greek stakeholders consulted confirmed their active involvement in the monitoring phase, through participating in committees and working groups focused on accessibility for people with disabilities.

Additionally, a Greek regional public authority representative outlined the establishment of working groups involving both regional companies and civil society, highlighting active participation in the conception and planning phases, particularly in areas like innovation, energy and entrepreneurship.

In **Latvia**, a public authority representative noted that regular consultations with the Environmental and Consultative Council helped shape investment directions, although reaching compromises sometimes required additional time. The ministry also maintained continuous communication with local government associations, ensuring that any regulatory or logistical issues are addressed promptly. It was reported that this ongoing dialogue has facilitated effective collaboration and successful implementation of investments. Furthermore, the representative highlighted the importance of engaging with the NGO sector, particularly through the Environmental Advisory Council, which includes green organisations and nature protection groups. During the 2014-2020 period, the ministry held public discussions on regulatory acts, allowing citizens and organisations to review drafts and provide feedback. To ensure that relevant groups are informed, the ministry proactively sent official notifications to organisations about these discussions. Although this was primarily focused on environmental investments at regional level, there was also ongoing communication with municipal entities and larger cities.

It was noted that cooperation between civil society organisations and the Latvian Ministry of Health was being structured through a subcommittee. In this setup, NGOs actively participate by attending meetings, asking questions and providing feedback on drafts of criteria and regulations, primarily related to the broader strategic adjustments to policies and investments.

In addition, the importance of collaborating with companies and NGOs to shape programme allocations and reallocation decisions was highlighted, which led to streamlining processes and reallocating unused funds based on stakeholder feedback to meet demand, such as consolidating equipment programmes and directing innovation funds to the SME programme.

However, several stakeholders in Latvia expressed that while participation opportunities exist (e.g. supervisory committees and working groups), capacity issues are limiting. Furthermore, it was perceived that there are insufficient resources allocated to NGOs for monitoring and overseeing the use of EU funds. In their perception, this has led to ineffective implementation and poor outcomes in some programmes.

It was noted that Latvian NGOs have been included in supervisory committees, which has improved oversight and allowed for the inclusion of diverse perspectives, particularly from marginalised groups. However, they also acknowledged that the involvement of NGOs was felt as largely formal, and their ability to influence decisions was perceived as limited. Furthermore, it was emphasised that marginalised groups, such as people with disabilities, often lack representation in decision-making processes, particularly in the allocation of EU funds.

However, a representative of women’s rights and a representative of rural communities observed that there have been improvements in the consultation process, with more efforts to include civil society organisations in the preparation of EU programmes. This has allowed for broader representation and the inclusion of feedback from a variety of sectors, including those representing vulnerable groups.

Across all regions, it was perceived by **Polish** public authorities that civil society played a central role in the preparation and implementation of the European-funded programmes, with a focus on ensuring their active participation from planning to execution. The Polish development bank representative confirmed that civil society was active in monitoring committees for their programmes. It was perceived that they played a significant role in shaping business development and innovation areas.

Furthermore, a Polish regional representative highlighted the substantial growth in NGO involvement during the 2014-2020 period, noting their increased participation in monitoring committees, regional dialogues, and public consultations. Public consultations, thematic meetings, and working groups have expanded the involvement of stakeholders throughout the programme's lifecycle.

Polish employer representatives noted the role of social partners in monitoring committees, which include trade unions and employer organisations by law. It was acknowledged that while these groups participate more easily, civil society organisations face challenges in representation. However, it was perceived that the frequent meetings of working groups within these committees have fostered better informal communication and increased influence.

Furthermore, the Polish social partners expressed concerns about the composition and voting dynamics of the monitoring committees, particularly the perceived dominance of the public sector. It was suggested that less than 50% of votes should be allocated to the public sector to provide civil society organisations with more influence, ensuring a more inclusive decision-making process.

A representative from a Polish territorial association stressed the importance of early involvement of civil society in the planning stages, which allowed their organisation to influence funding priorities. However, they raised concerns about the technical language used in EU funding discussions, which often alienates grassroots organizations and citizens. Additionally, they criticized a provision that requires the project leader to have the highest social and economic potential, which can exclude smaller NGOs, despite their expertise.

Furthermore, the ongoing challenges for NGOs in participating in monitoring committees were noted, particularly regarding exclusion from capacity-building support due to legal structures. However, they acknowledged that NGOs are increasingly invited to participate as regional authority representatives in monitoring committees, which has allowed them to engage in discussions.

Furthermore, a Polish NGO representative expressed concerns about the limited involvement of third-sector organisations in the overall funding and evaluation process. While they have participated in the evaluation process as beneficiaries themselves, they noted that third-sector organisations still have low representation and suggested more efforts to ensure better participation.

In **Romania**, multiple representatives emphasised the importance of involving civil society in all stages of the project lifecycle. Stronger mechanisms should be present to involve civil society in design, management, implementation, monitoring and control, so that more diverse expertise and views are included in the development of operational programmes. Some guidance could be taken from the legislation of the Recovery and Resilience Facility in this matter.

Civil society's participation in managing ERDF funds, including initiatives like the Community-Led Local Development (CLLD) funds, which involved local action groups, was highlighted as an example of successful collaboration. These groups ensured a balanced decision-making process, preventing any one entity from dominating, and involved a wide range of stakeholders including NGOs, academia and local bodies.

A representative from a regional development agency emphasised that civil society's role should extend beyond just project implementation and include significant contributions during the planning phase, particularly in shaping project criteria and participating in public consultations.

It was noted that for the 2021-2027 programming period, civil society will also play an active role in monitoring projects through mechanisms such as integrity pacts. These pacts allow civil society to oversee projects from start to finish, ensuring transparency and accountability. The representative noted that involvement from NGOs, public bodies and academic institutions in decision-making processes is crucial to ensuring that local voices are heard and integrated into the development process.

An example cited by the representative was the community-led development funds used during the 2014-2020 period. These funds were managed through local action groups that ensured no single entity held more than 40% of decision-making power. This collaborative model enabled civil society to participate in every stage of the project – from planning to implementation – particularly in urban areas where these funds were predominantly directed.

The importance of ensuring that vulnerable groups, such as the Roma community and people with disabilities, are included throughout the entire project lifecycle – development, implementation, and assessment. They warned that rushing projects to meet deadlines or indicators could lead to the exclusion of proper representation, which ultimately diminishes the quality and relevance of projects. More inclusion of vulnerable communities in decision-making processes concerning local and regional development policies was called for, advocating for civil society partnerships that allow for meaningful participation and better development outcomes.

In the **Romanian** monitoring committee, civil society holds 30% of the votes and meetings take place three times a year. The members of the monitoring committee have access to training to understand their role. At the moment, however, beneficiaries who are members of the monitoring committee do not have access to technical assistance. This should be improved. It would be beneficial not only to provide training, but also to create spaces for beneficiaries to represent themselves, and present their arguments and positions.

The public authority representative mentioned that various organisations were represented in the monitoring committees for both the partnership agreement and the programmes they supported, such as large infrastructure and competitiveness. It was perceived that these representatives actively participated in decision-making within these committees.

A trade union representative highlighted issues with the monitoring committee, noting that civil society has limited influence on decisions and votes. Requests for clarity or better information from civil society are often ignored. The committee should better align with its intended role in project implementation, ensure synergy with partnership codes and have the capacity to fulfil its obligations according to its internal code of conduct.

Moreover, there is a confidentiality problem in the monitoring committee, as there is no clear definition of what constitutes and what does not constitute confidential information. Additionally, conflicts of interest should be addressed. It can be problematic if, for example, an expert who is a committee member suggests reallocating funds or supporting different calls for tender, because it is unknown whether that person might have a conflict of interest. There is currently no solution to this, and both issues should be addressed at European level.

A representative of employers of women-led SMEs, who is part of the monitoring committee for the Bucharest-Ilfov regional programme, shared some positive experiences. They collaborate with a regional development agency to learn from past mistakes and work in technical subgroups, where private sector representatives are organised by expertise and work on the calls for projects dedicated to SMEs, saving time for representatives of public institutions. Meetings are transparent and direct, with final documents voted on after agreement with the regional development agency. However, the monitoring committee meetings are not held frequently enough.

In **Spain**, interviewed stakeholders expressed mixed views on the involvement of civil society across the different phases of the ERDF and CF projects.

Regarding the conception phase, civil society organisations were consulted in the preparation of the Association Agreement (AA) and the programmes through a two-step procedure, with consultations at the beginning and, later on, a draft document. The consultation process and participating partners were outlined in the AA and each program.

Regarding the implementation phase, civil society organisations are included in the implementation phase through their participation in monitoring committees, with functions defined under Article 49 of the CPR. However, several representatives noted challenges in actively engaging, such as low visibility of ERDF projects and insufficient dissemination of information about results and investments. One employer representative emphasised the need for clearer communication of the impact of these funds and suggested that social partners should play a central role, with simplified participation and targeted training.

In the monitoring phase, some stakeholders expressed frustration with their limited participation in monitoring committees and public consultations, stating that social partners were not properly convened, and there was a lack of transparency in the process. One trade union representative suggested greater involvement of social partners in the evaluation and analysis of ERDF programs, as the complexity of evaluation reports made it difficult for them to understand and disseminate the results. Furthermore, involving social partners in the dissemination of calls for projects was recommended to increase accessibility and participation.

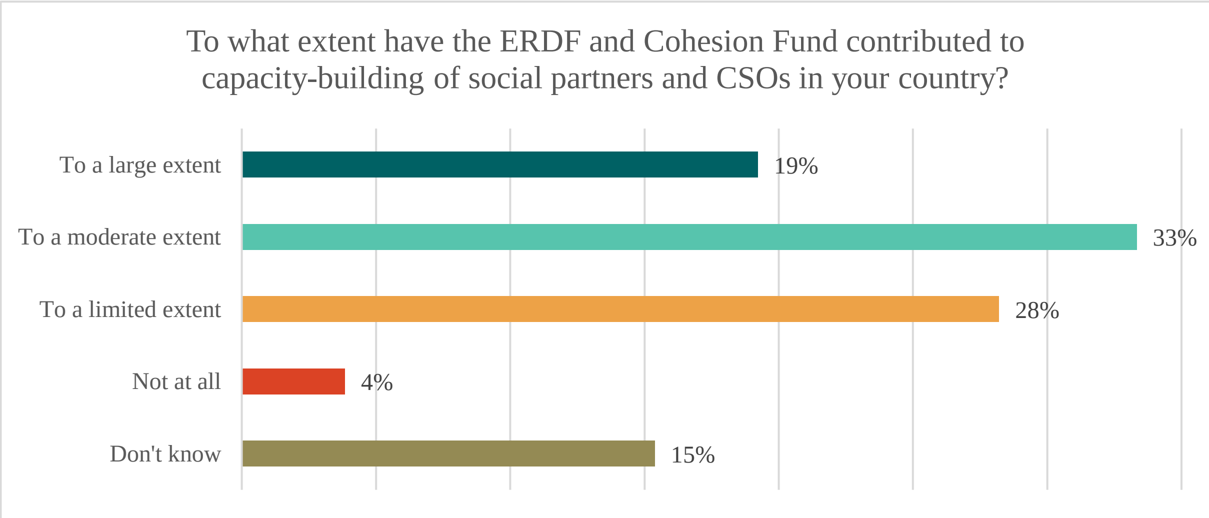
Overall, stakeholders agreed that the involvement of beneficiaries, especially in the planning and monitoring stages, should be strengthened. Beneficiaries possess valuable insights into current challenges and priorities and could contribute to more effective decision-making, reducing the risk that essential projects miss ERDF funding opportunities. More inclusive participatory processes, similar to those used for the European Social Fund, were suggested.

Respondents had a mitigated, leaning towards positive, perception of the **contribution of the ERDF and CF to capacity-building of social partners and CSOs in their countries**. Non-public authorities had a more negative perspective (12 out of 35 believed it had been limited, and three, not at all). On a country-by-country analysis, most followed closely the average evaluation. The only exception was Greece where out of 19 answers, seven were ‘to a large extent’ and six ‘to a moderate extent’, and was thus the country with the most positive perceptions.

In the country visit to **Greece**, concerns were raised about the lack of qualitative data on young people’s social and economic conditions, pointing to a need for better capacity-building and greater youth organisation involvement in programme design.

Furthermore, Greek stakeholders stressed that civil society’s involvement could be more meaningful, through enhanced capacity-building, enabling more effective contributions to programme design and implementation. Special emphasis was placed on capacity-building to address accessibility issues for people with disabilities.

***Question 14**: To what extent have the ERDF and Cohesion Fund contributed to capacity-building of social partners and CSOs in your country?*



In **Latvia**, it was noted that while the mechanisms for engagement are there, capacity constraints hinder the active participation of civil society – both to monitor everything and to reach a uniform consensus among members. It was also pointed out that, while social partners are invited to express opinions in working groups, it is unclear how much their input influences final decisions.

Furthermore, it was underlined that sometimes stakeholders are eligible for funding, however the process is not pursued due to insufficient awareness or the lack of necessary guidance on how to implement the activity.

In **Poland**, it was noted that while direct capacity-building support for NGOs was not a focus of the Ministry of Development Funds and Regional Policy, NGOs are eligible for funding to participate in the Partnership Agreement Committee meetings, monitoring committees, and to carry out information and promotional activities related to cohesion policy. This provides an avenue for NGOs to remain engaged without direct capacity-building support. Furthermore, it was underlined that NGOs have benefited from funding through technical assistance, which has supported projects aimed at strengthening non-governmental entities' roles in cohesion policy. Despite this, a need for continued capacity building was emphasised, especially for smaller organisations that may lack the resources to effectively engage with the policy.

In **Poland**, it was further underlined that while larger organisations have generally been able to navigate the system, smaller civil society groups face significant challenges that hinder their involvement and effectiveness, especially around the difficulty in meeting their **financial contributions** to projects. Despite being in a less-developed region, this issue persists, compounded by complex EU fund procedures that overwhelm these organisations. Limited access to information and the lack of specialised advice was also reported to hinder smaller groups' ability to prepare projects. Similarly, challenges faced by NGOs in more-developed regions like Warsaw were highlighted, where **co-financing rates** are lower (50%), creating barriers for organisations that struggle to meet the required contribution. This disparity affects weaker entities, with many relying on partnerships with larger organisations that specialise in EU funding. Furthermore, it was pointed out that smaller NGOs in **Poland** tend to focus on projects funded by the ESF, which are more aligned with their capabilities, whereas projects funded by the ERDF are more complex and thus less accessible to them.

A representative from a Polish NGO shared that while citizens can easily access EU funds as beneficiaries, NGOs often struggle to obtain funding due to their inability to afford the costs of hiring professionals for grant applications or analyses. They noted improvements compared to previous funding periods, but emphasised the need for more active involvement of third-sector organisations in the funding process. They also pointed out that organisations with more experienced management teams tend to fare better in securing funds, but the broader sector still faces barriers.

In **Romania**, a representative of a public authority stated that they contributed to strengthening the capacities of social partners through projects that financed the monitoring committee for the partnership agreement and organised meetings with social partners. They also mentioned working with various NGOs, regional development agencies and associations focused on territorial investment coordination. No significant issues were encountered with these groups in submitting applications or managing projects, however it was acknowledged that training for civil society representatives would be beneficial. They also noted that civil society has developed independently and has become more engaged in various activities, making civil society organisations capable of effectively representing the monitoring committees. While they did not recall a specific example for the technical assistance monitoring committee, they highlighted that discussions in the committees have become much more active and dynamic over time, compared to the initial stages.

One representative of a consulting company expressed that the ERDF's role in improving administrative capacity has been significant in building the organisational capability of public bodies and NGOs. However, it was emphasised that these funds have been more effective in hard investments rather than fostering human capital or civil society development.

On the other side, several representatives of civil society and social partners pointed out that for the 2014-2020 programming period, no funding was allocated for strengthening civil society's capacity. However, for the 2021-2027 financial framework, projects aimed at enhancing the administrative capacity of civil society and social partners will be available. This excludes organisations that have been active through voluntary work or internal resources, but which lack official proof of experience. While funding is now available to build the capacity of civil society organisations and social partners, the evaluation criteria need refining, as they currently favour organisations with past funding experience, leaving newer or dynamic organisations at a disadvantage. This limits their ability to influence public policies and access funding to grow their institutional capacity. Additionally, some organisations which were criticized during the European Semester and have done some mistakes still receive funding, highlighting the need to eliminate this discriminatory criterion.

The importance of partnerships between public authorities and civil society organisations was emphasised, particularly in the implementation of social services projects. This partnership is essential as both public authorities and NGOs bring unique perspectives to the table. However, the representative highlighted a significant challenge: many regions in Romania lack NGOs with the capacity to contribute to local or regional projects. It was perceived that this gap limits the potential for impactful social initiatives and underscores the need for stronger capacity-building efforts.

The representative underlined the fact that Romania's social society needs broader discussions about advocacy and inclusion in all stages of the development process. They pointed out that there is significant potential to build on efforts for more inclusive consultation and greater representation moving forward. This includes enhancing the capacity of civil society organisations not only to be beneficiaries of policies, but also to actively design and shape them.

In **Spain**, the difficulty experienced by social partners and CSOs in acquiring the technical knowledge needed to effectively participate as partners or beneficiaries was highlighted as a key challenge. In response, the Managing Authority for the 2021-2027 period committed to providing online training for members of monitoring committees, including CSOs, to enhance their administrative capacity.

A trade union representative suggested that training opportunities should be expanded to better support social partners in enhancing their capacity to participate actively in management. Although some regions, like Galicia, have provided online training and real-time project monitoring platforms, access to these resources has been problematic. Stakeholders expressed a desire for social partners not only to access these platforms but also to participate and contribute, a suggestion that has yet to be fully implemented.

Furthermore, general awareness of EU actions, especially regional policy, in the country, is on par with the EU average, as reported in various Eurobarometer editions. Key ERDF communication activities that have had a significant impact include an annual communication event with citizen participation, featuring a project contest that highlights the real impact of European-funded projects on society. Additionally, the European funds' website and social media provide up-to-date information on funded projects and the activities of managing bodies, such as technical meetings, seminars and institutional events. Thematic networks focused on areas like R&D, the environment and equality also play a crucial role by connecting experts and representatives in specialised fields.

3.4 <u>Additional comments</u>

Respondents were given the opportunity to raise **further issues that were not included in the questionnaire, or to expand on issues that they thought deserved additional attention** (**Question 15**). In summary of the additional contributions (per country):

In **Greece**, there was a call for strengthening the logic behind fund disbursement, specifically by making information more accessible to small businesses.

In **Latvia**, corruption concerns were noted between local NGOs and state institutions. It was noted that the funds have enabled activities that would otherwise not have been possible. However, it was expressed that separating ERDF and CF data from ESF data can be challenging. Additionally, the need for more climate-neutral projects was underlined, including initiatives for reducing car use, promoting cycle paths, and supporting business-related traffic infrastructure.

In **Romania**, it was perceived that legislative delays, lack of responsibility, and inefficient use of funds have hampered the successful implementation of ERDF projects. Key issues identified were long execution deadlines, delays caused by local authorities and increasing costs due to administrative inefficiencies. Recommendations of stakeholders included operationalising non-segregation principles in regional development and enhancing the participation of vulnerable groups (e.g. Roma, people with disabilities) in local decision-making processes. Furthermore, it was underlined that the implementation process has benefitted from shared management but still faces challenges.

In the country visit to Romania, representatives shared some negative examples which should be avoided in the future, and from which lessons can be learned. The monitoring committee for the implementation of the Recovery and Resilience Facility has not been convened by the ministry for more than 18 months. Furthermore, in the public debate on the energy strategy in Romania for 2030-2050, concrete and detailed proposals from SMEs and associations representing SMEs were completely ignored and not taken into account in the final energy strategy of Romania. Another negative example relates to the communication of the Industrial Strategy in August 2024 by the Ministry of Economy and Entrepreneurship. It was not announced by a press release or sent by e-mail to the stakeholders concerned. In addition, an unreasonable deadline of 10 calendar days was set during the summer break. Despite the submission of valuable input from many relevant stakeholders, there is still no consolidated version of the Industrial Strategy.

In **Spain**, it was expressed that administrative procedures remained heavily bureaucratic despite announcements of simplification for the 2014-2020 period. Furthermore, there was a call for a more streamlined regulatory framework and greater alignment between ESF+ and ERDF for better synergy. NGOs managing ESF and ESF+ need infrastructure support from ERDF, particularly in addressing housing issues, including shantytowns and vulnerable neighbourhoods.

4. Secondary data: literature review of EESC work

4.1 EESC Opinions related to Cohesion before the 2014-2020 period

In ECO/288 on the *5th Cohesion Report* (2011), the EESC endorses the European Commission's objectives for the future cohesion policy: enhancing European added value, strengthening governance, simplifying management and improving organisation.

Achieving these goals requires improved strategic programming, prioritisation of a few key objectives, social and economic mobilisation and participation of socio-economic partners, reforms to additionality and co-financing principles, as well as making impact assessments mandatory. Socio-economic partnerships and the dissemination of best practices should be standard and compulsory across cohesion policy processes.

Simplifying processes related to cohesion policy should be a main objective and can be enhanced by streamlining administrative procedures, improving monitoring and evaluation criteria, and reducing the procedures for presenting plans and projects. Furthermore, the implementation of a single authority in charge of coordinating and managing the five structural funds is essential, in order to establish functional and strategic coordination between the various funds.

In ECO/291 on *Role and priorities of Cohesion Policy/EU 2020* (2011), the EESC states that the effectiveness and efficiency of the funding and spending of cohesion policy should be improved. Cohesion Policy should also better align with the Europe 2020 strategy, which has the objective of fostering smart, sustainable and inclusive growth.

The EESC supports creating a common strategic framework to translate these goals into investment priorities. Cohesion policy should prioritise societal, social and solidarity objectives.

To facilitate closer policy and technical cooperation and coordination, it would be favourable to implement an integrated structural policy in a fully coherent set of general community policies, which could be called EU 2050.

In ECO/370 on the *6th Cohesion Report* (2015), the EESC acknowledges the efforts made to improve Europe, but highlights the challenges of increasing social and economic disparities among Member States due to crises.

Cohesion Policy should continue to pursue its original objective of promoting social, economic and territorial cohesion, placing cooperation and solidarity at the service of harmonious development and creating prosperous communities.

In many cases, cohesion policy presents the main investment source, and it must become more ambitious and undergo significant revision to boost economic growth and employment. Cohesion policy should continue to balance economic growth and competitiveness with social objectives to achieve smart and inclusive growth.

4.2 EESC Opinions related to Cohesion for the 2014-2020 period

In ECO/418 on *Islands in the EU: from structural handicap to inclusive territory* (2017), the EESC calls on the EU to recognise the special challenges islands face, and the fact that key EU policies, like the Single Market, competition policy, transport policy, rural development policy and fisheries policy, must be applied with greater flexibility.

Priority should be given to improve access to public services and to promote sustainable growth, full employment, competitiveness and cohesion, addressing the needs of disadvantaged groups, including people with disabilities. The high potential of Islands for clean energy solutions should be fully supported.

All island regions should be eligible for post-2020 cohesion policy. The European Commission should adopt a more appropriate legislative framework regarding state aid for islands and island regions, as well as improve coordination via the Commission's Inter-service Group on Territorial and Urban Development.

In ECO/460 on the *Multiannual Financial Framework after 2020* (2018), the EESC emphasises the high European added value of the MFF's focus on increased expenditure, but regrets that these came at the expense of significant cuts to cohesion policy (-10%). It strongly opposes reductions to the ERDF (-12%), CF (-46%), and European Social Fund (-6%, in real terms), advocating instead for maintaining their current funding levels.

The EESC supports increasing EU revenue from own resources, ensuring these methods align with EU policy goals, and welcomes the elimination of budget rebates for Member States that were large financial contributors to the EU budget. It also supports the InvestEU guarantee, but criticises the fact that it does not properly address the EU investment deficit. It also expresses concern that a rigid interpretation of the Stability and Growth Pact and co-financing requirements for cohesion policy hinder access to funds for the Member States most in-need. It calls for greater flexibility in the MFF and prioritisation of the European Semester for budget implementation.

In ECO/462 on the *Regulation on the European Regional Development Fund and Cohesion Fund* (2018), the EESC stresses the importance of cohesion policy as a key tool to reduce inequalities and disparities, and to bring the EU closer to its citizens. It strongly opposes the budget cuts of 12% to the ERDF and 46% to the CF, and warns that the lower national co-financing rates will hinder project implementation, particularly in Member States with budgetary constraints.

The EESC regrets the exclusion of horizontal principles such as equality, non-discrimination, and accessibility for persons with disabilities in the proposal for regulations. It urges the European Commission to adopt more flexible co-financing criteria, fully integrate the UN Convention on the Rights of Persons with Disabilities (UNCRPD) into the main text of the regulations and the CPR regulation, and account for additional social indicators in cohesion policy.

The EESC recommends establishing a European Civil Society Cohesion Forum and increasing the budget for European Territorial Cooperation in the new programming period. It welcomes the Commission's efforts to simplify the use of funds and enhance multi-level governance, emphasising the importance of strengthening civil society participation.

In ECO/484 on *The future of cohesion policy* (2019), the EESC underscores cohesion policy as essential for reducing disparities and inequalities across the EU, and strongly criticizes the proposed budget cuts for 2021-2027.

It advocates aligning cohesion policy with the UN 2030 Agenda and Sustainable Development Goals to address today's social and economic challenges effectively. Investment and policy responses of cohesion policy should be more regionally differentiated, and the EESC calls for all regions to be eligible for funding. The EESC supports stronger links between cohesion policy, the European Semester and investment strategies of the EU and Member States, to enhance complementarity.

It believes that the regulatory package and accessing funds for small-sized projects should be simplified. It also supports the use of financial instruments, but urges the European Commission to thoroughly assess their suitability for all Member States before implementation.

In ECO/514 on *The role of EU structural and cohesion policy in driving forward the transformation of the economy in an innovative and smart manner* (2020), the EESC states that cohesion policy is fundamental for addressing challenges caused by the COVID-19 pandemic.

A quick response is necessary to rebuild Europe's economy, protect employment and social rights. Interventions should push forward the digitalisation of services, strongly support e-business models and expand broadband infrastructure to foster modern agriculture and tourism in rural areas.

It is necessary to better protect SMEs and support infrastructure and investments that facilitate life-long training schemes and the acquisition of new skills.

The EESC fully supports the 'Green Deal' and the 'REACT programme', and urges the European Commission to inform and clarify Member States about conditions and distribution criteria. It should also be ensured that civil society organisations are actively involved in regional policies.

In ECO/547 on *Evaluation of the implementation of e-Cohesion in Programmes financed by ERDF and Cohesion Fund 2014-2020* (2021), the EESC emphasises that e-Cohesion will be crucial in simplifying, implementing and managing EU cohesion policy funds for the 2021-2027 programming period.

Consultations with civil society organisations and public authorities of five selected EU countries, revealed that the e-Cohesion systems are useful tools and that they have enhanced the efficiency of cohesion policy implementation. The COVID-19 pandemic highlighted the need to further streamline and improve the e-Cohesion systems, which ensures a constant information exchange of all stakeholders.

Several good practices, like open data systems, interoperability and training and assistance for beneficiaries were identified and should be accounted for in future regulations or systems.

4.3 **EESC Opinions related to Cohesion after the 2014-2020 period**

In ECO/579 on *8th Cohesion Report* (2022), the EESC stresses that social, economic and territorial cohesion is key for achieving climate-neutrality in the EU by 2050.

The EESC highlights two current major crises: Russia's invasion of Ukraine and the impact of the COVID-19 pandemic. It strongly supports Ukraine's swift integration into the EU and advocates for a dedicated EU fund for Ukraine's reconstruction and development. Civil society organisations should make rapid and effective use of CARE (Cohesion's Action for Refugees in Europe) to increase their operational capacity in supporting Ukrainian refugees, particularly in labour market integration.

Regarding COVID-19, the EESC stresses that cohesion policy must address the disproportionate impact on less developed regions and disadvantaged social groups. The crisis has revealed the need for stronger political cohesion and a reinforced coordinating role for EU institutions during crisis.

The EESC calls for cautious application of the additionality principle and ex-ante conditionalities in a way that does not disadvantage regions without alternative funding sources. It calls for a reformed fiscal policy approach that ends the current prevailing competition between Member States. Moreover, in-depth reforms of fiscal rules are essential, focusing on sustainable public debt, European economic governance, and progressive and equitable EU tax collection.

Cohesion policy should achieve the climate objectives while at the same time implement all 20 principles of the European Pillar of Social Rights, ensuring high-quality jobs at regional level and establishing robust social protection systems that combat poverty and exclusion.

The EESC also stresses that the digital transition is a key element of cohesion policy, promoting productivity, education and social participation, including disadvantaged groups. Universal access to broadband internet as a free public service is deemed essential.

Finally, the EESC urges the Member States and the EU to actively involve social economy entities, social partners, and civil society organisations in the implementation and monitoring of cohesion policy. It calls for supportive measures, such as targeted financial assistance, simplified rules, reduced bureaucratic burdens and preferential treatment in public procurement.

In ECO/610 on *Harnessing talents in EU regions* (2023), the EESC supports the development of targeted regional territorial strategies tailored to local characteristics of regions.

It stresses the importance of ensuring freedom of movement across the EU and addressing labour and skills shortages through long-term solutions, such as improved infrastructure.

It urges the European Commission and Member States to adopt European labour market and cohesion policies that leave no worker or region behind, and that are based on sustainable investment in quality jobs, access to training and essential services, social dialogue, as well as collective bargaining. Member States should also develop policies for skills and lifelong learning.

Moreover, the EESC calls for efficient and effective social dialogue, participation of civil society organisations and collaboration between civil society organisations, private and public entities.

In ECO/261 on *The Recovery and Resilience Facility and cohesion policy: towards cohesion policy 2.0* (2023), the EESC reaffirms that the core principle of cohesion policy – leaving no one behind – remains essential. Civil society organisations will continue supporting this goal.

The EESC highlights that inequality of opportunity harms growth and competitiveness across all levels, urging a more diversified and flexible cohesion policy focused on people's needs.

The range of instruments and approaches should be broadened and modernised, focusing more on capacity, interregional links, effectiveness of results and opportunities for beneficiaries. The Recovery and Resilience Facility should be fully compatible with future cohesion policy.

Particular support should be given to social groups with lower employment rates, through tailored training and reskilling programmes.

While protecting SMEs remains vital, financing large companies is also key for driving convergence.

Cohesion policy should remain central in supporting climate goals and for reducing rural-urban gaps. It should also ensure that the benefits of digitalisation are distributed effectively and equally, and that no one is left behind. EU Member States and regions should involve the social partners and other civil society organisations as broadly and genuinely as possible.

Diversification and specialisation should be better tailored across financial support, budget management and investments, with the broader involvement of social partners and civil society organisations. Streamlining cohesion policy through simpler and more flexible processes is essential in order to improve accessibility and effectiveness.

In ECO/639 on *The role of cohesion policy in upcoming rounds of EU enlargement* (2023), the EESC emphasises the importance of pre-accession aid as a key tool for EU enlargement. It calls for this aid to be better tailored to the specific strengths, challenges and needs of each region, with increased investment in human capital, education and social integration to reduce inequalities.

Future cohesion policy in candidate countries should focus on the protection and active inclusion of vulnerable groups, the inclusion of civil society organisations and improving the skills and employment of young people. These efforts should be accompanied by efforts enhancing institution building, governance reform, and strengthening civil society involvement. Moreover, regions bordering candidate countries should receive special support to deal with the changes on the labour market and international value chains resulting from EU enlargement.

In ECO/646 on the *Ninth Report on Economic, Social, and Territorial Cohesion* (2024), the EESC advocates focusing investments on policies that strengthen the manufacturing base to promote upward territorial cohesion. It highlights the importance of productive investment and competitiveness, which drive economic cohesion with positive spill-overs for social and territorial cohesion.

A well-functioning, inclusive labour market and complementary employment policies are essential, in order to reduce unemployment.

Increased investment in local and regional administrations is needed to enhance their capacity. The EESC calls for full and active involvement of local and regional authorities, social partners, and civil society in shaping and implementing cohesion policy. It stresses the need for adequate funding, urging a more ambitious MFF budget, and recommends adopting automatic, user-friendly investment tools to support the transition to a smarter, greener Europe.

In ECO/650 on *No one should be left behind! For an inclusive and participatory cohesion policy* (2024), the EESC underscores the continuing importance of cohesion policy's core principle: 'no one should be left behind' and calls on the EU and Member States to safeguard economic, social, and territorial cohesion. To achieve this, cohesion policy must become more flexible, diversified, stable and transparent, aiming to enhance social inclusion and reduce inequality of opportunities.

The EESC opposes eliminating a dedicated Commissioner for cohesion policy and criticises transforming it into a crisis management tool or a mechanism similar to the Recovery and Resilience Facility, which lacks stakeholder involvement, shared management and multi-level governance. It advocates for strong civil society participation for the next Common Provisions Regulation and stresses the need for a place- and people-based cohesion policy.

The EESC also recommends broadening, modernising, and revising cohesion policy instruments to ensure a cohesion policy that focuses more on capacity, interregional effectiveness of results and opportunities for beneficiaries beyond mere investment.

In ECO/640 on the *Revision of the Territorial Agenda 2030 – Towards a more integrated and civic approach with stronger links to cohesion policy* (2024), the EESC emphasises the need for the Territorial Agenda (TA) to prioritise ensuring 'the freedom to stay' in one's chosen place of residence, and promoting full economic, social, and territorial cohesion as well as strengthening the competitiveness of all regions.

The EESC calls for better alignment, coordination, and integration between the TA 2030 and cohesion policy, with the TA serving as a strategic tool to address regional challenges and cohesion policy ensuring its implementation. It welcomes the use of pilot actions to develop the TA 2030, but highlights the need to further enhance integrated territorial development processes encompassing social, economic, and environmental dimensions.

The EESC stresses that the cohesion, sustainability and resilience of the EU's territories cannot be effectively addressed using isolated or conventional approaches. It recommends incorporating the TA into the European Semester process, guided by ESPON's insights. Finally, the EESC calls for the full participation of civil society and socio-economic partners in planning and implementing the TA 2030.

5. List of organisations consulted

Organisation Name	Member State	Questionnaire	Meetings
Association Of Greek Tourist Enterprises (SETE)	Greece	X	X
BSE	Greece	X	
Crete Programme Management Special Service	Greece	X	
Economic Chamber of Greece (OEE)	Greece		X
Epirus Programme EYD (evaluation unit)	Greece	X	
Epirus Programme EYD (general administration)	Greece	X	
General Confederation of Greek workers (GSEE)	Greece		X
General Secretariat for ERDF & CF Ministry of Economic Affairs and Finance	Greece	X	X
Get Involved, Youth organisation	Greece		X
Hellenic Confederation of Professionals, Craftsmen and Merchants (GSVEE)	Greece		X
Hellenic Federation of Enterprises (SEV)	Greece		X
Ministry Of Climate Crisis and Civil Protection	Greece	X	
Municipality of Korydallos	Greece	X	
National Confederation of People with disabilities (ESA-AMEA)	Greece	X	X
NSRF Executive Structure of The Ministry of Shipping and Island Policy	Greece	X	
Secretariat-General for Sectoral Programmes ERDF, CF & ESF	Greece	X	
Secretariat-General for the NSRF	Greece	X	
Special Management Service for The Environment and Climate Change and Civil Protection Programmes	Greece	X	

Organisation Name	Member State	Questionnaire	Meetings
Special Service for State Aid	Greece	X	
Special Service for The Management of the ‘Attica’Programme	Greece	X	
Special Service for the Management of the ‘Ionian Islands’ Programme	Greece	X	
Special Service for The Management of the ‘South Aegean’ Programme	Greece	X	
Special Service for The Management of The Peloponnese Programme	Greece	X	
Special Service for The Management of the Programme ‘Eastern Macedonia, Thrace’	Greece	X	
Western Greece Regional administration	Greece		X
Alliance for Transversal Sustainable Development	Latvia	X	
Association of Large Cities	Latvia		X
Central Finance and Contracting agency of the Republic of Latvia	Latvia	X	
Chamber of Commerce and Industry	Latvia		X
EAPN-Latvia, Association	Latvia	X	
Employers Confederation	Latvia		X
Industry Federation	Latvia		X
IT Cluster	Latvia		X
Jēkabpils municipality	Latvia	X	
Jūrmala State City Administration	Latvia	X	
Latvian Adult Education Association	Latvia	X	
Latvian Construction Association	Latvia		X
Latvian Trade Union	Latvia		X

Organisation Name	Member State	Questionnaire	Meetings
Liepāja City Council Administration	Latvia	X	
Managing Authority	Latvia	X	
Ministry of Economy	Latvia	X	X
Ministry of Health, EU Funds Planning Division	Latvia	X	X
Ministry of Justice of Republic of Latvia	Latvia	X	
Ministry of Smart Administration and Regional Development of the Republic of Latvia	Latvia	X	X
Ministry of Welfare	Latvia	X	
Municipality of Valmiera region	Latvia	X	
Ogre municipality	Latvia	X	
Rural Consultation Centre	Latvia		X
Treasury Republic of Latvia	Latvia	X	X
University of Latvia	Latvia		X
Women's NGOs Cooperation Network of Latvia	Latvia	X	X
Youth Council	Latvia		X
Association of the Rzeszów Functional Area	Poland	X	X
Charity Association 'Res Sacra Miser'	Poland	X	X
Confederation 'Leviathan' (Konfederacja „Lewiatan")	Poland		X
Dr Wanda Błeńska School of Social Sciences in Piątków	Poland	X	
Federation of Polish Entrepreneurs	Poland	X	
Grand Masurian Lakes Association 2020	Poland		X
Marshal's Office of Małopolska Voivodship, Małopolska Centre for Entrepreneurship	Poland	X	
Marshal's Office of the Łódzkie Voivodship	Poland	X	

Organisation Name	Member State	Questionnaire	Meetings
Marshal’s Office of the Silesian Voivodship	Poland	X	X
Masovian Voivodship	Poland		X
Ministry of Development Funds and Regional Policy	Poland		X
National Alliance of Trade Unions	Poland	X	
Olsztyn Science and Technology Park	Poland	X	
Polish Development Bank	Poland	X	X
PRP, Employers of the Republic of Poland	Poland		X
Trade Union ‘Solidarity’	Poland	X	
Trade Unions Forum	Poland	X	
Braşov County Sustainable Development Agency	Romania	X	
Bucharest - Ilfov Regional Development Agency	Romania	X	X
Centre Regional Development Agency	Romania		X
Cluj Metropolitan Area Intercommunity Development Association	Romania	X	X
Concordia Employers’ Confederation	Romania		X
Distributie Energie Oltenia SA	Romania	X	
Divers Association Tîrgu Mureș	Romania	X	X
Esențial Consulting	Romania	X	
Europuls	Romania		X
Federation for Sustainable Innovation and Competitiveness in SMEs (FICSIMM)	Romania		X
fonduri-structurale.ro	Romania	X	
Galați Community Foundation	Romania		X
Ilfov County Council	Romania	X	

Organisation Name	Member State	Questionnaire	Meetings
Ministry of Investments and European Projects – Managing Authority for the Operational Programme Technical Assistance 2014-2020	Romania	X	X
Mures Community Foundation	Romania	X	
Northeast Regional Development Agency	Romania		X
OIR PECU Region Bucharest-Ilfov	Romania	X	
Regional Development Agency Bucharest Ilfov	Romania	X	
Regional Development Agency SV Oltenia	Romania	X	
Romanian Social Development Fund (FRDS)	Romania	X	X
Trade Union IMPACT	Romania	X	X
Trade Unions group at the Romanian Economic and Social Council	Romania		X
West Regional Development Agency	Romania	X	
Women Entrepreneurs Organisation (OFA)	Romania	X	X
Andalucía Emprende, public foundation	Spain	X	
Barcelona Supercomputing Centre	Spain	X	
CEOE, Spanish Confederation of Business Organizations	Spain	X	X
CIG, Galician Trade Union Confederacion	Spain	X	X
COCEMFE Confederación Española de personas con discapacidad física y orgánica	Spain	X	
Confederación Empresarial Española de la Economía Social, CEPES	Spain	X	X
EGTC – Galicia and North of Portugal	Spain	X	
Fisabio Foundation	Spain		X
Fundación Secretariado Gitano	Spain	X	X

Organisation Name	Member State	Questionnaire	Meetings
Junta de Extremadura (coordination)	Spain	X	
Junta de Extremadura (management European funds)	Spain	X	
Ministry of Finances - Directorate General of European Funds	Spain		X
NUTRICROP S.L.	Spain	X	
Organismo Intermedio de Extremadura	Spain	X	
UGT, Spanish General Union of Workers	Spain		X
Xunta de Galicia, Finances and Public Administration secretariat	Spain	X	
Total		**78**	**54**