

Public Consultation on EU funds in the area of Cohesion

Fields marked with * are mandatory.

Introduction

[Read the introduction](#)

Guidance

- **Are you replying as a as an individual in your personal capacity?** If so, please tick the first option under question 1. You will then be invited to enter your personal details and then led directly to questions 27 to 40 which relate to EU funds in the area of cohesion.
- **Are you replying as an entity or in your professional capacity?** If so, please tick the second option under question 1. You will then be invited to enter your personal details as well as information on the entity of behalf of which you are replying and then then led directly to questions 27 – 40 which relate to EU funds in the area of cohesion.
- **In both cases, you may skip the non-mandatory questions and upload a document** (1 MB max) under point 41 and enter any other comment under point 42. Please do not include any personal data in documents submitted in the context of the consultation if you opt for anonymous publication. It is important to read the specific privacy statement for information on how your personal data and contribution will be dealt with.

About you

*1 You are replying

- as an individual in your personal capacity
- in your professional capacity or on behalf of an organisation

*8 Respondent's first name

Filip

*9 Respondent's last name

Chraska

*10 Respondent's professional email address

filip.chraska@eapb.eu

*11 Name of the organisation

European Association of Public Banks (EAPB)

*12 Postal address of the organisation

Avenue de la Joyeuse Entrée 1, 1000 Bruxelles

*13 Type of organisation

Please select the answer option that fits best.

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- International or national public authority
- Other

*22 Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

*23 If so, please indicate your Register ID number.

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*24 Country of organisation's headquarters

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia

- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

***26 Your contribution,**

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

EU Funds in the area of cohesion

27 Please let us know whether you have experience with one or more of the following funds and programmes

at most 6 choice(s)

- The European Regional Development Fund (ERDF)
- The Cohesion Fund (CF)
- The European Social Fund (ESF)
- The European Globalisation Adjustment Fund (EGF)
- The Fund for European Aid to the Most Deprived (FEAD)
- Employment and Social Innovation (EaSI)

28 Please let us know to which of the following one or more topics your replies will refer

at most 3 choice(s)

- Economic and sustainable development
- Employment, skills and education
- Social inclusion

29 The Commission has preliminarily identified a number of policy challenges which programmes/funds under the policy area of cohesion could address. How important are these policy challenges in your view?

	Very important	Rather important	Neither important nor unimportant	Rather not important	Not important at all	No opinion
a. Promote economic growth in the EU as a whole	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>n. Promote sound economic governance and the implementation of reforms</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>o. Other (please give degree of importance here and fill in question 30 below)</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

30 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

Implementation of EU policies as close to citizens as possible, highly transparent, flexible and non-bureaucratic.

31 To what extent do the current programmes/funds successfully address these challenges?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Promote economic growth in the EU as a whole	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
o. Other (please give degree of importance here and fill in question 32 below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

32 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

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

- To a large extent
- To a fairly large extent
- To some extent only
- Not at all
- Don't know

34 Please explain how the current programmes/funds can add value compared to what Member States could achieve at national, regional and/or local levels

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

In context of the additionality principle, EU funds from EFRE and ESF contribute significantly to the EU and national promotional target. EU funds initiate and intensify investments, notably in areas of research and development and infrastructure. However, the use of ESI funds is highly complex and bureaucracy with application, approval, disbursement and proof for sound spending significantly increased in the present programming period. For the programming period post 2020 simplification in the context of ESIF is indispensable. In addition it is important to facilitate the compatibility between the EU- and the national funds and leave it to the discretion of the Member States to choose the appropriate mix of funding instrument as well as aligning them to changes if necessary.

35 Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

1. Member States should be authorized to prioritize their own targets. Additional bureaucracy should be proportional to the funding amount.
 2. Thematic field digitalisation: Analysis of the social impact in all areas and the development of concepts tackle the resulting consequences. This means not only promoting investment in digital infrastructure but also measures to reduce the negative consequences of the respective changes e.g. on the labour market and in the educational system.

36 To what extent do you consider the following as obstacles which prevent the current programmes /funds from successfully achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Complex procedures leading to high administrative burden and delays	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Heavy audit and control requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c. Available funding does not address the real challenges	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Insufficient administrative capacity to manage programmes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Insufficient information about funding and selection process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
f. Lack of flexibility to react to unforeseen circumstances	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Difficulty of combining EU action with other public interventions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Insufficient synergies between the EU programmes/funds	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Difficulty to ensure the sustainability of projects when the financing period ends	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Insufficient use of financial instruments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Co-financing rates	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Late disbursement of funds / delays in payments to beneficiaries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Insufficient linkages of the Funds with the EU economic governance and the implementation of structural reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
n. Legal uncertainty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
o. Insufficient ownership	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
p. Insufficient involvement of civil society in design and implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
q. Other (please specify below)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

Multiple controls including the control of the controllers, lead to a lack in mutual confidence.
The delayed adoption of the new legal package when changing from one funding period to the next leads to significant interruption of programs and funding.

38 To what extent would these steps help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
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a. Alignment of rules between EU funds	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Fewer, clearer, shorter rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. More freedom for national authorities to set rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. More flexibility of activity once funding is eligible	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. More flexibility of resource allocation to respond to unexpected needs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Simplify the ex-ante conditionalities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. More effective stakeholders' involvement in the programming, implementation and evaluation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other (please specify below)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

39 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

1. Cohesion policy aims at reducing disparities between regions. Regional authorities know the needs of their respective region best and should be enabled design programmes and instruments which address the specific needs of their region.
2. State aid rules should be simplified the way that with the approval of the Operational Programme, the funds should be defined per se as "no aid" or at the very least, the funding of beneficiaries from the OP should be declared compatible with the common market.
3. The collection of data should be limited the most relevant data.
4. The legislative framework, including all legal documents must be adopted and published before the start of the new funding period.
5. The legal framework needs to be reliable and should not be modified during a funding period.

40 How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication? For example, would you consider grouping/merging some programmes/funds?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

Merging/grouping alone is not sufficient. It has to be combined with fewer, clearer and shorter rules. Otherwise there will be a risk that rules for implementation and audit will become more complex and hence overcompensate the intended advantages. To facilitate the combination of programmes/funds, we suggest in case of the combination of programmes/fund , to apply only the rules of one programme/fund.

Document upload and final comments

41 Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

fb5873ac-465d-4f31-b6c4-72f407907832/EAPB_ESIF_post_2020_position.pdf

42 If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

1500 character(s) maximum

Contact

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