

# Public consultation on EU funds in the area of investment, research & innovation, SMEs and single market

Fields marked with \* are mandatory.

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### Introduction

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'A stronger Union needs to be equipped with appropriate financial means to continue to deliver its policies. The Union has changed fundamentally in recent years, as have the challenges it faces. Our Union needs a budget that can help us achieve our ambitions. The Multiannual Financial Framework for the period after 2020 must reflect this.' (Commission Work Programme 2018)

The EU budget currently amounts to less than 1 euro per citizen per day. Although a modest budget, at around 1 % of the EU's gross national income or 2 % of all EU public spending, it supports the EU's shared goals by delivering essential public goods and tangible results for EU citizens. These include: investing in skills, innovation and infrastructure; ensuring sustainable food systems and developing rural areas; ensuring a clean and healthy environment and the protection of natural resources; promoting joint research and industrial projects; funding shared activities in the field of migration and security; and supporting development and humanitarian aid.

The current Multiannual Financial Framework — the EU's long-term budget — runs until the end of 2020. In 2018, the Commission will put forth comprehensive proposals for the post-2020 Multiannual Financial Framework and for the next generation of financial programmes that will receive funding. These programmes/funds provide financial support to hundreds of thousands of beneficiaries such as regions, towns, NGOs, businesses, farmers, students, scientists, and many others.

The Commission's proposals will be designed to make it possible for the EU to deliver on the things that matter most, in areas where it can achieve more than Member States acting alone. This requires a careful assessment both of what has worked well in the past and what could be improved in the future. What should the priorities be for future policies and programmes/funds? And how can they be designed to best deliver results on the ground?

As an integral part of this process and following on from the [Reflection Paper on the Future of EU Finances](#), the Commission is launching a series of public consultations covering all the major spending areas to gather views from all interested parties on how to make the very most of every euro of the EU budget.

The EU has developed a variety of instruments to stimulate investment and entrepreneurship to create jobs and growth. The Investment Plan for Europe, the so-called Juncker Plan, aims to unlock investment throughout Europe through to the European Fund for Strategic Investments (EFSI), which provides a EU guarantee to mobilise investment. The EFSI also complements other existing instruments like COSME that make it easier for small and medium-sized enterprises (SMEs) to access finance in all phases of their lifecycle – creation, expansion, or business transfer. Through EU support, businesses have easier access to guarantees, loans and equity capital.

Research and innovation are instrumental for addressing the EU's productivity gap and play a crucial role in providing solutions to many global challenges the EU and its citizens are facing today. In that context, the EU has made a major contribution with the Horizon 2020 programme.

The European Single Market is one of the EU's greatest achievements. It has fuelled economic growth and made the everyday life of European businesses and consumers easier. A well-functioning Single Market, including in its digital dimension, stimulates competition and trade, improves efficiency, raises quality, and helps cut prices. In that context, the EU has set up several programmes in a wide range of areas (health, food safety, customs...) to facilitate the free circulation of goods, services, capital and persons across the European continent.

Recent consultations already covered several policy areas, including on current performance and future challenges. The views already expressed by stakeholders in these consultations will be taken into account as part of the current process for the future MFF.

Link to portal for recent consultations:

[https://ec.europa.eu/info/consultations\\_en](https://ec.europa.eu/info/consultations_en)

Interim evaluation of the programme for the competitiveness of enterprises and small and medium-sized enterprises (COSME) (2014-2020)

[https://ec.europa.eu/info/consultations/interim-evaluation-programme-competitiveness-enterprises-and-small-and-medium-sized-enterprises-cosme-2014-2020\\_en](https://ec.europa.eu/info/consultations/interim-evaluation-programme-competitiveness-enterprises-and-small-and-medium-sized-enterprises-cosme-2014-2020_en)

Consultation on modernising and simplifying the common agricultural policy (CAP)

[https://ec.europa.eu/agriculture/consultations/cap-modernising/2017\\_en](https://ec.europa.eu/agriculture/consultations/cap-modernising/2017_en)

Public stakeholder consultation – interim evaluation of Horizon 2020

[https://ec.europa.eu/research/consultations/interim\\_h2020\\_2016/consultation\\_en.htm](https://ec.europa.eu/research/consultations/interim_h2020_2016/consultation_en.htm)

Open Public Consultation of the mid-term evaluation of the 3rd Health Programme 2014-2020

[https://ec.europa.eu/health/programme/consultations/midterm\\_evaluation\\_fr](https://ec.europa.eu/health/programme/consultations/midterm_evaluation_fr)

Public stakeholder consultation – Interim evaluation of Joint Undertakings operating under Horizon 2020.

[http://ec.europa.eu/research/consultations/interim\\_joint-undertakings\\_h2020/consultation\\_en.htm](http://ec.europa.eu/research/consultations/interim_joint-undertakings_h2020/consultation_en.htm)

Public Consultation – Evaluation of Public-Public Partnerships (Art.185 initiatives) in the context of the Horizon 2020 Interim Evaluation.

[http://ec.europa.eu/research/consultations/pp\\_partnerships\\_art185/consultation\\_en.htm](http://ec.europa.eu/research/consultations/pp_partnerships_art185/consultation_en.htm)

Public consultation on Transformation of Health and Care in the Digital Single Market

[https://ec.europa.eu/info/consultations/public-consultation-transformation-health-and-care-digital-single-market\\_en](https://ec.europa.eu/info/consultations/public-consultation-transformation-health-and-care-digital-single-market_en)

## About you

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\*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

\*12 Postal address of the organisation

Avenue de la Joyeuse Entrée 1-5  
1040 Brussels

\*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.**

8754829960-32

**\*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.

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

*at least 1 choice(s)*

- European Fund for Strategic Investments (Investment Plan for Europe)
- Horizon 2020
- European Structural and Investment funds
- COSME
- EU Health Programme
- EU Food and Feed Programme
- Customs 2020
- Fiscalis
- Anti-Fraud Information System
- EURES
- Employment and Social Innovation Programme
- Standards in the field of financial reporting Programme
- Implementation of single market for financial services
- Enhancing consumers involvement in EU policy-making in the field of financial services
- Consumer Programme
- European statistical programme
- Interoperability solutions and common frameworks for European public administrations, businesses and citizens (ISA2 programme) as a means for modernising the public sector
- Support for the functioning of various aspects of the single market (including goods, services, taxation, company law) – standardisation, assistance to citizens and businesses, enforcement
- Digital Single Market support programme
- EEEF (European energy efficiency fund)
- PF4EE (private finance for energy efficiency)
- None of the above

\*28 Please let us know to which of the following topics your replies to this questionnaire will refer.

- EU support for Investment
- EU support for research and innovation
- EU support for SME and entrepreneurship
- EU support for the Single Market

**EU funds in the area of investment, research & innovation, SMEs and single market**



29 The Commission has preliminarily identified a number of policy challenges which programmes/funds in this area of investment, research & innovation, SMEs and single market 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
Facilitate transition to low carbon and circular economy and resilience to climate change, support security of supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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"/>
Support industrial development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support education, skills and training	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure a clean and healthy environment and the protection of natural resources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate digital transition of the economy, industry, services and society	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Ensure that existing rules are applied and enforced consistently across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensure smooth circulation of goods both within EU and at EU borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensure fair conditions of competition in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote security of citizens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support labour mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support capital flows and investment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate access to finance, in particular to SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote financial stability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve quality of public institutions (including digitalisation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce unemployment and social disparities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Ensure safe, sustainable transport and mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote and protect public health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote a safe and sustainable food chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support social investment and social innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure a high level of consumer protection and effective redress	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide reliable and comparable statistics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (Please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

31 To what extent do the current policies successfully address these challenges?

	Fully addressed	Fairly well addressed	Addressed to some extent only	Not addressed at all	No opinion
Facilitate transition to low carbon and circular economy and resilience to climate change; support security of supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Foster research and innovation across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support industrial development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support education, skills and training	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure a clean and healthy environment and the protection of natural resources	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate digital transition of the economy, industry, services and society	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that existing rules are applied and enforced consistently across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensure smooth circulation of goods both within EU and at EU borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensure fair conditions of competition in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote security of citizens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support labour mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support capital flows and investment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilitate access to finance, in particular to SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote financial stability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improve quality of public institutions (including digitalisation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce unemployment and social disparities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Ensure safe, sustainable transport and mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote and protect public health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote a safe and sustainable food chain	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support social investment and social innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure a high level of consumer protection and effective redress	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide reliable and comparable statistics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* 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?

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

34 Please specify how the current programmes/funds add value compared to what Member States could achieve at national, regional and/or local levels. Please clearly indicate to which policies, programmes and funds your answer refer.

*1500 character(s) maximum*

The national and regional promotional banks of the EAPB appreciate the existence of the current European programmes. By providing additional funding and/or risk-sharing, the EU complements the national and regional economic policies. The EU financial instrument and grants therefore enable our members to finance projects and companies which would not be possible without the EU share.

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

*1500 character(s) maximum*

Since our numerous members in different regions and Member States have different policy goals, the EAPB does not express its preferences for particular policy areas. Nevertheless, it is necessary having all instruments and funds equipped with sufficient financing and a broad scope for their use. Otherwise it does

not pay off for any financial intermediaries to join in a new programme, which necessarily carries additional costs. It is therefore essential to have distinct financial instruments for certain policy areas (general SME financing, innovation, infrastructure etc.) but not for very particular areas.

36 The Commission has preliminarily identified a number of possible obstacles, which could prevent the current programmes/funds from achieving their objectives. To what extent do possible obstacles prevent the current programme/funds from achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know
Too 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"/>
Insufficient administrative capacity to manage programmes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of flexibility to react to unforeseen circumstances	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient synergies between the EU programmes/funds	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficulty of combining EU action with other public interventions and private finance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient critical mass	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient use of financial instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of information/communication	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient scope	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of EU standards and EU rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate facilities to support enhanced cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Out of date and inadequate IT capabilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient involvement of citizens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (Please specify below)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\*37 If you have identified another obstacle, please specify it here:

*1000 character(s) maximum*

It is crucial that all necessary legislation for the next MFF will be adopted in time. The delay of the legislative process before the current MFF caused serious trouble in the implementation and had negative economic

effects. Furthermore, the financial intermediaries face double controls and audits which create an inadequate administrative and financial burden. The current control and audit procedures, again, have a negative impact on the performance of EU financial instruments and funds and should better be streamlined. Moreover, the legislation ought to be clearer than nowadays - the ambiguous rules often contradict each other. A significant burden is also placed on the final beneficiaries who usually have even smaller capacity to deal with the paperwork than financial intermediaries, especially in case of SMEs.

38 The Commission has preliminarily identified a number of steps that could help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds. To what extent would these steps be helpful in your view?

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know
Alignment of rules between EU funds	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fewer, clearer, shorter rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More reliance on national rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A stable but flexible framework between programming periods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extension of the single audit principle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better feedback to applicants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More structured reporting	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
User-friendly IT tools	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E-governance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adequate administrative capacity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (Please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*1500 character(s) maximum*

## Document upload and final comments

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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.*

**4e02a753-f6f1-4c21-814b-e96b7275853f/Joint\_Position\_on\_Future\_of\_EU\_Finances\_-\_AECM-EAPB-NEFI.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

SG-OPC-INVESTMENT-SME-INNOVATION@ec.europa.eu

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