



Mission  
Opérationnelle  
Transfrontalière

**Contribution of MOT to the consultation of the  
European Commission  
on the Conclusions of the Fifth Report  
on Economic, Social and Territorial Cohesion :  
the future of cohesion policy**



## A. INTRODUCTION

The European cohesion policy represents an opportunity not only to enhance the efficiency and coherence of sectoral EU policies, but also to secure the harmonious development of European territory by valuing the diversity which is so much part of its character, when compared with other large regions of the world.

This entails reducing structural disadvantages, for example in terms of accessibility and ensuring the development of respective potentials, without however making uniform European territory. The value of the European diversity is inestimable because it responds to a variety of needs, and offers a wide spectrum of solutions which can be adapted to different and ever-changing situations. This ability is one of Europe's key competences in a global context.

In addition to mobilising the potential and the talent existing in each territory, it is becoming increasingly important to go beyond the political and administrative frameworks in order to activate all available forces in each region, be it in the economy, in civil society, the world of culture and creation, or in research: this is also a prime condition for all governance, which means a joint and concerted action within a territory for the benefit of its inhabitants and its enterprises.

**But, Europe will only be accomplished if it works along its seams. And European diversity will only be perceived as an opportunity (rather than as a sum of its differences) if it proves its worth along its borders.** The credibility of European action and that of the States involved largely depend on the progress of European construction **in the development of cross-border territories<sup>1</sup> and of the living conditions of their inhabitants.**

The fifth report on economic, social and territorial cohesion reminds that over 196 million people (in 2007) or **almost 40 % of the total European Union population live in border regions.**

These cross-border territories have the ability to play the **role of European laboratories**, to test new phases of integration and therefore to be themselves the **driving forces of European integration** - and this in the objective of a better economic, social and territorial cohesion.

The Mission Opérationnelle Transfrontalière is grateful to the European Commission for having launched the processes of consultation on the conclusions of the fifth report on economic, social and territorial cohesion: the future of cohesion policy, as basis for the discussions on the future cohesion policy 2014-2020.

On the basis of its concrete experience in terms of local cross-border cooperation and its know-how, and bringing forward the needs expressed by its network, MOT wishes to contribute to this consultation.

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<sup>1</sup> A cross-border territory as a life territory located on one side and the other of one or more borders, a space of projects delimited and put forward by elected representatives, which is not aimed at the administration of that territory but at the definition and the implementation of coordinated action programmes to respond to the needs of the inhabitants.

Presentation of **Mission Opérationnelle Transfrontalière (MOT)**:

The Mission Opérationnelle Transfrontalière, created in 1997, is an association and at the same time a French intergovernmental structure having its principal objective to facilitate the implementation of cross-border projects. Its missions are operational assistance to cross-border project leaders (project set-up, legal structuring, studies etc.), networking, help to define overall strategies in terms of cross-border cooperation and leading European projects. MOT joins within its network local authorities and their groupings, associations, cross-border entities, major companies, States... in cross-border cooperation and situated on both sides of the borders. The MOT counts 58 members, involving 12 European countries.

Up to now, MOT has concentrated its work on local cross-border cooperation and the help in defining of politics, within cross-border territories.

Website: [www.espaces-transfrontaliers.eu](http://www.espaces-transfrontaliers.eu)

## B. ANSWERS TO THE QUESTIONS

### 1) How could the Europe 2020 Strategy and cohesion policy be brought closer together at EU, national and sub-national levels?

As the fifth report on cohesion indicates, "More can be done in the future to further alignment of cohesion policy with the Europe 2020 Strategy" and aligning the EU policies with the priorities of the Europe 2020 strategy is designed to focus the financing schemes and policies in order to "exit from a deep crisis and reduce unemployment and poverty, while switching to a low-carbon economy".

Indeed, **the purpose of the Europe 2020 strategy is to set up a reference framework for the European Union's policies, including cohesion policy.** Nevertheless we believe that cohesion policy, since the inscription of the objective of territorial cohesion together with economic and social cohesion in the Lisbon Treaty, should not exclusively be at the service of the Europe 2020 strategy. We remind in this context that territorial cohesion appears only scarcely in the "Europe 2020" strategy and that it deserves a more important place as a cross-cutting priority.

**A link between cohesion policy and the Europe 2020 strategy may nevertheless be sought at several levels:** coherence between the strategic documents, but also concerted governance. And with the entire structure founded on a better grasp of the realities on the ground and the needs of local stakeholders, who, ultimately, will be the project leaders.

- **Coherence between the strategic documents of the Europe 2020 strategy and cohesion policy**

In keeping with what is set out in the fifth report on cohesion, it is a question of linking the Europe 2020 strategy and its implementing documents (especially national reform programmes) to the programming documents of the cohesion policy while taking account of the specificity of the assets and the challenges particular to each territory.

Indeed, **cohesion policy provides an essential contribution to the Europe 2020 strategy** by promoting smart, sustainable and inclusive growth and the reduction of imbalances between European territories.

Nevertheless, it **should not apply only within the objectives of the Europe 2020 strategy**, but should more generally meet the needs of reducing economic, social and territorial disparities between regions of the European Union.

- **Concerted governance between the Europe 2020 strategy and the cohesion policy**

To this end, a genuine **concerted governance** needs to be implemented **between the agencies in charge of monitoring the Europe 2020 strategy** on the one hand and, on the other, **those responsible for cohesion policy**, from the time the documents are drawn up through to their implementation. This concerted governance is to be applied at the European, national and regional/local levels, and set up within each Member State. Competent partners are to be identified, meetings organised, and the timetable synchronised (see fifth report on cohesion: "The timing of the annual reports [within the

framework of cohesion policy] monitoring progress towards the targets would be aligned with the Europe 2020 governance cycle." [...])

In this context the proposal of the Committee of the Regions to create **territorial pacts**, within the framework of the Europe 2020 strategy, appears most wise: The purpose of these territorial pacts is to strengthen the partnership between the national, regional and local authorities of the Member States of the European Union by concluding agreements at all levels. They will allow objectives to be set at national and regional levels.

With regard to cross-border territories, their development is at the very heart of the process of European integration. Nonetheless such integration requires that all aspects of territorial development be taken into account, and so **it is important that the list of themes addressed by the future regulations of cohesion policy remains essentially open** for these territories and that it **integrates a territorial dimension** in order to allow integrated approaches. In a general way we are opposed to a too large restriction in the number of priorities at both the EU level and the programme level in order to allow a true territorial declension. The identification of priorities at the regional level can only be done via the development of a territorial diagnosis.

## 2) Should the scope of the development and investment partnership contract go beyond cohesion policy and, if so, what should it be?

- **Cohesion policy - a transversal policy by its very nature**

Cohesion policy is by its very nature transversal in that it concerns all the territories of the European Union and aims to integrate the sectoral policies that serve them. The European common strategic framework and the national development and investment partnership contracts must address the other EU policies whenever possible.

- **But how does one structure a link between cohesion policy and other EU policies?**

The fifth report on cohesion provides for the coordination of the European Regional Development Fund, the Cohesion Fund, the European Social Fund, the European Agricultural Fund for Rural Development and the European Fisheries Fund within the **common strategic framework** at the European level. Such a link should be provided at the national level with the **development and investment partnership contracts** and the regional level within the **operational programmes**. The approach is aimed at **improving the synergy between funds and policies**.

There are other EU financing programmes as LIFE (environment), Culture, etc. At the moment there are no coordination arrangements between these funds and those of cohesion policy. Ideally, the **financial funds and instruments could be coordinated by a single document**, at the European level in the common strategic framework and at the national level in the development and investment partnership contract.

Taking these considerations further, one should also ensure that **all the policies** are part of a logic of territorial cohesion and **take account of the territorial aspect, particularly the cross-border aspect**, as well as the territorial and cross-border impact of their policies. To this end, **consultation between the services of the European Commission** needs to be strengthened. For instance, the European Commission's Inter-service Group on Urban Development, headed by the Directorate General for Regional Policy, establishes ties between the urban dimension and all the EU policies. In this way EU programmes are better able to take account of the concerns of urban areas. Such an approach could be carried out on the cross-border issue as part of



this Inter-service Group on Urban Development with regard to urban territories, but also as part of the Inter-service Group on Territorial Cohesion also headed by the Directorate General for Regional Policy, for all types of cross-border territories.

### 3) How could stronger thematic concentration on the Europe 2020 priorities be achieved?

We express our opinion **against a concentration on only thematic priorities**. Focusing cohesion policy more sharply on the priorities of Europe 2020 is aimed at increasing the efficiency of these investments. But it is important to reiterate that the **implementation of priorities must take account of the specificities of the territories** concerned and so integrate a territorial dimension: national territory, urban territories, cross-border territories etc.

For this approach to be effective, the priorities identified at every level (in the development and investment partnership contract and the operational programmes) have to be pertinent and therefore be based on a **sound knowledge of the needs on the ground**. The (thematic and territorial) priorities will therefore be defined and implemented by **involving local stakeholders, including cross-border stakeholders**. This will enable the requirements of project leaders to be taken into consideration as well as the reality of the territories concerned. In this context, the local stakeholders will have to be involved as early on in the process as possible, i.e. from the moment the strategic documents are drawn up, through consultations, meetings, etc. (see item 7).

In this context we remind that **we are opposed to a too large restriction in the number of priorities** at the EU level and the programme level. Indeed, a **limited number of priorities would be contrary to the principal of an integrated approach**, which means the development of a global strategy based on a coherent intervention in several sectors on a given territory.

The **cohesion policy's** and the territorial cooperation's efficiency will be all the greater if it is better **linked**, in terms of content, **with national policies and territorial strategies**, both current and future. It is also important to promote a coordinated intervention of cohesion policy and of national schemes on a given territory. In the cross-border context, this also entails coordination among the Member States concerned.

### 4) How could conditionalities, incentives and results-based management make cohesion policy more effective?

An effective cohesion policy presupposes the existence of a national environment, an institutional and administrative framework favourable to the development of territories, particularly cross-border territories. Cohesion policy must incite it. But making the payment of European funds conditional on the fulfilment, by Member States, of the obligations set out as part of the cohesion policy or of other obligations such as the observance of the stability pact is not the right approach; such measures would be detrimental first and foremost to the project leaders, who would advance European funds without the assurance of reimbursement. In this sense, **we oppose to dispositions concerning conditionality, said extern**.

In terms of **incentives** it is more a matter of targeting specific territories whose cohesion potential is undeveloped, i.e. cross-border territories. As places of convergence for national and European policies, cross-border territorial projects are the source of a good link between national territories and a successful European integration. In this context the delegation of **global grants** to other entities by managing authorities, subject to

certain conditions, seems pertinent. This mechanism, already part and parcel of the programming period for 2007-2013<sup>2</sup>, allows structures to finance integrated strategies of territorial integration. This envelope can be managed as part of a sub-programme, by governance structures such as EGTC, which carry genuine integrated and shared territorial projects. The mechanism could therefore apply to cross-border territories aligned with this type of approach. This possibility has so far never been exploited but should be reaffirmed and encouraged. The European Commission could in this context think about incentive mechanisms in order to go into this sense.

### 5) How could cohesion policy be made more results-oriented? Which priorities should be obligatory?

Pertinent results require the definition of **priorities and objectives**. With regard to cross-border cooperation, they will need to be aligned on the development of **integrated cross-border territories**.

A policy more results-orientated goes along with **clear viable indicators (qualitative and quantitative)**. Those should help support the definition of objectives and priorities in order to measure the wished results. Most of the time the indicators are not sufficiently **adapted to the territory**, it is therefore indispensable to develop specific indicators for each category of territory. We support to have recourse to a limited number of common indicators, the majority of indicators should be established according to the territorial specificities. In the case of **cross-border territories**, these indicators concern especially the following:

- internal and external accessibility
- degree of mobility inside the territory
- functional distribution of facilities (infrastructures in terms of health etc.) as well as their cumulative availability on both sides of the border from a economy of scale perspective
- degree of employment
- demographic dynamics
- intra-regional differences in standard of living (per capita GDP, etc.)
- degree of involvement of key stakeholders
- degree of integration of actions
- organization of a joint (political and technical) governance
- characteristics of networks (density, functionality, etc.)
- vulnerability to risk
- degree of integration of cross-border territories (all kinds of flows)

Ex ante and ex post **evaluations** are to monitor the progress of the projects undertaken. Nonetheless, it is important to ensure that the projects do not suffer as a result of an excessive number of required conditions.

In this context, the efforts in terms of observation are fundamental, especially at the local level, not only to evaluate the results of projects but also before the realization, to define strategies, programs and to develop the ability to anticipate. In a general way, **cross-border territorial monitoring** plays a key role in the facilitation of territorial cohesion: to know better in order to understand better, in order to implement policies and projects based on that cross-border reality all too often regarded only based on intuition. Therefore a great deal of important cross-border observation work is still to be

<sup>2</sup> Council Regulation (EC) No 1083/2006 of 11 July 2006 laying down general provisions on the European Regional Development Fund, the European Social Fund and the Cohesion Fund and repealing Regulation (EC) No 1260/1999, Title III, Chapter II, Section 3.



undertaken at the scale of cross-border living areas: this begins with the **coordination of national indicators** beyond borders and goes as far as work at a European level: **towards a Eurostat at a more depth level, taking into account cross-border territories**. In the field of knowledge ORATE 2013 and other innovative approaches as the urban audit or atlas have to develop a cross-border component to provide better governance and continuous evaluation of territorial policies and projects.

With regard to capitalisation and the transfer of good practices, the same applies to the networks financed by the cooperation objective such as INTERACT, INTERREG C, URBACT (see below).

#### **6) How can cohesion policy take better account of the key role of urban areas and of territories with particular geographical features in development processes and of the emergence of macro-regional strategies?**

Urban territories and the territories mentioned in Articles 174 and 349 of the Treaty constitute **territories with specific challenges** that require the appropriate responses. The **management of these territories is all the more complex when they are cross-border**: conurbations, natural areas, rural or mixed rural/urban territories, mountain territories, river or sea basins, outermost regions, etc.

Cohesion deficits are particularly noticeable at the crossing of borders: namely when the neighbours present too important differences in terms of competitiveness, for example in revenues or taxation. In certain cases, the cross-border situation is marked by specific geographical characteristics (rivers, mountains, islands, sea borders). In all of these cases, special measures should be taken to compensate for a certain number of handicaps. Thus **significant and meaningful territorial dynamics such as integrated territorial projects should be encouraged, based on a common strategy drawn up by local partners**.

The **European common strategic framework and the national development and investment partnership contracts must include a component on territorial cooperation**, which will entail strategic cooperation by the Member States concerned at each border.

In this respect, the **macro-regional strategies** established for the Danube and the Baltic States are an interesting example of a multi-level coordination beyond the borders themselves, the strategies, the regulations and the financing arrangements (European or national), even if there is no question of systematising either the establishment of such strategies or the European Commission's intervention.

With regard to drawing up **operational programmes**, more emphasis ought to be placed on territorial approaches. This could be achieved by integrating **territorial** rather than just theme-based **priority axes** in the programming of cross-border cooperation (see global grants). More generally speaking, we support **a greater flexibility in the organisation of operational programmes according to territorial specificities**.

Specific territories whose cohesion potential has not been exploited such as cross-border territories must be the subject of particular **incentives**, for example through **dedicated global grants**. Here cross-border territories can represent **sites for experimentation and innovation** (see item 4).

The cross-border aspect also deserves to be integrated into **other EU programmes, for example via territorial or even cross-border priorities axes**. In border regions, the regional operational programmes of cohesion policy, and even the programmes of other EU or national policies, are intended to finance cross-border projects that have been

jointly identified on either side of the border, as part of the coordination of strategies mentioned above.

Cross-border issues require a multi-level governance approach. The more the cooperation targets the needs of the citizens, the more the services apply to complex infrastructure projects that concern the population and the more these projects become difficult to achieve in the absence of any consultation between the regional and local authorities, the Member States, and the European Union.

Such cross-border governance can intervene at different levels of scale, whether it's the organisation of local cross-border cooperation or macro-regional strategies. They are not mutually exclusive. On the contrary, they can be conducted simultaneously and coordinated to develop the solutions best suited to the most pertinent level. **Local cross-border cooperation can be part of the macro-regional approaches, of which they are integral components.**

In general, we support the reference to **territorial cooperation** with the three strands cross-border, transnational and interregional. It deserves a **significant budgetary increase** in the new programming period.

Territorial cooperation is a key issue for cohesion policy, and there is unanimity as to its value added. Many jobs and co-operative networks have been created thanks to territorial cooperation. From a territorial viewpoint, the three components of cooperation - cross-border, transnational and interregional - are relevant and deserve to be pursued and consolidated.

**Particular mention should be made in this context of cross-border cooperation** given the large number of people concerned and the good results obtained in the past. Cross-border territories are both a specific response to the requirements of the inhabitants of border regions and a powerful agent of integration of Europe's internal borders and of pacification of its external borders, contributing to European integration.

We would like to underline that the **European Grouping of Territorial Cooperation (EGTC)** is a precious tool to facilitate cooperation especially in the context of cross-border cooperation. The success of this tool, especially at the French borders, shows the **interest to promote this tool and to encourage the stakeholders involved.**

Finally there is an increased need in terms of **technical assistance** not only for operational programmes of territorial cooperation but also for cooperation projects. The current INTERACT 2007-2013 programme aimed at European territorial cooperation now targets operational programmes and rather than project leaders, as was the case in the past. This technical assistance might for example consist of thematic seminars (regarding cross-border cooperation on governance, health, transport, the labour market, the environment, economic development, culture, training, etc.) on good practices and lighthouse projects.

The **successor to the INTERREG 4 C programme** will aim to finance the networking of the regions and territories, not only on thematic European priorities (Europe 2020 strategy) but **also on territorial priorities**, including those relating to the development and governance of cross-border regions.

## 7) How can the partnership principle and involvement of local and regional stakeholders, social partners and civil society be improved?

The success of the cohesion policy needs to lean on a **multilevel governance** based on a reinforced partnership between managing authorities, local authorities but also local stakeholders (see following paragraph).

Participation by local and regional stakeholders, social partners and civil society bridges **the gap in the expectations of the stakeholders on the ground**. They include the local authorities, but also cross-border structures (European Groupings of Territorial Cooperation, Eurodistricts, etc.), urban planning agencies, the chambers of commerce and industry, NGOs and non-governmental associations, training institutes, trade unions, businesses, citizens, and any stakeholder involved in the development of a given territory, etc. More generally speaking, it is necessary to pay more attention to initiatives of local development.

The **partnership** should rely on large networks open to a great diversity of stakeholders. Nonetheless, the proper functioning of such networks requires transversal coordination, a competent and efficient engineering capacity, which needs to be improved. Involving stakeholders from different sectors helps to generate a value added, but needs to be contained within governance structures if necessary at multilevel.

The **European grouping of territorial cooperation** (EGTC), the European key-instrument for European territorial cooperation, plays a fundamental role: having legal personality (capacity to act on behalf of its members, to contract, to launch call for tenders, to answer on its own to European calls for proposals as its partnership respects the rules of eligibility, to have its budget and its own staff), it allows to associate in its entity an extremely large partnership – from the State, to local authorities and their groupings, to bodies governed by public laws following rules of public procurement.

At the cross-border level, participation requires first of all good information since the increase in the number of laws, regulations and procedures, not to mention the language and cultural barriers, make mutual understanding more difficult. Therefore these obstacles need to be overcome first before active participation is broached. So this implies first of all having **information and training tools** (see structures such as Infobest, Euro-Institut, Eures, etc.), then **developing participation procedures** (organising governance). This means also to improve the governance of territorial cooperation programmes.

- **Participation of local partners in drawing up cohesion policy programming documents**

As mentioned earlier, the local partners concerned need to be involved from the moment the strategies and operational programmes are drawn up, through information and exchange meetings, consultations, etc. During the previous programming period 2007-2013, the Member States had been encouraged to consult local authorities in particular. Unfortunately, the effective implementation of this recommendation has been noted only in certain Member States or in certain regions. A partnership of this kind at the start of the process, involving these stakeholders, i.e. future project leaders, is essential to drawing up the relevant thematic and territorial priorities and ensuring that they reflect the reality on the ground.

- **Participation of local partners in the bodies in charge of monitoring the operational programmes**

Given the role they play in the development of cross-border territories, regional and local authorities and cross-border entities, the European groupings of territorial cooperation (EGTC in particular) should participate in the bodies in charge of monitoring the operational programmes for cross-border cooperation (the current monitoring committees).

- **Dialogue and information among local partners throughout the programming period**

Permanent dialogue between the managing authorities and the local partners (project leaders) needs to be in place to review the state of progress of operational programmes, scheduled and future projects, and the financing possibilities for their projects. Such encounters offer these stakeholders an opportunity for exchange, for creating new projects, and even new partnerships.

- **Participation of local partners in the projects**

The participation of these stakeholders in projects co-financed by cohesion policy presupposes **an interest in taking action**: as has been said earlier, the operational programmes must comply with the interests of the project leaders, enable them to carry out activities that correspond to their priorities, and even drive new policies that reflect a need on the ground. So it is important that the operational programmes focus more on territory projects (or integrated development strategies) structured around a work programme. In the case of cross-border cooperation, the EGTC is likely to create an adapted multi-level governance structure to lead these approaches, and the creation of EGTC needs to be promoted.

Among local partners and within the framework of civil society, it is appropriate to draw a distinction with regard to associations, which, for the most part, do not have the financial means to resort to European financing. **Bureaucratic burdens, delays in repayment schedules**, etc., are all constraints which represent obstacles to the emergence of projects crucial to territorial cohesion.

On the basis of these local cross-border partnerships, it is apposite to **discuss experiences, good practices and innovative approaches** with other cross-border territories to make progress together and find synergies within the framework of European networks (project crossover). Local partners will thus be invited to talk about the results of the projects and good practices (lighthouse projects).

These exchanges must be supported by network programmes financed within the future objective of territorial cooperation (INTERACT, INTERREG C, URBACT).

It is worth emphasising the value of the methodology drawn up as part of the URBACT programme, which ought to be put to good use in other programmes of territorial cooperation. The URBACT II programme, which supports the thematic networks of towns, is aimed at supporting the sharing of experiences designed to provide food for thought for each partner. By the end of the network project<sup>3</sup> the process must lead to a local action plan eligible for subsequent EU financing schemes which ultimately should impact the local policies of the various partners. These strategic and operational documents must be produced by the local authority partner together with a **local support group** made up of key local partners. URBACT website: <http://urbact.eu/>

<sup>3</sup> The "EGTC" project, Expertising Governance for Transfrontier Conurbations, sur la gouvernance des agglomérations transfrontalières, is an example of an URBACT II project <http://urbact.eu/egtc>



**8) How can the audit process be simplified and how can audits by Member States and the Commission be better integrated, whilst maintaining a high level of assurance on expenditure co-financed?**

For projects involving several countries it is advisable to aim for a standardisation at the European level of the control procedures, which currently are defined at the national level, in order to alleviate the bureaucratic burdens caused by the heterogeneous nature of these rules.

It is essential to ensure that the competence of the first-level audit capabilities with regard to EU practices and regulations is established and homogeneous. The financial monitoring tools implemented by the Member States group together the data to be examined, but they are a burden on financial management (see item 9), especially since several national systems of financial management and audit need to be linked in the case of cross-border projects.

**9) How could application of the proportionality principle alleviate the administrative burden in terms of management and control? Should there be specific simplification measures for territorial cooperation programmes?**

With regard to the principle of proportionality and the freedom of Member States in matters of administrative implementation and financial monitoring, the means required (particularly in terms of time and human resources) for the monitoring of programming or project management are still disproportionate. Simplifications could be achieved already through better coordination - at both the level of the managing authority and the national level - of the **training/information** on the administration and financial management intended for the programmers, project leaders and financial auditors. This needs to be suggested sufficiently early on, through close ties with dedicated support staff at the national level.

The large number of levels of intervention is a complicating factor. Tools of a financial monitoring set up by the states (for example the system PRESAGE for France) may present administrative complexity. The systems of financial monitoring may vary from one country to another. The lead partner as well as the partners of the project have to use the national system of the lead partner. It is desirable to **standardize the different systems of financial monitoring** at the European level and at the same time to simplify their functioning in order to make easier the treatment of data at the EU level and finally to shorten the delays of repayment for the beneficiaries.

It is also important to underline the cash-flow problems involved in advancing money, which result in withdrawals and unsettle project leaders. This in turn results in major financial difficulties in the event of late EU payments. The **payment of cash advances** for example through working capital would be an opportunity.

Concerning cross-border projects, the **obligation to justify several co-financers** is both difficult for the setting up and the financial management of the project. This constraint has also a negative impact on the communication on the project and the visibility of local political commitment. The existence of cross-border governance structures, as the EGTC, that benefit of **global dedicated grants** for a territorial project as a whole, would simplify the administrative procedures pertaining to a cross-border project and would allow concentrating on the realization of lighthouse projects.

For **low-value projects**, specific simplification measures could also be introduced, such as the streamlined micro-project procedures trialled as part of certain operational programmes. In this context, one might consider introducing **lump sum payment of costs** as is the case with other European programmes such as "Europe for Citizens".

**10) How can the right balance be struck between common rules for all the Funds and acknowledgement of Funds' specificities when defining eligibility rules?**

Generally speaking, it is advisable to **harmonise as much as possible the rules for eligibility** to the various funds. These rules must take account of the territorial dimension in particular.

**11) How can financial discipline be ensured, while providing enough flexibility to design and implement complex programmes and projects?**

To enable the realisation of complex projects, as is the case with projects on integrated cross-border territories, it will be necessary from the outset to define strategies based on real needs on the ground. Major **territorial projects** can then be incorporated in the operational programmes, which means **the complex projects can be launched the moment the programmes are launched**. To this end, a genuine partnership approach needs to be initiated among local stakeholders, including policy makers, legal experts and the other stakeholders involved in the cross-border territory (see item 7).

**12) How can it be ensured that the architecture of cohesion policy takes into account the specificity of each Fund and in particular the need to provide greater visibility and predictable funding volumes for the ESF and to focus it on securing the 2020 objectives?**

First, we support that **all the European regions continue to benefit from the cohesion policy** (independent from their level of development) through the importance of this policy for the economic, social and territorial cohesion of the European Union. Second, cross-border projects relating to employment and inclusion contribute to the Europe 2020 strategy; the provisions of article 6 of the ERDF regulation, allowing ESF projects to be financed through this fund, need to be maintained.

**13) How could a new intermediate category of regions be designed to accompany regions which have not completed their process of catching up?**

As mentioned before, we support that **all European regions continue to benefit from territorial cooperation** so they are able to learn, exchange and contribute to the integration of the territory of the European Union.