

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

*9 Respondent's last name

*10 Respondent's professional email address

* 11 Name of the organisation

Ministry of Economic Affairs and Climate, coordinated Dutch Government position

* 12 Postal address of the organisation

Bezuidenhoutseweg 73
2594 AC Den Haag
The Netherlands

* 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

* 21 Please specify the type of organisation.

- Intergovernmental organisation
- EU institution, body or agency
- National parliament
- National government
- National public authority or agency

* 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

* 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Reduce unemployment, promote quality jobs and support labour mobility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| e. Promote social inclusion and combat poverty | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <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"/> | <input type="radio"/> |
| j. Promote sustainable transport and mobility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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"/> |
| n. Promote sound economic governance and the implementation of reforms | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| o. Other (please give degree of importance here and fill in question 30 below) | <input 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

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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| e. Promote social inclusion and combat poverty | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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"/> |
| 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 type="radio"/> | <input checked="" 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| k. Promote territorial cooperation (interregional, cross-border, transnational) | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| l. Support education and training for skills and life-long learning | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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"/> |
| n. Promote sound economic governance and the implementation of reforms | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| o. Other (please give degree of importance here and fill in question 32 below) | <input type="radio"/> | <input checked="" 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

For INTERREG the promotion of territorial cooperation is carried out to a fairly large extent, whereas under the national ERDF programmes there is more room for improvement.

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.

European added value of ESI funds lies in cross border cooperation between regions, especially between innovative hubs, clusters and smart cities, and in investments in themes that have significant cross border spill-over effects, such as innovation and sustainability. Added value is most significant in least developed Member States, where public investments in these themes are limited. Furthermore, European added value lies in addressing European societal challenges by promoting cooperation between regions. Innovative projects financed by national programmes or INTERREG programmes prove their added value to strengthening the European economy and addressing these societal challenges. Furthermore, cross border innovation projects strengthen the European knowledge economy, promote knowledge sharing between regions and close the economic gap between regions.

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.

A next period of cohesion policy should be enhanced to address future challenges. Cohesion policy should focus more on the least developed Member States and contribute to creating European added value (innovation, economic growth, interregional cooperation, climate and energy). Addressing mission driven societal challenges should be the central goal of all MFF instruments. Therefore, synergies between structural funds and other instruments such as the Framework Programme for Research and Innovation should be increased. Structural funds should focus on themes with cross border spill-over effects, such as economic growth, innovation and sustainability/climate change. Furthermore, to maximize European added value, more possibilities for cross border cooperation based on smart specialization strategies between innovative hubs and regions should be created. For example, there should no longer be a set maximum of 15% in national programmes that can be used outside the own region. In order to promote cross-border cooperation under national ERDF programmes, funding outside the own region should not be limited. Also, the effectiveness of investments can be enhanced by extending the RIS3 strategies, for example by including investments in SMEs. Besides, attention should be paid to new challenges, such as migration. Higher national co-financing rates could increase national ownership of investments, thereby optimizing policy impact as well as create cost savings.

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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| e. Insufficient information about funding and selection process | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| h. Insufficient synergies between the EU programmes/funds | <input checked="" type="radio"/> | <input 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 checked="" type="radio"/> | <input 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 checked="" type="radio"/> | <input type="radio"/> | <input 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| n. Legal uncertainty | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| o. Insufficient ownership | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| p. Insufficient involvement of civil society in design and implementation | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| q. Other (please specify below) | <input type="radio"/> | <input 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

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 |
|---|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. More flexibility of activity once funding is eligible | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| e. More flexibility of resource allocation to respond to unexpected needs | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| f. Simplify the ex-ante conditionalities | <input type="radio"/> | <input checked="" 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

Performance budgeting and the use of simplified cost options will significantly lower the administrative burdens for beneficiaries.

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.

There is a need to create more synergy between funding programs and to better align them in order to avoid overlap or duplication. But, as long as the Commission services are characterized by their sectorial approach with different funding programs and regulations, the risk of overlaps/duplication will exist in the future. There is a need to break down the existing silos and to create a more integrated policy approach within the European Commission. This more integrated approach could result in more focused funding programs. By focusing on European priorities and creating synergy, funds and programmes can complement each other in achieving common goals. This prevents fragmentation and overlap. Such an approach aims at improved coherence, not only between the various European Structural and Investment Funds, but also with other instruments such as the EU Framework Programme for Research and Innovation (from 2020 FP9) and the European Fund for Strategic Investments (EFSI). A 'broader' RIS3 is also a good tool for establishing smart links between the various ESI funds during the preparation of the ESI programmes, and with other EU initiatives such as FP9, resulting in improved coordination and less overlap. This focus, critical mass and synergy in respect of issues that can be addressed more effectively at the European level results in European Added Value.

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.

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

The Netherlands proposes to further increase the conditionality of EU funding, especially ESI funds. Such a measure is required in particular in the field of structural reforms stemming from country-specific recommendations and the Stability and Growth Pact.

Above answers are without prejudice to the overall position of the Netherlands on the MFF. The Netherlands advocates a future proof, flexible and financially sustainable budget; modernization should go hand in hand with increasing effectiveness and efficiency. Focus should be on those areas where EU timely and adequate response creates added value. Individual programmes and objectives should support this overall objective and allow for an integrated evaluation of the future MFF.