



# Cross-border Impact Assessment 2016

## Dossier 3: Cross-border cooperation: A study of INTERREG programmes in the Dutch border regions



The Institute for Transnational and Euregional cross border cooperation and Mobility / ITEM is the pivot of research, counselling, knowledge exchange and training activities with regard to cross border mobility and cooperation.

Maastricht University

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Dossier 3: Cross-border cooperation: A study of INTERREG programmes in the Dutch border regions

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The *Institute for transnational and Euregional cross border cooperation and Mobility / ITEM* is the pivot of research, counselling, knowledge exchange and training activities with regard to cross-border cooperation and mobility.

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## 1. Motivation and Background

2015 marked the 25<sup>th</sup> anniversary of the EU INTERREG programme. This was celebrated in several places in European and cross-border circles, for example during the annual Open Days in Brussels.<sup>1</sup> The INTERREG A programme has been part of *European Territorial Cooperation* (ETC) under the *European Fund for Regional Development* (EFRD) since 2007. This grant programme for cross-border cooperation has been in place since 1990 and has entered its fifth subsidy round. The INTERREG A programme aims to remove borders, in the sense of barriers, between countries and to economically reinforce the border regions by facilitating and stimulating cross-border cooperation. This can be seen in a very broad context since the initiatives and projects financed by INTERREG A cover a wide spectrum, ranging from socio-cultural initiatives to technological and innovative projects.<sup>2</sup> Approximately EUR 6 billion was divided across 60 programmes during the previous programming period (2007-2013), thereby financing around 6,000 projects on innovation, labour mobility, education, work and health across Europe. Given the importance of cross-border cooperation, the budget was raised to EUR 6.6 billion for this programming period (2014-2020).<sup>3</sup>

Figure 1 shows the growth and development of the INTERREG programme. INTERREG was initially founded as a Community initiative for cross-border cooperation within EFRD. During later programming periods, INTERREG was also used for stimulating transnational and interregional cooperation through the INTERREG B and C programmes. This resulted in a total volume of EUR 10.1 billion for all INTERREG programmes, i.e. A, B and C, in the period 2014-2020.<sup>4</sup>

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<sup>1</sup> Committee of the Regions (2015) *Open days 2015-Local Events. European Cooperation Day Events*

<sup>2</sup> Cf. Giessen, van der (2014) *Coping with Complexity. Cross-border cooperation between The Netherlands and Germany*/ [www.interact.eu](http://www.interact.eu)

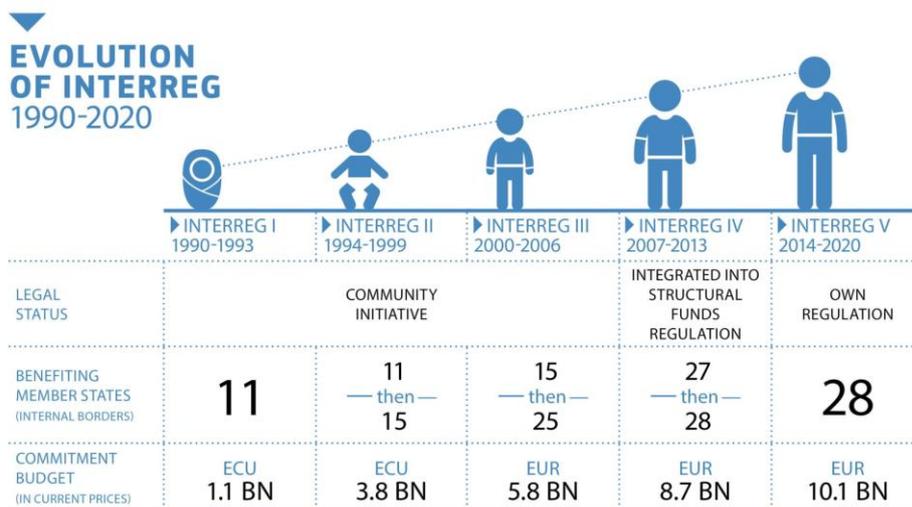
<sup>3</sup> Cf. European Commission, DG Regio (2015) *Interreg: European Territorial Co-operation*

<sup>4</sup> The period 2014-2020 includes a total of 60 cross-border INTERREG V A programme regions located on 38 EU internal borders with a total budget of EUR 6.6 billion in EU means. In addition, 12 IPA programmes for “cross-border co-operation between candidate countries, potential candidate countries and EU Member States” are in place, as well as 16 ENI Cross-Border programme regions offering programmes for EU and non-EU border regions, 15 INTERREG B programmes, the INTERREG Europe programme and network programmes such as Urbact III, Interact III en Espon . (Cf. European Commission, DG Regio (2014) *IPA Cross-border Co-operation Programmes*

[http://ec.europa.eu/regional\\_policy/en/funding/ipa/cross-border/](http://ec.europa.eu/regional_policy/en/funding/ipa/cross-border/) European Commission, DG Regio (2014) *Regional development co-operation programmes outside the EU*

[http://ec.europa.eu/regional\\_policy/en/policy/cooperation/european-territorial/outside-the-eu/](http://ec.europa.eu/regional_policy/en/policy/cooperation/european-territorial/outside-the-eu/)

Figure 1: Development of the INTERREG programme 1990-2020<sup>5</sup>



## 2. Research Objective

The previous grant eligibility period (2007-2013) was marked by much discussion about the need for simplification of the general European Cohesion Policy on all policy levels cooperating within the European subsidy programmes. Prior to the current programming period, the five European Structural and Investment (ESI) Funds<sup>6</sup> were aligned to a much greater extent, by clustering, among others, the EU regulations pertaining to these funds and thus adapting the ‘rules of play’. The rules of the five ESI Funds are clearly connected to the Europe 2020 strategy.<sup>7</sup> In addition, the renewal of the policy framework should help to ensure closer cooperation and coordination between the ESI Funds. It should also lead to better comparability of the programmes. The common provisions and rules for the ESI Funds can be found in Regulation (EU) 1303/2013. There are also fund-specific regulations in addition to this Regulation. The ERDF structural fund, under which the INTERREG programme resides, is governed by Regulation (EU) No 1299/2013 for the programming period 2014-2020.<sup>8</sup>

<sup>5</sup> European Commission, DG Regio (2015) *Interreg: European Territorial Co-operation* [http://ec.europa.eu/regional\\_policy/en/policy/cooperation/european-territorial/](http://ec.europa.eu/regional_policy/en/policy/cooperation/european-territorial/)

<sup>6</sup> The five ESI Funds are: the European Regional Development Fund (ERDF), the European Social Fund (ESF), the Cohesion Fund, the European Agricultural Fund for Rural Development (EAFRD) and the European Maritime and Fisheries Fund (EMFF).) (Cf. European Commission (2015) *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*, p. 8).

<sup>7</sup> The Europe 2020 strategy concerns ‘generating smart, sustainable and inclusive growth in the EU, improve coordination, ensure consistent implementation and make access to the ESI Funds as straightforward as possible for those who may benefit from them.’ (Cf. European Commission (2015) *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*, p. 8)

<sup>8</sup> Cf. European Commission (2015) *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*, p. 8 / Regulation (EU) No 1303/2013 of the European Parliament and Council of 17 December 2013/ Regulation (EU) No 1299/2013 of the European Parliament and Council of 17 December 2013

The restructuring of the European Cohesion Policy also extended to the INTERREG V A programme, so that its three main objectives, i.e. concentration, simplification and concrete result-orientation, also became central to the INTERREG V A programme.

This study starts with a comparison of the progress of INTERREG V A in the three programme regions on the Dutch border, using 1 August 2016 as its measurement date. It reviews the practical implementation of INTERREG and the daily activities as part of INTERREG on the local and regional level. This study focuses on the most striking, practical differences in daily procedures between the previous INTERREG IV A and the current INTERREG V A programme. Until the end of the INTERREG IV A period in 2013, each new INTERREG A programme received a growing number of complaints from the field about the increased bureaucracy involved in its implementation.<sup>9</sup> Fingers would often automatically point at 'Brussels', and the programmes would gain the reputation of being "administratively burdensome", "difficult to work with" or "procedurally cumbersome". This study aims to examine whether pointing the finger of blame at 'Brussels' is in order for the INTERREG V A programme, especially since the European Commission has been engaged in simplifying programmes such as INTERREG for years.<sup>10</sup> The second section of this study briefly examines whether the regulations of INTERREG V A have actually been simplified and whether this has facilitated the implementation of cross-border projects compared to the preceding programme. The final section reviews the actual image of the INTERREG V A programme. Are the negative responses, still mainly carried over from the INTERREG IV A programming period, justified?

In summary, the following research questions will be addressed:

1. *What is the state of affairs of the INTERREG V A programme in the programme regions on the Dutch border?*
2. *What are the main implementation differences between the INTERREG V A programme and the previous programming period?*
3. *What might cause the negative image of the INTERREG programme?*

### **3. Definition of the research area**

This study covers all Dutch-German, Dutch-German-Belgian and Dutch-Belgian border regions, using the geographical units of the INTERREG A programme regions as provided in the manual to the 2016 cross-border impact assessment:

the German-Dutch INTERREG V A programme region of the Ems-Dollart Region, the EUREGIO, the Rhine-Waal Euregio and the Rhine-Meuse-North Euregio, the German-Dutch-Belgian programme region of the Meuse-Rhine Euregio and the INTERREG V A Flemish-Dutch programme region.<sup>11</sup>

<sup>9</sup> Giessen, van der (2014) *Coping with Complexity. Cross-border cooperation between The Netherlands and Germany*

<sup>10</sup> Cf. European Commission, DG Regio (2012) *Simplifying Cohesion Policy for 2014-2020*

<sup>11</sup> ITEM (2016) *Het instrument grenseffecten beoordeling (The instrument of the cross-border impact assessment)*

### 4. Indicators

The study is part of ITEM's 2016 Cross-border Impact Assessment. A cross-border impact assessment aims to demonstrate how (changes in) regional, national or European regulations impact certain professional fields, geographical regions or situations in border regions. This study can be considered an ex-post study focusing on the regulatory changes imposed on the INTERREG programme, specifically between INTERREG IV A and INTERREG V A, from the European, but also the regional and national level. A cross-border impact assessment departs from the assumption that regional, national or European regulations may either promote or impede cross-border cooperation.<sup>12</sup>

The following indicators are used to this end:

**Table 1: Objectives- Benchmarks- INTERREG Dossier Indicators**

Principles/Objectives	Good practice/benchmark	Indicators
<p><u>Principles:</u></p> <p>Euregional partnerships that support cross-border projects with the help of the INTERREG A programme.</p> <p>Objective EFRD: Reinforcing economic, social and territorial cohesion by addressing the primary regional imbalances within the Union.<sup>13</sup></p> <p>Objective of cross-border cooperation: To face the common challenges which have been jointly identified and to exploit the unused potential for growth in the border regions, thereby simultaneously improving the cooperation process, geared towards the overall harmonious development of the Union.<sup>14</sup></p>	<p>The functioning of regional INTERREG V A programmes.</p> <p><u>Research Objectives:</u></p> <p>1. Rendering visible the positive and negative changes to the INTERREG V A programme compared to INTERREG IV A.</p> <p>2. Comparing the programmes on the Dutch border.</p>	<p>Development of Euregional governance structures</p> <p>Depletion/reservation of means INTERREG V A (as per 01/08/2016)</p> <p>Number of INTERREG V A projects approved (as per 01/08/2016)</p> <p>Interest in INTERREG V as compared to INTERREG IV</p> <p>Average time from first meeting to approval</p> <p>Cooperation between the programme partners (compared to previously)</p> <p>Procedures for project applications</p> <p>Procedures for project implementation</p> <p>Concrete procedural changes compared to INTERREG IV A</p> <p>Concrete regulatory changes compared to the INTERREG IV A programme</p> <p>Image of the INTERREG V A programme</p>

<sup>12</sup> ITEM (2016) *Het instrument grenseffecten beoordeling (The instrument of the cross-border impact assessment)*

<sup>13</sup> Cf. European Commission (2015) *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*, p. 199

<sup>14</sup> Regulation(EU) No 1299/2013 of the European Parliament and the Council of 17 December 2013 (5)

## 5. Method and Approach

This stocktaking and comparative study uses a qualitative research method.

Qualitative interviews with a previously compiled questionnaire will be conducted for each programme region. The interviewees will receive the questionnaire prior to the interview, which will take place in person or by telephone.

The participating partners will be questioned on programme level, e.g. members of the INTERREG project management, members of the supervisory board and the management authorities, as well as on project level, i.e. the INTERREG project coordinators. The participating partners are selected to include a minimum of two interviewees per programme region.

## 6. Embedding of current research and opportunities for future research

Of all cooperating levels of management within INTERREG A, this stocktaking study mainly investigates the local/regional level. The academic literature considers the European cooperation in the ESI Funds, and particularly the INTERREG A programme, a system of multi-level governance (MLG). Future studies might give a voice to all representatives of the four vertically and horizontally, cooperating levels of government and policy making (local, regional/provincial, national and European). The findings of such a study can then be fed back in terms of the relevance of the theoretical model applied.

This study disregards comparative basic data on the different INTERREG V A programme regions, such as size (in km<sup>2</sup>, inhabitants), history of the Euregional organisations or forms of government. Rather, it compares all three programme regions mentioned, situated on the Dutch border, as to their daily practice and their progress in implementation. The analysis provides a clear explanation of certain aspects of the administrative and organizational forms of the programs which impact, for example, the decision and settlement procedures of projects.

The analysis and comparison of the different regions and the comparison with the previous INTERREG IV A programme will be made on the basis of the responses from the interviews and comparison of the programme documents of the three different programmes. The analysis cannot be considered a full explanation for the observed changes within the INTERREG V A programme regions compared to the INTERREG IV A programme, nor does it constitute a full comparison of the progress of the various programs. This study gives an indication of the state of affairs in the various programme regions and shows the major changes in the implementation compared with INTERREG IV A.

This comparative, stocktaking study can mark the start of a larger and a more comprehensive research project. This could, for example, include a comparison of other INTERREG A programme regions on the European internal borders, using the programme regions on the Dutch border as a frame of reference.

## 7. Research Design

Between August and October 2016, in-depth interviews were conducted with participants in the three different INTERREG V A programs on the Dutch border (see also Table 2). The interviews had an average duration of 2 hours and were held on the basis of a pre-composed questionnaire, designed for this study. The participants received the interview questions at least one week prior to the interview, allowing them to prepare.

Initially, the idea was to make a distinction between interview partners on programme level and partners on project level and to pose different questions to each group. In practice, however, this distinction was only maintainable for the German-Dutch programme region, as it is separated into sub-programme regions with a central management on programme level. The other two programme regions on the Dutch border do not use this format, however, effectively removing the distinction between decisions made on programme and project level. Despite the distinction between interview partners on project and programme level in the German-Dutch programme region, here too overlap occurred in the information obtained, mainly because the programme managers were also able to answer the questions about the project level. Conversely, this was not the case: the questions about the general progress of the programme were not posed to the project coordinators. Rather, these interviews focused on the daily activities of coordinating and initiating cross-border projects.

The analysis section of this study is based on the results of the interviews, supported by statements from the programme documents of the various programmes where necessary.

Table 2 lists the persons interviewed in each region. Some programme managers also supervise projects, giving them a double role within a programme (see second column). The names of the interviewed persons are known to the author. Many of the interviewees preferred to remain anonymous. For this reason, the analysis below refers to the encrypted interviews.

**Table 2: Interviews conducted between August and October 2016**

Programme region	Level	Date	Encryption
German-Dutch programme region	Programme Level	30/08/2016	DNLinterview1
German-Dutch programme region	Project Level	30/08/2016	DNLinterview2
German-Dutch programme region	Programme and project level	01/09/2016	DNLinterview3
German-Dutch programme region	Programme and project level	06/09/2016	DNLinterview4
Belgian-Dutch-German programme region	Programme and project level	24/08/2016	EMRinterview5
Belgian-Dutch-German programme region	Programme Level	06/10/2016	EMRinterview6

Programme region	Level	Date	Encryption
Flanders-Netherlands	Programme Level	30/09/2016	InterviewNLVlaan7
Flanders-Netherlands	Programme and project level	14/10/2016	InterviewNLVlaan8

## 8. Results and Analysis

### 8.1. Development of Euregional governance structures

The programme regions, within which INTERREG A is effective, have grown across the different programme periods due to the extension of the regions in which INTERREG A subsidies can be granted. In addition, the INTERREG A regions throughout Europe were merged step by step.

Since the start of INTERREG III A in 2000, for instance, the three German-Dutch programme regions, the EUREGIO, the Rhine-Waal Euregio and the Rhine-Meuse-North Euregio, have been working together in a common programme region. Under INTERREG IV A (2007-13), this region was extended even further as the Ems-Dollart Region was added.<sup>15</sup> Under INTERREG V A, the region still cooperates in the joint German-Dutch INTERREG V A programme, with a common INTERREG Secretariat that supports a joint Supervisory Committee regarding programme approvals and progress. Since these four once independently operating programme regions now collaborate within a larger programme region, this joint programme region now has four regional sub-programme regions. While their objectives and basis are uniform, there are, however, different working methods in these sub-programme regions, e.g. with regard to the application period for projects.<sup>16</sup>

The INTERREG programme's Meuse-Rhine Euregio has not merged with any other INTERREG region through the programme periods.

INTERREG's Flemish-Dutch programme region has changed in the course of the programme periods, as has the German-Dutch programme region. Under INTERREG II, this border region was still divided in two programme regions: the Central Benelux region and the Scheldemond Euregio. Under INTERREG III A, it officially became one single, joint programme region with two regional steering groups for the approval of projects and two regional secretariats. Under INTERREG IV A, both regions were completely united, without any sub-programmes in place any more. The INTERREG V A programme region is now managed by a Joint Secretariat on the Flemish-Dutch border, independently of the (former) Euregios. The Central Benelux Euregio no longer exists at all. The Scheldemond Euregio has survived.<sup>17</sup>

As explained above, the German-Dutch programme region INTERREG V A is a common programme region with four different regional sub-programmes, each of which is managed by a regional programme management. While located in the different Euregios, they operate even more independently of the Euregios under INTERREG V A than under INTERREG IV A. The separation

<sup>15</sup> Cf. Giessen, van der (2014) *Coping with Complexity. Cross-border cooperation between The Netherlands and Germany*

<sup>16</sup> Cf. DNLinterview4

<sup>17</sup> InterviewNLVlaan8

between Euregios and regional programme management allows the Euroregions themselves to become lead partners or partners in INTERREG projects, for instance, but not exclusively, in the so-called framework projects. Framework projects are projects with a Euregio as lead partner. They allow for the realization of smaller sub-projects through simplified approval procedures. The four regional programme regions in the German-Dutch INTERREG V A programme use different names for these project constructions, such as *Dachprojekte* (Umbrella Projects) in the Ems-Dollart Region or *Rahmenprojekte/Kaderprojecten* (Framework Projects) in the EUREGIO, Rhine-Waal Euregio.<sup>18</sup> But Euregios may act as lead partners in other INTERREG projects too. This is currently not the case in all three INTERREG A programme regions, however. In the Flanders-Netherlands border region, the Scheldemond Euregio does not take this position, for example. Since it is not a legal entity, it cannot submit applications to INTERREG in its own right.<sup>19</sup> <sup>20</sup> In the INTERREG V A programme area of the Meuse-Rhine Euregio, the Euregio Meuse-Rhine Foundation will submit a People to People Framework Project for the implementation of small scale sub-projects.<sup>21</sup>

### 8.2. Programme progress INTERREG V A

Projects submitted by the requesting parties as part of INTERREG V A must always fit the priorities set by the programme partners, the so-called Priority Axes (PA). The priorities set by the programmes on the Dutch border for the period of INTERREG V A are related to the European frameworks of the Europe 2020 strategy, which promotes smart, sustainable and inclusive growth.<sup>22</sup> The Province of Limburg summarized the ambition of Europe 2020, as underpinned by the prioritizing of the three INTERREG V A programmes, as follows:

‘De Europa2020 strategie zet in op kennis, innovatie en onderwijs (slimme groei), maar ook op een duurzaam en efficiënter gebruik van natuurlijke hulpbronnen (groene groei) met het oog op meer werkgelegenheid en maatschappelijk cohesie (inclusieve groei). Met Europa2020 als integrale benadering wil de Europese Commissie de grote maatschappelijke uitdagingen van deze tijd effectief aanpakken: grondstoffenschaarste, vergrijzing, klimaatverandering, groeiende energie- en voedselbehoefte, dichtslibbende wegen en sterke internationale concurrentie. Deze ontwikkelingen hebben grote impact op de concurrentiekracht van de regio.’<sup>23</sup>

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<sup>18</sup> DNInterview2

<sup>19</sup> The Scheldemond Euregio is a collaboration between provincial governments aimed at bringing them together in their daily operations. While this type of cooperation still exists in the former Central Benelux Euregio, it has no longer been formally laid down in a delineated Euregio region. (InterviewNLVlaan8)

<sup>20</sup> More information about the Scheldemond Euregio [www.euregioscheldemond.be](http://www.euregioscheldemond.be). A concise overview of all Euregios can be found on <https://www.europadecentraal.nl/onderwerp/grensoverschrijdende-samenwerking/euregios/>.

<sup>21</sup> The information in this paragraph is largely based on a comparison of the approved project lists. Requested from the different programme secretariats and found on [www.deutschland-niederland.eu](http://www.deutschland-niederland.eu), [www.grensregio.eu](http://www.grensregio.eu) and [www.interregemr.eu/](http://www.interregemr.eu/) InterviewNLVlaan8/ EMRinterview6

<sup>22</sup> Cf. European Commission (2010) Communication from the Commission Europe 2020. A strategy for smart, sustainable and inclusive growth.

<sup>23</sup> Provincie Limburg (2012) *Position Paper Provincie Limburg (NL) inzake programmegebieden INTERREG V A 2014-2020*, p. 8 (*Position Paper Province of Limburg (NL) on the INTERREG V A programme regions 2014-2020*)

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*(The Europe2020 strategy invests in knowledge, innovation and education (smart growth), but also in a sustainable and more efficient use of natural resources (green growth), with a view to increased employment and social cohesion (inclusive growth). With Europe2020 as an integral approach, the European Commission aims to address the major societal challenges of this time in an effective manner: raw materials shortage, ageing, climate change, growing energy and food needs, road congestion and fierce international competition. These developments will have a significant impact on the competitiveness of the region.)*

The cooperation programmes are submitted to and approved by the European Commission prior to their implementation. They zoom in on the characteristics of the region in which the programme will be implemented, causing slight differences in the identification of the priorities. The classification of the priorities and priority axes must fit the above-mentioned EU 2020 strategy formulated at European level. As a consequence, the focus for the period 2014-2020 lies on the three main pillars: smart, sustainable and inclusive growth.<sup>24</sup>

The German-Dutch programme has two priorities: Priority 1: 'Reinforcement of research, technological development and innovation' and Priority 2: 'Social-cultural and territorial cohesion'. Before the start, an indicative division of the programme budget was made: around 61,1% was reserved for Priority 1 projects and 32.9% for Priority 2 projects.<sup>25</sup>

INTERREG V A in the Meuse-Rhine Euregio has four Priority Axes (PA), with the following descriptions and indicative percentage distributions of the ERDF/INTERREG contribution:

- PA 1 'Innovation 2020' (around 34,4%);
- PA 2 'Economy 2020' (around 20.8%);
- PA 3 'Social inclusion and training' (around 20,23 %) and
- PA 4 'Territorial development' (around 18.5%).<sup>26</sup>

The Flanders-Netherlands programme also has four priority axes with an indicative percentage distribution of the ERDF/INTERREG budget of:

- PA 1 Smart Growth (Innovation)' (40%);
- PA 2 'Sustainable growth (energy)' (22%);
- PA 3 'Sustainable growth (environment and resources)' (22%) and
- PA 4 'Inclusive growth (labour mobility)' (10%).<sup>27</sup>

<sup>24</sup> Cf. INTERREG Deutschland-Nederland (2015) *INTERREG Deutschland Nederland Samenwerkingsprogramma 2014-2020* p. 4-24 (*INTERREG Germany Netherlands Collaboration Programme 2014-2020*)/ INTERREG Vlaanderen-Nederland (2015/2016) *Publiekversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 3-53 (*INTERREG Flanders-Netherlands (2015/2016) Public Version INTERREG-Flanders-Netherlands Collaboration Programme*) / INTERREG Euregio Maas-Rijn (2016) *INTERREG V-A Euregio Maas-Rijn 2014-2020* p. 4-9 (*INTERREG Meuse-Rhine Euregio (2016) INTERREG V-A Meuse-Rhine Euregio 2014-2020*).

<sup>25</sup> 6% of the total German-Dutch INTERREG V A programme has been reserved for Technical Support (*INTERREG Deutschland-Nederland (2015) INTERREG Deutschland Nederland Samenwerkingsprogramma 2014-2020*, p. 21 (*INTERREG Germany-Netherlands (2015) INTERREG Germany Netherlands Collaboration Programme 2014-2020*))

<sup>26</sup> The programme document contains a fifth PA: PA 5 Technical Support for the general programme administration. Almost 6% of the total ERDF contribution goes to this PA 5 (cf. *INTERREG Euregio Maas-Rijn (2016) INTERREG V-A Euregio Maas-Rijn 2014-2020*, p. 4 (*INTERREG Meuse-Rhine Euregio (2016) INTERREG V-A Meuse-Rhine Euregio 2014-2020*))

Since the different programmes were approved by the European Commission at different speeds and since the different programme partners required more or less time to establish common subsidy guidelines among themselves, the programmes started approving the projects at different times.

The programme for the German-Dutch region was the first to be approved, which could be the reason that it had approved the largest number of projects, comparatively, at the measurement date of 1 August 2016. In total, 65 projects were approved in this programme region. Another 20 projects were still in the pipeline with a real chance of approval at the time of measurement. It must be noted, however, that this is never more than an indication as new projects are added every month. Projects 'in the pipeline' are projects that have been in contact with at least one of the project coordinators of the German-Dutch programme region for a longer period of time and are considered likely, by these project coordinators, to receive actual approval because they comply with the subsidy guidelines and because positive signals have been received from the co-financing parties.<sup>28</sup> According to the programme management of the German-Dutch programme, EUR 124 million of the total budget of around EUR 222 million has already been committed. This is a total committed budget size of EUR 251 million, representing a percentage of 65.2 % of committed EU resources.<sup>29</sup>

It can be said that the level of commitment of the German-Dutch region's budget does not diverge much from the previous INTERREG programming period two years from the start. INTERREG IV A only had more difficulty with the payment of funds to the projects, leading to slight payment delays in comparison with the current programming period.<sup>30</sup>

As far as the German-Dutch programme region is concerned, several interviews clearly stressed that the delayed start of the approval of projects within the framework of the German-Dutch INTERREG V A programme was not due to the new European rules on the granting of subsidies. Rather, it can be traced back to the longer alignment procedures existing between the programme partners involved at the beginning of a new programming period.<sup>31</sup>

The Dutch-German-Belgian programme region of the Meuse-Rhine Euregio has reserved a total EU budget of EUR 96 million for the duration of INTERREG V A, which will be supplemented by co-financing to a total programme budget of around EUR 140 million. On the measurement date of 1 August 2016, 14 projects were approved in this programme region, with total committed funds of EUR 59 million, EUR 29 million of which are EU resources. This means that around 42% of the entire programme budget has been committed. Estimates by programme management suggest that another 14 project applications are currently under preparation and could obtain approval within half a year.<sup>32</sup> The reason for the delays in the approval of the projects in this region mainly lies in the cooperation of the programme partners and '(th)e structure of and rules surrounding the

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<sup>27</sup> This programme also reserves 6% of the total ERDF/INTERREG budget for Technical Support (Cf. INTERREG Vlaanderen-Nederland (2015/2016) *Publieksversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 4 en p. 13 (INTERREG Flanders-Netherlands (2015/2016) *Public Version INTERREG-Flanders-Netherlands Collaboration Programme*))

<sup>28</sup> Cf. DNLinterview1/ DNLinterview4

<sup>29</sup> Cf. Programmadoocument Duits-Nederlands programma, p. 53(Programme document German-Dutch programme)/ DNLinterview1

<sup>30</sup> Cf. DNLinterview1/ DNLinterview4

<sup>31</sup> Cf. DNLinterview1

<sup>32</sup> EMRinterview6

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programme (...) [which had] not sufficiently taken shape yet.<sup>33</sup> According to one of the respondents from this programme region, it was mainly the Member States who were at the basis of the difficult cooperation between the programme partners.<sup>34</sup>

The Flemish-Dutch border region has reserved around EUR 153 million in INTERREG funds. With the approval of 30 projects, almost 55% of the resources have been committed already. Nine projects with a high probability of approval within six months are currently under preparation.<sup>35</sup> The interviews in this region showed that the Regulations of the European Commission regarding INTERREG V A have, on balance, alleviated the programme, compared to the Regulations on the INTERREG IV A programme.<sup>36</sup> The table below is a summary of the data provided during the interviews and taken from the programme documents of the various programmes.

**Table 3: Summary overview of programme claims (measurement date: 1 August 2016)**<sup>37</sup>

INTERREG programme region	Number of approved projects	Total programme budget	Total budget of EU resources	Total budget committed	EU budget committed	Percentage committed programme budget
German-Dutch programme region	65	EUR 444 million	EUR 222 million	EUR 251 million	EUR 124 million	65.20%
Dutch-Belgian-German programme region EMR	14	EUR 140 million	EUR 96 million	EUR 59 million	EUR 29 million	42%
Flemish-Dutch programme region	30	EUR 305 million	EUR 153 million	EUR 167 million	EUR 80 million	54.84%

### 8.3. Content Analysis

The research indicators mentioned in table 1 "average time from first meeting to approval"; "cooperation of the programme partners (compared to previously)"; "procedures for project applications"; and "procedures for project implementation", will be reviewed in more detail in this part of the analysis. Comparative feedback will be provided wherever possible, including the previous programming period, INTERREG IV A, thus enabling a comparison between the current programmes on the one hand and a comparison with the previous programming period on the other. Analysis section 8.3.2, "New structures and practices INTERREG V A", will include the comparison with the previous programming period and the further discussion and development of the indicators "concrete change of procedures in comparison with INTERREG IV A" and "concrete change of regulations in comparison with INTERREG IV A".

<sup>33</sup> EMRinterview5/ EMRinterview6

<sup>34</sup> EMRinterview5

<sup>35</sup> InterviewNLVlaan8

<sup>36</sup> InterviewNLVlaan7/ InterviewNLVlaan8

<sup>37</sup> All three programme regions allot 6% of the total programme budget to Technical Support. This Table counts Technical Support as one of the projects and the amount reserved for Technical Support has been included in the calculation, see also footnotes 25, 26 and 27.

### 8.3.1. Comparison of the INTERREG V A programme structures between the different regions

In contrast with the other regions, the German-Dutch INTERREG programme region has four regional sub-programme regions, which differentiate between decisions on programme and project level. Programme decisions are taken in the common Supervisory Committee that manages the entire programme region and to which all programme partners belong. Project decisions and approvals are taken within the four regional steering groups, in which representatives of the programme partners have a seat by regional area.

The Meuse-Rhine Euregio and the Flemish-Dutch border region do not make this distinction. In these programmes, decisions concerning the projects/ project applications and the programme are taken by the Supervisory Committee (SC), and no extra (regional) steering groups are in place.<sup>38</sup>

The role of the SC on both the level of project decisions and that of programme decisions in the Flemish-Dutch border region becomes clear from the characterization below that the SC started the preparation of the new INTERREG V A programme in the Flemish-Dutch border region in 2011.<sup>39</sup> This shows that the SC operates at a programme level. The SC also operates on project level, as the "application guide" clearly states: *'Deze leidraad is opgesteld voor projectaanmeldingen die groen licht hebben gekregen van het Comité van Toezicht en uitgewerkt kunnen worden tot een complete aanvraag'*.<sup>40</sup> (This guide is drawn up for project applications which have been given the green light by the Supervisory Committee to be developed into complete applications).

The role of the SC in INTERREG's Meuse-Rhine Euregio programme is comparable to that in the Netherlands-Flanders border region, where it is tasked with the supervision of management and implementation of the programme.

Despite its non-exhaustive character, the description below provides a brief outline of the different approval procedures of projects in the various programme regions:

Whereas the German-Dutch programme region offers the possibility to submit projects at any time during the programme, the Flemish-Dutch programme launches calls for projects, whereby the SC decides on the date, form and content. The Dutch-German-Belgian border region also works with generic calls for project proposals, indicating when they can be submitted and which specific conditions have to be fulfilled.<sup>41</sup>

<sup>38</sup> Cf. DNLinterview1/ EMRinterview5/ InterviewNLVlaan7/ InterviewNLVlaan8

<sup>39</sup> INTERREG Vlaanderen-Nederland (2015/2016) *Publieksversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 52f. (INTERREG Flanders Netherlands (2015/2016) *Public Version INTERREG-Flanders-Netherlands Collaboration Programme*)

<sup>40</sup> INTERREG Vlaanderen-Nederland (2015/2016) *Leidraad aanvraag*, p. 1 (INTERREG Flanders-Netherlands (2015/2016) *Application Guidelines*)

<sup>41</sup> INTERREG Euregio Maas Rijn (2016) *INTERREG V-A Euregio Maas-Rijn 2014-2020*, p. 12 (INTERREG Meuse-Rhine Euregio (2016) *INTERREG V-A Meuse-Rhine Euregio 2014-2020*) / INTERREG Vlaanderen-Nederland (2015/2016) *Publieksversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 49f. (INTERREG Flanders-Netherlands (2015/2016) *Public Version INTERREG-Flanders-Netherlands Collaboration Programme*) / InterviewNLVlaan8

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The Dutch-Flemish border regions and the Meuse-Rhine Euregio do offer personal consultations prior to the call for project applications.<sup>42</sup> This is also the procedure for the applications, which can be submitted at any time, in the German-Dutch border region.<sup>43</sup>

All three programme regions make use of a digital system for the submission of applications. The various programme and project partners have access to the applications and the corresponding status of the application. The extent to which the programme partners can enter the digital systems or access the data varies per programme, nor are the digital programmes uniform. Some programme regions have been working with a digital system for a longer time, e.g. the German-Dutch programme, others are using it for the first time during the INTERREG V A period. The Dutch-Belgian-German programme region only started using the electronic management system after the first INTERREG V A projects had been approved. The Flemish-Dutch INTERREG region works with a system called *E-loket (E-counter)*, the Dutch-German INTERREG programme uses *InterDB* and Meuse-Rhine INTERREG programme uses the *eMS* system. The systems are partly based on the structure and content of the general digital system for project applications made available by INTERACT. Since the system provided by INTERACT is quite general, the programme regions on the Dutch border have developed their own programmes, incorporating elements of the INTERACT system.<sup>44</sup>

In the Flemish-Dutch region applications are initially assessed by the Joint Secretariat for Flanders-Netherlands, located in Antwerp, which also issues a reasoned opinion. Subsequently, the programme partners make a reasoned decision.<sup>45</sup> This programme region uses a two-stage procedure. The project applicant must register the project proposal by uploading a project outline to the digital *E-loket (E-counter)* system. Subsequently, the Supervisory Committee (SC) determines whether the registration can be elaborated into a full-fledged application. An official body, comprised of the same parties as the SC, advises the SC during this initial assessment, where high officials give feedback from their own specialist departments. After a positive decision, applicants can further develop their application, after which the Joint Secretariat again checks it against the subsidy criteria of the programme. The SC ultimately decides on the approval. A total application duration of approximately 1 year should be taken into account.<sup>46</sup>

The Management Authority plays a central role in the approval procedure of the INTERREG V A Meuse-Rhine programme region, supported by the Joint Secretariat. Ultimately, the SC decides on project approvals in this programme region too.<sup>47</sup> Here too, it is difficult to estimate the average time required for a project application to obtain approval. The programme document of the Dutch-Belgian-German programme sets a time path of up to 6 months for approval, i.e. from the time of

<sup>42</sup> Cf. EMRinterview5/ InterviewNLVlaan7

<sup>43</sup> Cf. DNLinterview4

<sup>44</sup> Cf. DNLinterview1

<sup>45</sup> INTERREG Vlaanderen-Nederland (2015/2016) *Publieksversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 49 en p. 52 (INTERREG Flanders-Netherlands (2015/2016) *Public Version INTERREG-Flanders-Netherlands Collaboration Programme*)

<sup>46</sup> Cf. InterviewNLVlaan7/ InterviewNLVlaan8

<sup>47</sup> EMRinterview5/ INTERREG Euregio Maas-Rijn (2016) *INTERREG V-A Euregio Maas-Rijn 2014-2020*, p. 12 (INTERREG Meuse-Rhine Euregio (2016) *INTERREG V-A Meuse-Rhine Euregio 2014-2020*)

submission of the project outline to the submission of a request for approval of the application. This does not include the time for the elaboration of a project outline, which takes several months.<sup>48</sup>

In the German-Dutch border region, the SC does not decide on all projects, but focuses mainly on procedures and the progress of the programme itself. The Common INTERREG Secretariat, which connects the four regional sub-programme regions and can be seen as the organizer for the SC, has little to do with most of the projects and the decisions concerning them. Instead, the Common INTERREG Secretariat and the common SC focus their activities on the supervision of the overall progress of the programme, the coordination and communication between the regional programmes and, among others, also on the communication with the European Commission.<sup>49</sup>

Nevertheless, the German Dutch programme region also has variations in the approval procedures between the four regional programmes. There are sub-programme regions, such as the regional management of the Rhine-Meuse-North Euregio, which test each project idea for regional support as one of the first steps in the application procedure: The project outlines have to be presented to a body of mayors who represent the members of the Rhine-Meuse-North Euregio organization to see whether the project idea might have impact on the region. Only in the next steps do they check whether all grant requirements have been met and whether the relevant project plan might qualify for (national) co-financing. Other programmes offer yet other routes to approval: the programme management of the Rhine-Waal Euregio, for instance, has project coordinators prepare project applications to such detail that both content and technicalities meet the programme requirements. This is achieved through discussions with the Lead Partner, discussion of applications during *Technical Consultations* (Technisch Overleg) and the adjustment of projects that don't meet the grant requirements and the requirements of the intended national and/or provincial co-financiers. Only in the next step is the elaborated project presented to potential national and/or provincial co-financiers and decision makers of the regional steering group, where the Euregio itself and its member municipalities share one of the seats.<sup>50</sup>

It is difficult to indicate an average application time because the approval procedures differ in the German-Dutch INTERREG programme region. According to the interviewees, an average time of 1 year should be taken into account from the first interview to the approval of the project by the regional steering group, but wide disparities exist, ranging from shorter application procedures of 6 months to much longer ones. How long the actual approval procedure will take depends on many factors related to both the working methods of the regional programme management and the substantive aspects of the project applications, such as meeting the grant requirements, the conversations with potential partners and co-financiers, etc.<sup>51</sup>

In all regions, the project applicants really need not interfere in the internal procedures of approval of the various programmes. They are supported by a regional programme management in the German-Dutch border region or by the (Common) Secretariats elsewhere. Overall, the projects

<sup>48</sup> Cf. EMRinterview5/ INTERREG Euregio Maas-Rijn (2016) *INTERREG V-A Euregio Maas-Rijn 2014-2020*, p. 12 (INTERREG Meuse-Rhine Euregio (2016) *INTERREG V-A Meuse-Rhine Euregio 2014-2020*)

<sup>49</sup> Cf. DNLinterview1

<sup>50</sup> Cf. DNLinterview1/ DNLinterview4

<sup>51</sup> Cf. DNLinterview1/ DNLinterview2/ DNLinterview3/ DNLinterview4

submitted must meet the grant requirements and comply with the wishes of the national and/provincial co-financiers in order to be approved. All programs strive for the shortest possible route to approval.

A comparison in the German-Dutch programme region shows that the testing of the applications has not become significantly simpler under the INTERREG V A programme than it was under the INTERREG IV A programme. The substance of the applications has become clearer. For example, the estimation and planning of the costs has been facilitated in the project applications through the introduction of the overhead costs and the classification of staff costs into five different groups of hourly rates. Applicants can do the grading of staff to be deployed on the project themselves without having to submit, for example, their pay slips any longer, as was the case during the INTERREG IV A programming period.<sup>52</sup>

Because the German-Dutch programme works with two priorities and with *Strategic Initiatives* (framework projects), an additional approval step, in the form of *Innovation Consultations*, was built into the approval procedure for these strategic initiatives and for Priority 1 project applications, i.e. projects that lead to an *increase in the cross-border innovation power of the programme region*. These *Innovation Consultations* take place across all four sub-programmes. The participants are all programme partners, while positive or negative recommendations can be made and suggestions for changes or modifications offered.<sup>53</sup>

Based on the replies obtained during the interviews and the information extracted from the various programme documents, it may be concluded that the procedures prior to the approval of project proposals clearly differ between the three programme regions. The preparation of projects and even the decision making takes place on different levels in the various programme regions.

### 8.3.2. New structures and practices in INTERREG V A

This section of the analysis reviews the practical implementation of the changes in the three programme regions between INTERREG IV A and INTERREG V A. Since the details of the working methods of the programmes differ, only the most striking differences between the programme regions that were mentioned in the interviews are explained here. Where the previous part of the analysis mainly used project approvals to show the different structures of the programmes, this part of the analysis focuses on changes in relation to project progress, project accounting, project reporting and project reviewing. During the interviews, the partners were asked to name the most significant simplifications within the current programming period based on their own professional experience. The simplifications made by the EU can be observed in the EU regulations for the programming period 2014-2020 and in documents about the simplification of the programming period 2014-2020 as compared to the previous period.<sup>54</sup> Most of this analysis will not quote the official wording from the EU regulations but will focus on the daily procedure of the Dutch INTERREG V A programmes.

<sup>52</sup> Cf. DNInterview1/ DNInterview3/ DNInterview4

<sup>53</sup> Cf. DNInterview2

<sup>54</sup> Cf. European Commission (2015) *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*, pp. 24f and 199f / Regulation (EU) No. 1303/2013 of the European Parliament and Council of 17 December 2013/ Regulation (EU) No. 1299/2013 of the European Parliament and Council of 17 December 2013

Examination of the list of the 65 projects already approved in the German-Dutch INTERREG V A programme region shows that many of the project carriers also realized projects under INTERREG IV A and III A, and possibly even under INTERREG II. However, one can also find project lead partners who have assumed this role for the first time. These new lead partners do often have prior INTERREG experience, however, gained as a project partner or participant in multiple projects during previous programmes. The INTERREG V A programming period also attracts new project partners. This shows that the number of organizations, companies and institutions that participate in the programme is growing. Experienced partners and project carriers often include inexperienced parties in their project applications.<sup>55</sup>

The interviews conducted in the German-Dutch programme region made it clear that the procedures for the implementation and administration of projects have in part become easier compared to the previous period. All respondents from this programme region confirmed unanimously that the rules of the EU had not become more complex for the German-Dutch programme. On the contrary, the intended simplification of subsidy programmes has indeed taken place.<sup>56</sup>

One of the interviewees describes his general impression as follows:

‘During INTERREG IV A I knew each accountant and all financial and administrative staff of the projects. INTERREG V A allows me to focus on the content of the projects again.’<sup>57</sup>

All four respondents in the German-Dutch programme region mentioned the simpler procedures for settlement, payment and financial monitoring of the projects. During INTERREG IV A, the projects were required to submit so-called "means requests" to a regional programme management, which were first checked by internal accountants and then subjected to another internal audit and a second, external audit. This was a lot of work, above all, as it required much communication to and fro, caused, among others, by the need to correct any errors made during all three audits, and a substantially longer monitoring procedure, which often led to payment delays. INTERREG V A saw the implementation of a new system: Project Lead Partners apply for reimbursement of their costs directly. These costs are checked through an internal *First Level Control* (FLC), which can be performed in-house at all regional programmes. The sub-programmes perform FLCs on each other, so that, for example, the FLC of the EUREGIO programme region audits the projects of the Rhine-Waal Euregio. Project partners have to allot 1% of their total budget to the costs of submission of their application to the FLC. On the other hand, the costs for accounting, which had to be budgeted in during INTERREG IV A, have disappeared.<sup>58</sup>

Not only the preparation of the means request and its audit has changed, but also the content of these requests. For example, whereas INTERREG IV A required all staff costs to be monitored by means of payslips, prior grading of staff remunerated on project basis and keeping a record of the

<sup>55</sup> Cf. DNLinterview1/ DNLinterview2/ DNLinterview4/ List of approved projects through the Joint INTERREG Secretariat (non-public)

<sup>56</sup> Cf. DNLinterview1/ DNLinterview2/ DNLinterview4

<sup>57</sup> DNLinterview4

<sup>58</sup> Cf. DNLinterview1/ DNLinterview3/ DNLinterview4

hours worked by means of proof are sufficient under INTERREG V A.<sup>59</sup> Invisible expenses, such as overhead costs, also had to be proven under INTERREG IV A. INTERREG V A adds an overhead percentage to the staff costs. This percentage can be seen as a kind of flat rate, so that not every type of cost should be entered separately but can be added at once to the hours worked.<sup>60</sup> The German-Dutch programme uses two different percentages of overhead costs: Priority 1 projects can include 25% overhead costs and Priority 2 projects 15% (see above for an explanation of the programme priorities).<sup>61</sup>

The declaration procedure has also changed: whereas INTERREG IV A still required the submission of original documentary evidence and means requests by mail, INTERREG V A uses a digital monitoring system, in which the projects' progress reports can also be entered. These progress reports should be submitted every six instead of three months under INTERREG V A.<sup>62</sup>

It also became clear that INTERREG V A requires a division of project expenditures into fewer cost categories than INTERREG IV A. Also, internal changes between costs categories no longer require approval from the regional steering groups. INTERREG V A has established that the cost calculation for a project plan should be considered a mere estimate and that there will always be deviations in the course of the implementation of a project. Cost calculations should preferably be kept by the project lead partner as part of the notes or of the progress report regarding the implementation of the project. It became clear from the interviews that this is considered great progress, in that it gives lead partners more freedom to take project decisions independently. The downside to this is that lead partners also bear greater responsibility, partly because they cannot have all decisions approved by programme management. This could even mean that a lead partner is less focused on the content of a project in INTERREG V A than in INTERREG IV A. A greater responsibility rests on the shoulders of the lead partner regarding the administrative and financial structure and any changes to it. The lead partner also has to monitor the realisation of the project results more than before.<sup>63</sup>

The above examples of changes in project implementation demonstrate that the everyday administrative processes of the current INTERREG V A programme in the German-Dutch region have actually become simpler.

The Dutch-German-Belgian INTERREG V A programme region had approved 14 projects on 1 August 2016, thus having committed around 42% of the entire budget (see also Table 3). As such, this programme region is slightly behind the other programmes in terms of financial commitment.<sup>64</sup> As indicated above, the slow start of this programme was due mainly to the coordination between the

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<sup>59</sup> INTERREG V A uses five different tariff groups for staff costs. The projected staff are put in the different tariff groups already in the application, see INTERREG Deutschland-Nederland (2015) *Förderbestimmungen des INTERREG V A-Programms Deutschland-Nederland*, p. 6 en 7 (INTERREG Germany-Netherlands (2015) *Regulations of the INTERREG V A Programme Germany-Netherlands*)

<sup>60</sup> See also Regulation (EU) No 1303/2013 of the European Parliament and the Council of 17 December 2013, Article 68, p. 57

<sup>61</sup> Cf. INTERREG Deutschland-Nederland (2015) *Förderbestimmungen des INTERREG V A-Programms Deutschland-Nederland*, p. 8 (INTERREG Germany-Netherlands (2015) *Regulations of the INTERREG V A Programme Germany-Netherlands*)/ DNLinterview4/ DNLinterview2

<sup>62</sup> Cf. DNLinterview4

<sup>63</sup> Cf. DNLinterview1/ DNLinterview4/ DNLinterview3/ DNLinterview2

<sup>64</sup> Cf. EMRinterview<sup>6</sup>

programme partners and not to the revised European regulations. The interviewees from this region also mentioned different points regarding the settlement of projects which have made the work method of the programme easier compared to the INTERREG IV A programme. They agree that the regulations of the European Commission have not made the rules for the implementation of the programme stricter but rather more lenient. They confirmed that, 'in principle, the general & specific ETS-Regulations (Vo) (...) [offer] more room for administrative simplification, e.g. via fixed sums for expenses.'<sup>65</sup> It became clear that the potential, offered by the European Commission, to simplify the programmes was not fully realized. This could be due to the fact that the Member States play an even stronger role in this programme than was previously the case. The question whether the interviewees could identify parts of the regulations of the European Commission that caused any burdening of or delay in the current programme received an unambiguous reply: 'No, it is rather about making the transition to practice and meeting the demands of the Member States regarding the implementation of the Regulations.'<sup>66</sup> It is claimed that the Member States too often tend to take their own position as the measure of all things, rather than cross-border cooperation. According to one of the respondents from this programme region, the position of the project partners should become the starting point more often in the future, and the context of the border region should be considered more instead of promoting national and regional interests. This may include the return of more and smaller INTERREG programme regions, where sub-programme working methods can be maintained if necessary. This would put the border regions at the heart again.

Prior to the current programming period, a restructuring took place, in which the Management Authority of the *Stichting Euregio Maas-Rijn* (Euregio Meuse-Rhine Foundation) was transferred to the Province of Limburg (NL). This transfer constitutes a significant change in the working methods of the INTERREG programme in this region, and it will have to be reviewed in the course of the current programme which procedures work best.<sup>67</sup>

In addition to these aspects at the programme level, the same simplifications as referred to in the section above about the German-Dutch region were reported at the project level. Especially the change of being allowed to calculate the overhead costs in proportion to the staff costs and no longer having to break them down alleviates the work.<sup>68</sup> The fact that all documentation, i.e. applications, reports and official communication, must be made available in three languages, however, remains an aggravating aspect of this programme.<sup>69</sup>

The Flemish-Dutch region has also undergone changes in the monitoring and management of the implementation due to the transition from INTERREG IV A to INTERREG V A. These were announced as follows in the *Public Version of the INTERREG-Flanders Netherlands Collaboration Programme*:

'De beheers- en controleregelingen (...), borduren deels voort op deze in voorgaande Interreg-programma's. Nieuwe elementen of accenten komen voort uit leerpunten uit de voorgaande programma-periode, aanbevelingen uit systeemaudits, een bestuurlijke wens tot

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<sup>65</sup> EMRinterview<sup>5</sup>

<sup>66</sup> EMRinterview<sup>6</sup>

<sup>67</sup> EMRinterview<sup>5</sup>

<sup>68</sup> EMRinterview<sup>5</sup>

<sup>69</sup> EMRinterview<sup>5</sup>

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administratieve vereenvoudiging, harmonisatie waarrond in Interact-verband en met naburige programma's is overlegd en vanzelfsprekend de nieuwe verordeningen.<sup>70</sup>

*(The management and monitoring arrangements (...) partly build on those of previous INTERREG programmes. Any new elements or accents are derived from lessons learnt from the previous programming period, recommendations from system audits, the managerial desire for administrative simplification, harmonisation agreed upon through Interact and with neighbouring programmes and, of course, the new Regulations.)*

The interviewees in this region identify the above aspects of project implementation as the striking changes in working daily within and with cross-border INTERREG projects in this programming period. They also gave examples such as working with flat rates for expenses. Simplifications such as reduced burden of proof and standard hour rates for calculating staff expenditures are also seen as positive. In addition, this INTERREG A programme, supported by the relevant European regulations, allows all projects, regardless of the level of the total planned budget, to claim preparation costs of about EUR 30,000 without having to prove the costs incurred separately during the preparation period.<sup>71</sup>

It is noteworthy that the interviewees in the Flemish-Dutch region raised an issue that was not addressed in the interviews elsewhere, i.e. the requirements regarding publicity. The relevant EU Regulation stipulates these requirements in a very detailed manner.<sup>72</sup> This programme region has rewritten these European directives to create a workable guide for the region.<sup>73</sup> Indicating the support received from INTERREG resp. Europe was already a requirement in the previous programming period, but the descriptors were much less detailed.<sup>74</sup> According to the participating partner, the controls on publicity lead to much irritation and extra work, and barely result in more or better communication. The current rules concerning logo size, for example, even generate an adverse effect: beneficiaries actually communicate less about their project.<sup>75</sup>

Another point of focus in the interviews in this programme region was the issue of state aid, which can be defined as follows:

'De Europese Unie streeft naar onvervalste mededinging in de interne markt (...). Wanneer publieke autoriteiten voordelen toekennen aan bepaalde ondernemingen, die concurreren in de markt, kan de mededinging worden verstoord. Dergelijke voordelen worden staatssteun genoemd.'<sup>76</sup>

<sup>70</sup> INTERREG Vlaanderen-Nederland (2015/2016) *Publieksversie Samenwerkingsprogramma INTERREG-Vlaanderen-Nederland*, p. 48 (INTERREG Flanders-Netherlands (2015/2016) *Public Version INTERREG-Flanders-Netherlands Collaboration Programme*)

<sup>71</sup> InterviewNLVlaan8

<sup>72</sup> Regulation (EU) No. 1303/2013 of the European Parliament and the Council of 17 December 2013, Articles 15, 16 and 17, p. 75 ff.

<sup>73</sup> INTERREG Vlaanderen-Nederland (2015/2016) *Leidraad promotie en publiciteit INTERREG V (2014-2020)* (INTERREG Flanders-Netherlands (2015/2016) *INTERREG V A Guidelines for Promotion and Publicity (2014-2020)*)

<sup>74</sup> See Regulation (EC) No 1083/2006 of the Council of 11 July 2006, Article 69, p.34

<sup>75</sup> InterviewNLVlaan8

<sup>76</sup> Ministerie van Buitenlandse Zaken (2016) (Dutch Ministry of Foreign Affairs) <http://www.minbuza.nl/ecer/dossiers/staatssteun/staatssteun.html>

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*(The European Union is committed to achieving undistorted competition in the internal market (...). When public authorities grant benefits to certain undertakings that compete in the market, competition will become distorted. Such benefits are referred to as state aid.)*

The rules regarding state aid are more nuanced during this programming period. This can be seen in Regulation 1303/2013, which states:

‘Financial instruments should be designed and implemented so as to promote substantial participation by private sector investors and financial institutions on an appropriate risk-sharing basis. To be sufficiently attractive to the private sector, it is essential that financial instruments are designed and implemented in a flexible manner. Managing authorities should therefore decide on the most appropriate forms for implementing financial instruments in order to address the specific needs of the target regions, in accordance with the objectives of the relevant programme, the results of the ex ante assessment and applicable State aid rules.’<sup>77</sup>

Thus, with regard to state aid, the European Commission created more opportunities for subsidization through Interreg.<sup>78</sup>

### 8.4. Contact between INTERREG V A programme regions

Most of the programme partners on the Dutch border know each other. Some programme partners are part of two programme regions, because two programmes are being implemented within the same region, for example, within the German Land of North-Rhine Westphalia. The three programmes that include the Dutch border regions are often staffed by people who worked for INTERREG A during previous programming periods, sometimes in different positions. In addition, regular consultations between the programme regions form an opportunity for the programme managers to meet.

Furthermore, some of the programme regions are members of Europe-wide networks such as the *Association for European Border Regions* (AEBR) and INTERACT. For instance, 95 out of an estimated 163 cross-border regions are members of the AEBR. The main task of the AEBR, which was founded in 1971 long before the implementation of the INTERREG programme in 1989/90, is the representation of the interests of European border regions at national and European level. In addition, the AEBR aims to initiate, support and coordinate cooperation across Europe by sharing information and formulating common interests and potential solutions to problems.<sup>79</sup> The annual, often multi-day conferences assemble representatives of the member regions of the AEBR. The programme partners from the Dutch cross-border regions are very regular participants in these annual conferences.

<sup>77</sup> Regulation(EU) No. 1303/2013 of the European Parliament and the Council of 17 December 2013, Art. 36, p. 6

<sup>78</sup> InterviewNLVlaan8

<sup>79</sup> [www.aebr.eu](http://www.aebr.eu)

The programmes also form part of the INTERACT network.<sup>80</sup> The INTERACT network consists of networks concerned with INTERREG.<sup>81</sup> INTERACT is a help desk to support the programmes in their daily activities and as to their working methods and to connect them mutually, for example by encouraging the exchange of experiences or by providing information about the possibilities of INTERREG. The objectives of INTERACT are threefold: 1. Improving the management capabilities of the INTERREG programmes; 2. Improving INTERREG capacities with regard to the recording and the communication of project results and 3. Enhancing the implementation of new cooperation methods.<sup>82</sup> Staff from the German-Dutch and Flemish-Dutch programme regions are regularly approached from the INTERACT network with questions about the structure of the procedures in this programme region. The reason is that the German-Dutch region is far ahead of the other programmes in Europe regarding the commitment of funds (see above), the coordination of regulations and the exceptional involvement of the German and Dutch partners in the programme.<sup>83</sup> Representatives from the Flemish-Dutch region also enjoy participating in the INTERACT network and the events and workshops it offers. Around two thirds of the people working at the Joint Secretariat in Antwerp participate in the INTERACT network. An important aspect of the network is the opportunity it provides to learn from the different elements of other programmes and to improve one's own programme or working method, in part thanks to this mutual communication.

Another important aspect of the INTERACT network are the interpretive discussions of the European regulations. It is interesting for programmes to explain their own interpretation or method of enforcement to other programmes, so that, all across Europe, these programmes are aware of the possibilities and are aligned as much as possible, wherever possible. Since it is difficult, in practice, to obtain a direct explanation from the European Commission regarding the interpretation of a certain aspect of the Regulation, the programmes can spar together and, where necessary, jointly formulate a question to present to the European Commission. Discussions have made clear that this often leads to a quicker answer. Overall, the interviewees were satisfied with the work of INTERACT: the organization responds quickly to changes and supports the implementation of new regulations when necessary.<sup>84</sup>

## 8.5. The Image of the INTERREG V A programme

The final research indicator in Table 1 of this document is the image of the INTERREG A programme. As this indicator is not immediately quantifiable, all interviewed persons were asked to assess the programme.

<sup>80</sup> With the INTERACT network also being an INTERREG project in its own right, in which all 28 Member States, Norway and Switzerland participate as members (cf. [www.interact.eu](http://www.interact.eu))

<sup>81</sup> Over 100 INTERREG programmes are members of the INTERACT network, also including the INTERREG B and C programmes.

<sup>82</sup> Cf. [www.interact.eu](http://www.interact.eu)

<sup>83</sup> Cf. DNInterview1

<sup>84</sup> Cf. DNInterview1/ InterviewNLVlaan8

The various interviews generally showed that INTERREG A has the image of being bureaucratically and administratively burdensome.<sup>85</sup> Although the transition of INTERREG IV A to V A has resulted in procedural simplification, which can be traced back to the simplified legislation of the European Commission's regulations, the image of INTERREG V A does not yet appear to have improved much. One of the partners suggested that the image of the previous INTERREG IV A programme is transferred to the INTERREG V A programme.<sup>86</sup>

This stocktaking study has made it apparent that the programme regions operate in different ways within the same framework. In some programme regions, partners jointly pursue the goal of promoting cross-border cooperation. In other regions, the partners on both sides of the border engage in cross-border cooperation with different interests. The diverging interests in these programme regions can be the cause of more difficult cooperation compared to areas where the partners have been collaborating towards approximately the same objective for years. The "final consumers", i.e. the organizations carrying out the projects, are often unaware that certain procedures and requirements within one INTERREG A programme region do not automatically apply to the other INTERREG A region as well. This may cause negative experiences in one programme region to give another INTERREG A programme a negative image too.

The interviews also made clear that European subsidy programmes are generally much more burdensome in terms of administration and monitoring systems than national or provincial subsidies.<sup>87</sup> The INTERREG A programmes usually do much to improve the programme's image. As a consequence, info sheets and websites exist with detailed information, and regional meetings are held to communicate the simplifications of the European regulations that govern the programme. The interviewees admit that it remains difficult to actually change the image.<sup>88</sup>

The interviews did not fully reveal which aspects of the programme exactly cause the bureaucratically and administratively burdensome image. Perhaps it is caused by the interplay and cumulation of various aspects: the extensive approval and coordination procedures, the co-financing interviews, the interviews and presentations for the various fora on the way to approval, as well as the time allotted for these (see above for the duration of project-application procedures).

The interview partners do not fully agree to the statement that cross-border cooperation in their region would be a given fact even without INTERREG A. Opinions diverged from:

'cross-border cooperation would also have taken place in our region without INTERREG. INTERREG is only an instrument, not a condition for cooperation.'<sup>89</sup>

to:

'[If INTERREG were to disappear,] there will be some 'memory effect' [on the short term]. The networks will probably survive initially but will be diluted after a while. Cohesion is

<sup>85</sup> It should be noted that this study does not provide an exact definition of the term 'bureaucratic' as it is not immediately quantifiable and no comparison takes place with, for instance, another European programme. The responses to this question merely concern a personal assessment of the interviewees.

<sup>86</sup> Cf. DNLinterview3

<sup>87</sup> InterviewDNL8

<sup>88</sup> Cf. DNLinterview1

<sup>89</sup> DNLinterview3

stronger within a country, due to regular contacts, seminars and consultations. There is less of this across the border, and if INTERREG were no longer there as a trigger, it might water down our network, which would be a step back.<sup>90</sup>

This does not alter the fact that, despite the obstacles, rules, lengthy procedures etc., almost all interviewees share a fundamentally positive attitude towards cross-border cooperation. Especially the interviewees in the German-Dutch and Flemish-Dutch programme regions were convinced that INTERREG A actually stimulates cross-border cooperation. One of the partners explained this very simply:

'Public institutions have an introverted task; they only look toward their own circles within their own country. Genuine cross-border cooperation between public and semi-public authorities will not take place without a programme such as INTERREG A. The situation is different at universities; they have contacts throughout Europe. However, things are different for educational institutions. Here, INTERREG stimulates cross-border cooperation.'<sup>91</sup>

## 9. Summary and Conclusion

This comparative stocktaking study gives a first impression of the INTERREG V A programme in the programme region between Germany and the Netherlands, the Meuse-Rhine Euregio, i.e. a German-Belgian-Dutch programme, and the border region between Flanders and the Netherlands. The study focuses firstly on comparing the progress of the various programme regions and secondly on comparing the approval and implementation procedures of the INTERREG projects. The main focus of the research lies on the most significant differences in implementation between the current and the previous programming period in the various programme regions. Finally, it addresses the image of INTERREG in the programme regions. Since the European Commission has been striving for the simplification of programmes such as INTERREG A, establishing whether the regulations of INTERREG V A have indeed become simpler is key.

The results of the study show that the INTERREG V A programme regions of Germany-Netherlands and Flanders-Netherlands are ahead of schedule, given that around 50% or more of the total budget has already been committed 2.5 years after the start of the programme. The Meuse-Rhine Euregio is slightly behind by comparison. As the interviews made clear, this had nothing to do with any extra bureaucratic burden caused by European legislation. Almost all of the interviewees confirm that the European regulations for the implementation of INTERREG V A have indeed become simpler. The programme regions themselves have also attempted to achieve the simplification, so that the final beneficiaries of the programme, i.e. the project carriers and partners, bear a lesser administrative burden and increase their decision-making power in the projects. This increased decision-making power sometimes also implies greater responsibility for the project partners. This can go hand in hand with a higher own risk since lead partners carry more responsibility for the achievement of the project's targets than in earlier programming periods. Moreover, the approval of mid-project changes to the cost structure no longer lies with the responsible programme management in all

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<sup>90</sup> InterviewNLVlaan8

<sup>91</sup> DNLinterview4

cases but increasingly with the lead partner. In short, project implementation, overall, is more result-oriented than before.

Ultimately, it can be established that the INTERREG V A programme has clearly been simplified, both through the relevant EU regulations and by their actual implementation in the regions. This shows, among others, the way in which the programme is managed in the various programme regions, the way in which new project applications can be submitted and the way in which projects are carried out, supervised, monitored and settled. This does not mean, however, that all programme regions are achieving the maximum result from this simplified regulatory environment. There is still much ground to be gained both at regional, provincial and national level.

In general, the INTERREG programme still suffers from a negative image in terms of the bureaucratic burden of its implementation. The interviewees identified several potential causes for this: perhaps the experiences from programme regions where the implementation of INTERREG has been relatively difficult are generalized and transferred to all programme regions. Or perhaps past experiences with INTERREG III A and INTERREG IV A have a negative effect on the perception of the new programme. The interviewees also pointed out that other European subsidy programmes are probably not less cumbersome than INTERREG. This also raises the question of the subsidy programmes at national, regional or local level to which the European INTERREG programme is being compared. European subsidy procedures can generally incur a reputation of being bureaucratic in comparison with mostly regional or local grant applications, where decision-making procedures are often shorter as fewer bodies are involved at fewer different levels of government, not to mention the absence of any cross-border bodies or administrative tiers.

The interviews also made clear that the structure of INTERREG A gains a reputation of being complex and not very transparent when many and many different programme partners have to make joint decisions and procedures vary slightly across the different programme regions. On a positive note, however, it is exactly this joint management and decision making by programme partners on different sides of the border that makes the INTERREG A programme unique, as the interviewees confirmed. As such, the structure and organisation of the programme itself constitute a cross-border impulse in their own right.

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