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Reforming the MFF and Cohesion Policy 2021-27: pragmatic drift or paradigmatic shift?



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EXECUTIVE SUMMARY

This paper provides a review and assessment of the EU budget and Cohesion policy reforms proposals for 2021-27.¹ European Commission proposals for the Multiannual Financial Framework for 2021-27 were tabled in May 2018 and presented as being both ambitious for the EU but also pragmatic given the straightened budget circumstances associated with Brexit. It was also said to be future-oriented in reflecting the pressures of rapid developments in innovation, the economy, the environment and geopolitics, while retaining a strong commitment to solidarity.

The Commission's proposals provide for a budget of €1,135 billion in commitments (2018 prices) for 2021-27, equivalent to 1.11 percent of EU27 GNI. Initial reactions from some net payers (Austria, Denmark, Netherlands, Sweden) is that the size of the budget is unacceptably high, compounded by the proposed phasing-out of rebates, which could lead to steep increases in some net payments. At the other end of the spectrum, several net recipients are critical of the 'lack of ambition' of the EU budget (Greece, Hungary, Poland, Portugal) as are the European Parliament and Committee of the Regions

Changes in the composition of headings are significant because they conceal shifts in expenditure. This is particularly so for Headings 1b and II – Cohesion policy. The Cohesion policy budget appears to increase, but the new Cohesion and Values heading includes Erasmus+, transferred from Heading 1a (€26,368 million), and the new EMU reform support tool (€22,282 million), as well as a number of smaller items from Security and Citizenship. Taking account only of the ERDF, the Cohesion Fund and the ESF+, the proposed Cohesion policy budget is around €331 billion for 2021-27 compared with €374 billion for 2014-20. The budget lines for agricultural policy (Heading 2 and III) also show a pronounced reduction in proposed spend on agriculture, fisheries and rural development.

In short, compared to 2014-20, the Commission proposes a significant shift away from Cohesion policy and market-related expenditure and direct payments towards other areas of spend, notably the single market innovation and digital heading. Overall, the new proposals envisage that 'other' policies would account for almost half of spend, rather than just over a third in 2014-20.

Within the Cohesion policy heading, there are major implications for individual Member States. Although the Commission has proposed changes to the Berlin formula, the allocations are primarily determined by 'adjustments': a safety net (to limit cuts); and a reverse safety net capping (to limit increases). Increases in Cohesion policy allocations are concentrated in southern Europe – especially Greece, Italy and Spain - which would see gains of over ten percent relative to 2014-20. Seven countries would see decreases in Cohesion policy allocations exceeding 20 percent of initial 2014-20 allocations – mainly in Central and Eastern European (especially Poland, in absolute terms), but also Malta and Germany.

As in previous reforms, there is a big gap between the expectations of the Member States on the overall size of the MFF as well as its allocation to policy headings. However, there are other factors that will affect the dynamics of the negotiations:

- the absence of the UK is placing greater pressure on those net payers seeking a smaller EU budget to take a more prominent role;

¹ This paper was originally prepared for the 39th Meeting of the European Regional Policy Research Consortium (EoRPA) held on Loch Lomondside on 30 September – 2 October 2018. It has been updated to reflect new research and policy contributions since the EoRPA meeting.

- the proposed phasing-out of rebates and changes to national co-financing would significantly affect the net position of individual Member States;
- coalition politics may influence national negotiation strategies and the flexibility available to some national leaders;
- the Commission's publication of figures for Member State receipts at the outset of the negotiations, focus political and public attention on budgets rather than policy issues – this may accelerate the negotiations but may also constrain the flexibility available to Member States;
- changes to the Berlin Formula include migration in the algorithm for allocating Cohesion Policy funding, but also include arbitrary figures for capping and safety nets;
- there may be less coherence among the Central and Eastern European countries, who are affected very differently by proposed national allocations;
- proposals to link funding to the rule of law are highly divisive; and
- increased allocations to non-traditional policies may lead some countries to seek compensation for cuts in CAP and Cohesion policy through a territorialisation of policies such as Horizon Europe.

The regulatory proposals for Cohesion Policy are less divisive, with continuity in some areas (especially continuation of an all-region approach) and efforts to respond to Member State concerns on issues such as proportionality, flexibility, harmonisation of rules, and simplification. There are also some imaginative elements – the potential for increasing the emphasis on integrated territorial development and more citizen-focused intervention (Policy Objective 5) and the new innovation-focused strand of INTERREG.

However, early reactions have drawn attention to several aspects that are likely to be problematic for at least some Member States:

- the absence of an overarching strategy or framework to provide direction and purpose to the policy;
- the perceived encouragement for ESIF funding to be allocated to InvestEU and other instruments (but not vice versa);
- the uncoupling of rural development from the CPR;
- the grouping of ERDF/CF and ESF+ with different groups of EU instruments, and the potential 'nationalisation' of ESF;
- continuation of thematic concentration through earmarking, albeit at national rather than programme levels, particularly for parts of Central and Eastern Europe which now have Transition Region status;
- the lack of coherence between the thematic objectives for ERDF/CF and ESF+;
- the implications of a closer link of Cohesion Policy to the European Semester and Country-Specific Recommendations;
- the proposed reduction of spending on European Territorial Cooperation;
- the changes to pre-financing, especially when combined with greater national co-financing; and
- the shift from n+3 back to n+2, especially for Member States allocating funding to large and complex projects.

Looking beyond the specific proposals, there are several points of note about the broad approach to the reform. First, there is no clear mission for Cohesion Policy: to answer the question posed in the title of this paper, the reform appears to be more 'pragmatic drift', without a clear *leitmotif*, rather than any

significant shift in the paradigm of the policy. Indeed the same applies to the MFF as a whole. Previous reforms of the policy were conceptualised, structured and communicated with a set of strategic objectives – facilitating enlargement, delivering EU policy objectives (Lisbon Strategy, Europe 2020) – that are absent from the Commission’s proposals for 2021-27. The five repackaged policy objectives lack an overarching EU strategic framework, potentially weakening the political commitment to and visibility of EU Cohesion Policy in delivering EU goals at both EU and national levels. At one time, it appeared that the UN Sustainable Development Goals might provide a framework for the MFF or Cohesion policy specifically, but this was rejected by the Commission. Insofar as objectives are set out, they are functional and administrative (e.g. modernisation, flexibility, simplification) rather than strategic. In part, this reflects the way in which the current proposals have emerged, with a much more constrained role for the Commissioner for Regional Policy and DG REGIO, and stronger control from the centre of the Commission. Of particular concern is the lack of attention paid to OECD and academic research on the need for more place-based or place-sensitive policies for economic development. Sectoral interests have won out; the centre of the Commission is clearly less sympathetic to Cohesion Policy and appears to regard it more as a political tool than in the past.

Second, the Commission is seeking more control over EU spending, reflected in the proposed shift from shared management to central management of funding, and greater influence for the Commission services in areas such as the European Semester, application of the proposed conditionality on the rule of law, and the introduction of structural reform programmes. In this context, it is notable how the Commission’s spending review uses evidence selectively to rationalise its proposals for change.

Third, the line of argument - characteristic of previous reform debates - that Cohesion policy is ineffective or inefficient seems to have been laid substantially to rest. The MFF proposals recognise that the ERDF and Cohesion Fund have high additionality. Cohesion policy is acknowledged to support economic adjustment and mitigating shocks. Similarly, the high EU added value of the ESF is recognised. Yet, the major strides in improving the effectiveness of Cohesion Policy, investing in performance management and demonstrating results appear to have counted for little in the decisions made on policy priorities.

Finally, the reform proposals weaken the long-standing commitment to a coordinated use of the Funds. A key principle of the 1988 reform, reiterated and strengthened in successive reforms, has been seriously undermined. The separation of rural development from the CPR is likely to complicate efforts to coordinate intervention in rural areas at both strategic and operational levels. Further, the regional role of ESF has been almost entirely airbrushed out of the story in the budget proposals and the spending review (as was the case in the ESF ex post evaluation of 2007-13). While the ERDF-ESF-EAFRD coordination task has often been difficult at EU and national levels, and unpopular in parts of DG EMPL and DG AGRI, it is remarkable that these moves have been proposed at a time when greater emphasis is being placed on synergies and integrated development.

1. INTRODUCTION

On 2 May 2018, the European Commission published its proposals for the Multiannual Financial Framework (MFF) 2021-27 with the title 'A Modern Budget for a Union that Protects, Empowers and Defends'. The proposals comprised a draft Council Regulation on future expenditure, a 'spending review' to justify the Commission's choices, a draft Interinstitutional Agreement, and a series of proposals for reforming the system of Own Resources. The budget was presented as being *ambitious* but also *pragmatic* given the straightened budget circumstances associated with Brexit, *future-oriented* in reflecting the pressures of rapid developments in innovation, the economy, the environment and geopolitics, while retaining a strong commitment to *solidarity* (see Box 1).

Box 1: European Commission presentation of the MFF proposals

"Today is an important moment for our Union. The new budget is an opportunity to shape our future as an ambitious Union of 27 bound together by solidarity. With today's proposal we have put forward both a vision for the kind of Union we want, as well as a pragmatic plan for how we make it happen."

Jean-Claude Juncker, President of the European Commission, 2 May 2018

"This budget proposal is truly about EU added value. We invest even more in areas where one single Member State cannot act alone or where it is more efficient to act together be it research, migration, border control or defence. And we continue to finance traditional – but modernised – policies, such as the Common Agricultural Policy and Cohesion Policy - because we all benefit from the high standard of our agricultural products and regions catching up economically."

Günther Oettinger, Commissioner for Budget & Human Resources, 2 May 2018

The Commission's proposals for the MFF involved less change than might have been expected during 2017. The proclaimed modernisation does not involve either 'radical redesign'² – an option set out in the 2017 White Paper on the Future of Europe – and is arguably more evolution than revolution.³ As the Bulgarian Presidency of the EU noted:⁴

The Commission's MFF proposal does not constitute a radical reform in relation to either budget size or the key priorities for funding. This also reflects the political state of play across the EU, where reinforcing stability and harmony across EU-27 is imperative. Nonetheless, tensions will likely emerge during the negotiation period and are likely to focus on CP budget size and the different views from some EU member states; conditioning CP funds on the rule of law; and the role and direction for a strengthened commitment to address structural reforms.

² Bachtler J, Mendez C and Wishlade F (2016) *Reshaping the EU budget and Cohesion Policy: carrying on, doing less, doing more or radical redesign?* EoRPA Paper 17/4, European Policies Research Centre, University of Strathclyde, Glasgow.

³ Bachtler J, Mendez C and Wishlade F (2016) *Evolution or revolution? Exploring New Ideas for Cohesion Policy. 2020+*, EoRPA Paper 16/4, European Policies Research Centre, University of Strathclyde, Glasgow.

⁴ *High Level Conference Dedicated to EU Cohesion Policy: post-2020 Perspectives for Convergence and Sustainable Regions, Sofia, 8th June 2018, Background paper*, Bulgarian Presidency of the Council of the European Union.

These tensions referred particularly to the MFF being accompanied by a proposal “on the protection of the Union's budget in case of generalised deficiencies as regards the rule of law in the Member States” and giving the EU the powers to adopt “appropriate” measures including the “suspension, and reduction of funding under existing commitments, or the prohibition to conclude new commitments with specific categories of recipients”.

The presentation of the budget proposals was also linked with a plea for urgency in negotiating the proposals. President Juncker said “*The ball is now in the court of Parliament and Council and I believe we should aim to have agreement before the European Parliament elections next year.*” The Commission’s argument is that, unless the Council are able to agree by April 2019, the European Parliament elections and appointment of a new Commission would significantly delay any prospect of reaching agreement until late into 2020.

The individual policy proposals for the budget headings were published over a two-week period almost a month after the MFF. Proposals for a new Common Provisions Regulation were published on 29 May 2018 covering the ERDF, Cohesion Fund and EMFF (but not the EAFRD) as well as for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument. Specific regulations were also published for the ERDF and CF, territorial cooperation, and a new cross-border mechanism, as well as the impact assessment. A day later, proposals were also published for the ESF+ and the accompanying impact assessment.

Since the launch of the budgetary and legislative proposals, the ‘clarification’ phase of the negotiations has got underway in different Council configurations, notably the Working Parties on the MFF and on Structural Measures, chaired by the Austrian Presidency, with weekly meetings (ongoing) - in the case of the legislation on blocks of the regulations and examinations article-by-article, as well as orientation debates. Consideration of the proposals is also underway in different committee of the European Parliament with draft opinions beginning to be issued.

This paper provides a review and assessment of the budgetary and regulatory proposals for Cohesion Policy. It is based on desk research covering policy and media sources, and fieldwork discussions on Member State positions (mainly conducted prior to the publication of proposals). It also takes account of the views expressed by Member States and EU institutions.

An initial version of this paper was published in July 2018.⁵ The current paper includes updated information that has emerged over the past four months.

⁵ Bachtler J, Mendez C and Wishlade F (2018) *Proposals for the MFF and Cohesion Policy: a preliminary assessment*, EoRPA Interim Meeting Paper, European Regional Policy Research Consortium, European Policies Research Centre, University of Strathclyde and EPRC Delft.

2. PROPOSALS FOR THE MULTIANNUAL FINANCIAL FRAMEWORK

The Commission proposed Multiannual Financial Framework (MFF) for 2021-2027⁶ was accompanied by proposals for a new Interinstitutional Agreement (IIA),⁷ for a own resources Decision⁸ and for a Regulation to protect the EU budget in relation to ‘generalised deficiencies’ in a Member State’s application of the rule of law.⁹ Collectively, these documents set out Commission thinking on the key parameters for revenue and expenditure in 2021-27 and involve some significant changes, elaborated further in the legislative proposals for spending programmes.

2.1 Policy rationale

The Commission has presented its MFF proposals as being aligned with the Commission’s political priorities set out by President Jean-Claude Juncker in his State of the Union address on 14 September 2016 agreed by the EU27 Leaders in the Rome Agenda Declaration of 25 March 2017 (Box 2). Thematic spending priorities correspond to the headings in the formal budget structure grouped in policy clusters.

Box 2: Rome Agenda for the future of the EU

In the ten years to come we want a Union that is safe and secure, prosperous, competitive, sustainable and socially responsible, and with the will and capacity of playing a key role in the world and of shaping globalisation. We want a Union where citizens have new opportunities for cultural and social development and economic growth. We want a Union which remains open to those European countries that respect our values and are committed to promoting them.

In these times of change, and aware of the concerns of our citizens, we commit to the Rome Agenda, and pledge to work towards:

- **A safe and secure Europe:** a Union where all citizens feel safe and can move freely, where our external borders are secured, with an efficient, responsible and sustainable migration policy, respecting international norms; a Europe determined to fight terrorism and organised crime.
- **A prosperous and sustainable Europe:** a Union which creates growth and jobs; a Union where a strong, connected and developing Single Market, embracing technological transformation, and a stable and further strengthened single currency open avenues for growth, cohesion, competitiveness, innovation and exchange, especially for small and medium-sized enterprises; a Union promoting sustained and sustainable growth, through investment, structural reforms and working towards completing the Economic and Monetary Union; a Union where economies converge; a Union where energy is secure and affordable and the environment clean and safe.

⁶ *A Modern Budget for a Union that Protects, Empowers and Defends – the Multiannual Financial Framework for 2021-2027*, COM(2018) 321 final, 2 May 2018.

⁷ *Proposal for a Interinstitutional Agreement between the European Parliament, the council and the Commission on budgetary discipline, on cooperation in budgetary matters and on sound financial management*, COM(2018) 323 final, 2 May 2018.

⁸ *Proposals for a Council Decision on the system of Own Resources of the European Union*, COM(2018) 325 final, 2 May 2018.

⁹ *Proposal for Regulation of the European Parliament and of the Council on the protection of the Union’s budget in the case of generalised deficiencies as regards the rule of law in the Member States*, COM(2018)324 final, 2 May 2018.

Box 2: Rome Agenda for the future of the EU (continued)

- **A social Europe:** a Union which, based on sustainable growth, promotes economic and social progress as well as cohesion and convergence, while upholding the integrity of the internal market; a Union taking into account the diversity of national systems and the key role of social partners; a Union which promotes equality between women and men as well as rights and equal opportunities for all; a Union which fights unemployment, discrimination, social exclusion and poverty; a Union where young people receive the best education and training and can study and find jobs across the continent; a Union which preserves our cultural heritage and promotes cultural diversity.
- **A stronger Europe on the global scene:** a Union further developing existing partnerships, building new ones and promoting stability and prosperity in its immediate neighbourhood to the east and south, but also in the Middle East and across Africa and globally; a Union ready to take more responsibilities and to assist in creating a more competitive and integrated defence industry; a Union committed to strengthening its common security and defence, also in cooperation and complementarity with the North Atlantic Treaty Organisation, taking into account national circumstances and legal commitments; a Union engaged in the United Nations and standing for a rules-based multilateral system, proud of its values and protective of its people, promoting free and fair trade and a positive global climate policy.

Source: European Commission (2018)

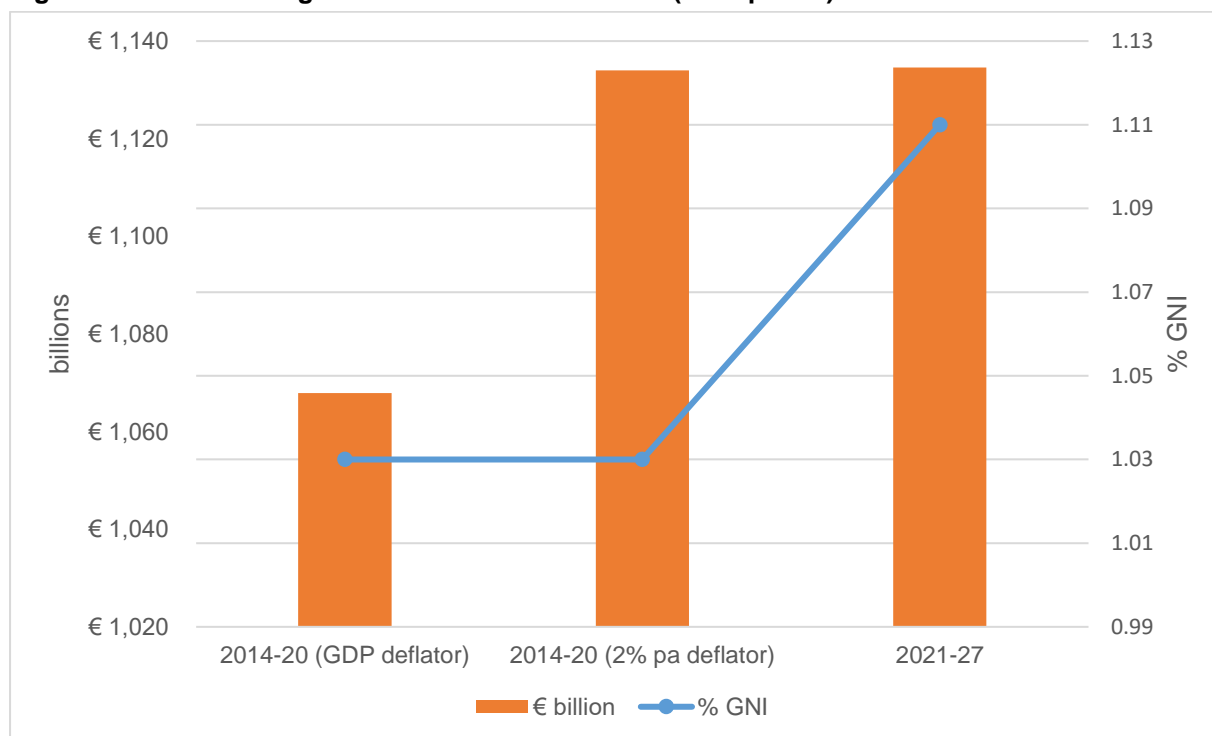
2.2 Expenditure

The main features of the Commission's proposals for 2021-2027 expenditure concern the overall scale of the budget, its structure and policy priorities, new provisions for sound financial management and the rule of law and linkages between the EU budget and economic and monetary union.

In terms of **scale** the Commission's proposals provide for a budget of €1,135 billion in commitments (2018 prices) for 2021-27, equivalent to 1.11 percent of EU27 GNI. This includes the European Development Fund (EDF), which was off-budget in 2014-20. The Commission notes that the amounts are broadly comparable between the two periods once EDF is taken into account.

Direct comparisons between 2014-20 and 2021-27 are not entirely straightforward, as illustrated in Figure 1. Past Commission presentations of MFF proposals have usually included the final year of the current period as a point of comparison, but the current proposal eschew this – perhaps because the Commission considers that Brexit diminishes the relevance of such comparisons. By convention, EU budget calculations apply a two percent deflator in the annual adjustments of the MFF.¹⁰ Using this approach, the overall amount is indeed comparable between the periods – €1,134 billion in 2014-20 compared to €1,135 billion in 2021-27. Importantly, however, the 2021-27 figure applies to the EU27 i.e. post-Brexit. Also interesting is that inflation in the EU27 has averaged around 1.1 in the EU27 between 2011 and 2018, well below the two percent deflator. As a proportion of GNI, the proposals involve a substantial increase – from 1.03 percent (including the EDF) to 1.11 percent. As a result, it could be argued that the proposals represent a significant increase compared with 2014-20.

¹⁰ For the latest version see: *Technical adjustment of the financial framework for 2019 in line with movements in GNI (ESA 2010)(Article 6 of Council Regulation No 1311/2013 laying down the multiannual financial framework for the years 2014-2020)*, COM (2018) 282 final.

Figure 1: Headline budget data 2014-20 and 2021-27 (2018 prices)

Note: EDF is included in the 2014-20 data to render the two period comparable.

Source: Own calculations from MFF 2014-20, COM(2018) 322 final and AMECO online.

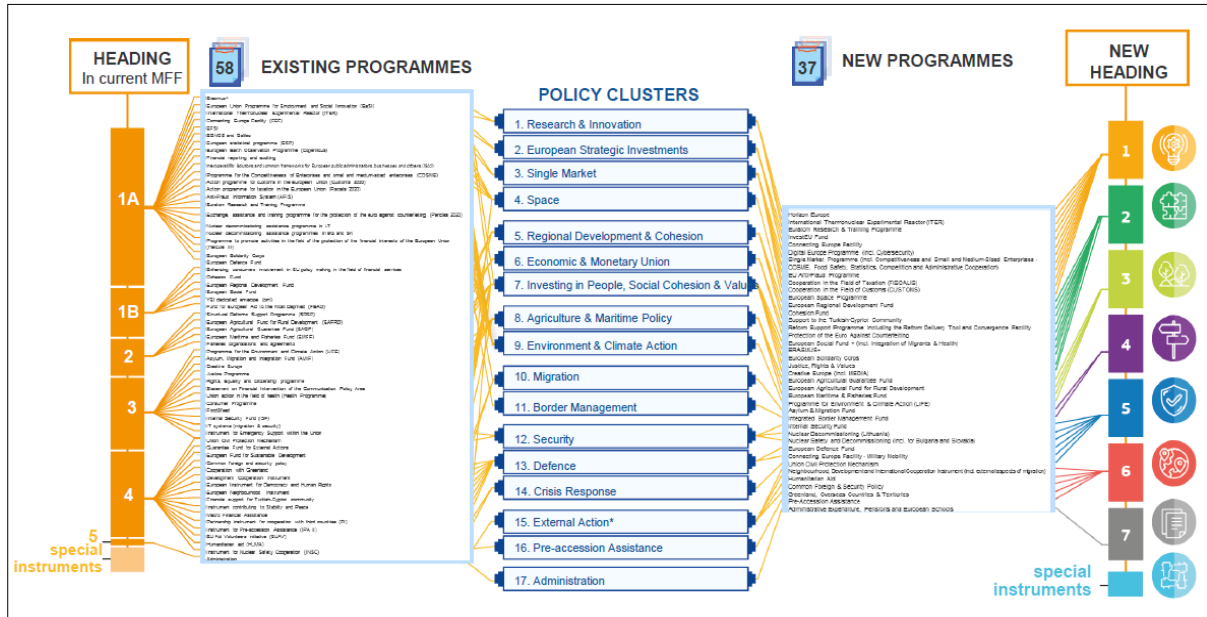
The key developments in the **structure and policy priorities** of the budget comprise:

- **changes to budget headings** and their content;
- significant **cuts** to Cohesion policy and the agriculture; and
- significant **increases** in others, albeit from a much lower base, notably in the case of policies for *migration and borders*, which are set to more than double under a new heading, support for *young people*, and *research and innovation*.

In broad terms, the number of headings has been increased from five (six if the 1a / 1b split is included) to seven – ostensibly to align spending with the political priorities of the EU. Each of the broad headings comprises up to four policy ‘clusters’, of which there are 17 in total. There is also at least a partial rationalisation of programmes, according to the Commission, with the total falling from 58 in 2014-20 to 37 in 2021-27.

Overall, there are similarities in top-level headings, but there are important changes of detail within them. This is illustrated in Figure 2 where the Commission has provided a ‘read-across’ from MFF 2014-20 to the proposed new MFF.

Figure 2: ‘Mapping’ MFF 2014-20 to MFF 2021-27



Source: European Commission.

The complexity of the relationship between the existing programmes (58) and the new policy clusters (17) limits the scope for direct expenditure comparisons between periods. Indeed, only Heading 2 (MFF 2014-20) and Heading III (MFF 2021-27) are directly comparable.

Table 1: Current and proposed MFF headings, € million, 2018 prices

MFF 2014-20	Commitment	MFF 2021-27	Proposal	Key shifts
1a Competitiveness & growth for jobs	€144,330	I Single market, innovation & digital	€166,303	<ul style="list-style-type: none"> Losses Erasmus+ to II (€26,368m) Losses nuclear safety to V (€1190m)
1b Economic, social & territorial cohesion	€373,596	II Cohesion & values	€391,974	<ul style="list-style-type: none"> Gains Erasmus+ (€26,368m) EMU reform tool support (€22,282m)
2 Sustainable growth: natural resources	€428,783	III Natural resources & environment	€336,623	<ul style="list-style-type: none"> Directly comparable
3 Security & Citizenship	€18,023	IV Migration & border management	€30,829	<ul style="list-style-type: none"> New heading, some shifts from 3 to I and II
		V Security & defence	€24,323	<ul style="list-style-type: none"> New heading, some shift from 1a and 3 to V
4 Global Europe (including EDF)	€96,648	VI Neighbourhood and the world	€108,929	<ul style="list-style-type: none"> Broadly comparable
5 Administration	€70,812	VII Administration	€75,602	<ul style="list-style-type: none"> Comparable
Total	€1,134,031		€1,134,583	

Source: Own calculations from MFF 2014-20 and MFF proposals for 2021-27, using MFF price deflator.

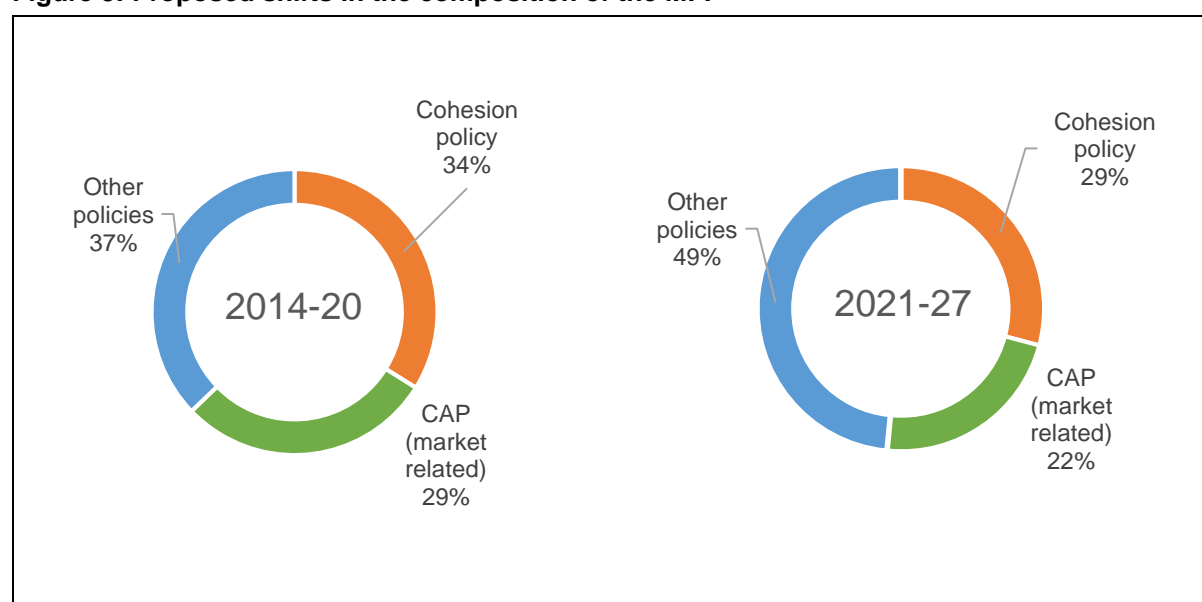
Changes in the composition of headings are significant because they conceal shifts in expenditure. This is particularly so for Headings 1b and II – Cohesion policy. The Cohesion policy budget *appears* to increase (see Table 1), but the new Cohesion and Values heading includes Erasmus+, transferred from

Heading 1a (€26,368 million), and the new EMU reform support tool (€22,282 million), as well as a number of smaller items from Security and Citizenship. Taking account only of the ERDF, the Cohesion Fund and the ESF+, the proposed Cohesion policy budget is around €331 billion for 2021-27 compared with €374 billion for 2014-20.

By contrast with Cohesion policy, the budget lines for agricultural policy (Heading 2 and III) are directly comparable and show a pronounced reduction in proposed spend on agriculture, fisheries and rural development.

In short, compared to 2014-20, the Commission proposes a significant shift away from Cohesion policy and market-related expenditure and direct payments towards other areas of spend, notably the single market, innovation and digital heading. Overall, the new proposals envisage that 'other' policies would account for almost half of spend, rather than just over a third in 2014-20 (see Figure 3).

Figure 3: Proposed shifts in the composition of the MFF



Source: Own calculations for MFF 2014-20 and Commission proposals for MFF 2021-27.

2.3 Revenue

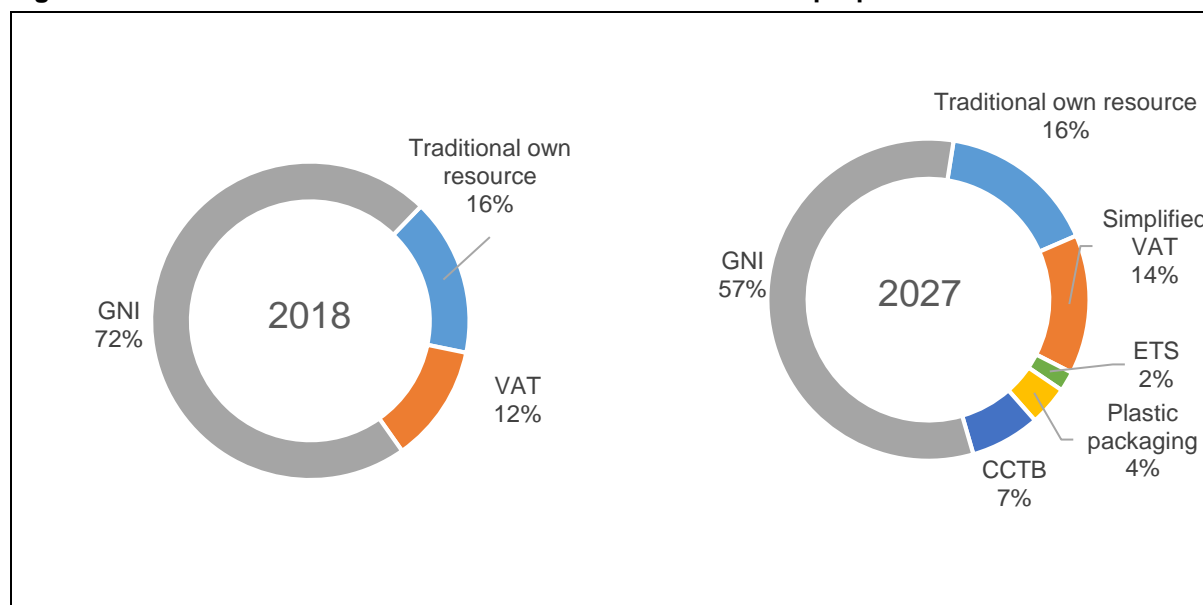
Expenditure rather than the revenue drive the EU budget available. As such, revenues are adjusted largely automatically to meet spending needs, essentially through the GNI-based contribution. This was introduced in 1988 as 'balancing' contribution to ensure full funding of agreed spending and avoid the budget crises that characterised the pre-MFF era. Since then, however, the revenue side of the budget has proven resistant to change with successive Commission attempts to introduce new own resources rebuffed by Member States. Own Resources Decisions (ORD) apply indefinitely rather than being linked to specific MFF periods, but a new ORD is required following Brexit. This is required both to address the revenue shortfall arising from the UK departure and to amend the specific correction mechanisms linked to the UK rebate.

On the **revenue side**, the key changes involve:

- a *higher own resources ceiling* – up from .1.2 percent of GNI to 1.29 percent;
- *new categories of own resources*:
 - a three percent call rate applied to the common consolidated tax base (CCTB)
 - a national contribution based on the amount of non-recycled plastic packaging waste
 - a 20 percent share of the auctioning revenue from the EU emissions trading system;
- *phasing out national rebates* over five years;
- reducing the *customs duties collection costs retained by Member States* from 20 percent to ten percent; and
- simplifying the *VAT-based resource*.

Overall, the main outcome of these proposals would be to reduce quite significantly the share of own resources based on GNI (see Figure 4). However, at national level, the effects will be quite differentiated, with those currently benefiting from corrections negatively affected, along with those which account for a significant share of customs duty collections. Other impacts are more uncertain since some of the changes depend on further legislation (CCTB) or would be phased-in. However, the Commission estimates that its proposal would result in the share of GNI falling from 72 percent of revenues to 57 percent by the end of MFF 2021-27.

Figure 4: EU revenues under the Commission’s own resources proposals



Source: European Commission.

3. POLITICAL REACTIONS TO THE MFF PROPOSALS

3.1 European institutions

European institutions exchange views publicly on the future MFF on 12 October 2018 at a key conference entitled “EU Budget for the Future – the road ahead” gathering members from the Parliament, the Council and the Commission. Also, the European Parliament and the Committee of the Regions have issued general reactions to the Commission’s proposals, draft opinions and launched consultations among their members.

In the Council, the ad hoc Working Party on the MFF 2021-27 has been meeting regularly since June 2018 to examine the technical detail of the Commission’s proposals and to exchange Member State views behind closed doors. The first public debate in the Council of Ministers (General Affairs) on the MFF 2021-27 will take place on 18 September 2018, which should identify key areas of consensus and disagreement.

The European Parliament adopted a resolution on the 2021-2027 MFF and own resources on 30 May 2018,¹¹ and published an in-depth analysis at the end of July comparing the Commission proposals to the Parliament’s priorities.¹² The resolution provides support for of some of the Commission’s proposals, but is critical of the proposed size of the new MFF and various other aspects, especially the reduction in CAP and Cohesion Policy expenditure (Box 3).

A draft Interim Report on the 2021-27 MFF by the European Parliament’s Committee on Budgets was prepared for a plenary vote in November 2018.¹³ The report outlines the Parliament’s priorities for the next MFF in line with the previous resolution (Box 4) while adding more detailed budgetary proposals on the budgetary ceilings and headings by programme (Table 2), as well as specific legislative amendments to the Commission’s legal texts and recommendations on own resources. In terms of overall spending, the EP recommends an increase in the total MFF to 1.34 percent of GNI (compared to 1.14 percent proposed by the Commission), including maintaining Cohesion Policy and CAP spending at 2014-20 levels.

¹¹ European Parliament resolution of 30 May 2018 on the 2021-2027 multiannual financial framework and own resources (2018/2714(RSP))

¹² Parry M and Sapala M (2018) *2021-2027 multiannual financial framework and new own resources: Analysis of the Commission’s proposal*, European Parliamentary Research Service, European Parliament, Brussels.

¹³ European Parliament (2018a) *Draft Interim Report on the proposal for a Council regulation on the Multiannual Financial Framework 2021-2027 – Parliament’s position with a view to an agreement*, Committee on Budgets, 27 September 2018.

Box 3: European Parliament Resolution on the 2021-27 MFF and Own Resources

- Expresses concern that the MFF proposal weakens EU solidarity policies
- Manifests disappointment with the total budget proposed of €1,1 trillion or 1,08 percent of EU-27 GNI (after deducting the EDF), which is lower than the current MFF despite additional needs and new priorities
- Criticises the reduction in CAP and Cohesion policy spending (of 15 percent and 10 percent respectively) and is particularly opposed to cuts in the Cohesion Fund (by 45 %), the EAFRD (over 25 percent), and the European Social Fund (by 6 %);
- Calls for the 2021-2027 MFF to be set at the level of 1.3 percent of EU-27 GNI including;
 - maintaining the CAP and Cohesion Policy for the EU-27 at least at the level of the 2014-2020 budget in real terms,
 - tripling the current budget for the Erasmus+ programme,
 - doubling the specific funding for SMEs and for tackling youth unemployment,
 - increasing the budget for research and innovation by at least 50 percent to reach €120 billion,
 - doubling the Life+ programme,
 - significantly increasing investment through the Connecting Europe Facility, and
 - additional financing for security, migration and external relations
- Requests the mainstreaming of the UN sustainable development goals and of gender in the MFF along with increased climate-related spending to reach 30 % by 2027
- Supports the EU own resources proposals by the Commission, but questions the absence of proposals on the creation of a special reserve comprising all types of unforeseen other revenue, including competition fines, a tax on large companies in the digital sector and the Financial Transaction Tax;
- Supports a financial sanctioning mechanism for Member States that do not respect EU values, with guarantees that final beneficiaries will not be affected by breaches of rules for which they are not responsible;
- Supports a mid-term review of the MFF but it must allow the next Parliament and Commission to conduct a meaningful adjustment of the 2021-2027 framework
- welcomes flexibility proposals particularly the re-use of decommitted appropriations for the Union reserve, the increased allocations of special instruments, and the dismissal of any constraints for the Global Margin for Payments

Box 4: European Parliament Budget Committee Draft Interim Report on MFF 2021-27**MFF issues**

- **Figures.** Calls for a total MFF budget in 2021-2027 of €1,324.1 billion (2018 prices) or 1.3% of EU27 GNI and the following adjustments:
 - Increase the budget for research and innovation to €120 billion (2018 prices);
 - Increase funding for the CEF-Transport;
 - Double the funding for the current COSME programme;
 - Further reinforce the European Space Programme;
 - Maintain EU Cohesion Policy funding at the 2014-2020 level in real terms;
 - Double resources for the Youth Employment Initiative programme;
 - Introduce a specific allocation (€5.5 billion) for Child Guarantee;
 - Triple the current budget for the Erasmus+ programme;
 - Increase the current funding for Creative Europe programme;
 - Maintain CAP funding at 2014-2020 level in real terms;
 - Reinstate the initial amount of the agricultural reserve;
 - Reinforce by 10% the level of the EMFF
 - Double the current funding for Life+ programme;
 - Introduce a specific allocation (€4 billion) for a new Energy transition fund;
 - Reinstate at least the 2020 level for all agencies;
 - Maintain 2014-2020 funding for several programmes for which cuts are proposed;
 - Reinforce instruments for neighbourhood and development policies (€3 billion)
- **Mid-term Revision.** Calls for a compulsory and legally binding revision following a review by January 2023 without altering pre-allocated national envelopes
- **Flexibility.** Welcomes the proposals and calls for: replenishment of the Union Reserve with revenue resulting from fines and penalties; re-use of decommitments; lapsed amounts of special instruments to be made available for all special instruments; higher allocations for the Flexibility Instrument, the Emergency Aid Reserve, Solidarity Fund, and the Contingency Margin
- **Duration.** Underlines the need for MFF's duration to move progressively towards a 5+5 with the modalities endorsed at the mid-term revision stage
- **Structure.** Accepts the structure of seven MFF headings and "programme clusters"
- **Unity of the budget.** Welcomes the proposed integration of the EDF; stresses that the MFF ceilings should not obstruct the financing of objectives, requiring an upwards revision of ceilings for new objectives

Legislative issues

- **Rule of Law.** Final beneficiaries should not be affected by sanctions
- **Review clauses.** Detailed clauses should be included to ensure meaningful assessment
- **Delegated Acts.** EP must play a role in the further elaboration of programmes. Measures such as objectives/priorities, allocations, eligibility, selection criteria, conditions, definitions, and calculation methods should be in the basic act or delegated acts
- **Legislative proposals.** requests proposals for a Regulation establishing an energy transition fund, insertion of the European Child Guarantee in the ESF+, revisions of the Solidarity Fund, Humanitarian Aid and Financial Regulations

Own resources

- Supports EC proposals and calls for the introduction of other revenue (fees, fines, seigniorage) and for an increase in own resources ceilings.

Table 2: Comparison of European Parliament and Commission MFF 2021-27 proposals

	Commission proposal	Parliament position
Commitment appropriations	Total 2021-2027	Total 2021-2027
1. Single Market, Innovation and Digital	166 303	215 072
2. Cohesion and Values	391 974	456 077
Of which: Economic, social and territorial cohesion	330 642	377 697
3. Natural Resources and Environment	336 623	407 877
4. Migration and Border Management	30 829	30 985
5. Security and Defence	24 323	24 639
6. Neighbourhood and the World	108 929	113 837
7. European Public Administration	75 602	75 602
Of which: Administrative expenditure of the institutions	58 547	58 547
TOTAL COMMITMENT APPROPRIATIONS	1 134 583	1 324 089
as a percentage of GNI	1,11%	1,30%
TOTAL PAYMENT APPROPRIATIONS	1 104 805	1 294 311
as a percentage of GNI	1,08%	1,27%
OUTSIDE THE MFF CEILINGS		
Emergency aid reserve	4 200	7 000
European Globalisation Adjustment Fund (EGF)	1 400	1 400
European Union Solidarity Fund (EUSF)	4 200	7 000
Flexibility instrument	7 000	14 000
European Investment Stabilisation Function	p.m.	p.m.
European Peace Facility	9 223	9 223
TOTAL OUTSIDE THE MFF CEILINGS	26 023	38 623
TOTAL MFF + OUTSIDE THE MFF CEILINGS	1 160 606	1 362 712
as a percentage of GNI	1,14%	1,34%

Source: European Parliament (2018) Annex I

A draft input by the REGI committee to the report calls for increase in the overall MFF budget and for Cohesion policy in line with the EP resolution, as well as increased INTERREG funding and a transfer of €20 billion from the Reform Delivery Tool to the Cohesion policy budget. Specifically, the report:¹⁴

- rejects the ten percent reduction in the Cohesion policy budget and calls for its budget to be maintained at the current MFF level (in constant prices), and its share of the MFF to be increased by five percent (to 34 percent) for 2021-2027 as in the current period;
- opposes the reduction in the Cohesion Fund's budget, including through its contribution of €10 billion to the Connecting Europe Facility;

¹⁴ Draft Opinion of the Committee on Regional Development for the Committee on Budgets on the Interim report on MFF 2021-2027 – Parliament's position in view of an agreement, 2018/0166R(APP), 13.7.2018

- calls for the restoration of the INTERREG budget with funding equal to the 2014-2020 envelope in constant prices;
- calls for a transfer €20 billion from the proposed Reform Delivery Tool to Support Structural Reforms to the Cohesion Policy budget, and the INTERREG envelope within it; The ESF+ budget should receive €5 billion of this transfer; and
- notes that lower EU co-financing rates might result in difficulties to access EU funding for beneficiaries.

The European Committee of the Regions has issued a draft opinion on the MFF for 2021-27 (Box 5).¹⁵ Like the European Parliament, it argues that the future MFF should be at least 1.3 percent of GNI and is very critical of the reduced allocations to Cohesion Policy and the Common Agricultural Policy. It also opposes the removal of the common heading for cohesion, since it considers that will weaken the commitment to Cohesion Policy and pave the way for a separation of the ESF in the future. Another key concern is the increased focus on centrally managed instruments at the expense of shared management funds, which reduces the role of regional and local authorities in the management and implementation of EU funding.

¹⁵ Committee of the Regions (2018) *Draft Opinion on The Multiannual Financial Framework package for the years 2021-2027*, COTER-VI/042, 131st plenary session, 8-10 October 2018.

Box 5: Committee of the Regions Draft Opinion on the 2021-27 MFF

General comments

- Calls on the Commission to spell out the strategic objectives for the various EU policies and their expected impact
- Reiterates the Committee's position, shared by the European Parliament, that the future MFF should be at least 1.3 percent of GNI
- considers it unacceptable that the financing of new priorities is to be at the expense of Cohesion Policy and the Common Agricultural Policy.
- opposed to the MFF's proposed structure, including the removal of the common heading for cohesion, since this will weaken the position of Cohesion Policy and pave the way for a possible separation of the ESF+.
- notes with concern the strengthening of centrally managed instruments at the expense of shared management, which weakens partnership and multi-level governance

Own resources

- notes with regret that the Commission has accepted only two further own sources, and takes the view that the Commission proposal could have been more ambitious in this respect;
- welcomes the Commission's efforts to simplify the revenue side of the budget, particularly phasing out of rebates and to streamline VAT-based revenue
- regrets the lack of assessment of subsidiarity and impact local and regional authority finances
- calls for a Common Consolidated Corporate Tax Base to be made binding for a large number of companies and has concerns about income based on non-recycled plastic packaging waste
- calls for the set among for collection costs to be in accordance with actual costs;

Rule of Law, flexibility and stability

- welcomes efforts to put in place effective mechanisms to ensure respect for the rule of law and to protect final beneficiaries' interests, which should be further developed
- calls for clear criteria to determine what constitutes a generalised deficiency as regards the rule of law and recommends a stronger role for the European Court of Auditors
- welcomes more flexibility, which must not be at the expense of planning and strategic objectives; and, therefore, calls for an assessment of whether the Commission's enhanced powers to reallocate funds is in line with the principles of subsidiarity and multi-level governance;

Box 4: European Committee of the Regions draft opinion on the 2021-27 MFF (continued)

Individual EU budget headings

- welcomes the proposals to increase the budget for policies relating to major new challenges and supports the increase in resources for other policies, which should not be at the expense of the Cohesion Policy and the Common Agricultural Policy;
- Strongly opposes the proposed 10% cut to the Cohesion Policy, in particular in relation to the Cohesion Fund (45%); Views the cuts to the Common Agricultural Policy - 11% for EAGF, 28% for EAFRD and 13% for EMFF - as unacceptable.
- Regrets that ESF+ commitment have not been increased in real terms, despite covering additional tasks
- Opposed to introducing the n+2 rule instead of n+3 rule, the cuts to the level of pre-financing and EU co-financing
- calls on funding allocations to be calculated using the latest breakdown of NUTS-2 regions
- rejects the cuts to the Connecting Europe Facility (CEF) and transport infrastructure
- considers the "European Investment Stabilisation Function" to be too small to respond appropriately to shocks
- has concerns about the Reform Support Programme and considers that structural reforms in the area of cohesion must be supported through grants; calls for local and regional authorities to be properly involved in the planning
- stresses that the cuts to Cohesion Policy and the CAP will have a significant detrimental effect on efforts to meet environmental protection objectives
- the planned objective to use 25% of the EU budget for climate change goals is not enough and considers that over 30% of expenditure should go towards the decarbonisation of the energy sector, industry and transport;
- welcomes the increase in funds for the "Horizon Europe" but urges limiting the option of budgetary transfers from "Horizon Europe" to other instruments under the MFF;
- welcomes the inclusion of a specific heading on migration and border management but question whether the resources are sufficient
- welcomes the simplification of the external action instruments and the allocation of resources, and calls for a continued role for local and regional authorities

The European Economic and Social Committee has voiced similar reservations to the European Parliament committees and the Committee of the Regions. In its opinion on the MFF, the EESC states:¹⁶

"The powers and financial resources currently allocated to the EU have been increasingly misaligned with the concerns and expectations of Europeans. The EESC, in accordance with the European Parliament's position, therefore proposes that the expenditure and revenue figure reach 1.3% of GNI. The proposed level of commitments of 1.11% of the EU's GNI is too modest to credibly deliver on the political agenda of the EU.

The EESC recognises the high European added value of the programmes where the MFF 2021-2027 concentrates the main increases in expenditure. However, the Committee questions

¹⁶ *Opinion of the European Economic and Social Committee on the Multiannual Financial Framework post 2020, ECO/460, 19 September 2018, EESC, Brussels.*

the fact that these increases are made at the cost of strong cuts in cohesion policy (-10%) and the Common Agricultural Policy – CAP (-15%)”.

The EESC considers that the financing of cohesion policies (the sum of ERDF, CF and ESF) should be maintained in the MFF 2021-2027, at least with the same resources, at constant prices, as in the current financial framework.

3.2 Member State perspectives on the MFF reform proposals

3.2.1 Scale of funding

Immediate reactions to the publication of the Commission’s proposals can be divided into three groups of Member States, broadly conditioned by the implications of the proposed MFF for net payments or receipts. (These were the initial reactions; as the negotiations progress, these are being refined and amended.)

First, there is a net payer group comprising Austria, Denmark, Netherlands and Sweden – dubbed the ‘frugal four’ - who considered that **the proposed EU budget is too large** and (in some cases) referred to one percent of EU GNI as being a threshold for post-2020 EU spending (see Box 6).

Box 6: EU budget is too large: initial political reactions

“It is an unreasonable proposal and we cannot accept that.....we want a more modern budget which reduces agricultural subsidies and focuses resources on things that create common EU benefits such as EU security, migration and job creation..... “Some form of [rebate] adjustment is needed to ensure reasonable payments. Sweden is a country that contributes a lot.”

Magdalena Andersson, Finance Minister of Sweden

“The proposal from the European Commission for the multiannual budget is an unacceptable outcome for the Netherlands. A smaller EU means a smaller budget. It requires austerity and ambitious modernization. Moreover burdens are not distributed fairly.”

Mark Rutte, Prime Minister of the Netherlands

“The EU Commission’s proposal for a new EU budget contains some positive approaches for modernization....but it still far from and acceptable solution. Our goal must be for the EU after Brexit to be slimmer, more economical and more efficient.”

Sebastian Kurz, Chancellor of Austria

The EU just presented an EU budget the size of 28 Member States. But we are only 27 Member States to finance it. A smaller EU should mean a smaller budget

Lars Løkke Rasmussen, Prime Minister of Denmark

The Dutch government called the MFF unacceptable due to an expected rise in national contributions of potentially 30-40 percent; spending on foreign policy and Cohesion policy was still considered too high. Likewise, the Swedish government estimated that its net contributions would increase by 35

percent, which is not considered acceptable; it also expressed concern at the phasing out of rebates. Similarly, Denmark's official position is that it will not increase its budget contributions to the EU, regardless of Brexit and the consequence for reduced national Cohesion Policy receipts. Clearly, the position of Member States will be determined by the individual effects of removing/reducing rebates and changes to own resources.

Second, some Member States regarded the MFF proposal as **broadly acceptable as a starting point for negotiation**. This included countries that were not necessarily satisfied with the proposed level of spending, and had concerns about the distributional or other issues (see Box 7), but presented their position in more flexible terms. For example, Finland called the MFF a 'good basis for negotiation'. It is reluctant to pay more into the EU budget, but does not regard itself as part of the 'one percent club'; it is concerned about the scale of funding to both the CAP and Cohesion Policy and seeks to maintain EU funding for eastern and northern Finland. Germany also did not reject the MFF proposal out of hand, though drew attention to the significant increase in net payments implied and the need for burden sharing across the whole EU27.

Box 7: MFF proposals are a starting point: initial political reactions

"Our starting point is that the gap left by Britain will not be met and our net contribution will remain reasonable. However, we have not set ourselves at the strictest net contributors' rate. Finland is ready to invest through the EU if the policy priorities are balanced and acceptable, and the decisions and the EU's activities have added value and impact. We want to maximize the EU's return to Finland while we want to keep our net payment reasonable."

Juha Sipilä, Prime Minister of Finland, 9 May 2018

"The proposal of the EU Commission would considerably increase the additional burden on Germany. Even with an EU budget of 1 percent of gross national income (GNI), Germany would have to pay an average of up to 10 billion euros per year from 2021 onwards. We are ready to take responsibility for strengthening the European Union - but this requires a fair burden-sharing of all Member States."

Otto Scholz, Federal Minister of Finance, and Heiko Maas, Federal Minister for Foreign Affairs, Germany, 2 May 2018

"We welcome the fact that despite the anticipated withdrawal of the United Kingdom from the EU, the European Commission has proposed a level of funding comparable to the current multiannual financial framework as the starting point for the negotiations. We believe that in this way, the key challenges of the European Union can be addressed effectively."

Government of the Republic of Slovenia

Like some other Central and Eastern European countries, Slovenia and the Czech Republic acknowledged that a decline in funding is at least partly attributable to economic growth. Romania, one of the few countries, predicted to have an increase in EU funding also referred to the MFF proposals as 'balanced'.

Third, there is a large group of countries that expressed unhappiness with the Commission proposal, arguing that **the MFF has insufficient funding** (see Box 8). Greece, Hungary and Portugal, for example, considered the Commission to have been insufficiently ‘ambitious’ in matching the budget to new policy needs. Portugal criticised the proposal as a ‘bad starting point’ for negotiations that are likely to be ‘long and difficult’. Subsequently, it has advocated an MFF equivalent to 1.2 percent of GNI.¹⁷ Malta has expressed its disagreement with proposals to reduce its EU funding. The most trenchant criticism has come from Poland, which considers the MFF to be divisive at a time when unity is needed.

This group of Member States also includes those countries that feared that the MFF ‘could have been worse’. This applies partly to some of the less-developed Member States (e.g. Estonia, Latvia) where more severe cuts in budget receipts were anticipated. Estonia, for example, had expected that cuts to EU funding might exceed 45 percent, which (for now at least) puts a lesser reduction in a more favourable light. Some more developed Member States (or their regions) had been concerned that the Commission’s presentation of ‘policy scenarios’ in March 2018 would lead to the abolition of Cohesion policy funding for some categories of regions; the retention of an all-region policy was initially greeted with some relief. Some of the Baltic States (Estonia, Latvia) are looking to compensate cuts in Cohesion Policy allocations with increased funding from the Connecting Europe Facility (Rail Baltic) and Horizon Europe.

Box 8: MFF has insufficient funding: initial political reactions

“The European Union budget and cohesion policy will require compromise. The most important thing is that we achieve a common goal – an agreement. Today’s proposals of the European Commission significantly distance the possibility of concluding such an agreement by spring next year. It can be said that such an agreement is almost impossible. The proposed drop in funds for Poland and other Central European countries, largely to the benefit of richer countries of the South of Europe, is not acceptable. We are ready to seek a compromise, but the distribution of resources from cohesion policy must be fair.”

Jerzy Kwiecieński, Minister of Investment and Development, Poland

“Europe needs a budget tailored to its ambitions....what Europeans really do not like is that Europe will continue to promise them more than it actually can deliver. This is what disillusioned the Europeans, that is what generates populism and anti-Europeanism. If we want a strong Europe, we have to have a budget that is tailor-made for Europe that we want.”

António Costa, Prime Minister of Portugal

Lastly, all Member States recognise the scope for changing the Commission’s proposals during the negotiation – albeit in very different directions. The unanimity required in the Council (and agreement from the European Parliament) gives all Member States options to press for changes to the proposals during the negotiations, with respect to the overall MFF or allocations to individual headings.

¹⁷ Speech by Nelson de Souza, State Secretary of Development and Cohesion to the High-Level Conference ‘An inclusive Cohesion Policy closer to citizens’, Bucharest, 29-30 October 2018

3.2.2 Allocations to budget headings

While Member States are divided on the overall budget, there is widespread support for the Commission's focus on innovation and digitalisation in the proposed MFF. The importance of spending on migration is also welcomed, especially among countries most affected by migration flows. Enhanced attention to defence spending has support too, especially among several Central and Eastern European countries.

The greatest criticism of the Commission concerns the proposed cuts to the Common Agricultural Policy and Cohesion policy.

3.2.3 Implications of the MFF proposals for Cohesion policy

Some of the Central and Eastern European countries losing receipts have highlighted the potential negative impact for convergence and cohesion. The Slovak government, for example, has noted the role played by Cohesion policy in public investment (50+ percent) in contributing to three percent growth over the 2014-20 period – although also acknowledging the difficulties of absorption. Croatia has made similar points, warning against the sustainability of infrastructure development and research and innovation projects – not just from reductions in funding but also the increased national co-financing proposed. Hungary has highlighted that its four regions are ranked among the 20 poorest regions in the EU, yet would suffer a 'radical drop in funding'; further a significantly lower share of EU resources coupled with a higher co-financing rate would overstretch the national budget, impacting on major development programmes and projects. The Czech Republic has also acknowledged the implications for loss of EU receipts and the requirement to consider other options for financing regional development. Regional interest groups in some more-developed countries also anticipate that cuts in Cohesion Policy funding will not be 'compensated' by national regional policy funding, with implications for development programmes.

Polish government officials have been particularly critical of the compound effects of several budgetary changes: the cuts in Cohesion Policy allocations; the proposed increase in national co-financing; the reduction in pre-financing; and the scope to reallocate Cohesion Policy funding to other policy areas (but not vice versa).

Several Member States (Germany, Netherlands, Sweden) have voiced support for the Commission's proposals to link EU funding to compliance with the rule of law, and for a stronger link between Cohesion Policy and economic governance, with greater emphasis on structural reforms.

By contrast, Central, Eastern and Southern Member States either have concerns or are opposed to these proposals. The Czech Republic, for example, is against linkage of Cohesion policy and Country-Specific Recommendations (CSR) but in favour of 'positive incentives' for fulfilment of enabling conditions. The Greek position is still more opposed to conditions on funding, not just with respect to the rule of law, but also advocating the abolition of macroeconomic conditionality and any linkage of Cohesion policy with the European Semester and CSR. Positive incentives may be introduced to encourage structural reforms but sanctions and conditionalities should be avoided. Poland has been particularly critical of linkage to the rule of law. Others in Central & Eastern Europe have been less immediately critical but are concerned about the need for transparent and objective criteria for applying

the principle of rule of law to funding, and the processes of assessment and decision-making (Bulgaria, Czech Republic).

3.2.4 Implications of the MFF proposals for the CAP

While acknowledging the positive elements of the MFF proposals (reorganisation of the MFF architecture, new priorities, links to the rule of law), France has been vociferous in its opposition to the scale of reduction in agricultural spending (see Box 9). Along with Finland, Greece, Ireland, Portugal and Spain, the French government aims to retain allocations to the CAP at current levels.

Box 9: Proposals for the Common Agricultural Policy: political reactions

“The budgetary proposal presented by the Commission is nothing but a proposal. Concerning the CAP, the proposal is not acceptable. It is not acceptable because it would lead to drastic cuts in the revenue of our farmers and it would concern most agricultural undertakings. It is not acceptable because CAP is at the heart of the strategic challenges of the EU....modernising CAP yes, because that is what farmers ask of us, it should be more efficient and simpler, but to sacrifice the CAP is out of the question.”

Nathalie Loiseau, Minister for European Affairs, France

“The Commission has proposed cuts in the agricultural budget. This is very difficult to accept. We need close cooperation and negotiations with the Commission, the Member States and the Parliament.”

Juha Sipilä, Prime Minister of Finland

Cohesion policy and the CAP “should not be the adjustment factors” as they are “two policies that are the EU’s ‘identity marks’...sacrificing these policies in a bad contribution to the future of the European Union”.

António Costa, Prime Minister of Portugal

“[a] notable reduction in funding [for agriculture, particularly rural development] is proposed by the European Commission. Given the importance and role of rural development policy, Slovenia believe that the proposed reduction in this area is much too large.”

Government of the Republic of Slovenia

4. PROPOSALS FOR COHESION POLICY REFORM

4.1 Rationale for the reform of Cohesion Policy

Turning now to the proposed legislative changes to Cohesion policy for 2021-27,¹⁸ the Commission identified four main features of its proposal for a modernised Cohesion policy:¹⁹

- (a) **a focus on key investment priorities, where the EU is best placed to deliver:** innovation, support to small businesses, digital technologies and industrial modernisation, shift towards a low-carbon, circular economy and the fight against climate change;
- (b) **a Cohesion policy for all regions and a more tailored approach to regional development:** Retaining the existing regional eligibility categories - less-developed, transition and more developed regions – with GDP per capita remaining as the main allocation criterion while introducing new climate change and migration criteria; more involvement of local, urban and territorial authorities is proposed, and increased co-financing rates to increase ownership of EU-funded projects;
- (c) **fewer, clearer, shorter rules and a more flexible framework:** Simplifying access to funds through fewer rules and lighter control procedures for beneficiaries; a single rulebook to cover seven EU funds, flexibility in order to cope with unforeseen events through a mid-term review; and
- (d) **a strengthened link with the European Semester to improve the investment environment in Europe:** stronger Cohesion policy support to structural reforms ensuring full complementarity and coordination with the new enhanced Reform Support Programme.

Subsequently, the Commission has presented the principles underlying the reforms as being four-fold:²⁰

- modernisation – redefinition of fundamental policy objectives on a more limited but broader set of priorities, with a particular focus on innovation and embedding of support for long-term integration of migrants;
- dynamism – punctual launch of the new programmes and scope for more quicker response to changing conditions;
- flexibility – more opportunities for Member States to make adjustments, link with other policies, and use different instruments; and
- simplification – involving a programme of some 250 measures to simplify management and implementation

¹⁸ https://ec.europa.eu/commission/publications/regional-development-and-cohesion_en

¹⁹ European Commission (2018) *EU budget: Regional Development and Cohesion Policy beyond 2020* European Commission Press Release, IP-18-3885, Strasbourg, 29 May 2018: http://europa.eu/rapid/press-release_IP-18-3885_en.htm

²⁰ Speech by Marc Lemaitre to the High-Level Conference on Cohesion Policy, Sofia, 8 June 2018.

Some of the justification for specific changes to Cohesion policy are set out in the Commission's spending review.²¹ This is intended as a strategic review that "blends detailed bottom-up analysis of all spending programmes with top-down guidance from senior management and the political level."

Further, the review states that it sought to maximise the EU added value and efficiency of spending, making the budget simpler and more flexible, and streamlining delivery mechanisms (see Box 10).

Box 10: Commission spending review of Cohesion policy: lessons learned

Simplification: Despite recent efforts to simplify the delivery of cohesion policy funds in the 2014-2020 period, a strong effort for further simplifying implementation and allowing for more agile and flexible programming is needed

Contribution to policy objectives and structural reforms:

- Cohesion policy funds provide insufficient incentives to Member States to ensure that policy objectives are met. Funding and conditionalities should be more closely aligned with the European Semester to support reforms and increase the funds' political leverage.
- The importance of the local business environment and innovation ecosystem is key for helping regions move up the value chain.
- Shortcomings in administrative capacity and institutional quality are often key obstacles to economic, social and territorial progress.

Flexibility: Despite the responsiveness of Cohesion policy to both the financial crisis and the more recent migration crisis, the capacity of current programmes to adapt to changing political environment is considered limited. Cohesion policy needs to review how it can better prepare and react to unexpected developments, crisis, economic and societal changes.

Result orientation: The result orientation of the programmes could be further improved and there are still difficulties to fully capture the contribution of the funds to EU policy priorities. Further efforts are needed to ensure that cohesion policy funds are more effectively implemented through the sound definition of targets and results to be achieved.

²¹ European Commission (2018) *op. cit.*

Box 10: Commission spending review of Cohesion policy: lessons learned (continued)

Synergies: the experience from the 2014-2020 period shows that additional efforts to harmonise rules are still needed and that the synergies with sectoral policies and programmes such as LIFE, Connecting Europe Facility, Horizon 2020, Erasmus+, Asylum, Migration and Integration Fund/Internal Security Fund were not exploited to their full potential. The diverging rules for similar interventions under different funding sources (e.g. state aid, public procurement, maturity of projects) created uncertainty for programme beneficiaries. A more coherent use of EU funds would enable establishing a more visible link between EU policies and the needs and realities at national and regional level.

Stabilisation impact: During the financial crisis, EU funds played a countercyclical role with a stabilising effect, by increasing the co-financing rates and lowering the national contribution for affected Member States. It is now appropriate to increase national co-financing rates, in order to increase ownership at national level. In particular as long as the European Investment Stabilisation function is not yet in place, this would also allow keeping a margin of co-financing rate for potential stabilising action in the future.

Source: European Commission (2018) op cit.

4.2 Legislative proposals

Against this context for the regulatory proposals, the following sections now review each of the main areas of proposed change and the potential implications.

4.2.1 Thematic concentration

The Commission's proposals for thematic concentration envisage a smaller but wider menu of five Policy Objectives (POs) to replace the previous 11 Thematic Objectives (TOs) – see Table 3. This could be interpreted as a cosmetic change because the scope of action within priority objectives is wider and essentially covers all the previous thematic objectives. The Commission argues that this simplification enables synergies and flexibility between various strands within a given objective, and removes artificial distinctions between different policies contributing to the same objective. It also provides flexibility to reallocate funding within priorities during implementation given the wider scope of action.

Table 3: Changes to thematic objectives

2014-2020 Thematic objectives	2021-2027 Policy objectives
<ol style="list-style-type: none"> 1. strengthening research, technological development and innovation; 2. enhancing access to, and use and quality of, ICT; 3. enhancing the competitiveness of SMEs, of the agricultural sector (for the EAFRD) and of the fishery and aquaculture sector (for the EMFF); 4. supporting the shift towards a low-carbon economy in all sectors; 5. promoting climate change adaptation, risk prevention and management; 6. preserving and protecting the environment and promoting resource efficiency; 7. promoting sustainable transport and removing bottlenecks in key network infrastructures; 8. promoting sustainable and quality employment and supporting labour mobility; 9. promoting social inclusion, combating poverty and any discrimination; 10. investing in education, training and vocational training for skills and lifelong learning; 11. enhancing institutional capacity of public authorities and stakeholders and efficient public administration 	<ol style="list-style-type: none"> 1. a smarter Europe by promoting innovative and smart economic transformation; 2. a greener, low-carbon Europe by promoting clean and fair energy transition, green and blue investment, the circular economy, climate adaptation and risk prevention and management; 3. a more connected Europe by enhancing mobility and regional ICT connectivity; 4. a more social Europe implementing the European Pillar of Social Rights; 5. a Europe closer to citizens by fostering the sustainable and integrated development of urban, rural and coastal areas and local initiatives.

The ERDF/CF Regulation disaggregates the five policy objectives into 21 specific objectives. Among the main changes are a stronger focus on digitisation within the Smarter Europe objective, and on the integration of migrants within the Social Europe objective.

- **Policy Objective 1 (smarter Europe)** is intended to focus on four objectives: enhancing research and innovation capacities and the uptake of advanced technologies; reaping the benefits of digitalisation for citizens, companies and governments; enhancing growth and competitiveness of SMEs; and developing skills for smart specialisation, industrial transition and entrepreneurship. Of particular importance for the policy objective is industrial transition and the market orientation of research activities, exploiting the opportunities of digitalisation and promoting networks of cooperation on innovation. The context is the persistent innovation divide in Europe, attributable in particular to weaknesses in the diffusion of innovation beyond the 'frontier regions' and beyond leading firms.²²
- **Policy Objective 2 (greener, low-carbon Europe):** with four specific objectives on a greener Europe and three low-carbon Europe objectives: (i) promoting energy efficiency measures; (ii) promoting renewable energy; (iii) developing smart energy systems, grids and storage at local level; (iv) promoting climate change adaptation, risk prevention and disaster resilience; (v) promoting sustainable water management; (vi) promoting the transition to a circular economy; and (vii) enhancing biodiversity, green infrastructure in the urban environment, and reducing pollution

²² European Commission (2018) *Thematic policy paper – Policy Objective 1: A smarter Europe by promoting innovative and smart economic transformation*, Brussels, 19 June 2018

- **Policy Objective 3 (a more connected Europe):** to enhance mobility and regional ICT connectivity through four specific objectives: (i) enhancing digital connectivity; (ii) developing a sustainable, climate resilient, intelligent, secure and intermodal TEN-T; (iii) developing sustainable, climate resilient, intelligent and intermodal national, regional and local mobility, including improved access to TEN-T and cross-border mobility; and (iv) promoting sustainable multimodal urban mobility.
- **Policy Objective 4 (a more social Europe):** Implementing the European Pillar of Social Rights covers ten specific objectives under the ESF+: (i) improving access to employment of all jobseekers, in particular youth and long-term unemployed, and of inactive people, promoting self-employment and the social economy; (ii) modernising labour market institutions and services to assess and anticipate skills needs and ensure timely and tailor-made assistance and support to labour market matching, transitions and mobility; (iii) promoting women's labour market participation, a better work/life balance including access to childcare, a healthy and well-adapted working environment addressing health risks, adaptation of workers, enterprises and entrepreneurs to change, and active and healthy ageing; (iv) improving the quality, effectiveness and labour market relevance of education and training systems, to support acquisition of key competences including digital skills; (v) promoting equal access to and completion of, quality and inclusive education and training, in particular for disadvantaged groups, from early childhood education and care through general and vocational education and training, and to tertiary level, as well as adult education and learning, including facilitating learning mobility for all; (vi) promoting lifelong learning, notably flexible upskilling and reskilling opportunities for all taking into account digital skills, better anticipating change and new skills requirements based on labour market needs, facilitating career transitions and promoting professional mobility; (vii) fostering active inclusion with a view to promoting equal opportunities and active participation, and improving employability; (viii) promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma; (ix) enhancing the equal and timely access to quality, sustainable and affordable services; modernising social protection systems, including promoting access to social protection; improving accessibility, effectiveness and resilience of healthcare systems and long-term care services; (x) promoting social integration of people at risk of poverty or social exclusion, including the most deprived and children; (xi) addressing material deprivation through food and/or basic material assistance to the most deprived, including accompanying measures.

For the ERDF, the specific objectives are: (i) enhancing the effectiveness of labour markets and access to quality employment through developing social innovation and infrastructure; (ii) improving access to inclusive and quality services in education, training and life-long learning through developing infrastructure; (iii) increasing the socioeconomic integration of marginalised communities, migrants and disadvantaged groups, through integrated measures including housing and social services; and (iv) ensuring equal access to health care through developing infrastructure, including primary care.

- **Policy Objective 5 (a Europe close to citizens):** by fostering the sustainable and integrated development of urban, rural and coastal areas and local initiatives through two specific objectives: (i) fostering the integrated social, economic and environmental development, cultural heritage and security in urban areas; and (ii) fostering the integrated social, economic

and environmental local development, cultural heritage and security, including for rural and coastal areas also through community-led local development.

The ESF+ regulation specifies that the Social Europe objective (PO4) will be addressed through eleven specific objectives, and that it will also contribute to PO1 (Smarter Europe) and PO2 (Greener, Low-carbon Europe).

Thematic concentration will continue to require **spending to focus on areas that are considered to have high added value**. The majority of the ERDF would be concentrated on the innovation (PO1) and low-carbon economy (P2) objectives with more flexibility for less developed countries. The mechanism is applied at national level (rather than OP / category of region level, as in 2014-20) with varying flexibility for three country groupings on a sliding scale (Table 4).

Table 4: Thematic concentration in ERDF/CF Priority Objectives

Country Group	PO1: Smarter Europe (minimum share)	PO2: Greener, low-carbon Europe (minimum share)
1. GNI above 100%	60%	<i>PO1 + PO2 = min. 85%</i>
2. GNI 75-100%	45%	30%
3. GNI below 75%	35%	30%

Source: COM(2018) 372

The implications of the thematic concentration requirements for spending patterns under the ERDF/CF are estimated in the Commission's impact assessment,²³ which shows **a significant shift in funding from infrastructure towards innovation, broadband and SME support**. The overall increase is 16 percent, bringing the relative share for innovation, broadband and SME support up from 30 percent of total ERDF/CF at present to 46 percent in 2021-27. .

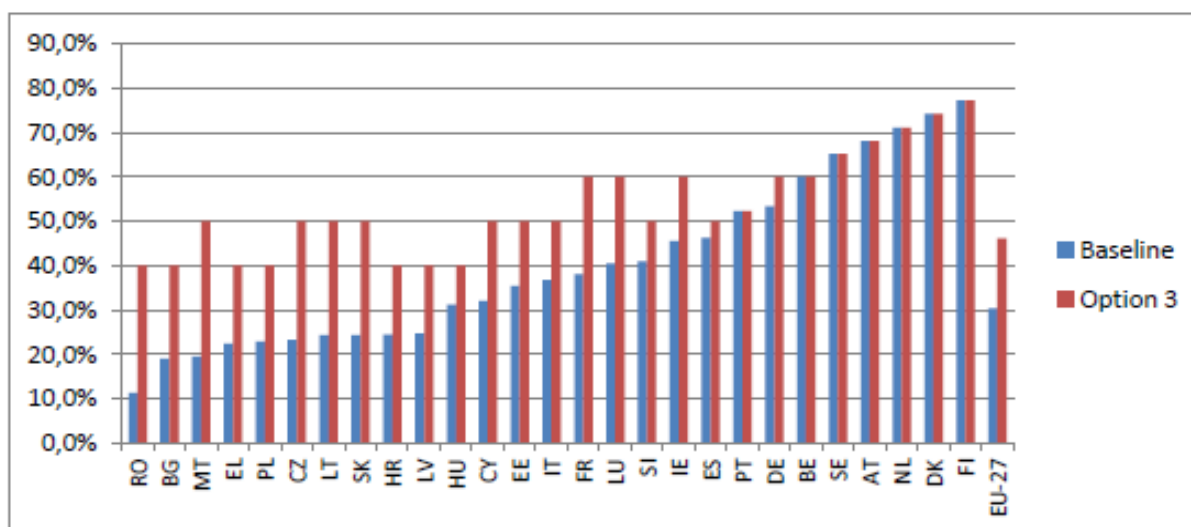
There are marked variations across countries in anticipated shifts in thematic concentration, according to the Commission's estimates - see Figure 5). In some EU15 countries, there will be no adjustment needed because the current levels of concentration on P01 and PO2 already meet the new thresholds (e.g. Finland, Denmark, Netherlands, Austria, Sweden, Belgium and Portugal). However, there would be radical shifts in funding prioritisation required in some EU12 countries, notably in Romania, Malta, Czech Republic, Lithuania and the Slovak Republic. Major reductions in infrastructure allocation to support competitiveness-oriented activities are likely to pose absorption capacity challenges in some of these countries.

A further tightening in current ERDF/CF funded activities is expected because of **new restrictions on eligible expenditure**, as specified in Article 6 of the draft ERDF/CF Regulation. In particular, support to large enterprises and to regional airports (except those in the outermost regions) will no longer be eligible, justified by the Commission based on the low impact of these measures. In addition, certain

²³ European Commission (2018) Impact Assessment Accompanying the document Proposals for a Regulation of the European Parliament and of the Council on the European ERDF and on the CF, on a mechanism to resolve legal and administrative obstacles in a cross-border context, on specific provisions for the European territorial cooperation goal (INTERREG) supported by the ERDF and external financing instruments, Commission Staff Working Document, SWD(2018) 282, Strasbourg.

activities that are not in line with EU priorities will be ineligible: landfill and fossil fuels (due to the negative environmental impact) and tobacco (because of the negative impact on health).

Figure 5: ERDF/CF Thematic concentration shifts in 2021-2027



Note: Option 3 refers to percentage of spending in the new PO1 (former TOs 1-3: innovation, broadband, SME support) in 2021-27 compared to the baseline in 2014-20.

Source: European Commission (2018)

The Visegrad 4+4 group oppose the strictness of the thematic concentration requirements, preferring instead a more flexible approach involving bilateral negotiations, and are equally critical of the proposed list of funding exclusions, which they consider will reduce the effectiveness of Cohesion policy support.²⁴

For the ESF+, Member States will be required to allocate an ‘appropriate amount’ of funding to address challenges identified in relevant CSRs. The relative share of funding allocated to the **social inclusion specific objective – including integration of migrants – will increase** from a 20 percent of funding minimum at present to 25 percent. Commission’s impact assessment states that many Member States allocated significantly more than the minimum level and the EU average was close to the 25 percent level, although it does not identify the countries that allocated less than 25 percent or whether it expects absorption challenges in these cases.

New ESF+ earmarking requirements are proposed in the areas of youth employment and addressing deprivation.

- **Youth employment.** At least ten percent of funding should be concentrated on targeted actions and structural reforms to support youth employment where there is a NEET rate (age group 15 – 29) above the EU average in 2019, increasing to 15 percent in outermost regions.
- **Deprivation.** Two percent of funding should concentrate on addressing material deprivation.

A first debate on the thematic concentration proposals during the Bulgarian Presidency indicated mixed views among Member States. Some net payers were positive about the focus on innovation, digitalisation and integration of migrants, and in favour of concentration. However, Central and Eastern European countries do not agree with the strict limits on thematic concentration and are calling for

²⁴ Joint Statement discussed by the Visegrad Group (Czech Republic, Hungary, Poland, Slovakia), Bulgaria, Croatia, Romania and Slovenia, Bratislava.

greater flexibility for Member States to focus on their specific needs needed and to recognise differences in added value in the objectives across Member States. By contrast, a CPMR analysis supports proposals for significant flexibility although criticise the thematic concentration requirements across funds because it will be “complex for managing authorities to align funding and break silos”.²⁵

4.2.2 The territorial dimension

The territorial dimension has received greater visibility through a new dedicated Policy Objective: “a Europe closer to citizens by fostering the sustainable and integrated development of urban, rural and coastal areas and local initiatives” (PO5). While greater visibility of the territorial dimension is likely to be welcomed by Member States and stakeholders, it could be argued that the territorial dimension should be a horizontal and crosscutting objective.

The required ERDF funding for this objective will go up marginally from five to six percent, delivered through local development partnerships via existing tools (sustainable urban development strategies, integrated territorial instruments, community-led local development) but with more flexibility in decision-making responsibilities for cities. A key difference is that the EAFRD is no longer included within the remit of the Cohesion Policy Funds and the territorial instruments. This is problematic given the inherently territorial nature of rural development and because of concerns of centralisation in EAFRD management.²⁶ It may also make coordination more difficult between the ERDF/ESF and EAFRD. Accordingly, the Visegrad 4+4 group consider that better alignment should be sought between the new Common Provisions Regulation and the CAP Strategic Plans Regulation to provide clear rules for an effective approach to integrated development.²⁷ The European Parliament’s REGI committee has also called for a re-integration of the EAFRD into the CPR.²⁸

A **European Urban Initiative** will provide a more streamlined and coherent approach to capacity building, innovative actions, knowledge and policy development and communication by combining the various urban tools (such as URBACT or the Urban Innovative Actions) in a single programme.

A more ambitious **European territorial cooperation** is proposed, albeit with a lower budget. INTERREG and cross-border cooperation would facilitate funding projects with other regions anywhere in Europe. Key changes highlighted by the Commission are the emphasis on enhancing cross-border strategic planning and institutional cooperation, including through new legal instruments; and the addition of co-operation outside the EU with a specific strand for outermost regions and incorporating the current IPA/ENI funding to support enlargement and cooperation with neighbourhood countries. Maritime CBC programmes would no longer exist but would be subsumed into transnational programmes. INTERREG will continue to be able to draw on all of the priority objectives.

Analysis of the European Territorial Cooperation proposals by **the CPMR highlights the radical nature of the changes and provides a mixed assessment** including criticism of the restructuring of the

²⁵ CPMR (2018) *Initial views on the post-2020 Cohesion Policy package*, CPMR briefing.

²⁶ *Ibid.*

²⁷ See footnote 22.

²⁸ European Parliament (2018b) Draft Report on the proposal for a regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument, Committee on Regional Development, 13.9.2018.

components and the cut in the budget (Box 11). The European Parliament and Committee of the Regions will be aiming to restore the INTERREG cooperation budget, which is arguably optimistic given the downward pressure on the overall budget for Cohesion policy.

The CPMR's opposition to the proposed cessation of maritime CBC programmes is shared by several Member States with such programmes in the Baltic, North Sea and Mediterranean. It would also limit the future options available to INTERREG-based cooperation with the United Kingdom.

The European Parliament's position is still being developed, although a draft REGI Committee report on ETC has identified a number of key negotiating priorities.²⁹

- Increased funding for ETC to at least 3 percent of the Cohesion policy budget
- More priority to border regions by shifting funds in favour of component 1 (cross-border cooperation) to account for 73.8 percent of ETC.
- Inter-regional innovation investments (component 5) under direct management of the Commission is at odds with the spirit of subsidiarity underpinning ETC and its financial envelope should not be at the expense of other ETC components.
- Maritime cooperation should continue to be possible under component 1 for regions not connected over the sea by a fixed link.
- Opposition to earmarking 15 percent of ETC funding to the two INTERREG-specific objectives - 'Better INTERREG governance' and 'A safer and more secure Europe'
- Increase the EU co-financing from 70 percent to 85 percent as at present, and higher pre-financing rates at the start of the period to facilitate programme launch.
- Ensure flexibility in the setting of INTERREG indicators beyond those defined in the regulation
- Eliminating state aid checks due to ETC compatibility with the internal market and limited impact on trade and competition.

²⁹ European Parliament (2018c) Draft Report on the proposal for a Regulation of the European Parliament and of the Council on specific provisions for the European territorial cooperation goal (INTERREG) supported by the European Regional Development Fund and external financing instruments, Committee on Regional Development, 26.7.2018.

Box 11: CPMR position on European Territorial Cooperation

- **Maritime CBC programmes and INTERREG Europe are no more.** The fears of CPMR Members are now confirmed: maritime cross-border programmes will cease to be under the Commission proposal, and will be merged with the transnational component. This is a massive concern for a variety of reasons as expressed in our open letter on the future of INTERREG sent out in April. The INTERREG Europe inter-regional programme is also set to disappear.
- **'Functional areas' to define the geography of transnational programmes.** Article 5 ETC states that the regions to be supported by the transnational programmes (Components 2A and 2B) will be regions 'covering contiguous functional areas' taking into account (where applicable) macroregional strategies and sea-basin strategies. What 'contiguous functional areas' means would require clarity.
- **New outermost regions component.** The additional outermost regions component sounds like a positive development, though a closer look (including a comparison of what that component would achieve in relation to the European Development Fund) would be needed.
- **New Inter-regional innovation investments component.** Similarly, scaling up the already existing cooperation between regions on innovation is certainly a positive step but there are questions about how this will be managed, not to mention the transversal nature of innovation which is already supported by all strands of INTERREG.
- **The UK can participate in INTERREG programmes after 2020.** This was a key message from the CPMR and is very much welcome.
- It is difficult to get around the fact that **INTERREG will be cut by 12% compared to the 14-20 period** (€8.4bn compared to €9.3bn in 14-20) and will only represent 2.5% of the Cohesion Policy envelope, even though ETC will get two additional 'components' to address."

Source: CPMR (2018) Initial views on the post-2020 Cohesion Policy package, CPMR briefing.

4.2.3 Synergies

The CPR states that synergies between different EU instruments will be encouraged through the strategic planning process, which will identify common objectives and common areas for activities across different EU programmes (e.g. with the CAP, Horizon Europe, CEF, DEP, Erasmus, InvestEU Fund, LIFE) – see Table 5.

The most significant synergies are expected with Horizon Europe and the Connecting Europe Facility, although the CPR mainly demarcates the different scope of actions or provides for transfers of Cohesion policy funding to the CEF (and other EU policies).

- **Horizon Europe:** will focus on 'European excellence' (the generation and exploitation of new knowledge) the ERDF will focus on 'regional relevance' (diffusion of existing knowledge and technology notably via smart specialization). The 'Seal of Excellence' will allow projects successfully evaluated under Horizon Europe to be funded by Cohesion policy without having to pass another selection process. The Commission has highlighted the options for achieving synergies through 'combined funding' through co-funding of actions from both Horizon Europe and ERDF, as well as synergies through 'sequential funding' where Horizon Europe supports aspects of the operationalisation of ERDF-funded investment R&D infrastructure (upstream

synergies) or vice versa ERDF supports the application of Horizon research results (downstream synergies).

- **Connecting Europe Facility:** The CEF will focus in particular on the "core network" while the ERDF and the Cohesion Fund will also provide support for the "comprehensive network". As previously, there are provision for a transfer of CF resources (€10 billion) to the CEF, despite the Commission apparently having given assurances to Member States in 2013 that the transfers would not be repeated.
- **Migration:** All Cohesion Policy Funds will also address long-term needs linked to the integration of migrants, while AMIF will focus on short-term needs.
- **Cohesion policy transfers to other EU instruments/objectives:** Framed as providing flexibility, the CPR enables voluntary transfers of funding towards the InvestEU instruments or to any instrument under direct or indirect management, including the Reform Support Programme.

The European Parliament is critical of the proposal to allow voluntary transfers of Cohesion funding to other EU policies. While supportive of the other EU spending programmes, they argue that Cohesion policy is equally important for achieving European objectives and are calling for the voluntary transfer provisions be entirely removed from the regulation.³⁰

³⁰ European Parliament (2018b) *Op.cit.*

Table 5: Main expected synergies for Policy Objectives

Programme/fund	PO1	PO2	PO3	PO4	PO5
ESF+	X			X	No specific synergies
EAFRD/CAP	X	X	X	X	
Horizon Europe	X	X	X	X	
Erasmus+	X			X	
Invest EU	X		X		
Digital Europe	X		X		
Single Market Programme	X			X	
Reform Support Programme	X				
Space Programme	X				
Defence Fund	X				
LIFE programme	X	X		X	
Creative Europe	X				
rescEU		X			
Connecting Europe Facility			X		
Asylum & Migration Fund				X	
Rights & Values Programme				X	

Source: European Commission thematic policy papers, 2018

A key budgetary concern among Cohesion policy stakeholder are the provisions on transfers to other EU funds, which could mean further losses to an already reduced Cohesion policy budget. Moreover, the synergies are one-way in terms of how Cohesion policy can contribute to other EU instruments and objectives with no provision for other instruments to contribute to cohesion goals. The Vice-President of the European Parliament was also critical:

“in the negative aspects of the Commission’s Cohesion Policy package, I consider the possibility for Cohesion Policy funds to fly away towards other directions that have absolutely no relation with Cohesion. Just like, for example, European defence, which has nothing to do with Cohesion.”³¹

The decoupling of rural development policy (EAFRD) from Cohesion policy is a key concern for the European Parliament, Committee of the Regions, and some Member States given the strong territorial dimension to rural policy and, as a consequence, the strong case for coordination across the two policies.

In a similar way, **the perceived ‘nationalisation of the ESF’ has raised alarm** at the Committee of the Regions as it is considered to hamper the pursuit of integration with the ERDF/CF and to weaken territorial cohesion goals and decentralised delivery. By contrast, the Commission maintains that cooperation will continue to be very close given the shared management structure and rules under the CPR.

³¹ Papadimoulis: Cohesion distribution could be improved but we don’t accept cuts, euractiv.com, 9 July 2018.

4.2.4 Performance framework

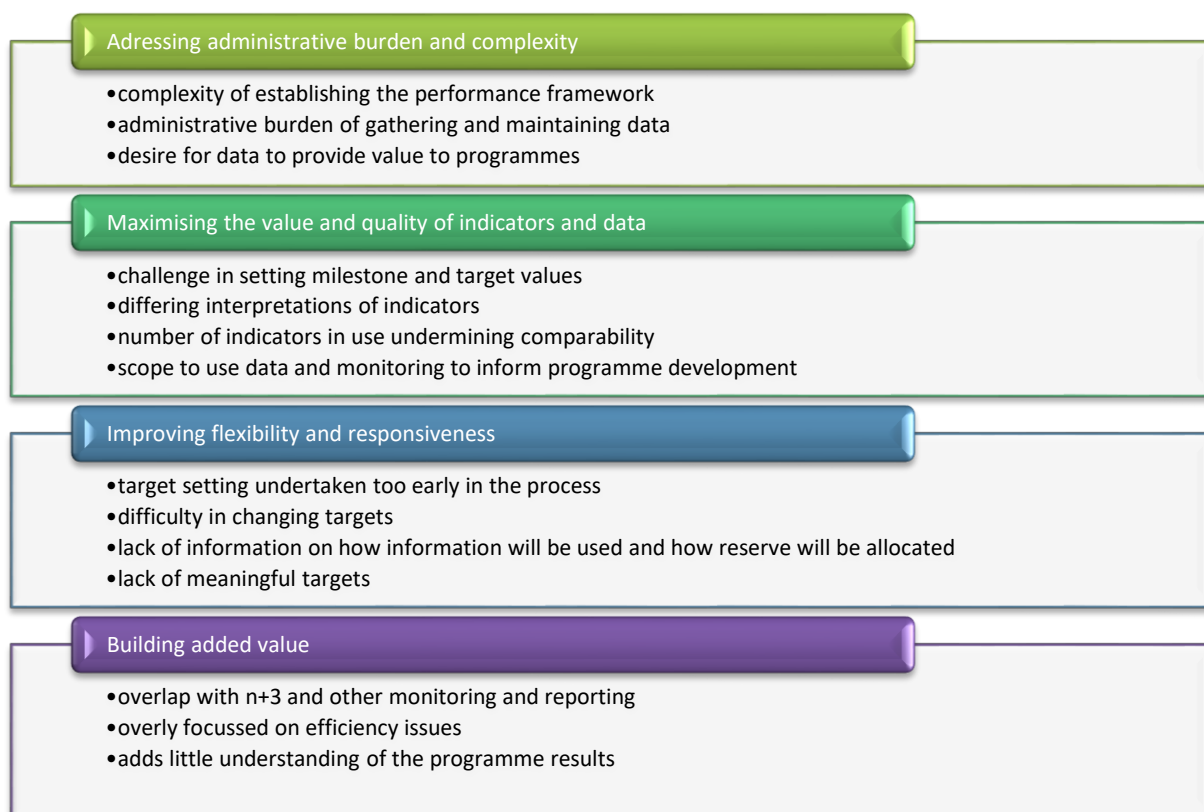
The proposals continue to place emphasis on a **strong performance framework**. Member States will continue to be expected to monitor programme performance, applying the intervention logic and setting milestones and targets. The output and result indicators are set out in the Fund-specific regulations and do not change significantly. However, all output indicators are part of the performance framework and relevant for the performance review, and common result indicators are introduced for the first time. Annual reports and progress reports are to be replaced by information provided to Monitoring Committees and to the Commission for the annual review meeting, and the electronic transmission of data.

A European Court of Auditors study on the 2014-20 performance framework criticised the focus on spending and outputs and called for the post-2020 rules to encourage a performance orientation through more use of immediate result indicators and by turning milestones (key implementation steps) into tools which better demonstrate actual performance of long term infrastructure interventions.³² Similarly, a number of Member State position papers on the post-2020 MFF and Cohesion policy have emphasized the value of the result orientation and performance framework in 2014-20 and the need to strengthen the demonstration of results (Finland, Italy, Poland, Portugal). For instance, the Italian position paper called for a stronger result orientation with resource allocations more closely linked *“to the clear identification of results, their systematic verification in the implementation phase and ex-post evaluation, encouraging transparency and the ability to communicate results, and promoting mobilization of partnerships and use of “open data” methods.”* The new performance framework is considered effective (Poland) with “positive effects on programming” (Portugal). Whilst several countries have a positive image of new performance framework (Poland, Portugal), others have called for improvements (France) or criticised the resulting pressures (Hungary).

Similar concerns were found in an operational review of the performance framework, based on evidence from managing authorities.³³ It found that many authorities support the principle of the framework, but would like to see an end to the Performance Reserve (or a framework but no reserve) due to the administrative burdens and ‘red tape’ that it generates for the managing authority and intermediate bodies; there are also important operational lessons that need to be considered for 2021-27 (see Figure 6).

³² ECA (2017) *Special Report Ex ante conditionalities and performance reserve in Cohesion: innovative but not yet effective instruments*, Special report No 15/2017, European Court of Auditors, Luxembourg.

³³ McMaster I and Kah S (2017) *The Performance Framework in Cohesion Policy: Expectations and Reality*, IQ-Net Thematic Paper 41(2), European Policies Research Centre, University of Strathclyde, Glasgow.

Figure 6: Operational lessons from the performance framework 2014-20

4.2.5 Links with economic governance

Strengthened and streamlined links between Cohesion Policy, structural reforms and sound economic policies are envisaged building on current arrangements.

The European Semester's **Country-Specific Recommendations** will be taken into account twice throughout the 2021-2027 programming cycle: during the design of programmes, and during the mid-term review in 2024. Member States would be required to present to the Commission progress in implementing the programmes in support of the Country-Specific Recommendations.

To support the closer link with the European Semester process, a new provision under Article 4 of the CPR specifies that the Commission and Member States shall ensure the coordination, complementarity and coherence between the Funds and the new **Reform Support Programme**, including the Reform Delivery Tool and the Technical Support Instrument.

However, there are concerns about the relevance, accountability and political implications of the reform support programme. While Germany would like to see a stronger link between Cohesion policy and relevant CSRs, the SRDT is different in that it aims to link Cohesion policy to all/any structural reforms. It is also based on bilateral relationships between an individual Member State and the Commission implying less transparency – unlike the European Semester approach, where there is a clear and transparent system. The current structural reform programme only funds technical assistance i.e. funding to design not implement reforms and is not seen to be functioning well. Whereas the idea is that the SRDT would also fund the implementation of structural reforms, there is a risk that this could increase euro-scepticism if uncomfortable reforms are seen to be being imposed by EU. Finally, the

allocation key for the Reform Support Programme is based on population and not GDP implying that it does not take into account cohesion objectives, even though it has been placed under the 'Cohesion and Values' heading of the revised MFF structure.

The EEP President in the CoR indicated the need for regional interests to be involved in the linkage of Cohesion Policy and the European Semester

*"in general, to link Cohesion Policy with the European Semester is a good idea, but in detail, it must be secured, safeguarded that the regions have a say in this process and that it is not a centralised process inside the member states. So, if this pre-condition is fulfilled, it could be fruitful and efficient. But only under this pre-condition."*³⁴

More broadly, a research paper for the European Parliament argued that the rationale, specific objectives and the mode of implementing the links between structural reforms and Cohesion policy all need to be clarified, and drew attention to the potential conflicts of goals and outcomes (see Box 12). Further, the added value of the Cohesion policy model of governance and ability to target support to places needs to be more widely appreciated among those promoting the structural reform agenda.³⁵

4.2.6 Conditionality

Macroeconomic conditionality is maintained and justified on the basis of a need to ensure EU investments operate in a sound fiscal environment. As in the current period, when a Member State fails to take effective or corrective action in the context of key EU economic governance mechanisms (Excessive Deficit Procedure, Excessive Imbalance Procedure) or fails to implement the measures required by a stability support programme, the Commission must make a proposal to the Council to suspend all or part of the commitments or payments for one or more of the programmes of a Member State. The Commission can recommend that the Council cancels the suspensions may on the basis of exceptional economic circumstances or following a reasoned request by the Member State concerned.

Ex-ante conditionalities (now labelled 'enabling conditions') are proposed by reducing the number of conditions, which would cover similar thematic and horizontal areas as in 2014-2020 and with more precise conditions.

³⁴ Schneider: Commission's proposal on Cohesion going in the wrong direction, *euractiv.com*, 11 July 2018.

³⁵ Huguenot-Noel R, Hunter A and Zuleeg F (2018) *Research for REGI Committee – Future links between structural reforms and EU cohesion policy*, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels.

Box 12: Challenges and recommendations for the links between structural reforms and Cohesion policy

The scope for the Reform Support Programme (RSP) to complement Cohesion policy faces three significant challenges:

- the **negative legacy** of linking Cohesion Policy to structural reforms (SR), as highlighted by the negative reception of the macroeconomic conditionality mechanism introduced in the 2014-2020 period;
- a **lack of clarity** on the ultimate aim of structural reforms and remaining uncertainties related to the kind of structural reforms that member states should prioritise;
- a **possible mismatch** between Cohesion Policy priorities of reducing regional disparities and promoting social inclusion and the RSP's focus on reducing macroeconomic imbalances

To provide stronger complementarity between these agendas, the EU needs to:

- **provide a stronger narrative for EU SR support** by integrating the SR agenda with a more explicit rationale for how it supports the aim of empowering EU citizens in a new global environment;
- **showcasing how Cohesion Policy can complement the EU's SR agenda** by demonstrating the added value of CP's tailored approach in boosting EU economic, social and territorial resilience;
- **ensure that the SR support agenda considers EU cohesion goals** including by encouraging stronger support from EU member States to those adversely impacted by structural changes in the economy;
- **build a multi-level governance structure for the EU's SR agenda** by defining the respective roles for each level of governance (EU, national, regional and local) in delivering on the EU's SR agenda.

Source: Huguenot-Noel R, Hunter A and Zuleeg F (2018) *op. cit.*

Four horizontal conditions would apply to all specific objectives:

- effective monitoring mechanisms of the public procurement market
- tools and capacity for effective application of State aid rules
- effective application and implementation of the EU Charter of Fundamental Rights
- implementation and application of the United Nations Convention on the rights of persons with disabilities.

Aside from reducing the number, the procedures linked to the enabling conditions are simpler by not requiring action plans to be submitted in cases of non-fulfilment, although Member States will not be able to send payment claims related to unfulfilled preconditions, and their fulfilment will need to be respected throughout the programming period.

The horizontal conditions are complemented by thematic enabling conditions applicable to ERDF, ESF+ and the Cohesion Fund. These conditions, however, vary significantly between policy objectives (see Table 6).

Table 6: Enabling conditions for Policy Objectives

Policy Objective	Main enabling conditions
PO1: Smarter Europe	<p>Good governance of national/regional smart specialisation strategy, requiring evidence of:</p> <ul style="list-style-type: none"> • up-to-date analysis of bottlenecks for innovation diffusion, including digitalisation • existence of competent regional / national institution or body responsible for the management of the smart specialisation strategy • monitoring and evaluation tools to measure performance towards the objectives of the strategy; • effective functioning of entrepreneurial discovery process; • actions necessary to improve national or regional research and innovation systems; • actions to manage industrial transition; • measures for international collaboration
PO2: Greener, low carbon Europe	<p>Strategic policy framework to support energy efficient building renovation</p> <ul style="list-style-type: none"> • National long term renovation strategy to support building renovation • Energy efficiency improvement measures to achieve required energy savings, <p>Governance of the energy sector (National Energy and Climate Plan)</p> <p>Effective promotion of renewable energy use (measures in place)</p> <p>Effective disaster risk management framework (management plan)</p> <p>Updated water/wastewater planning (national investment plan)</p> <p>Updated waste management planning (management plan)</p> <p>Priority action framework for conservation</p>
PO3: More connected Europe	<p>National or regional broadband plan</p> <p>Comprehensive transport plan</p>
PO4: More social Europe	<p>Strategic policy framework for active labour market policies</p> <p>National strategic framework for gender quality</p> <p>National strategic policy framework for education & training system</p> <p>National strategic policy framework for social inclusion and poverty</p> <p>National Roma integration strategy</p> <p>Strategic policy framework for health</p>
PO5. Europe closer to citizens	No specific conditions

Source: European Commission, Annex IV of draft CPR and thematic policy papers, 2018.

- PO3 and PO4 require **specific national or regional strategic plans**. Under PO4, Member States will be required to have a national/regional broadband plan in place for investment in regional ICT connectivity; and a comprehensive transport plans at the appropriate level for transport investments. PO2 also requires (for SO2.1 and 2.2) an integrated national energy and climate plan and a national long-term building renovation strategy, national disaster risk management plans (for SO2.4) and waste management plans (for SO2.6). PO4 requires a series of strategic plans for labour market, gender equality, education and training, social inclusion and poverty reduction, Roma integration, and health.

- Others conditions are specified as **measures**, some of which are precisely defined – as in the case of compliance with national renewable targets under PO2 – but others are framed in more generic ways, such as ‘measures for international collaboration’ (PO1).
- There are also implicit and explicit references to provision of **data and assessments** that are required e.g. analysis of bottlenecks for innovation diffusion (PO1) or assessments of environmental provisions for renewable energy investment (PO2).
- Still more general are the kind of **governance and process requirements** required for PO1 with respect to, monitoring and evaluation tools or ‘effective functioning of entrepreneurial discovery processes’.

Streamlined conditions and decision-making will be welcomed, as it was a key demand by some Member States during the reform debate, along with an increased focus on conditions that are more relevant to Cohesion policy and under the control of managing authorities. Whether new requirements for ongoing monitoring throughout the period will lead to additional bureaucratic burden remains to be seen. A number of EU12 countries have expressed concern about the impact of the continuous application of conditionality on planning certainty and find the linkage with payment claims problematic. Further, they stress the need to clarify the fulfilment criteria to provide the basis for an objective assessment by the Commission and to guarantee equal treatment for all Member States.

4.2.7 Rule of law conditionality

Conditionality linked to the rule of law is a controversial proposal that has received considerable media attention in the context of debates about legislative changes in Poland and Hungary. Introduced in a separate financial regulation on ‘the protection of the Union's budget in case of generalised deficiencies as regards the rule of law in the Member States’ (COM 2018/383), it goes beyond Cohesion policy and is applicable to various EU instruments under both centralised and shared management. In the case of shared management funds, the Commission proposes a range of financial sanctions where there is a risk of a generalised deficiency in the rule of law in a Member State:

- a suspension of the approval of one or more programmes or an amendment thereof;
- a suspension of commitments;
- a reduction of commitments, including through financial corrections or transfers to other spending programmes;
- a reduction of pre-financing;
- an interruption of payment deadlines;
- a suspension of payments.

The sanctions would be applied where the deficiency in the rule of law in a Member State risks affecting the principles of sound financial management or the protection of EU financial interests particularly in the context of:

- public procurement or grant procedures;
- the proper functioning of investigation and public prosecution services in relation to the prosecution of fraud, corruption or other breaches of EU budget law;

- the effective judicial review by independent courts of actions or omissions by the authorities referred to in
- the prevention and sanctioning of fraud, corruption or other breaches of EU law relating to the implementation of the EU budget, and the imposition of effective and dissuasive penalties on recipients by national courts or by administrative authorities;
- the recovery of funds unduly paid; and
- the effective and timely cooperation with the EU fraud and prosecution offices.

The Commission would propose such measures to the Council, which would make a decision based on a reversed qualified majority vote, and the measures would be lifted once the deficiency has been remedied or ceases to exist.

There is support for the introduction of a rule of law conditionality among net payers in principle, notably in Germany, France and the Netherlands. Countries such as Poland and Hungary oppose the proposals arguing that it would be subjective, lacks transparency, politicises the EU budget and does not support the objectives of cohesion.

The European Parliament is supportive of the principle of rule of law conditionality, but argues that sanctions should not be imposed on final beneficiaries for breaches of rules by national governments. The proposals have also been criticised by the European Court of Auditors for granting the Commission too much discretionary power and not providing clear criteria and guidance for determining breaches in the rule of law.³⁶ In line with the ECA opinion, a study for the European Parliament argues that significant revisions are needed for the instrument to be effective and workable including greater legal coherence/consistency, a focus on a limited number of key rule of law breaches linked to EU spending, credible guarantees that final beneficiaries would not be affected, and involvement of the Council and Parliament in enforcement decisions to ensure legitimacy.³⁷

4.2.8 Management of funding

The slow launch of programmes and pace of spending in 2014-20 has been a challenge for implementation with negative political implications for debates on the performance of EU Cohesion policy in the context of the EU spending review. To speed up absorption the Commission has proposed to **return to the n+2 rule** whereby committed funding can be lost to the programme if it is not spent within two years as opposed to the three-year rule used in 2014-2020.

Some Member States are critical of n+2 and argue that it will lead to a recurrence of problems with preparing and managing large, high-value projects, encourage a less strategic approach to project selection and may not even improve budget discipline. Other Member States consider that financial absorption could speed up if N+2 was reintroduced if it is accompanied by a genuinely simplified designation and programming process. Indeed, a commonly held view is that the reason for slow absorption is not only slow designation but also risk aversion due to concerns about net financial correction risks during annual closure processes.

³⁶ ECA (2018) *Opinion No 1/2018 Concerning the proposal of 2 May 2018 for a regulation of the European Parliament and of the Council on the protection of the Union's budget in case of generalised deficiencies as regards the rule of law in the Member States*, European Court of Auditors, Luxembourg.

³⁷ Viță V (2018) *Conditionalities in Cohesion Policy*, Research for REGI Committee, Directorate-General for Internal Policies, European Parliament, PE 617.498, September 2018, Brussels.

The issue of absorption has been addressed by two reports in recent months for the European Court of Auditors³⁸ and the European Parliament.³⁹ In the ECA report, the Commission argued that the decommitment rule is a decisive factor in influencing the absorption of ESIF funds by the end of the programme period:

“As compared to the n+3 rule, the n+2 rule enforces a stronger budgetary discipline and incentivises faster budgetary implementation....The Commission recognises the disincentive effect on absorption of the n+3 rule.”

However, the EP report warned of the potentially problematic effect of the proposed change to n+3:

“Reduction of the automatic decommitment rule (Article 99) from three years in the 2014-20 period to two years in the 2021-27 period will be difficult for major projects that have long preparation times and are often subject to unplanned delays.”

A reduction in pre-financing levels is also proposed to speed up absorption, which would in the future constitute 0.5 percent of programme resources to be paid each year except for 2027, the final year of the new funding period. The risk here is that less pre-financing will lead to liquidity challenges in less-developed countries with fiscal constraints. In the ECA report on absorption, the Commission maintained that high pre-financing has a negative effect on absorption:⁴⁰

“The Commission considers that absorption (defined in terms of EU payments) is slower given that the overall pre-financing amounts in 2014-2020 are significantly higher than in 2007-2013. This does not incentivise Member States to submit payments claims, in particular as to this end designation had to be completed.”

The European Parliament's REGI committee is calling for a gradual increase in pre-financing rate over the course of the MFF to reach a rate of 2 percent in 2026, instead of the annual flat rate of 0.5 percent proposed by the Commission, in line with the increasing spending profile of implementation at the end of the period.⁴¹

Lastly, EU co-financing rates would be reduced. The Commission argues that high EU co-financing rates are no longer necessary, since they were a temporary response to the crisis, and lower rates promote "ownership" and increase the overall Cohesion policy budget. The reduced EU co-financing rates proposed by the Commission are opposed by the European Parliament (REGI committee) and Committee of the Regions, which would like to maintain existing rates or introduce a more generous rate of 70 percent for transition regions in the case of the Committee of Regions (Table 7).

³⁸ ECA (2018) *Commission's and Member States' actions in the last years of the 2007-2013 programmes tackled low absorption but had insufficient focus on results*, Special Report No.17, European Court of Auditors, Luxembourg

³⁹ Bachtler J, Ferry M and Gal F (2018) *Financial Implementation of European Structural and Investment Funds*, Study requested by the BUDG Committee, Directorate-General for Internal Policies, European Parliament, PE 621.785, June 2018, Brussels.

⁴⁰ See footnote 28.

⁴¹ European Parliament (2018b) *Op.cit.*

Table 7: EU co-financing rate proposals

	Less Developed Regions	Transition Regions	More Developed Regions
2014-20	80-85%	60%	50%
2021-27 proposals			
- European Commission	70%	55%	40%
- European Parliament (REGI)	85%	60%	50%
- Committee of the Regions	85%	70%	50%

Efforts to reduce the EU component of funding are generally welcomed by net payer countries. However, in countries facing fiscal constraints greater domestic co-financing may be a challenge. Indeed, Italy is calling for Cohesion policy investments to be deducted from deficit calculations to ease fiscal pressures. Many new Member States consider that the new financing conditions will impose additional budgetary pressures, especially on poorer regions, and are inconsistent with cohesion objectives.⁴² The EP report on absorption also noted that:⁴³

“Reduction of the co-financing rate and reduction of advance payments are likely, in tandem, to create serious liquidity problems for some Member States. Beneficiaries in some countries are unlikely to have the domestic co-financing to fund projects.”

4.2.9 Flexibility

To provide flexibility to adjust programmes at the end of the period, **a mid-term review will be introduced**. Allocations for the first five years will be programmed, while the budget for the remaining two years – 2026 and 2027 – will be allocated following a review in 2024. The programming period will essentially become a 5+2 period with a reprogramming in 2025 to take account of:

- the challenges identified in the relevant Country-Specific Recommendations adopted in the context of the European Semester in 2023 and 2024;
- the socio-economic situation of the Member State or region concerned;
- the progress made towards the milestones of the programmes' performance framework;
- the outcome of the technical adjustment, an exercise which will be carried out in 2024 and lead to a review of national Cohesion Policy envelopes based on the most recent statistics.

As a consequence of the new mid-term review, the previous performance reserve is discontinued.

The Commission justifies the proposal on the basis of needing to strike “a balance between two main principles in programming: the need for both stability and flexibility”, allowing adaptation to the evolution of investment needs, objectives and targets.⁴⁴ However, based on previous experience of the mid-term reviews in the 1994-99 and 2000-06 periods, key questions are whether the administrative effort will be worth the effort and that any reprogramming does not disrupt the stability provided by the long-term

⁴² Joint Statement discussed by the Visegrad Group (Czech Republic, Hungary, Poland, Slovakia), Bulgaria, Croatia, Romania and Slovenia, 24th October 2018, Bratislava.

⁴³ See footnote 29.

⁴⁴ European Commission (2018) *Mid-term review of programmes supported by the ERDF, the ESF+ and the Cohesion Fund (Article 14 CPR proposal)*, Structural Measures 2021-2017 Fiche no.4, 4, Brussels.

planning approach. More cynically, there are concerns that the exercise will merely be used to divert Cohesion policy funding to other EU priorities or centralised instruments.

Programming flexibility will also be provided through the possibility to transfer funding across priorities without the need for formal Commission approval - a threshold for such transfers is set at five percent of a priority's budget.

The Visegrad 4+4 group of Member State are critical of the new approach arguing that a '5+2' approach to programming would result in excessive administrative burden and less predictability for long-term investments.⁴⁵ Instead, they argue that programming for seven years should be maintained for all commitments and that re-programming must be justified by the outcomes of the mid-term review. Further, they argue that national funding envelopes should not change during the review.

The CoR rapporteur on the CPR has also been cautious about the flexibility proposal on the grounds that the impact of programmes may be reduced:⁴⁶

"Introducing some flexibility can meet a number of programming requirements for both the member states and individual regions. Clearly, we need to keep up cohesion policy's capacity to tackle specific issues, and particularly its focus on the structural aspects of development. It would be a mistake if flexibility were to lower cohesion policy expectations, since this policy needs to use complex projects and programmes to redress the existing weaknesses in Europe's regions.

Flexibility is therefore useful when it comes to devising regional operational programmes, provided that there is no decrease in the expected impact of the investments."

This concern with maintaining performance is underlined by the findings of a recent European Court of Auditors report, which found that the increased focus on results is not being sufficiently translated into project selection procedures in the Member States: *"processes continue to emphasise outputs and absorption rather than results"*.⁴⁷

4.2.10 Simplification

Responding to ongoing concerns about the complexity of Cohesion policy administration, the Commission has proposed 80 simplification measures for 2021-2027. The detailed measures are set out in a Simplification Handbook and cover the following ten themes:⁴⁸

1. **Legal framework:** A shorter, unified legal framework providing certainty from the start
2. **Policy framework:** A streamlined framework for easier programming
3. **Conditions:** Fewer, strategic requirements to increase policy effectiveness
4. **Faster and more strategic programming:** For a quick and simple start to implementation
5. **Territorial tools:** Simpler design tailored to local situations
6. **Simpler implementation:** Faster and simpler delivery of results

⁴⁵ *Ibid.*

⁴⁶ Marini: Rules on public expenditure will be the real challenge for Cohesion, *euractiv.com*, 23 July 2018.

⁴⁷ ECA (2018) *Selection and monitoring for ERDF and ESF projects in the 2014-2020 period are still mainly outputs-oriented*, Special Report No.21, European Court of Auditors, Luxembourg.

⁴⁸ European Commission (2018) *Simplification Handbook: 80 simplification measures in cohesion policy 2021-2027*. Directorate-General for Regional and Urban Policy, European commission, Brussels.

7. **Management, control and audit:** Simpler and proportionate system with high reliance on national systems
8. **INTERREG:** A single integrated regulatory framework tailored to the specific cooperation context
9. **Financial instruments (FIs):** simpler and less detailed provisions
10. **Monitoring and evaluation:** More frequent but lighter reporting, streamlined provisions

The main simplifications from a management perspective are as follows:⁴⁹

- **the management designation process will not be repeated**, so that existing arrangements can be rolled over with simpler rules for designating new bodies.
- **fewer layers of control** involving Certifying Authorities (CA) being replaced by an accounting function, which will not duplicate controls; however, in some countries the existing arrangements are valued, with a CA as part of the MA or as a separate body,⁵⁰ and there is an open question about whether this will imply a new designation with additional administrative effort;
- **a risk-based sampling method for administrative verifications**, instead of verifying 100% of payment claims;
- **a more proportionate system for low error rate programmes** involving reliance on national systems, no system audit, and a maximum audit sample of 30 operations; and
- **a simpler process for acceptance of accounts** through clearance of expenditure by Member State Audit Authorities without needing a Commission decision, and eliminating the need submit zero accounts.

Member State debates during the Bulgarian Presidency suggested that expectations were higher in the area of simplification, with more radical proposals anticipated drawing on the work of the high-level group on simplification. Others welcomed the core direction of change and expressed support for specific proposals especially on designation. To achieve a more radical simplification of management and control system and a result-oriented approach, the Visegrad 4+4 group of Member States stress the need for a significant shift from formal compliance verification towards outputs/results and progress in implementing and verifying the functioning and effectiveness of national management and control systems.⁵¹ To do so, they call for more consideration to be given to method of payments linked to conditions and underpinned by clear rules.

4.3 Eligibility and allocations

There is both continuity and change in the approach to Cohesion policy eligibility and allocations under the Commission proposals.

- Presentationally, the structure of the Cohesion policy budget has **changed** to include an *a priori* allocation to the ERDF and ESF+. Previously, allocations distinguished categories of region, but not the division between funds

⁴⁹ von Breska E (2018) *EU Budget for the future, CPR ERDF/CF ETC & ECBC*, CoR COTER meeting, 6 June 2018

⁵⁰ Joint Statement discussed by the Visegrad Group (Czech Republic, Hungary, Poland, Slovakia), Bulgaria, Croatia, Romania and Slovenia, 24th October 2018, Bratislava.

⁵¹ *Ibid.*

- Spatial coverage **retains** the same eligibility categories – Less Developed, Transition and More Developed Regions, but the threshold for Transition Regions is **changed** from 90 percent of the EU average to 100 percent.
- The Cohesion Fund eligibility threshold **remains** at 90 percent of EU GNI per head, but the reference period is aligned with the reference period for GDP data used elsewhere.
- Calculation of the financial allocations **remains** based on the so-called Berlin formula and the dominant allocation criterion is GDP per head, but there are **changes** in approach, notably the addition of criteria related to climate change and migration
- According to the Commission, GDP accounts for 81 percent of the distribution formula (compared to an estimated 86 percent in the 2014-20), with labour market data accounting for 15 percent, and migration and climate change accounting for three percent and one percent respectively.⁵²
- As in the past, the ‘adjustments’ play a determining role in the allocations notably through capping.
- Perhaps most the striking **change** from past practice is that the Commission has published the outcomes from applying the Cohesion policy allocation formulae at the outset.

4.3.1 Overall budget allocations

The overall budget allocation for economic, social and territorial cohesion is proposed as €330,624 million for 2021-27 compared with €373,596 million for 2014-20.⁵³ This is effectively a cut of around €30 billion in real terms, once Brexit is taken into account.

In the Commission proposals, this is broken down between funds as illustrated in Table 8.

Table 8: Proposed allocations by fund 2021-27

Fund	€ million
European Regional Development Fund	200,622
Cohesion Fund (including transfers to CEF)	41,374
European Social Fund + (excluding health, employment and social innovation)	88,646

Source: Commission proposals for MFF 2021-27.

An initial breakdown for ERDF and ESF was not made in MFF 2014-20, but comparisons can be made between the two periods at the level of categories of region and overarching objectives. This shows that while the overall budget would fall by over 11 percent, allocations to Less Developed and Transition Regions would increase (see Table 9). The reduction in allocations to the Cohesion Fund – almost 46 percent in real terms, is especially striking. This is largely due to the elimination of the requirement to allocate a minimum share of one third of total funding to the Cohesion Fund in eligible countries acceding to the EU after 2004. In per capita terms, however, only the allocations to LDRs increase.

⁵² Eric von Breska presentation to CoR and COTER, 6 June 2018.

⁵³ Both in 2018 prices, with the 2014-20 figures based on the MFF, and the application of the 2% deflator.

Table 9: 2014-2020 and proposed 2021-27 commitment appropriations for Cohesion policy (€m)

	Total, €million (2018 prices)			€ per head per annum (2018 prices)		
	2014-20	2021-27	% change	2014-20	2021-27	% change
Less Developed Regions	188,757	198,622	5.2	213	230	8.1
Transition Regions	36,397	45,935	26.2	74	58	-20.7
More Developed Regions	56,867	34,843	-38.7	26	24	-10.1
Territorial Cooperation	10,282	8,430	-18.0			
Cohesion Fund	76,250	41,349	-45.8	84	47	-43.7
OMR and LPD	1,593	1,447	-9.2	35	30	
YEI	3,447		-100.0			
Total	373,596	330,624	-11.5			

Note: The 2014-20 figures include the United Kingdom, which was allocated around €12,273 million (2018 prices). OMR=Outermost Regions. LPD=Low Population Density. YEI= Youth Employment Initiative.

Source: Own calculations from MFF 2014-20 and MFF proposals for 2021-27, using MFF price deflator.

4.3.2 Spatial coverage

The approach to spatial coverage in the Commission proposal is broadly consistent with that in 2014-20. It is based on GDP(PPS) per head at NUTS 2 over the period 2014-16 (as opposed to 2007-09 for MFF 2014-20). However, there are two key differences.

- First, in anticipation of Brexit, **EU27 averages are used instead of EU28**. This is a break from convention insofar as Commission calculations are by convention based on *current* membership, even when accession of new countries is imminent. In practice, however, the departure of the UK has a limited impact on EU average GDP per head and the relevant thresholds.
- Second, **Transition Region coverage is widened** to include regions with GDP per head between 75 percent and 100 percent of the EU average, rather than 75 percent to 90 percent, as previously. This has a significant impact on Transition Region coverage – increasing it from under 15 percent to over 25 percent of the EU27 population.

The impact of changes in GDP(PPS) per head and of the new Transition Region definition are summarised in Table 10 and illustrated in Figure 7 and Map 1 and Map 2.

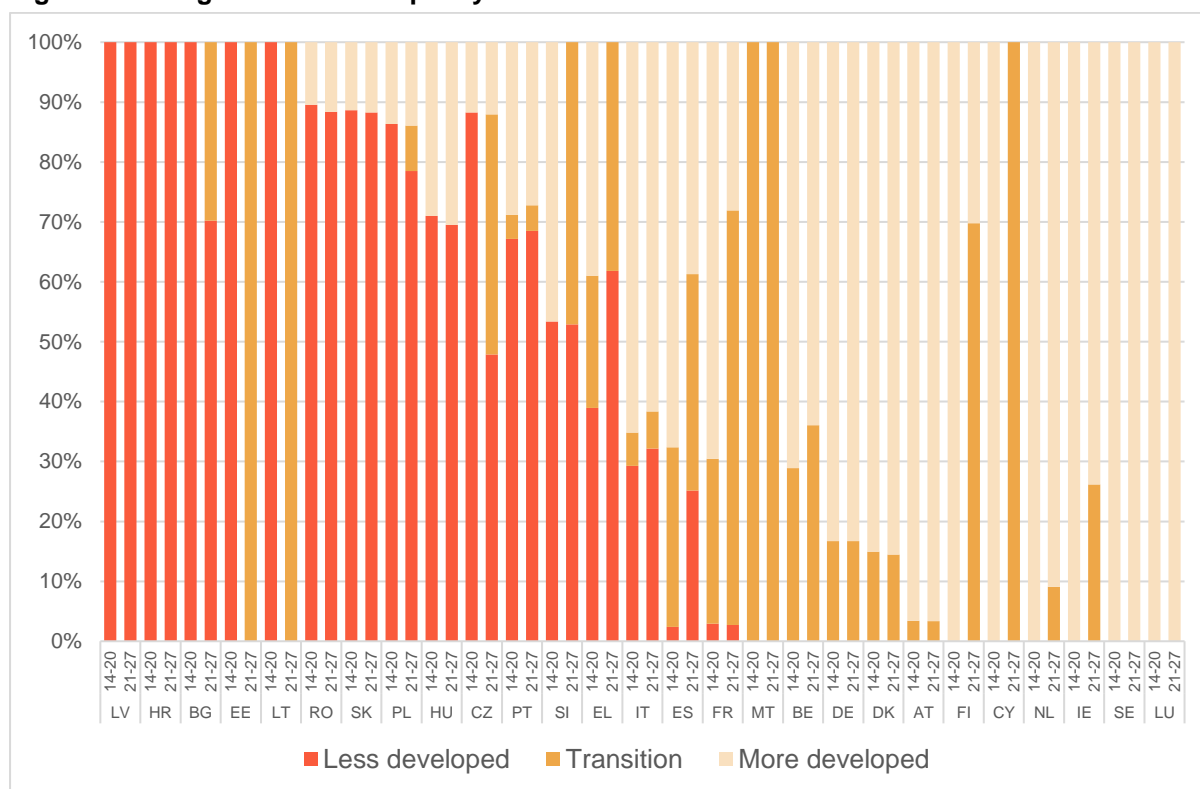
Table 10: Cohesion policy status 2014-20 and under Commission proposal for 2021-27 (% of population)

	MFF	LDR	Transition	MDR
EU28	2014-20	25.4	13.5	61.0
EU27	2021-27	27.6	25.3	47.1

Source: Own calculations from Eurostat data.

In 2021-27, the Less Developed Regions would cover 27.6 percent of the EU27 population. The overall pattern is of a southern shift in coverage, with Greece, Spain, Italy and Portugal all gaining LDR coverage to varying degrees, and many Central and Eastern European countries losing LDR coverage.

Figure 7: Changes in Cohesion policy status 2014-20 and 2021-27



Source: Own calculations from Eurostat data.

The key points to note are:

- only Latvia and Croatia would be covered by LDR status in their entirety;
- Estonia and Lithuania would no longer have LDR status;
- LDR coverage also falls in Czech Republic, Poland and Bulgaria;
- all of Greece except Athens and the Northern Aegean would 'gain' LDR status and none of Greece would have MDR status;
- similarly in Spain, LDR coverage would increase significantly include Andalucía, Murcia and Castilla-La-Mancha; and
- there would be more modest increases in Italy and Portugal as Sardegna and Madeira, respectively, would qualify as LDR regions.

Changes to Transition Region coverage are more complex owing to the different threshold:

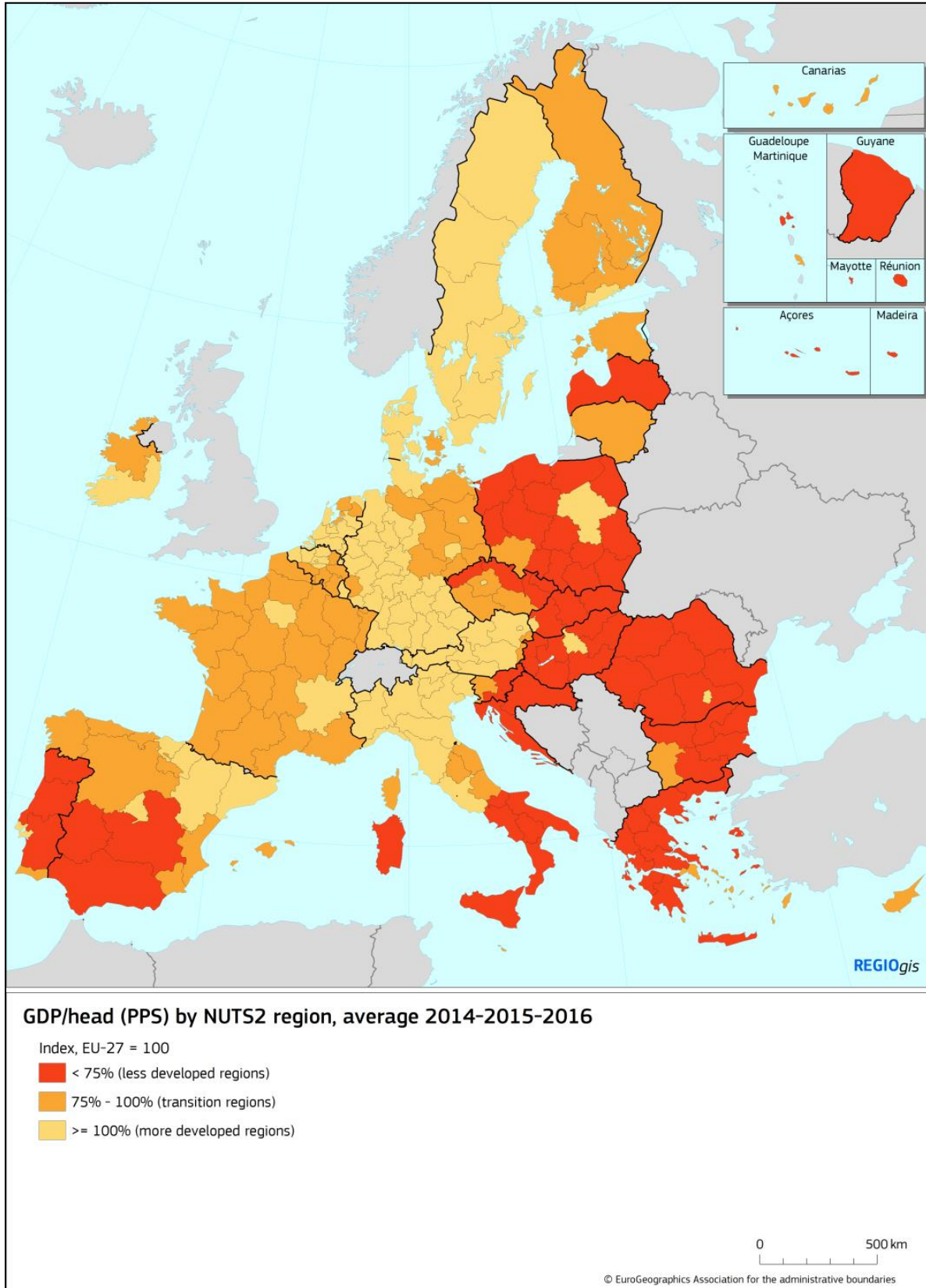
- Transition coverage in Germany is unchanged, but largely due to the change in threshold, without which Transition coverage would have been extremely limited;
- several countries increase Transition coverage due to the new definition, notably Belgium, Finland, France, the Netherlands and Slovenia;
- Cyprus and Ireland increase Transition coverage, but because of economic change, not the threshold; and
- in Italy, Transition coverage increases to include Umbria, Abruzzo and Marche, the latter owing to the new threshold.

There are two outstanding questions on coverage. First, it is unclear whether new data would be used for eligibility – in principle, revised GDP data will be available in spring 2019. A second question is whether the new NUTS Regulation would be taken into account. This entered into force in January 2018 and, among other changes, affects NUTS 2 boundaries in Hungary, Lithuania, Poland and Ireland, with implications for Cohesion policy status in most cases.

Initial reactions to the new spatial coverage are mixed. Clearly, there are concerns about the impact on budget receipts for those countries with a significant loss of coverage from LDR to TR (e.g. Czech Republic, Estonia) as well as the stricter rules on thematic concentration and its implication for absorption. Countries gaining TR status for the first time (e.g. Netherlands) are also concerned about the greater complexity of implementation.

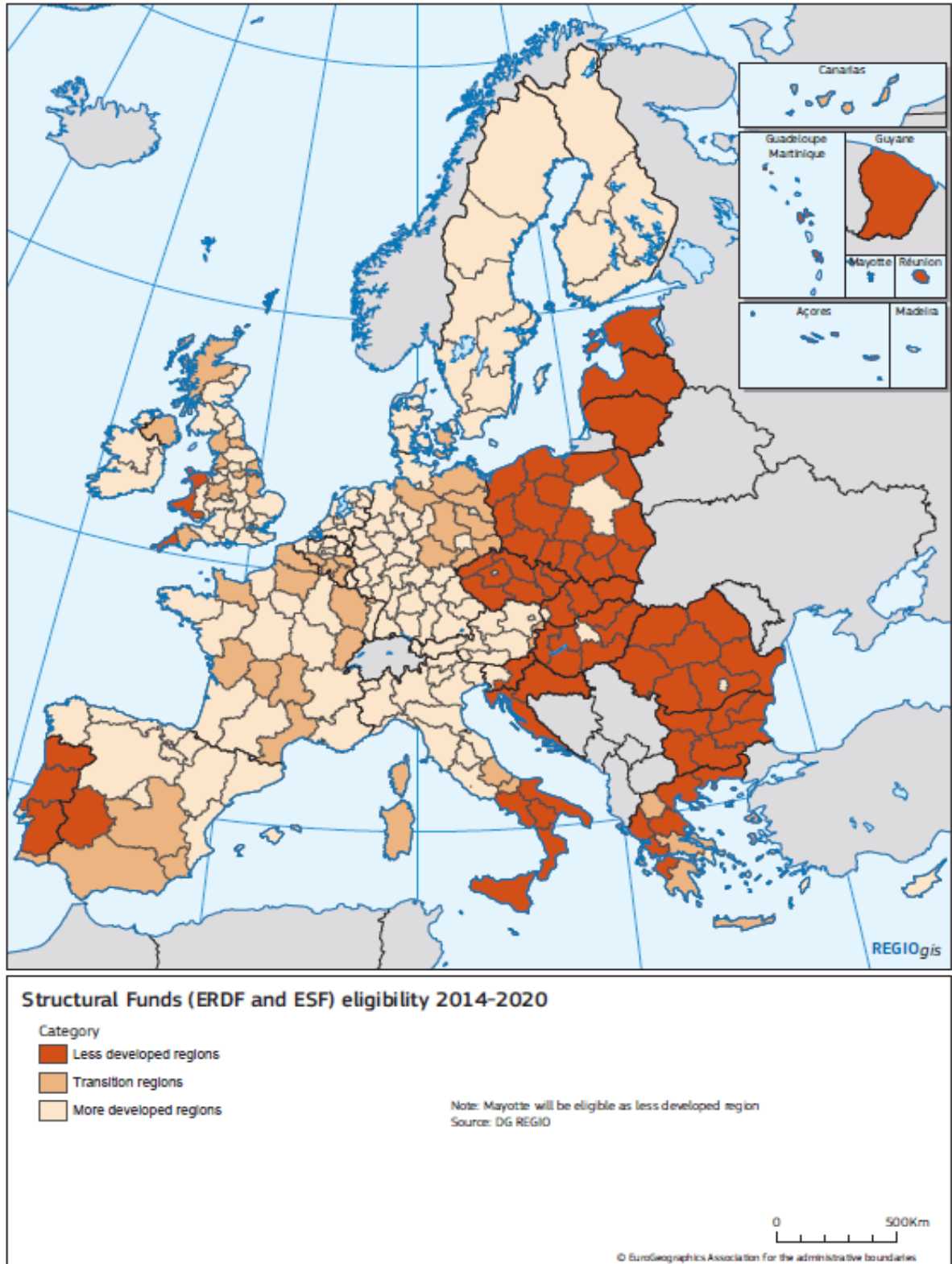
A final point to note concerning coverage is eligibility for the **Cohesion Fund**. Current coverage is shown in Map 3. The only change compared to the current period would appear to be that Cyprus would qualify in full for the Cohesion Fund, whereas in 2014-20 it had Phasing-out status.

Map 1: GDP(PPS) per head 2014-16 average – EU27=100



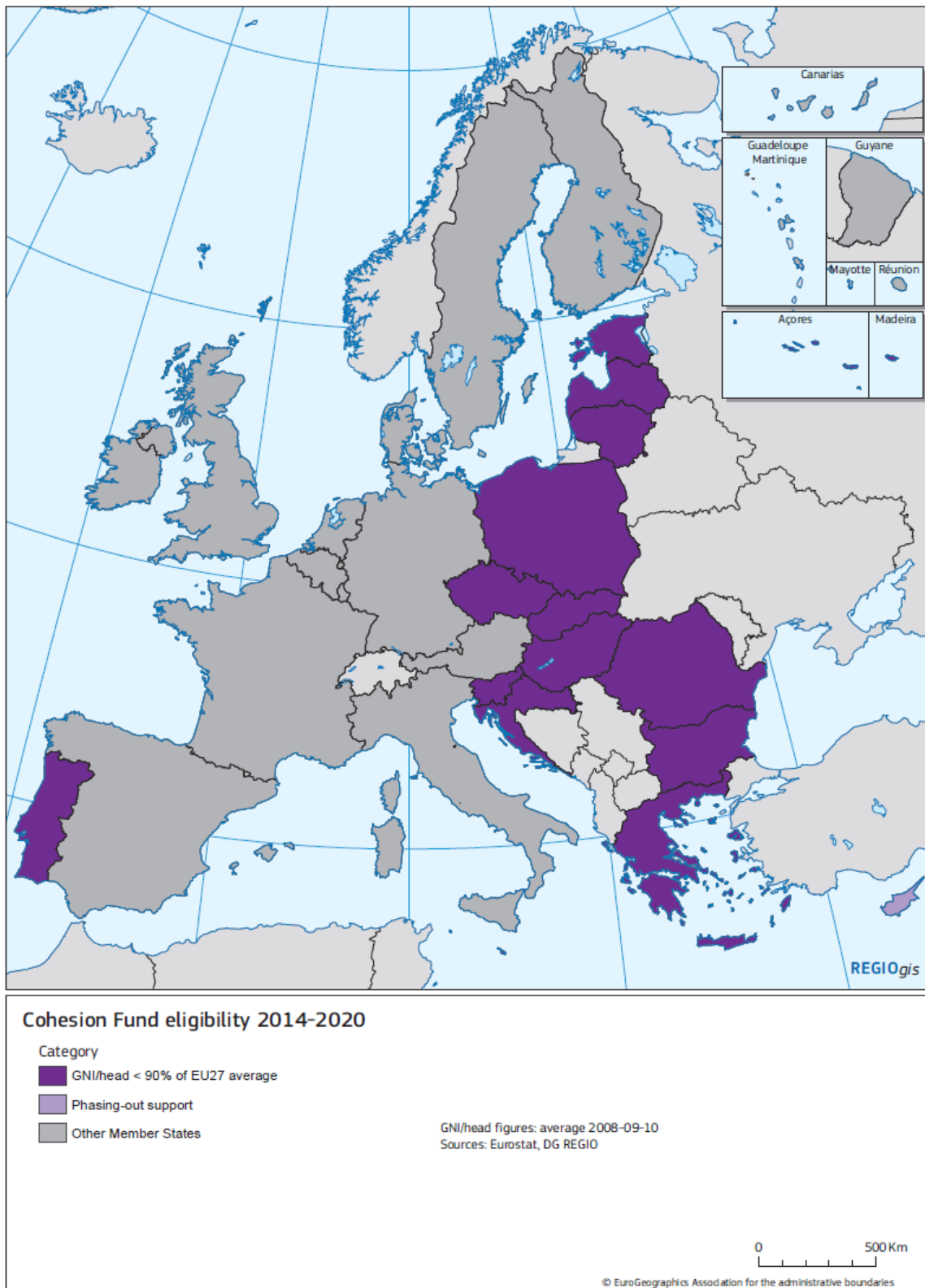
Source: DG REGIO.

Map 2: Cohesion policy assisted areas 2014-20



Source: DG REGIO.

Map 3: Cohesion Fund Eligibility 2014-20



Source: DG REGIO.

4.3.3 *Financial allocation mechanisms*

In the past MFF, financial allocations for Cohesion policy have comprised three main elements:

1. Specific methodologies for allocating the sums under each strand of policy (LDR, TR, MDR, OMR/LPD, CF, ETC);
2. A series of adjustments is applied in the form of capping, safety nets, 'reverse' safety nets and ceilings at regional and national levels; and
3. Provisions to address 'special situations' – typically the outcome of last minute negotiations.

Since the late 1990s, when the so-called 'Berlin formula' was introduced by the Commission to calculate Objective 1 allocations, the precise details of the methodology (1 and 2, above) have been the subject of intense discussion, with the list of 'special situations' growing longer (and accounting for more funds) under successive MFFs. A key difference in the current proposals is that the Commission has published the outcome of its methodology at the start of the negotiating process.⁵⁴ Nevertheless, the methodology remains opaque in places – indeed the Commission considers it useful to 'keep parts of the method secret in order to help the negotiations'.⁵⁵

The following subsections outline the main features of the methodologies and adjustments – (a) and (b) above – and highlights proposed changes between 2014-20 and 2021-27.

(i) *Less-Developed Regions*

The core elements of the Berlin formula used to allocate funding to LDRs **remain the same**, i.e.:

- a) the **regional allocation** is based on the 'gap' between GDP(PPS) per capita in the eligible regions and the EU average;
- b) the allocation (in euros) is calculated as percentage of that gap, the percentage varying according to **national prosperity**;
- c) an **unemployment premium** is added for each unemployed person in excess of the LDR average rate.

However, there are important **changes** of detail to the national prosperity coefficient (b), and the employment premium (c); and **additional criteria** (see (d) to (g) below) are introduced:

- b) **National prosperity**, as Table 11 shows, the Commission proposals *retain* the 'banding' from the current period, although Brexit means that EU27 refers to the EU28 excluding the United Kingdom, rather than the EU28 excluding Croatia. There are significant changes in relative levels of national prosperity, with the result that the Czech Republic moves 'up' a band, while Spain, Italy, Greece and Slovenia all move down. The proposed coefficients differ, with the Commission proposing lower rates across the board, but (proportionately) less of a reduction in the least prosperous Member States, albeit with no apparent logic to the reduction. In the past, these bands have been the subject of intense negotiations – in the original Berlin

⁵⁴ See Annex XXII to Commission proposal for a new common provisions Regulation, COM(2018)375.

⁵⁵ Lewis Dijkstra presentation of proposals for Cohesion Policy post 2020 at Regional Studies Association conference, Lugano, 3-6 June 2018.

formula Commission proposals of the late 1990s, the coefficients were five, four and three percent, and in no MFF round have the coefficients remained unchanged.

Table 11: National prosperity coefficients 2007-13 and 2014-20

2014-20			2021-27 proposals		
GNI EU27=100	Member State	Coeff (%)	GNI EU27=100	Member State	Coeff (%)
<82	BG CZ EE LV LT HU PL PT RO SK	3.15	<82	BG EE LV LT HU PL PT RO SK, SI, HR, EL	2.8
<99	EL SI	2.7	<99	CZ, ES, IT	1.3
>99	ES FR IT UK	1.65	>99	FR	0.9

Source: Own calculations from Ameco online and Council Regulation (EC) No 1303/2013 'Common provisions regulation', OJ L347/320; Commission proposals for a new common provision Regulation, COM(2018)375.

c) Unemployment premium. This is *retained*, but the amount is reduced sharply. For 2014-20, the unemployment premium was set at €1494, per person per annum (2018 prices), but for 2021-27, the Commission proposes €500 per person per annum.

Alongside the core provisions that have been part of the Berlin formula since the outset, **four new criteria** are added:

d) youth unemployment: this operates in the same way as the unemployment premium and involves a further €500 per person per annum in relation to the 15-24 age group;

e) educational attainment: a premium of €250 per person per annum related to proportion of the regional population with below LDR average low education levels;

f) greenhouse gas emissions: €1 per year per tonne of CO₂ equivalent of the regional share⁵⁶ of the amount by which the Member State exceeds its 2030 GHG emission targets outside the emissions trading scheme; and

g) migration: €400 per person per year applied to the regional population share of net migration from outside the EU to the Member State.⁵⁷

⁵⁶ Calculated using regional shares of national population applied to emissions targets, rather than as regional GHG targets.

⁵⁷ As for the GHG premium, this appears to be calculated using regional shares of national population, rather than requiring regional net migration data.

(ii) *Transition Regions*

As previously, the calculation of the TR allocation is complicated. Indeed, the **same complexity is retained**, with some changes of detail. The per capita allocation for each Transition Region (TR) is calculated with reference to a theoretical maximum intensity and a minimum intensity.

- The *maximum* intensity is based on the method for LDR. The formula assumes a region with GDP of 75 percent of the EU average, applies the LDR method outlined above, including the national prosperity coefficient (see Table 11), and then takes 60 percent of the amount obtained by this method as the maximum.⁵⁸
- The *minimum* intensity is the 'initial average per capital aid intensity for all MDR regions', this being given as €18 per person per annum.⁵⁹

The *actual* aid intensity for each TR depends on the prosperity of the region and is calculated through a 'linear interpolation' of regional GDP per head along scale from the minimum and maximum calculated as outlined above. This means that the closer a region's per capita GDP is to the EU average, the closer the aid intensity of the TR will be to the average of the MDRs.

As before, the unemployment premium applies on top of this sum, but under the Commission proposals is at the same rate as for the LDRs (whereas before the amount was lower). Similarly, the new premia in relation to youth unemployment, educational attainment, greenhouse gas emissions and migration are also applied, and also at the same rates as for the LDRs.

In addition, a specific safety net is applied to ensure that no TR receives less than it would have had it been a MDR.

(iii) *More Developed Regions*

The MDR methodology is similar to that for 2014-20. It is based on an initial financial envelope set on a per capita basis - €18 per head of eligible population per annum. As for 2014-20, this initial sum is distributed on the basis of a key (see Table 12). The criteria proposed for 2021-27 are very similar to the current period, but involve a shift toward younger people.

⁵⁸ This is 40 percent in the current CPR.

⁵⁹ In the 2014-20 CPR, the *national* average of MDR regions is used as the minimum.

Table 12: Criteria and weightings for MDR financial allocations 2014-20 and proposed for 2021-27

2014-20		Proposed for 2021-27	
Criterion	(%)	Criterion	(%)
Total MDR population	25.0	As 2014-20	20.0
Number of unemployed people in NUTS 2 regions with an unemployment rate above the average of all MDRs	20.0	As 2014-20	15.0
Employment to be added to reach the Europe 2020 target	20.0	Employment to be added to reach the average employment rate (age 20-64) of all MDRs	20.0
Number of people aged 30 to 34 with tertiary educational attainment to be added to reach the Europe 2020 target of 40 percent	12.5	Number of people aged 30 to 34 with tertiary educational attainment to be added to reach average of all MDRs	20.0
Number of early leavers from education and training (aged 18 to 24) to be subtracted to reach the Europe 2020 target of 10 percent	12.5	Number of early leavers from education and training (aged 18 to 24) to be subtracted to reach the average of all MDRs	15.0
Difference between the observed GDP(PPS) of the region and the theoretical regional GDP if the region had the same GDP per head as the most prosperous NUTS 2 region	7.5	As 2014-20	7.5
Population of NUTS 3 regions with a population density of below 12.5 inhabitants per km ²	2.5	As 2014-20	2.5

Source: Common provisions regulation', OJ L347/320; Commission proposals for a new common provision Regulation, COM(2018)375.

In addition to the distribution of this initial amount based on the key above, the premia related to greenhouse gas emissions and migration also apply on the same terms and rates as for LDR and TR (the youth unemployment and educational attainment premia do not apply, these having been incorporated into the MDR key).

(iv) Outermost, sparsely-populated regions and islands

As in 2014-20, proposed 2012-27 allocations to the Outermost regions and the northern sparsely-populated regions are based on a per capita amount and are in addition to any allocation under the relevant designated area strand (i.e. LDR, TR, MDR). In 2014-20, this amounted to about €35 per head per annum (at 2018 prices). The Commission has proposed an allocation of €30 per head per annum for 2014-20; this is obviously below the intensity in 2014-20 (and substantially below that for 2007-13).

(v) Cohesion Fund

As for 2014-20, for 2021-27 the Commission proposes an initial distribution of Cohesion Fund monies on the basis of a 'theoretical envelope'. The initial theoretical envelope is calculated on the basis of €62.9 per annum per head of eligible population.⁶⁰

The criteria for the distribution of the theoretical envelope across Member States are unchanged since 2007-13. This takes the form of an allocation key based on national shares of population and surface area, adjusted for prosperity. However, the requirement to allocate a minimum share of funding to the Cohesion Fund has been abolished and explains the sharp fall in the CF share of the cohesion budget. While in both 2007-13 and 2014-20, the Cohesion Fund is to account for a minimum of one-third of total Structural and Investment Fund allocations in EU12 countries, this is no longer a requirement for 2021-2027. The Commission argues that this is justified because many major infrastructure gaps have been addressed in previous periods, and the intention is to focus more on competitiveness oriented spending under the ERDF/ESF.

4.3.4 Adjustments

The allocations resulting from the above methodologies are subject to a series of adjustments. The role of these adjustments is crucial. For example, in 2014-20, Cohesion policy allocations to eight central and eastern European countries was determined by GDP-related capping, rather than the allocation methodologies outlined above.

(i) Capping

As in 2007-13 and 2014-21, the Commission proposes that 2021-27 Cohesion policy allocations will be subject to capping, expressed as a proportion of GDP. Where capping applies to a national allocation, as previously, it reduces all transfers, except those to ETC and MDRs – in other words, the allocations to LDRs, TRs and the Cohesion Fund are reduced proportionately to respect the cap.

Proposals for capping vary by GNI(PPS) per head as set out below in Table 13; the rates proposed are lower than in 2014-20, and much lower than 2007-13, but GDP growth in the intervening period complicates direct comparisons of impact. On the basis of *current* data, all but three countries would be subject to the same cap (although most countries escape the cap altogether). Importantly, capping is calculated on an annual basis for the MFF. Assuming the same method is applied as in the past, this means that the level of Cohesion policy allocations is directly affected by actual growth in a given country, and by DG ECFIN long-term growth forecasts.

Table 13: Capping based on 2016 GNI(PPS) per head

Threshold	Member States	Cap
GNI(PPS) per head < 60% EU27	BG RO HR	2.3% of GDP
GNI(PPS) per head >60%, <65% EU27	~	1.85% of GDP
GNI(PPS) per head >65% EU27	All others	1.55% of GDP

⁶⁰ Compared to €55 per head – 2018 prices – in 2018.

Capping was a major area of contention in 2014-20 – the Commission had proposed a general cap of 2.5 percent of GDP, but as this had the effect of enabling higher allocations to countries where there was higher growth, (arguably a perverse effect), a ‘low growth’ gap of 2.59 percent was introduced to compensate for this. As in the past, capping seems likely to be a controversial aspect of the negotiations, not least since it is this rather than actual allocation formula that can determine a Member State’s Cohesion policy receipts.

(ii) *Ceilings (‘reverse’ safety net)*

As in 2014-20, the Commission proposes that national allocations be limited as a percentage of the previous period. In 2014-20, this was set at 110 percent of previous allocations; for 2021-27, the Commission proposes to **reduce** this to 108 percent.

A **new proposal** is that, for Member States with GNI exceeding 120 percent of the EU average, allocations should be capped at 2014-20 levels. On the basis of 2016 GNI data, this would apply to:

- Belgium
- Sweden
- Germany
- Netherlands
- Austria
- Denmark
- Ireland
- Luxembourg

(iii) *Safety net*

Conversely, and again as in the past, the Commission proposes a minimum national allocation compared to the previous period. This is proposed as 76 percent of the 2014-20 allocation, **considerably higher than the 55 percent** applicable in 2014-20.

(iv) *Transitional arrangements*

Similar to previous period, the Commission proposes special arrangements for regions losing LDR status. As in 2014-20, this is set at 60 percent of their indicative annual allocation. However, an important issue is that **indicative allocations at regional level are never published by the Commission**. Much of the uncertainty involved in replicating Commission calculations arises from the absence of information on allocations in the previous period, sometimes compounded by NUTS boundary changes.

4.3.5 Outcomes

For the first time in the history of MFF negotiations, the Commission has published the outcome of applying the methodology alongside its proposals. This is replicated in Table 14.

Table 14: Proposed Cohesion policy allocations 2021-27 (€)

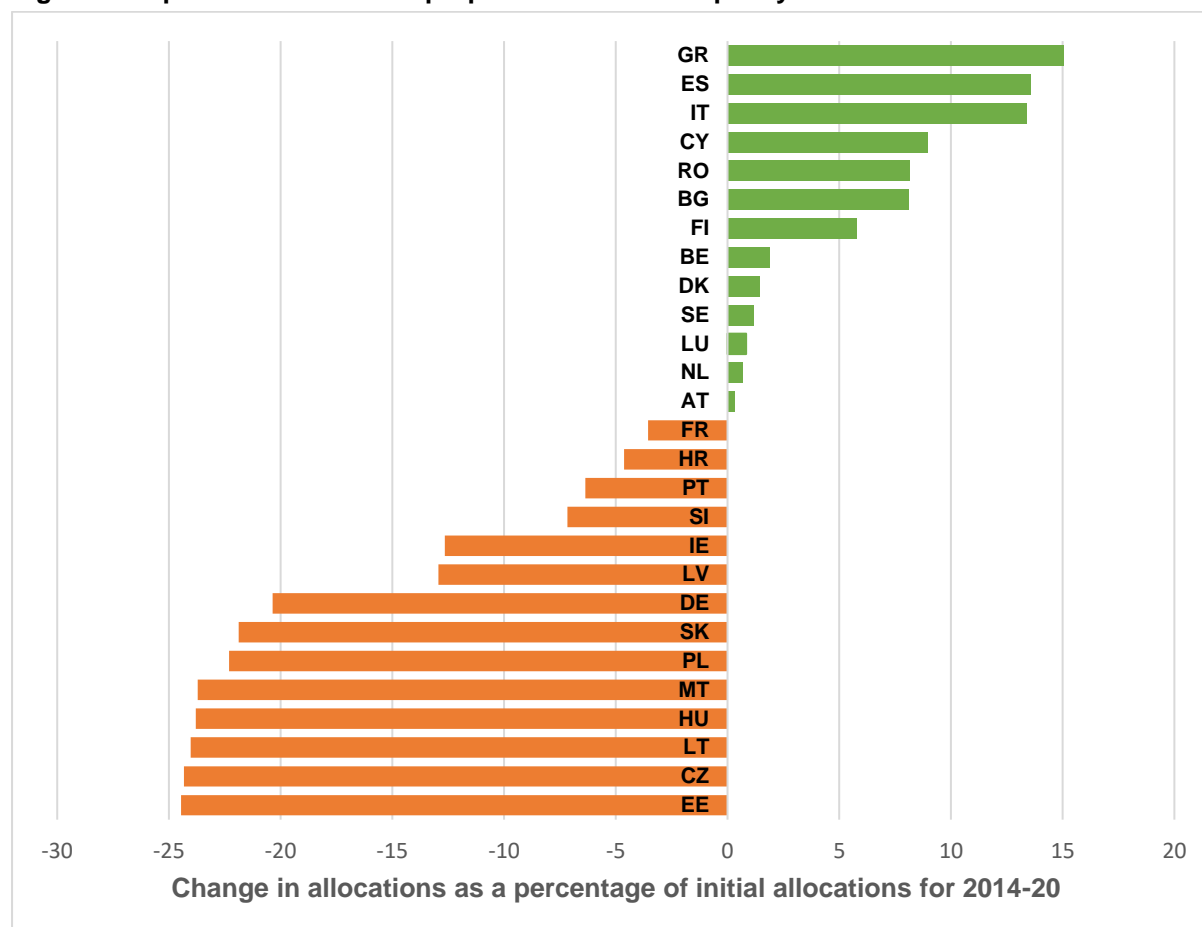
	2018 prices	Current prices
BE	2 443 732 247	2 754 198 305
BG	8 929 511 492	10 081 635 710
CZ	17 848 116 938	20 115 646 252
DK	573 517 899	646 380 972
DE	15 688 212 843	17 681 335 291
EE	2 914 906 456	3 285 233 245
IE	1 087 980 532	1 226 203 951
EL	19 239 335 692	21 696 841 512
ES	34 004 950 482	38 325 138 562
FR	16 022 440 880	18 058 025 615
HR	8 767 737 011	9 888 093 817
IT	38 564 071 866	43 463 477 430
CY	877 368 784	988 834 854
LV	4 262 268 627	4 812 229 539
LT	5 642 442 504	6 359 291 448
LU	64 879 682	73 122 377
HU	17 933 628 471	20 247 570 927
MT	596 961 418	672 802 893
NL	1 441 843 260	1 625 023 473
AT	1 279 708 248	1 442 289 880
PL	64 396 905 118	72 724 130 923
PT	21 171 877 482	23 861 676 803
RO	27 203 590 880	30 765 592 532
SI	3 073 103 392	3 463 528 447
SK	11 779 580 537	13 304 565 383
FI	1 604 638 379	1 808 501 037
SE	2 141 077 508	2 413 092 535

Source: Annex XXII to Commission proposals for a common provisions Regulation, COM(2018)375.

For some countries, these allocations differ quite considerably from those for 2014-20. Figure 8 compares the initial allocations for 2014-20 (expressed in 2018 prices) with the allocations given in the Commission's new proposals.⁶¹ This suggests the following.

- **Increases** in Cohesion policy allocations are concentrated in southern Europe – Greece, Italy and Spain, which would see gains of over 10 percent relative to 2014-20 – along with Bulgaria and Romania. In *absolute* terms, the highest 'gainers' are Italy and Spain, with increases of €4.5 billion and €4 billion, respectively; gains in Romania and Greece exceed €2 billion compared to 2014-20, and Bulgaria €670 million, but elsewhere the absolute sums are small.
- Seven countries would see **decreases** in Cohesion policy allocations exceeding 20 percent of initial 2014-20 allocations – mainly in central and eastern European and the Baltic countries, but also Malta and Germany. In *absolute* terms, the worst affected Poland where receipts would fall by over €18 billion, but the Czech Republic, Hungary, Germany and Slovakia would also see reductions in the range €3 - €6 billion.

⁶¹ It does not take account of any adjustments in the interim.

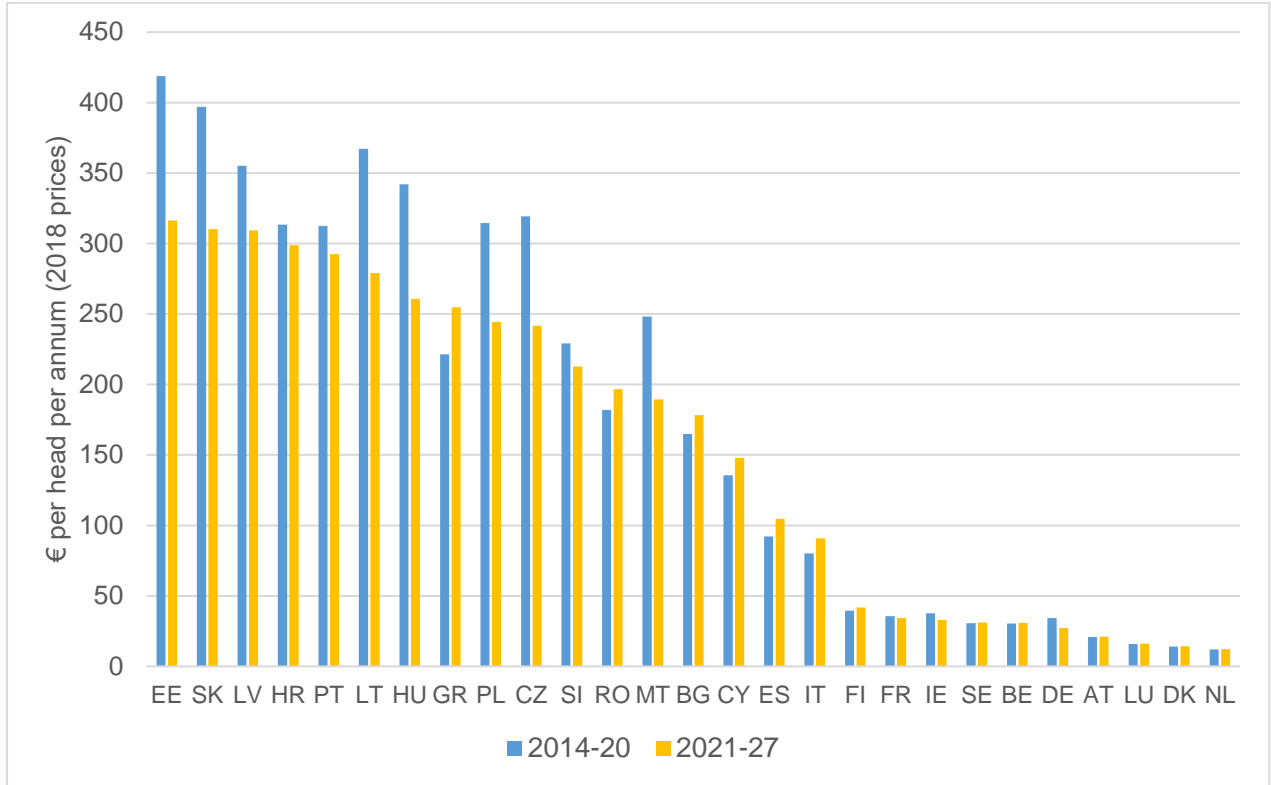
Figure 8: Impact of Commission proposal on Cohesion policy allocations

Source: Own calculations using 2014-20 initial allocations converted to 2018 prices and Com(2018)375 Annex XXII.

Related, there are also changes in the *intensity* of support – expressed as an aid amount per head of national population per annum. In Figure 9, countries are ranked by aid intensity under the 2021-27 proposals. This shows an overall narrowing of the range of aid intensities, although in Estonia, Latvia and Slovakia they still exceed €300 per person per annum, at one end of the spectrum, while in Luxembourg, Denmark and the Netherlands per capita annual amounts are less than €20.

One interesting point to note is that Romania and Bulgaria have much lower aid intensities than other countries that are far more prosperous. This reflects the impact of the capping provisions, which in are indicative of concerns at the capacity to absorb the funds in the current period.

Figure 9: Changes in aid intensity



5. CONCLUSIONS

The publication of the European Commission proposals for the MFF and Cohesion Policy has initiated negotiations among Member States in the various Council formations, beginning with the clarification of details with the Commission services. In parallel, the European Parliament (and the CoR and EESC) have begun the process of developing their own positions in preparation for the inter-institutional negotiations once the Council has reached agreement.

The reform agenda is, of course, still in its early stages. The European Parliament has called for agreement to be reached among the Member States ahead of the May 2019 European elections, and the Commission favours an early conclusion. The Austrian Presidency is clearly pushing the pace on deliberating the detailed proposals through different working groups. However, the European Council favours finalisation at a later stage.⁶² Member State officials are divided on whether this timescale is achievable and, based on past patterns of MFF negotiations and the range of issues to be addressed, it remains to be seen whether the process can be concluded any more swiftly than in the past.

As in previous reforms, **there is a big gap between the expectations of the Member States on the overall size of the MFF as well as its allocation to policy headings.** However, there are other factors that will affect the dynamics of the negotiations:

- the absence of the UK is placing greater pressure on those net payers seeking a smaller EU budget to take a more prominent role;
- the proposed phasing-out of rebates and changes to national co-financing would significantly affect the net position of individual Member States;
- coalition politics may influence national negotiation strategies and the flexibility available to some national leaders;
- the Commission's publication of figures for Member State receipts at the outset of the negotiations, focus political and public attention on budgets rather than policy issues – this may accelerate the negotiations but may also constrain the flexibility available to Member States;
- changes to the Berlin Formula include migration in the algorithm for allocating Cohesion Policy funding, but also include arbitrary figures for capping and safety nets;
- there may be less coherence among the Central and Eastern European countries, who are affected very differently by proposed national allocations;
- proposals to link funding to the rule of law are highly divisive; and
- increased allocations to non-traditional policies may lead some countries to seek compensation for cuts in CAP and Cohesion policy through a territorialisation of policies such as Horizon Europe.

The regulatory proposals for Cohesion Policy are less divisive, with continuity in some areas (especially continuation of an all-region approach) and efforts to respond to Member State concerns on issues such as proportionality, flexibility, harmonisation of rules, and simplification. There are also some imaginative elements – the potential for increasing the emphasis on integrated territorial development and more citizen-focused intervention (Policy Objective 5) and the new innovation-focused strand of INTERREG.

⁶² European Parliament (2018) *The European Council and the Multiannual Financial Framework*, available at: [http://www.europarl.europa.eu/RegData/etudes/BRIE/2018/615644/EPRS_BRI\(2018\)615644_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2018/615644/EPRS_BRI(2018)615644_EN.pdf)

However, initial reactions have drawn attention to **several aspects that are problematic for at least some Member States**:

- the absence of an overarching strategy or framework to provide direction and purpose to the policy;
- the perceived encouragement for ESIF funding to be allocated to InvestEU and other instruments (but not vice versa);
- the uncoupling of rural development from the CPR;
- the grouping of ERDF/CF and ESF+ with different groups of EU instruments, and the potential 'nationalisation' of ESF;
- continuation of thematic concentration through earmarking, albeit at national rather than programme levels, particularly for parts of Central and Eastern Europe which now have Transition Region status;
- the lack of coherence between the thematic objectives for ERDF/CF and ESF+;
- the implications of a closer link of Cohesion Policy to the European Semester and Country-Specific Recommendations;
- the proposed reduction of spending on European Territorial Cooperation;
- the changes to pre-financing, especially when combined with greater national co-financing; and
- the shift from n+3 back to n+2, especially for Member States allocating funding to large and complex projects.

Looking beyond the specific proposals, there are several points of note about the broad approach to the reform.

First, **there is no clear mission for Cohesion Policy**. To answer the question posed in the title of this paper, the reform appears to be more 'pragmatic drift', without a clear *leitmotif*, rather than any significant shift in the paradigm of the policy. Indeed the same applies to the MFF as a whole.

Previous reforms of the policy were conceptualised, structured and communicated with a set of strategic objectives – facilitating enlargement, delivering EU policy objectives (Lisbon Strategy, Europe 2020) – that are absent from the Commission's proposals for 2021-27. **The five repackaged policy objectives lack an overarching EU strategic framework, potentially weakening the political commitment to and visibility of EU Cohesion Policy in delivering EU goals at both EU and national levels.** At one time, it appeared that the UN Sustainable Development Goals might provide a framework for the MFF or Cohesion Policy specifically, but this was rejected by the Commission. Insofar as objectives are set out, they are functional and administrative (e.g. modernisation, flexibility, simplification) rather than strategic. In part, this reflects the way in which the current proposals have emerged, with a much more constrained role for the Commissioner for Regional Policy and DG REGIO, and stronger control from the centre of the Commission. Of particular concern is the lack of attention paid to OECD and academic research on the need for more place-based or place-sensitive policies for economic development. Sectoral interests have won out; the centre of the Commission is clearly less sympathetic to Cohesion Policy and appears to regard it more as a political tool than in the past.

Second, **the Commission is seeking more control over EU spending**, reflected in the proposed shift from shared management to central management of funding, and greater influence for the Commission services in areas such as the European Semester, application of the proposed conditionality on the rule of law, and the introduction of structural reform programmes.

In this context, it is notable how the Commission's spending review uses evidence selectively to rationalise its proposals for change. For example, the review of Cohesion Policy makes full use of a range of evaluation studies and ECA reports to provide comprehensive (critical) assessment of the strengths and weaknesses of ESIF. By contrast, the review of the European Fund for Strategic Investment has no significant evidence base to justify the continuation of the instrument and omits any reference to the criticisms of EFSI's lack of additionality in the (one) evaluation conducted to date, while ECA and European Parliament reports go completely uncited (an issue picked up by the RSB, and corrected, following a similar omission in the impact assessment).

In this context, the line of argument - characteristic of previous reform debates - that Cohesion Policy is ineffective or inefficient seems to have been laid substantially to rest. The MFF proposals recognise that the ERDF and Cohesion Fund has high additionality: "only limited parts of [its] investments would happen without the two Funds". Cohesion Policy is acknowledged to support economic adjustment and has an "important role in mitigating economic and financial shocks by stabilising public investment in times of fiscal consolidation" and promoting territorial cooperation (p.28). Similarly, the ESF is also "one of the tangible illustrations of EU added value". Yet, the major strides in improving the effectiveness of Cohesion Policy, investing in performance management and demonstrating results appear to have counted for little in the decisions made on policy priorities.

Finally, **the reform proposals weaken the long-standing commitment to a coordinated use of the Funds**. A key principle of the 1988 reform, reiterated and strengthened in successive reforms, has been seriously undermined. The separation of rural development from the CPR is likely to complicate efforts to coordinate intervention in rural areas at both strategic and operational levels. Further, the regional role of ESF has been almost entirely airbrushed out of the story in the budget proposals and the spending review (as was the case in the ESF ex post evaluation of 2007-13). While the ERDF-ESF-EAFRD coordination task has often been difficult at EU and national levels, and unpopular in parts of DG EMPL and DG AGRI, it is remarkable that these moves have been proposed at a time when greater emphasis is being placed on synergies and integrated development.

EoRPA RESEARCH

This report has been prepared by the European Policies Research Centre (EPRC) under the aegis of EoRPA (European Regional Policy Research Consortium), which is a grouping of national government authorities from countries across Europe. The Consortium provides sponsorship for EPRC to undertake regular monitoring and comparative analysis of the regional policies of European countries and the inter-relationships with EU Cohesion and Competition policies. Over the past year, EoRPA members have comprised the following partners:

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