

Ministry of Development Funds and Regional Policy in Poland  
Territorial Cooperation Department

# Interreg 2027+: proposals

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## **1 MAIN PROPOSALS**

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### **1.1 STRENGTHENING THE ROLE OF INTERREG AS AN INSTRUMENT SIGNIFICANTLY CONTRIBUTING TO EU COHESION AND RESILIENCE**

Interreg is the key instrument supporting cooperation across borders, strengthening links between citizens, organisations and states. Through the partnership and transnational nature of its projects, Interreg promotes European integration and good neighbourly relations with countries outside the EU. This takes place at the state, regional, city and local levels. Not only does it allow facing challenges across borders or solving common problems that cross national boundaries, but it creates, above all, a platform for working together to maximise mutual benefits.

As part of the cohesion policy, Interreg becomes even more important in view of the current challenges arising from the war in Ukraine, climate change, migration and demographic changes, planned EU enlargement. The EU, as a whole, will tackle these challenges more effectively if the international cooperation supported by Interreg is stronger.

#### Proposals:

- 1) Interreg should remain a separate objective of the cohesion policy.
- 2) We propose to maintain the existing components: cross-border (with elements of land and maritime cooperation), transnational and interregional. All these components play an important role in enhancing the cohesion and integration of the EU and in seeking and implementing responses to current challenges. This is confirmed by results of the projects implemented with Polish partners within the framework of all these components.
- 3) Interreg programmes deserve the maximum possible financial resources beyond 2027, no lower than today in both relative and absolute values.
- 4) Cross-border programmes constitute the key element of Interreg. Allocation of at least 75% of all Interreg financial resources to land and maritime cross-border cooperation will be an adequate solution.
- 5) We consider it crucial to maintain the implementation of Interreg under shared management.

### **1.2 CHANGES IN THE ALLOCATION RULES**

#### Issue:

The population aspects were the criteria according to which Interreg resources have been distributed to Member States so far. The basic algorithm in previous perspectives was based on the share of the population living in a Member State (Interreg B) or a NUTS3 border regions (Interreg A) in the relevant EU population. In the current perspective, a criterion related to the population living within a belt of 25 km from the border has been added. This criterion is subjective and non-transparent. The data based on which it is calculated is not generally available and up-to-date (surveys every 10 years, last in 2021) and the calculation methodology is unverifiable.

#### Proposals:

1. We request that future rules concerning the allocation criteria, should be more transparent, objective and based on publicly available data (e.g. EUROSTAT), so that they can be verified.
2. We propose a departure from the distribution criterion used for the 2021-2027 period relating to the population living up to 25 km from the border. Alternatively, the weight of this criterion should be significantly reduced from the one currently adopted.
3. Member States should have more flexibility than so far (currently 15%) in allocating ERDF funds between strands A (cross-border cooperation) and B (transnational cooperation), based on their assessment of the situation and needs.

### **1.3 PROVIDING SUPPORT FOR EASTERN BORDERLAND REGIONS**

The eastern borderland of the EU is particularly affected by Russian aggression and deserves support in dealing with the challenges they have faced and in reorienting their local economies.

#### **1.3.1 SPECIAL STATUS FOR CROSS-BORDER PROGRAMMES WITH UKRAINE**

#### Issue:

There is a need to enhance security and stability in the region while supporting Ukraine's integration with the EU. Given the increased pressure on borders, investment in road, rail and border infrastructure, as well as the enhanced cooperation with EU Member States, are essential to manage the increased traffic effectively.

Furthermore, the implementation of the current Polish-Ukrainian programme confirms the high demand for Interreg funds occurring despite the war.

#### Proposals:

1. We request that the current geopolitical situation related to the aggressive attitude of Russia and Belarus should be taken into account when setting financial envelopes and that the Poland-Ukraine programme is significantly strengthened.
2. The optimal solution would be an Interreg NEXT budget determined separately of the ERDF resources for Interreg, adequately to the EU policy towards Ukraine. We propose that a special status for cross-border cooperation programmes with Ukraine is created, analogically to the PEACE PLUS programme.

### **1.3.2 ADEQUATE SUPPORT FOR EU REGIONS LOSING OPPORTUNITIES FOR CROSS-BORDER COOPERATION**

#### Issue:

The aftermath of Russia's invasion of Ukraine and the war continuing since February 2022 is the deterioration of the socio-economic situation of Poland's sub-regions at the border with Russia and Belarus, including, among others, the loss of their tourist attractiveness, the disappearance of trade and difficulties in cross-border transport. Interreg cooperation with Russia and Belarus, which had been developed for years, was discontinued.

The consultation on the future of Interreg<sup>1</sup> confirms that stakeholders and residents of the Polish part of the former Poland-Russia programme area would like to implement international cooperation projects under Interreg with partners from Lithuania, Germany, Sweden, Latvia, Estonia, Denmark, Ukraine and Finland.

#### Proposals:

1. We propose, where possible and justified, to enable sub-regions bordering Russia and Belarus and having no other borders (Olsztyn, Białystok and Łomża sub-regions) to benefit from cross-border cooperation programmes on internal borders. The specific situation of these areas should also be taken into account when programming transnational and interregional cooperation.
2. These sub-regions should also be taken into account as eligible in the algorithm for calculating the allocation per Member State. This will ensure that the cross-border cooperation established in the 2021-2027 programmes can be continued, while at the same time the potential for international cooperation between these regions can be developed.

### **1.4 THEMATIC SCOPE ADAPTED TO THE SPECIFIC NATURE OF INTERREG**

As a separate cohesion policy objective, Interreg requires an integrated, territorial approach to the formulation of policy and specific objectives at the level of regulations. The experience of the past a dozen or so years shows that the sectoral approach adopted so far is not adequate to the complex needs of international cooperation.

The specific nature of Interreg is visible primarily in two dimensions:

- cooperation - applies to every programme and project, allowing to overcome barriers resulting from the existence of borders and mitigating the adverse impact of borders on the lives of local residents. The cooperation allows for integration within the EU at different levels and strengthens ties between actors from both the EU and the bordering countries.
- territorial nature - each programme has a defined and specific geographical territory, where diversity exists in almost every aspect, i.e. physical and geographical, cultural, linguistic,

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<sup>1</sup>Consultations/surveys on the future of Interreg requested by the European Commission as part of the so-called "Guide for consultations to shape the future Interreg - Toolkit". The respondents included Interreg stakeholders and residents of the cross-border eligible areas.

socio-economic, the size of cross-border flows or the existence of cross-border functional areas.

Despite the wide variety of individual programmes, the above dimensions are common. They should therefore serve as a starting point for determining the scope of support in Interreg programmes. At the same time, a set of monitoring indicators, adequately selected and measuring changes in the aforementioned dimensions, will ensure an intervention logic appropriate to Interreg.

Strengthening the key dimensions of Interreg requires a relevant amount of funding. As each territory is different and requires addressing various needs, imposing limits on the number of thematic objectives in a programme or on the amount of budgets for predefined thematic objectives or sectors (as in the case of the 2021-2027 perspective) results in Interreg programmes having limited ability to adequately respond to those needs. Consequently, they lose their distinctiveness and become similar to the goal 1 programmes of the cohesion policy - "Investment for jobs and growth". This results in problems of demarcation, understanding of the idea of Interreg by its stakeholders. The cooperation aspect becomes less visible and turns into a supplement additional to activities implemented for the benefit of particular sectors. However, Interreg's contribution to individual sectors is still limited due to the relatively small amount of funding. The number of kilometres of roads built under Interreg, kilometres of water supply network or SMEs supported, will never be comparable to interventions under the "Investment for jobs and growth" goal programmes.

#### Proposals:

1. We propose that specific policy objectives should be formulated for the "European Territorial Cooperation/Interreg" goal, independently from those formulated for the programmes under the cohesion policy goal: "Investment for jobs and growth". We propose the identification of two policy objectives similar to the current specific objectives (Article 14(4) of Interreg Regulation) i.e.: "*Cooperation*" and "*Integration and enhancement of safety and capacity for reconstruction*". The second objective is of great importance for external programmes including especially those implemented with Ukraine.
2. We recommend that in the framework of the two proposed policy objectives, cooperation can be implemented on the widest possible range of topics. This should include the possibility to continue the existing Interreg-specific objectives of "*Cooperation governance*" and "*A safer and more secure Europe*".
3. In order to better address the territorial dimension of Interreg, we advocate the departure from the principles of thematic concentration for the Interreg objective at a level of the Regulation and abandoning budget limits for individual policy/specific objectives at a level of programmes.
4. For monitoring and measuring the progress of meeting the programme's objectives, we propose maintaining a separate set of indicators for Interreg, relevant to its objectives.
5. In order to strengthen the territorial dimension, we propose that for the overall programme or a part thereof it should be possible to apply the integrated territorial strategies (Articles 28c and 29 of the Common Provisions Regulation). Strategies could be developed on the basis of cross-border functional areas and address common challenges.

## **2 PREPARATION OF PROGRAMMES AND THEIR IMPLEMENTATION**

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The rules for the implementation of the new programmes should be as favourable as possible for applicants, beneficiaries and the authorities implementing the programmes.

### **2.1 RESULT ORIENTATION**

#### Issue:

In an era of rapidly changing socio-economic circumstances and successive challenges faced by EU Member States, it is important to simplify the rules for implementation of the cohesion policy. A target- and result-oriented approach can result in a better use of resources also in the cohesion policy. The rigid implementation rules and the administrative burden associated with expenditure control make cohesion policy funds increasingly unattractive to beneficiaries. Target-orientation

allows to focus on achieving results, rather than on accounting settlements as till now. Financing not linked to costs allows for adapting the tools and actions to achieve the result to the changing situation without having to go through burdensome procedures.

Proposal:

1. We propose to specify the provisions concerning financing not linked to costs, especially in terms of setting precise and transparent rules for milestones, based primarily on the material or financial progress of a programme, its part or a project.

## **2.2 SMALL-SCALE PROJECTS**

We welcome the regulation of support rules for small-scale projects (small projects) in the Interreg regulation for 2021-2027. Given their important role, they should continue to operate in the programme implementation system. However, in order to make better use of this instrument, some modifications are needed, mainly to eliminate the uncertainties that make interpretation by the EC necessary.

Proposals:

1. The implementation of small-scale projects should be voluntary in all types of programmes, in accordance with their specific nature and needs. At the same time, no special clarification should be required in relation to programmes if they do not benefit from the support for small-scale projects.
2. Based on the experience of several financial perspectives, we propose maintaining of a possibility for implementing Small Project Funds (SPFs) by a sole beneficiary, but also allowing the implementation of SPFs in a partnership model, depending on the decisions of the programme authorities (especially in the future Poland-Ukraine programme, due to the capacity-building process in Ukraine).
3. At the same time, we support keeping the limit of the funds allocated to SPFs in the programme at the current level, i.e. up to 20% of the programme funds. This provides stable funding for small-scale projects while maintaining an adequate allocation for larger undertakings.
4. In order to simplify the implementation of the SPFs, a new mandatory type of flat rate (off-the-shelf flat rate) should be defined for the management of the SPFs. Its level should amount up to 25% of the eligible costs of small projects.
5. We propose streamlining of the rules on simplified costs in small projects implemented under the SPF. In particular, we advocate regulating a possibility to apply off-the-shelf rates also at a level of small projects under the SPF in the relevant regulations. We also propose consolidation of the provisions on a possibility of using the “draft budget” method up to EUR 200,000.
6. We advocate maintaining VAT eligibility for SPFs and projects of small scale.
7. The financial liability of the SPF beneficiary should be regulated where it is not possible to recover funds from the final recipients. Following the example of regular projects, in this situation, the liability for reimbursement should be borne by the State of origin of the final recipient generating the irregularity.
8. A regulation on the functioning and composition of the small project selection body in the SPF should be introduced to increase public participation in the process as well as enhance transparency and reduce the risk of conflicts of interest. We propose a similar construction to the provisions on the composition of the Monitoring Committee, requiring the participation of social, economic and civil society partners.

## **2.3 RULES AND PRINCIPLES FOR THE IMPLEMENTATION OF THE PROGRAMMES ALLOWING FOR QUICK ADAPTATION TO CHANGING CIRCUMSTANCES**

Issue:

The provisions in the regulations laying down the rules for the implementation of Interreg programmes should allow for adapting the programmes to changing circumstances as quickly as possible. This will make the programmes more resilient to various kinds of sudden crisis situations, such as those related to pandemic, war or migration. Special solutions tested in the past can also be

used for this purpose. They will facilitate adaptation to emergency situations without the need to wait a long time for special implementing legislation.

This does not mean that Interreg programmes should become crisis management tools. The cohesion policy, including Interreg, should continue to respond to strategic, long-term challenges. Both of these aspects (long- and short-term) should be taken into account in designing the rules of future Interreg programmes.

#### Proposals:

1. We propose to increase the flexibility to transfer funds between priorities (Article 19.5 of the Interreg Regulation) without the requirement to seek official approval from the EC.
2. We propose to introduce the solutions adopted in the Regulation following programme implementation disruption for cooperation programmes on external borders (EU Regulation 2022/2192 of 9 November 2022) into the Common Provisions Regulation, allowing for the efficient settlement of projects omitting the lead beneficiary principle or the recovery of funds in a simplified manner - directly from the partner.

## **2.4 COMMON RULES FOR THE PROGRAMMES ON THE EU EXTERNAL AND INTERNAL BORDERS**

We recognise the harmonisation of the rules for the programmes on the external and internal borders introduced in the 2021-2027 financial perspective, including covering them under a single common Interreg regulation as a success and this approach should be continued in the next perspective.

Consideration should be given to the application of favourable rules known only in external border programmes in internal border programmes, e.g. advance payments to beneficiaries, advance payments for the programme. This will make cross-border programmes much more attractive to applicants, while the increased interest may consequently result in more cross-border projects of enhanced quality.

## **3 FINANCIAL ASPECTS OF PROGRAMME AND PROJECT IMPLEMENTATION**

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### **3.1 INCREASE IN THE PERCENTAGE LEVEL OF FUNDING FOR PROGRAMMES**

We propose to increase the co-funding for Interreg programmes at internal borders to the level of 85% and to maintain a co-funding level of 90% for programmes implemented with non-EU partners (currently the NEXT programme) .

#### Justification:

Given the difficult financial situation of beneficiaries, particularly those outside the EU, in the context of the post-pandemic situation, high inflation in the region and the war in Ukraine (beneficiaries outside the EU cannot provide high own contribution, project partners on the Polish side are regions heavily burdened by the situation of the war in Ukraine and its consequences), the interest of beneficiaries in Interreg programmes should be increased, and Interreg programmes should be made more attractive in the context of national programmes. According to beneficiaries, the high level of co-financing, along with advance payments in the NEXT programme, is a key advantage of the Interreg programmes.

### **3.2 MORE SIMPLIFIED COST OPTIONS**

We propose to extend the use of simplified cost options (SCO), including:

- simplifications used at a project level (more off-the-shelf simplified cost options in the regulation),
- simplifications used for programme settlements with the EC (introduction of an option to settle at the SCO rates indicated in the regulation).

Moreover, we propose:

- Considering introducing off-the-shelf options in the form of lump sums for specific types of expenditure and/or unit cost rates, e.g. for personnel costs in the form of a monthly/hourly salary table for project personnel;

- Limiting the EC interpretation by clarifying regulations or preparing EC delegated acts to ensure legal certainty for the managing authority when implementing simplified cost options;
- Analysing the relationship between the simplified cost option rules in the scope of the cohesion policy and the rules on state aid and public procurement law. We propose the elimination of any inconsistencies between them.

#### Justification:

Increasing the number of potential off-the-shelf options will allow the managing authority to shape the programme more flexibly and to use simplified solutions without having to prepare a methodology, which was a major difficulty when programming the solutions in the 2021-2027 perspective.

Departure from the principle of a single flat rate for specific types of projects/programme: a possibility for specific beneficiaries to choose a lower rate than the maximum allowed by the programme (different flat rate for beneficiaries within the same project - the programme shall only specify the maximum flat rate while each beneficiary can choose any percentage value of the rate as long as it is lower than the maximum) - this will make budgets more flexible and realistic.

### **3.3 ADEQUATELY HIGH ADVANCE PAYMENTS**

We advocate the following changes in the scope of advance payments:

- For programmes with non-EU partners (currently, the NEXT programmes), we propose to increase the pre-financing of programmes to the level of 100% of the EC annual commitment or, at least, to maintain pre-financing at the current level (80% of the EC annual commitment, but excluding the current discretionary payment on the EC side).

#### Justification:

This will allow the continuation of granting advance payments to beneficiaries. Project partners coming from non-EU countries (in the case of Poland, from Ukraine) do not have a possibility to incur the costs of their projects from their own resources. Project implementation is contingent on the receipt of advance payments from the programme at a level that allows for efficient transfer of funds to project partners. The opportunity of project pre-financing is indicated by NEXT beneficiaries as the most important advantage of projects implemented under this programme.

- For Interreg programmes at internal borders, we propose to increase the level of programme pre-financing by the EC.

#### Justification:

The advance payments currently provided for Interreg programmes by the EC are not sufficient to allow the transfer of funds as reimbursement to partners. Low advance payments for the programmes result in a temporary liquidity disruption on programme accounts. They cause a temporary suspension of payments to beneficiaries and consequently withhold project implementation on the part of partners. At the same time, it is not possible to support Interreg programmes using Polish state budget funds.

Due to the lack of funds in the programme bank account, we suspended payments to beneficiaries of Interreg 14-20 programmes on several occasions. We expect that a similar situation may occur in programmes 21-27. Among all the EU programmes currently under implementation in the country (beginning of Q4 2024), the highest level of contracting is recorded in the Interreg Poland-Slovakia 21-27 programme. At the same time, the beneficiaries have so far settled significantly less expenditure in the programme than in other EU programmes implemented in the country. In the subsequent years, we therefore expect an accumulation of beneficiary expenditure from contracted projects, which, considering low payments from the EC, will result in withholding payments to beneficiaries. The long-term effects will trigger financial difficulties on the part of beneficiaries, extended implementation of projects and an increase in the risk concerning the loss of funds in the programme due to incomplete implementation of the programme commitments towards the EC.

Higher advance payments would enable the effective implementation of the programme commitments towards its beneficiaries. In addition, this could contribute to increasing the interest in



the offer of Interreg programmes among project applicants (it would provide an additional incentive to apply for Interreg funding).

- For all Interreg programmes, we propose clearing of advances at the end of the programme implementation (discontinuation of the annual settlement of advance payments).

#### Justification:

The annual settlement of advance payments means that advance payments provided by the EC cannot be transferred to beneficiaries, instead, they must be frozen in a programme account for the purpose of settlement with the EC. Consequently, it results in the financial liquidity problems during the implementation of the programmes.

### **3.4 N+3 RULE**

We propose to extend the decommitment rule, whereby the programme should submit expenditure to the EC by the end of the third calendar year following the year in which the budget commitments were incurred (the so-called N+3) for the last year of the programme implementation. This rule should be uniform for all years of the programme implementation. For the 2021-2027 implementation period, the N+3 rule applies for 2021-2026, while for 2027, the N+2 rule applies.

### **3.5 TECHNICAL ASSISTANCE**

#### Issue:

Introduction of a flat rate method of raising funds from the EC for Technical Assistance (TA) has resulted in major simplifications in the scope of settlement of programmes with the EC. However, a number of problems can be seen at a level of settlements between the programme and the authorities that benefit from TA. The main issue is the large gap in authorities' financing at the beginning of the programming period, before the beneficiaries of regular projects have spent and settled the expenditure on the basis of which the flat rate can be added. Many programmes in which Poland participates cannot provide advance payments to authorities from programme funds (advance payments are too low) and consequently, programme authorities carry out their tasks from their own, often insufficient funds and wait too long for payments to be transferred for the TA from the EC.

Another problem is the issue of uncertainty regarding the actual availability of the TA budget. Since the final total budget is not known until the end of the programme implementation, funds may not be sufficient to cover expenditure already incurred if the programme does not manage to use the full allocation, e.g. due to irregularities detected in projects.

#### Proposals:

- We propose introducing mechanisms to safeguard the programme against the occurrence of the aforementioned situation, i.e.:
  - to guarantee the total TA budget for the programme,
  - to apply financing not linked to costs (FNLC) in the settlements with the EC, which would allow TA funds to be paid to the programme regardless of the progress of project implementation by the beneficiaries, thus addressing the current problems described above.
- In addition, for programmes with non-EU partners (currently the NEXT programme), we propose preferential conditions for the settlement of TA programmes, including TA eligibility at a level of 100% (this applies to all authorities implementing tasks for the programme). In the 2021-2027 period, non-EU programme partners do not contribute financially to the programmes and authorities located on their territory can benefit from the TA. Consequently, the overall provision of national co-financing now relies on Polish authorities. For the purpose of equal treatment of all institutions implementing tasks for the programme, 100% of TA funds should originate from the EU sources.

### **3.6 HIGHER AMOUNT WITHOUT RECOVERY**

We propose to simplify and extend the mechanism of non-recovery of minor amounts by one of two mechanisms:

- allowing non-recovery of any amount of irregularities below EUR 250 at a level of the irregularity found in the beneficiary's payment claim, without cumulating the amounts per financial year and per project or
- increasing the amount of non-recovery of irregularities up to EUR 500 per financial year at a project level.

#### Justification:

Both in the 2014-2020 and 2021-2027 programmes, it was possible to use the mechanism provided by the regulation concerning non-recovery of amounts below EUR 250 per project per financial year. This mechanism results in a significant reduction of the administrative burden primarily on the part of the beneficiaries, but also on the part of the programme authorities. However, its structure is complicated by the need to accumulate amounts per financial year and per project. We propose two alternative methods to simplify the mechanism.

### **3.7 VAT**

We propose maintaining of VAT eligibility provisions i.e., among others:

- eligibility in the case of operations whose total cost is lower than EUR 5,000,000 (including VAT);
- eligibility in the case of operations whose total cost is at least EUR 5,000,000 (including VAT), if not reimbursable under the national VAT regulations; and
- eligibility for small project funds and investment implemented by final recipients in the context of SPFs under Interreg.

We also propose that the aforementioned rules should apply to operations subject to public aid. To this end, we advocate harmonising the VAT eligibility provisions at a level of the Common Provisions Regulation and the State Aid Regulation.

## **4 OTHER PROPOSALS REGARDING THE IMPLEMENTATION AND SIMPLIFICATION**

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Regulations establishing the legal framework for Interreg programmes should be adopted much more in advance of the programming period and the provisions contained therein should be more precise so as not to generate the need for interpretation.

Examples of issues where the regulations should be clarified or simplified include:

- Provisions regarding **control processes** should clearly indicate the mandatory actions to be taken when an error rate is exceeded: what kind of corrective action the must be taken by the MA, what the consequences are if the actions are not implemented. Such key information should not be formulated in EC interpretations or guidelines.
- The rules concerning **closing the programmes** should already be known at the programming stage rather than at the end of the programming period.
- There should be clear rules for accounting for unpaid **volunteer work**, including an indication of the category in which it should be classified in the project budget.
- **Donation** costs (*gifts*) are currently included in the catalogue of ineligible expenditure (Article 38.3.b of the Interreg Regulation). This raises questions concerning, among others, the contradiction with the communication and visibility requirements, as well as the ineligibility of expenditure on items made available/transferred to project participants which are directly related to the purpose of the project.
- The provisions concerning **visibility and communication** should explicitly define the obligations for Interreg project partners. For example, the specific nature of the SPFs should be taken into account in the event of failure to comply with the obligations set out in the regulations. The small project partners should be independently responsible for the implementation of their responsibilities. SPF operators should only be responsible for the management of the SPF (any adjustments to the grant should relate to management costs rather than the whole operation). In addition, we propose to abandon the use of durable plaques/billboards by Interreg project partners. The current provisions are unclear and result

in the need for billboards to be displayed in practically every Interreg project. However, surveys show that it is not an effective communication tool. In addition, the multiple number of billboards is not compliant with the New European Bauhaus initiative.

- We support the exemption of Interreg programmes from the **state aid** rules in accordance with the assumptions defined for the cohesion policy in the document *Cohesion for a competitive and inclusive Europe: report of the High-Level Group on the Future of Cohesion Policy, February 2024*. If it is not possible to exempt Interreg programmes from the state aid rules, we advocate for further simplification of these rules at a level of EC regulations.
- An important element of the implementation system for the new Interreg programmes should be the **capitalisation**, i.e. the systematic use of results and good practice from projects already implemented in new ventures and gaining additional benefits by learning from the experience of others. Due to the capitalisation, the effects of the programme can be increased with an unchanged level of expenditure. This is significant for a situation with a large number of different challenges and limited budgetary resources. Capitalisation should be an important issue not only within individual Interreg programmes, but also between these programmes and between Interreg and other EU programmes (including, in particular, at a regional level). At its level, the EC should provide tools to allow capitalisation activities also between programmes managed by Member States and those managed by the EC.
- We propose to simplify the system for **submission of reporting data to the EC** in the SFC by reducing the frequency of data submission (to a maximum of 3 times per year). Reducing the frequency of data submission to the EC will reduce the administrative burden on the part of programme institutions, but will still ensure an adequate level of notifying the EC.