

Briefing note on project selection – Interreg 2021-27

Version 1, August 9, 2022

Disclaimer:

The document has been prepared by Interact following discussions with services of DG Regio. It is, thus, not an official document of the European Commission nor an official position of the European Commission.

This document is a guideline to help programmes. It does not impose a ‘one-size-fits-all’ as programmes have different practices. It highlights some elements against which the Commission may review the admissibility/eligibility / quality criteria.

This note has been prepared as a follow-up to the two webinars on the selection we had in May 2022 (May 12 and 19, 2022). With this note, we want to illustrate the requirements, perspectives and considerations for the selection process. The document consists of two parts:

- Part A: Principles, legal requirements, procedures, and roles,
- Part B: Requirements for assessment and selection criteria.

When taking a closer look at the assessment and selection criteria the Commission will be particularly vigilant on the following five aspects:

- (1) Cross-border impact as eligibility criteria;
- (2) Economic and social durability;
- (3) Horizontal principles (gender equality, accessibility, human rights);
- (4) Eco-conditionality to ensure environmental sustainability (linked with the Don-No-Significant-Harm (DNSH) principle and the role of the Strategic Environmental Assessment (SEA)), and
- (5) Scoring and ranking.

Please note that this document covers the legal requirements for the selection of standard and small-scale projects.¹ Provisions for the selection procedures for small projects in the Small Project Fund (SPF) are covered in Article 25 of the Interreg Regulation and have been presented and discussed in an ongoing series of webinars on SPF.²

¹ We use the term ‘small-scale projects’ for the second option to meet the requirements according to Article 24 of the Interreg Regulation. Cross-border programmes have to go either for small projects in the SPF or for other projects of limited financial volume. We use the term small-scale projects for the second option.

² Further information: e.g., [Publication on the small project fund](#); [presentations from the SPF workshop](#) (December 2021). Another information offer is our online community for small-scale projects and SPF: in case you are interested to join, please send an email to small.projects@interact-eu.net.

Part A: Principles, legal requirements, procedures and roles

Issue	We recommend considering	Comments
Introduction on principles, legal requirements, strategic choices		
Overarching principles	<p>The procedures for the selection of operations can be competitive or non-competitive provided that:</p> <ul style="list-style-type: none"> • criteria applied and procedures used are non-discriminatory, inclusive and transparent, • the projects selected maximise the contribution of the Union funding, and • the projects are in line with the horizontal principles defined in the CPR Regulation. <p>Specific provisions on the selection of operations should be simple and clear: avoid gold-plating and additional administrative burden (Preamble 24 Interreg Regulation). The effectiveness and efficiency of project selection processes should be duly observed taking into account the necessary resources, potential delays, costs for the process.</p> <p>The process design should be technically simple avoiding complexity and it should be transparent for programme management as well as applicants. In communication with applicants, it is recommended to use straightforward language avoiding technical jargon.</p>	<p>In Interact we plan to review the “Fact Sheet; Project Selection Process”. The FS for 2014-20 provides some insights on principles.</p>
Governance of the process	<p>The MA and its leadership in the process is pivotal for the good governance of the process –the MA is in many CBC programmes accompanied by the National Authority (NA) that might have an obvious support function in governance.³ Good governance of the process is essential to establish trust and an open atmosphere. It rests on three main pillars:</p> <ul style="list-style-type: none"> • a process which is fair and transparent from the perspective of the applicant (assessment criteria published, possibility to submit questions, a reasonable time for replies, complaints procedures in place); • an efficient internal process design and management; i.e., clear rules of procedures, which allow for efficient and timely decision-making; • clear internal task distribution: what should be decided at the MA level and what should be decided at the monitoring/steering committee level. 	
Legal requirements	<ul style="list-style-type: none"> • Partnership, transparency, equal treatment, etc., for the selection procedure (including the complaints procedure): 	

³ In transnational (TN) programmes co-chairing on a rotating basis is a usual model and Member State representatives in the MC take over the function of the NA, i.e. to support MA/JS in doing checks.

Issue	We recommend considering	Comments
<ul style="list-style-type: none"> Selection procedure meeting key principles 	<p><i>“For the selection of operations, the monitoring committee or, where applicable, the steering committee shall establish and apply criteria and procedures which are non-discriminatory and transparent, ensure accessibility to persons with disabilities, gender equality and take account of the Charter of Fundamental Rights of the European Union and the principle of sustainable development and of the Union policy on the environment in accordance with Article 11 and Article 191(1) TFEU”.</i></p> <p>[Article 22(2) of the Interreg Regulation]</p>	
<ul style="list-style-type: none"> Selection criteria and procedures (Article 22(2) of the Interreg Regulation - best value for money and prioritization) 	<ul style="list-style-type: none"> <i>“The criteria and procedures shall ensure the prioritisation of operations to be selected with a view to maximising the contribution of Union funding to the achievement of the objectives of the Interreg programme and to implementing the cooperation dimension of operations under Interreg programmes”</i> <p>[Article 22(2) of the Interreg Regulation]</p> <p>Selection mode.... Selection criteria should be drawn from the legal requirements and from the specific priorities set and the objectives pursued by a call for proposal, in line with the programme. Programmes have certain flexibility to tailor the approach to their context.</p>	<p>Depending on the context (i.e., the Programme) ideally, there should be common as well as specific criteria along the specific objectives. Based on the set of criteria Commission recommends using a clear scoring system.</p>
<p>Monitoring Committee</p> <ul style="list-style-type: none"> Decision-making – role of the MC and the MA 	<p>The Monitoring Committee (MC) or the Steering Committee (SC) takes decisions on projects – all provisions are set out in Article 22(1) of the Interreg Regulation. The SC works on basis of a mandate from the MC. There is one major exception from the rules that the MC members have the final say in project selection:</p> <ul style="list-style-type: none"> Projects to be implemented outside the programme area require explicit approval by the Managing Authority (MA) in the monitoring or steering committee (MC/SC) in case of [Article 22(1) of the Interreg Regulation]; <p>In supporting the work of the MC, the MA has to provide the MC⁴ in a timely manner with all information necessary to carry out its tasks (Article 75(a) CPR).</p> <p>Rules of Procedures (RoP):</p> <p>The RoP for the MC should detail how all procedures meet the tasks in accordance with Articles 22 (on selection) and 30 (on functions of the MC) of the Interreg Regulation. It should also include provisions on avoidance of conflict of interest.</p> <p>Partnership dimension:</p> <p>Monitoring committees and steering committees shall apply the partnership principle as set out in Article 8, CPR – partners should be included in most MC tasks including the selection of projects. The reference document is still the European code of conduct on partnership in the framework of the ESIF from 2014.⁵</p>	<p>Further reading: Model on RoPs for the MC for 21-27 (work in progress)</p> <p>Further reading on conflicts of interest:</p>

⁴ Interreg Europe has invited interested MC members to join the quality assessment briefing (one day) with all assessors. An excellent idea to foster a better understanding of the assessment methodology among MC members and hence also supporting mutual understanding between JS and MC.

⁵ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the ESIF.

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	<p>Articles 4 and 10(2) therein specify the relevant partners, Article 16 of the Code refers to the responsibility of the MA to involve the partners in the MC and its tasks.</p> <p>We are aware that inclusion of a wider partnership on an equal footing in the MC is a challenge for several reasons. Quite often the most adequate organisations decline the offer to participate since they would not like to enter a conflict of interest when applying for projects. Please consider that a wider partnership may bring important topical expertise to the MC!</p> <p>Voting principles:</p> <p>In principle we are aware of the following voting principles:</p> <ul style="list-style-type: none"> • Consensus (of the delegations); • Qualified majority (e.g. two-thirds); • Majority. <p>There is no one-size-fits-all approach. Voting principles are usually a rather stable cornerstone in programme procedures. Change is only likely if the procedure apparently lacks efficiency. A frequently applied model is 'one (national) delegation – one vote' and subsequent decision taken by consensus of the (national) delegations. Some programmes combine it with majority voting within the (national) delegations (two-steps model). Any model might be applied efficiently provided there is trust and good governance and leadership by MA (and NA).</p> <p>We see sometimes an ambiguous role of national committees: in principle such committees are good for testing waters prior to the official meeting but in turn, they might strengthen a unilateral perspective.</p> <p>Use of conditions:</p> <p>To ensure a fair and transparent selection it is recommended to strictly limit and clearly define the conditions imposed on projects in selection.</p>	<p>COMMISSION NOTICE</p> <p>Guidance on the avoidance and management of conflicts of interest under the Financial Regulation (2021/C 121/01)</p> <p>A couple of hints on relevant issues can also be found in the Interact study on risk management in assessment and selection.</p>
<p>Communication requirements</p>	<p>Fair and transparent selection procedures require several elements of communication as well as the option for applicants to file a complaint against the decision.</p> <p>On communication:</p> <p>First, it is the communication with the applicant. In terms of transparency, it is crucial to inform the applicants and the public about the decisive aspects and criteria against which projects will be assessed. We recommend to explain the selection criteria in an illustrative way as part of the programme manual(s).</p> <p>Key obligations of the MA according to Article 49 CPR comprise communicating the schedule of calls and results of selection:</p> <ul style="list-style-type: none"> • maintain an updated time schedule of calls on the programme website (in acc. with Article 36 of the Interreg Regulation) including all indicative elements listed under Article 49(2) CPR; 	<p>For those who are not long in business or work on subjects other than communication but might be interested to obtain a basic understanding we recommend the online learning course on Communication for beginners.</p>

Issue	We recommend considering	Comments
	<ul style="list-style-type: none"> publish a list of beneficiaries and projects which is regularly updated including a quite comprehensive set of data as listed in Article 49(3) CPR. <p>Moreover, it should be known who takes the decision. Article 29(2) of the Interreg Regulation stipulates: <i>The managing authority shall publish a list of the members of the monitoring committee on the website referred to in Article 36(2).</i></p> <p>We would recommend going beyond the legal requirements when communicating all information listed above. News sections on the website, social media, and even regional or local press could be used to highlight calls and the selection of projects.</p>	
Complaints procedure	<p>The MC decision is based on European legislation and applicants - in accordance with Article 69.7 (CPR) on responsibility of Member States - have a chance to file a complaint against the decision as part of a fair and transparent procedure. It is evident that – depending on the Member States – the exact legal status of such procedures may differ but in essence, a transparent and fair procedure needs to be developed, set out in the manuals allowing for fair and equal treatment of any applicant regardless of its country of origin.</p>	<p>The Interact Fact Sheet on the complaints procedure for 2021-27 provides useful information (work in progress).</p>
Calls for proposals	<p>For the selection of operations, the MC, or where applicable, the SC establishes and applies criteria and procedures, which ensure the prioritisation of operations to be selected with a view to maximising the value for money of the funds.</p> <p>To this end, calls are accordingly organized. In some cases (for example in area where there is a single (infrastructure) provider or under Policy objective 5)⁶, competitive calls might not always be the appropriate tool and the programme may proceed with direct award of the grants.⁷</p>	<p>NB: There might also be some projects selected without calls for proposal (decision by the monitoring committee). This could be an infrastructure project where a competitive procedure (call) does not make sense.</p>
Strategic choices for the call	<p>The procedures for the selection of operations can be competitive or non-competitive provided that:</p> <ul style="list-style-type: none"> criteria applied and procedures used are non-discriminatory, inclusive and transparent, operations selected maximise the contribution of the Union funding and are in line with the horizontal principles defined in the CPR Regulation. <p>In general, the decision to for the type of calls should result from an open debate in the Monitoring Committee in the context of economy, efficiency and effectiveness, agreeing on the needs and justification.</p> <p>In most cases, <u>competitive procedures make sense</u>; i.e., projects are scored and ranked to ensure financing the best quality projects. In cases where actions in sectors with only a certain type of operators mandated (as, for example, major infrastructure, water management or inland waterways, planning of railway links across borders, etc.) calls will not be competitive but rather calls for strategic projects (see below).</p>	

⁶ With its strategy-based approach and increased local and regional empowerment as major objective.

⁷ Calls are a common practice and can be a useful approach to structure and phase the programme implementation.

Issue	We recommend considering	Comments
	<p>When launching a call, there are a couple of options based on focus and timelines:</p> <ul style="list-style-type: none"> • Closed-ended competitive calls are open for submission of applications for a limited pre-defined period of time; applications are evaluated all together after the submission deadline, and contracts are also signed all together after the evaluation is concluded. • Open-ended competitive call: a call without deadline (sometimes also labelled as an ‘ongoing call’). Applicants can apply for all programme priorities whenever they want (when they are ready). Even though it is not intended to set a deadline in the call, it is still important that the applicant knows in advance when decision will be taken.⁸ • Targeted call (usually closed ended): Targeted calls can be used during the whole lifespan of the programme. In practice they are often used when a specific topic needs to be addressed. They can also be used when the available budget is limited, as targeting helps to limit the number of applications. Calls should be limited to a specific priority axis or specific objective and budget, certain type of organisations or operations. <p>Timing and reasonable periodicity are essential pillars for sound programme management: the period required for the quality assessment is usually the critical path in the process.</p>	
<p>One or two steps?</p>	<p>Finally, one has to decide about <u>one step or two-steps procedure</u>:</p> <p>Two-steps procedure is recommendable in order to reduce excessive use of resources in preparing the full application – in particular, when overall numbers of applications are high and the risk of ‘stranded investments’ for applicants is also high. In the first stage, requirements should be downsized, and a targeted assessment (focussing on key strategic quality criteria) should allow for reasonable response times to applicants.</p>	

⁸ It is recommended to announce the dates for forthcoming meetings of the MC and timelines for handing in applications to make it for the next MC.

Assessment		
Issue	We recommend considering	Comments
Overarching principles	<p>A fair approach of the assessors ensuring comparable results across projects is an obvious pre-requirement. The MA/JS has to closely follow the work of assessors to safeguard consistent quality.⁹ In practice, this usually means that there has to be training for assessors – regardless of the fact if a programme uses external or internal assessors. Ground rules are:</p> <ul style="list-style-type: none"> • four-eyes principle as a minimum requirement throughout all stages in the assessment; in particular, in CBC a ‘bilateral’ perspective¹⁰ in assessment is highly recommended; • clear rules on arbitration in case of controversial assessments. <p>And after all projects have been assessed, there should be a final, overarching check that all assessments are comparable in terms of quality and the judgements reveal no bias.</p>	
Proceedings	<p>Assessment and selection criteria have to be established prior to the launch of the programme to safeguard a transparent process as well as fair and equal treatment of applicants. It is highly recommended to use the results of the assessment <u>to establish a ranking of the projects submitted for decision-making by the MC.</u></p> <p>This is a major recommendation coming from the European Court of Auditors (ECA) Report on internal CBC programmes from 2021 (see Special Report (SR) 14/2021).</p>	
Stages of the project assessment process	<p>Usually, the assessment comprises three stages:</p> <ul style="list-style-type: none"> • <u>Administrative compliance (formal)</u>: usually a check with binary logic (0 or 1; passed or not passed; grace periods for missing documents are to be agreed; in principle, this stage should cover questions that can be answered either by automated systems or any programme assistant); • <u>Eligibility</u>: a check resulting in 0 or 1; for some criteria, it needs thorough consideration if / how they are tackled either as eligibility or quality criterion; the eligibility check requires certain expertise and understanding of the programme; it is often done in close cooperation with NAs or National Contact Points (NCPs) • <u>Quality</u>: assessing the quality, hence, the intensity of contribution to the quality features; this is clearly a task where Interreg experience, as well as topical expertise, is required. 	<p>For simplification, please consider not requesting all supporting documents at the application stage (e.g., building permits); the application should show the relevance of the project.</p> <p>Supporting documents can be requested also at a later stage.</p>
Issue	We recommend considering	Comments
Scoring and weighting in quality assessment	<p>Development of tailored scoring system allows programs to identify key criteria and assign different values to characteristics that are applicable to their own specific objectives and conditions, etc.</p>	<p>There are many different philosophies for the approach to scoring. Simple ones based</p>

⁹ If the assessment is done internal, i.e. by JS staff, we recommend that somebody from MA – or a person not involved in assessments from JS – takes over the role of a quality controller to ensure consistency and coherence of the assessments.

¹⁰ This is particularly important for programmes without a common language and where many documents are submitted in national languages.

	<p>When designing the scoring system the weighting of criteria deserves due attention and needs to be discussed and agreed in full detail with the MC since it is a decisive element in decision-making.</p> <p>Please be aware that a transparent assessment system should include scoring. It should be an explicit element in the system and not an implicit and tacit agreement among committee members. The main point is not the complexity of the system but fairness and transparency:</p> <ul style="list-style-type: none"> • fairness for the applicant since everyone can learn about the decisive criteria for a good project in the programme; • transparency in decision-making since there is an ex-ante agreement among the committee members about the key quality features. <p>It does not have to be a sophisticated methodology. On the contrary: we recommend straightforward systems with a limited set of criteria focussing on essential quality requirements. Such systems should be commonly used regardless of the programme volume. Even for quite small programmes, it is not considered as a disproportionate requirement since it does not require complex formula/algorithms/IT solutions, etc.</p> <p>Another major decision is whether a written justification for scores is provided or not. However, it is important that the MC has the option to request clarification in case of questions to assessment results!</p>	<p>on Low-Medium-High or rather finely graded scales.</p> <p>DG REGIO recommends using scoring with wider intervals to come to clear-cut results, e.g., 0, 3, 6, 9.</p> <p>And it is essential that everyone concerned – meaning programme management, programme partners, MC and applicants – knows exactly what the scores actually mean (e.g. which score means ‘sufficient’ or ‘insufficient’ etc.)</p>
Ranking of projects	<p>To establish a ranking list of projects according to the assessment results is one of the expected elements of a transparent selection process. It should be acknowledged as the shared point of departure for discussion and decision-making in the MC.</p> <p>In a recent report on Interreg cross-border programmes the European Court of Auditors concludes: <i>In order that the projects that best address the challenges of the cross-border regions and the objectives of the cooperation programmes are selected, programme authorities examined should:</i></p> <ol style="list-style-type: none"> <i>use a system of merit as part of the project appraisal¹¹ process; and</i> <i>propose projects for funding that have achieved a minimum threshold, including a minimum threshold for the cross-border character of the project.¹²</i> 	<p>For those interested the full version of the recent European Court of Auditors (ECA) Report for CBC programmes from 2021 might be interesting.</p>
Issue	We recommend considering	Comments
External and internal assessors	<p>A frequently asked question: external assessors versus internal assessors – what are advantages and disadvantages and inherent risks?</p> <p>Again, there is no clear-cut answer to it. We can only list a couple of points for consideration when making your choice. Systems using external assessors are quite often blended systems combining internal and external capacities. Internal strength is often the understanding of the border-crossing dimension in its full scope; external strength is mostly a topical one.¹³</p>	

¹¹ The term ‘appraisal process’ means project assessment

¹² See also recommendation 2 of the ECA Report for CBC programmes from 2021: Prioritise and award support to projects based on merit using scores (cf. ECA SR Report, 18, 2021, p. 43).

¹³ An example of specific external expertise which is often ‘outsourced’ by the programme management is State aid.

	<p>Pro Internal</p> <ul style="list-style-type: none"> - Understanding Interreg - Knowledge of the programme-specific objectives - Committed - Available 	<p>Pro External</p> <ul style="list-style-type: none"> - Specialised knowledge - Independence (not guaranteed) - Different perspective - Anonymous to the applicants 	
	<p>Con Internal</p> <ul style="list-style-type: none"> - Risk of being not impartial - Lack of sectoral experience - Capacity issues 	<p>Con External</p> <ul style="list-style-type: none"> - Limited knowledge of territorial cooperation and programme - Focus on their expertise area - Costs and availability 	
<p>Cost is a limiting factor and cost-efficiency should be a prevalent argument. Hence, we think the use of external expertise should always be focused. Additionally, assessment in Interreg poses different questions: e.g., in research and innovation projects the research output should be only one element of the assessment since Interreg is not research but a cooperation programme. It should also be a decisive criterion if the longer-term cooperation approach of the research institutions in the project is a promising one.</p>			

Part B: A closer look on the criteria

Programmes apply different practices regarding terminology and stages at which the individual administrative/eligibility/quality checks are performed. The following list of criteria is based on the HIT terminology but has been modified in discussions with Commission colleagues. [HIT documents for 2021-27](#) are available.

Issue	We recommend considering	Comments
Administrative and eligibility check		
We are aware that the handling of criteria in administrative and eligibility checks differs across programmes. The prevailing logic in this list was to put criteria requiring more expertise in checking under eligibility criteria. In case the applicants provide sworn statements on certain eligibility criteria the check of the statement might be done as part of the administrative compliance check.¹⁴		
Administrative compliance check	<p>The following criteria are usually part of automated checks in monitoring systems such as Jems and/or equivalent systems:</p> <ul style="list-style-type: none"> - submission by the deadline; - application complete (including required annexes); - project in line with the call [Article 22(4)(a) of the Interreg Regulation]; - project duration in line with conditions of the call; - operation is attributed to a type of intervention [Article 22(4)(g) of the Interreg Regulation] - co-financing rate. 	Check result is a clear Y or N
Eligibility check¹⁵	<p>The following criteria will be either covered by sworn statements or there should be an explicit check that they are clearly not relevant to the project (e.g., operation not relocated) or it should be checked:</p> <ul style="list-style-type: none"> - no double financing [Article 63(9) CPR]; - operation not relocated (not transfer of productive activity) [Article 22(4)(h) of the Interreg Regulation]; - operations do not conflict with the corresponding strategies established pursuant to Article 10(1) or established for one or more of the external financing instruments of the Union [Article 22(4)(b) of the Interreg Regulation]; - operations which fall under the scope of Directive 2011/92/EU of the European Parliament and of the Council (19) are subject to an environmental impact assessment or a screening procedure and that the assessment of alternative solutions has been taken in due account, on the basis of the requirements of that Directive [Article 22(4)(e) of the Interreg Regulation]; - Project not completed/or fully implemented before the application is submitted [Article 63(6) CPR/ Article 22(4)(f) of the Interreg Regulation]; 	<p>Check result is a clear Y or N</p> <p>For many criteria, it is a common practice to use declarations/ statements of honour by applicants – e.g., on the issue of relocation in critical cases (if not excluded in a quick relevance check) or on double funding.</p> <p>Further information on horizontal principles can be found here:</p>

¹⁴ To check if a statement – a compulsory annex - has been delivered or not is a typical administrative check.

¹⁵ It is important to note that the Regulation does not require a programme area defining the eligibility of partners in geographical terms. Partners may come from larger functional areas. Stepping away from a rather rigid approach might support more flexible perspectives on functional areas and partnerships.

Issue	We recommend considering	Comments
	<p>The requirements related to the cooperation character should be explicitly checked as part of the eligibility check:</p> <ul style="list-style-type: none"> - Co-operation character - Article 23(4) of the Interreg Regulation: “Partners shall cooperate in the development and implementation of Interreg operations, as well as in the staffing or financing, or both (...)”. [all strands are covered] <p>Compliance with horizontal principles at the selection stage can be treated either as eligibility criteria only (no adverse impact) or as eligibility and quality criteria (i.e., measuring the contribution of the project):</p> <ul style="list-style-type: none"> - Compliance with horizontal principles and policy/legislation – the principle of equal opportunities/ accessibility for persons with disabilities, equality between men and women, sustainable development, DNSH and the Union environmental acquis/Union policy on the environment, including the SEA and EIA Directives; [Article 9 CPR + Article 22(2) of the Interreg Regulation]. <p>The following aspect requires new check routines for infrastructure projects:</p> <ul style="list-style-type: none"> - Impact on climate for infrastructure projects; please note that the provision addresses only the climate adaptation (resilience) of infrastructure investments [Article 22(4)(j) of the Interreg Regulation] 	<p>Horizontal principles in 2021-2027</p> <p>It is important to be aware that compliance with and contribution to horizontal principles should be checked throughout the complete project and programme implementation period.</p>
<p>Operation not concerned by infringement [Article 22(4)(i) Interreg Regulation];</p>	<p>This point concerns the fact that EU funds should not be used for activities that might contribute to an infringement of EU law. For obvious reasons this needs to be checked prior to selection.¹⁶ Programme authorities should be engaged in such an assessment and programme partners may bring valuable additional expertise. The MA, the National Authority (NA) or MC may consult the database of infringement decisions as one of the sources of information. In legal terms it is the task of:</p> <ul style="list-style-type: none"> • The participating Member States to establish efficient communication on infringement cases, • The MA and MC to decide, based on all the information available, if an operation or a type of operations are directly affected on a case-by-case basis; directly affected means that a project needs to be excluded if activities within the project would work in the sense of a potential breach of EU law. <p>In practice it might be best to do an aggregate check – as part of the eligibility check - along the SOs. The check could be a shared task between MA, NA or Member State representatives in the MC.</p>	<p>Please follow the link to the database on infringements allowing for a search per Member State.</p> <p>When having a look into the database on infringement decisions you will quickly see that most issues addressed are not relevant for the usual scope and approach of Interreg projects.</p>
<p>Quality assessment</p>		
<p>Project relevance</p>	<p>How well is a need for the project justified?</p>	

¹⁶ A reasoned opinion (a formal request to comply with EU law) may be sent to the Member State when the Commission concludes that the Member State is failing to fulfil its obligations under EU law. It explains why the Commission considers that the country is breaching EU law. This justification is the basis for the Member State to establish if there is a direct link between the matter addressed and the expenditure at stake so that to put at risk its legality and regularity or the performance of operations.

Issue	We recommend considering	Comments
	<ul style="list-style-type: none"> The project addresses common territorial challenges of the programme or a joint asset of the programme area - there is a real need for the project; The project clearly contributes to a wider strategy on one or more policy levels (EU / national / regional). <p>Indicative sub-questions could be:</p> <ul style="list-style-type: none"> Does the proposal achieve synergies with the EU/ regional/national/local programmes? Is the project consistent with one or more cross-cutting themes of the programme? Does the proposal contribute to the relevant macro-regional/ sea-basin strategy? <p>To what extent will the project contribute to the achievement of programme's objectives and indicators?</p> <ul style="list-style-type: none"> The project's contribution to the achievement of the programme's objectives and indicators? The project's overall objective clearly contributes to the achievement of the programme's priority-specific objective. The project's outputs clearly link to the programme output indicators and their contribution to programme targets is sufficient. The project's contribution to the programme result indicators is realistic and sufficient. 	
Assessment of the project intervention logic	<p>To what extent is the project intervention logic plausible?</p> <ul style="list-style-type: none"> Project specific objectives are specific, realistic and achievable. Proposed project outputs are needed to achieve project-specific objectives. Project outputs and results that contribute to the programme indicators are realistic (it is possible to achieve them with given resources; i.e., time, partners, budget - and they are realistically based on the quantification provided). 	<p>Please see also the Q&A document following the event 'Hands on the intervention logic'.</p>
Intensity / quality of the cooperation	<p>This is one of the obvious key elements when it comes to Interreg projects. In the framework of HIT, a good common approach to assessment perspectives has been developed. The list is a point of departure but not exhaustive. The criteria should be adapted/developed with the view to address the specificities of the programme.</p> <p>Key question: What added value does the cooperation bring?</p> <ul style="list-style-type: none"> The importance of cooperation beyond borders for the topic addressed is clearly demonstrated. The results cannot (or only to some extent) be achieved without cooperation. There is a clear benefit from cooperating for the project partners / target groups / project area / programme area. The proposal includes coordination and cooperation with other Interreg programmes [recital 23 + Article 17(b)(ii) of the Interreg Regulation]. 	<p>HIT assessment sheets for 2021-27 are available.</p> <p>When assessing the quality of cooperation, it might be useful to go through the scenario without the project intervention:</p> <ul style="list-style-type: none"> How would the cooperation and project look like in the absence of funds from the programme? Could the project have been carried out at the

Issue	We recommend considering	Comments
	<ul style="list-style-type: none"> Projects build on similarities and differences across the border as a necessary resource to generate results and shared learning. <p>There might be other vital aspects to consider at the specific objective (SO) level such as:</p> <ul style="list-style-type: none"> In ISO 1¹⁷ in cross-border programmes along the internal borders: project aims at overcoming legal, administrative physical or perceived border obstacles, In ISO 1 in programmes in all strands along the external borders: project aims at increased involvement or empowerment of civil society and/or local actors. In research and innovation projects in all types of programmes: the partnership develops a longer-term plan for cooperation along the subject of the project based on complementarity and synergy <p>It is of utmost importance for Interreg programmes to be very strong in assessing this point since it is the unique selling point (USP) of Interreg! The European Court of Auditors (ECA) Report for CBC programmes from 2021 is very clear in addressing that weaknesses in some of the 23 programmes examined:</p> <p><i>[...] we identified several weaknesses in the implementation of the programmes and their monitoring:</i></p> <ul style="list-style-type: none"> <i>for half of the projects we examined, cooperation among partners was limited to presenting a common project proposal to secure financing for interventions. Those projects lacked a common identity as a cross-border project;</i> <p>(cf. ECA SR Report, 18, 2021, p. 5)</p>	<p>national/ regional/ local level?</p>
<p>Sustainability & durability</p>	<p>To what extent will project outputs have an impact beyond project lifetime?</p> <ul style="list-style-type: none"> Project outputs are durable (the proposal is expected to provide a significant and durable contribution to solving the challenges targeted) – if not, it is justified. <i>This should be checked also in relation to some results indicators.</i> Project main outputs are applicable and replicable by other organisations/regions/countries outside of the current partnership (transferability) – if not, it is justified. <p>Please note that the sustainability of a project - or more precisely of its results - is crucial. A project is sustainable when it continues to deliver benefits to the project beneficiaries and/or other constituencies for an extended period after the Commission's financial assistance has been terminated. Hence it is essential to include the aspects of sustainability and – in case of SME or infrastructure projects also durability in the quality check. Checking:</p> <ul style="list-style-type: none"> Sustainability means also to verify that the beneficiary has the necessary financial resources and mechanisms to cover operation and maintenance costs for operations comprising investment in 	<p><i>CPR, Preamble, Recital 47:</i> <i>“To ensure the effectiveness, fairness and sustainable impact of the Funds, there should be provisions guaranteeing that investments in infrastructure or productive investment are long-lasting and prevent the Funds from being used to undue advantage.”</i></p>

¹⁷ ISO 1 stands for Interreg specific objective on better cooperation governance; ISO 2 stands for ‘a safer and more secure Europe’,

Issue	We recommend considering	Comments
	<p>infrastructure or productive investment, so as to ensure their financial sustainability [Article 22(4)(d) of the Interreg Regulation]</p> <ul style="list-style-type: none"> • Durability means to check that the five years period¹⁸ in case of investment in infrastructure or productive investment is respected – no cessation or transfer of productive activity, no undue advantage owing to change of infrastructure ownership and no substantial change in nature, objectives etc.; the 5 years may be reduced to 3 years by the Member States involved in cases concerning the maintenance of investments or jobs created by SMEs. [Article 65 CPR] 	
Quality of the partnership	<p>To what extent is the partnership composition relevant for the proposed project?</p> <ul style="list-style-type: none"> • The project involves the relevant actors needed to address the territorial challenge/joint asset and the objectives specified. • With respect to the project's objectives the project partnership: <ul style="list-style-type: none"> - is balanced with respect to the levels, sectors, and territory? - consists of partners that complement each other. • Partner organisations have the competence in the thematic field concerned, as well as the necessary capacity to implement the project (financial, human resources, etc.). • Actions and responsibilities are clearly and appropriately distributed among the partners. 	<p>NB: The quality of the partnership is assessed, <i>inter alia</i>, through the competence of the project partners. Competence cannot be assessed through past participation/ experiences in an Interreg project as this would be discriminatory against 'newcomers'.</p>
Operational assessment		
Work plan	<p>To what extent is the work plan realistic, consistent and coherent?</p> <ul style="list-style-type: none"> • Proposed activities and deliverables are relevant and lead to planned outputs and results. • Operation presents the best relationship between the amount of support, the activities undertaken and the achievements of the objectives [Article 22(4)(c) of the Interreg Regulation]; • Distribution of tasks among partners is appropriate (e.g., sharing of tasks is clear, logical, in line with the partners' responsibilities and actions in the project, etc.). • Time plan is realistic. • Activities, deliverables and outputs are in a logical time sequence. • The importance of investments and their transnational/cross-border relevance is demonstrated to reach project objectives. 	
Lead partner capacity	<p>Does the lead partner (LP) demonstrate the capacity to coordinate, manage and monitor project implementation?</p> <p>In practice, it is quite common that programmes do specific checks on the capacity of private LPs. For the sake of transparency and fairness it is important that all requirements are presented in the programme</p>	<p>On the one hand, it is obvious that newcomers should not be discriminated with this argument. On the other hand,</p>

¹⁸ Within 5 years of the final payment to the beneficiary or within the period of time set out in State aid rules (where applicable).

Issue	We recommend considering	Comments
	<p>manual, including all parameters and indicators and / or requirements such as financial statements, balance sheets, external audit report or bank reference documents. Requirements have to be clear upfront and should not pose disproportionate cost or burden.</p> <p>Cooperation projects mean in essence persons interacting – hence, if the capacity of the LP is a recurring problem in projects, one might also request CVs for the project lead and add a clause on competent staff in the LP statement and in the partnership contract (such steps may help to raise awareness).</p>	<p>the programme needs the assurance that projects are implemented in time according to the plan.</p>
Communication	<p>To what extent are communication activities appropriate to reach the relevant target groups and stakeholders?</p> <ul style="list-style-type: none"> • The communication objectives are relevant and are expected to contribute to project-specific objectives. • The communication activities (and deliverables) are appropriate to reach the relevant target groups and stakeholders. 	
Budget	<p>To what extent is the project budget used in accordance with the principles of economy, efficiency and effectiveness?</p> <ul style="list-style-type: none"> • The principle of economy concerns minimising the costs of resources. The resources used by the project partners for its activities should be made available in due time, in appropriate quantity and quality, and at the best price. <ul style="list-style-type: none"> - The budget allocated to staff and external expertise is in line with the project content and the costs are realistic. - Sufficient and reasonable resources are planned to ensure project implementation. • The principle of efficiency concerns getting the most from the available resources. It is concerned with the relationship between resources employed and outputs delivered in terms of quantity, quality and timing. <ul style="list-style-type: none"> - The need for engaging external expertise is justified and the costs seem realistic. - Financial allocation per cost category is in line with the work plan. - If applicable, the distribution of the budget per period is in line with the work plan. - The application of simplified cost options (SCOs) is appropriate and in line with the programme rules. • The principle of effectiveness concerns meeting the objectives and achieving the intended results. <ul style="list-style-type: none"> - The available information in the budget is transparent and sufficient. On that basis, the project budget appears proportionate to the proposed work plan, project outputs and project's contribution to programme indicators aimed for. - Sufficient and reasonable resources are planned for investments and equipment purchases (if applicable) and their costs are realistic. 	<p>Firstly, we recommend providing a definition of the principle of sound financial management in accordance with Article 33 of the Financial Regulation in the programme guidance material to raise awareness among applications when drafting the budget.</p> <p>Secondly, a clear link between objectives set and performance indicators, results and economy, efficiency and effectiveness in the use of resources should be established in the guidance materials.</p>

Issue	We recommend considering	Comments
Additional criteria for consideration (not required in the legal framework)		
Innovative character	<ul style="list-style-type: none"> The project demonstrates new solutions that go beyond the existing practice in the sector/programme area/participating countries or adapts and implements already developed solutions. <p>Please be aware that a firm answer to this question requires in some cases quite ample thematic expertise and knowledge of the situation at the Member State level.</p>	
Maturity of project and readiness for implementation (for infrastructure projects)	<ul style="list-style-type: none"> How ready is the project (in which stage of completion are the administrative procedures that allow the implementation of the project (licenses, designs, permits, land acquisition, etc.)?) <p>It is quite evident that infrastructure projects pose certain risks for the programme. In particular, projects in transport or large infrastructure often require long periods for closing planning works and starting the implementation. Hence, it might be interesting to consider the maturity of the projects in selection in order to avoid major absorption risks at later programme stages. It is recommended to have at least a feasibility study before embarking on the implementation stage; i.e., construction works. Based on the feasibility study, the next stage should be carefully defined (i.e., design, build, or design and build).</p>	The availability of a building permit could be considered as a criterion to assess the maturity of the project and its readiness for implementation.
The territorial dimension of the project	<p>Territoriality is an important aspect of projects in European Territorial Cooperation (ETC) as the overarching policy objective behind Interreg. We clearly encourage you to look into it when assessing project quality. It might be a separate criterion or existing ones (such as project and partnership relevance) might be expanded with a limited set of 'territorial sub-questions'.</p> <p>The project includes customised solutions to the specificities of a territory, integrated approach, coordinated approach, participatory approach, etc.</p>	In Interact we have done some work under the heading of 'Territoriality in Interreg'. It includes inter alia the Territorial package , a series of eight information sheets on key issues.
Capitalization aspects	The project makes use of available knowledge and builds on existing results and practices.	NB: The use of the criterion should not pose a disadvantage for new applicants.