

# P-BA How to ...?

## Measure's total cost estimation

Interact, 16 April , 2026

**Interact**



Co-funded by  
the European Union  
Interreg

# Objectives of the workshop

## Objective 1

Recap what can be found on measure's costing in regulation's proposals and related discussions

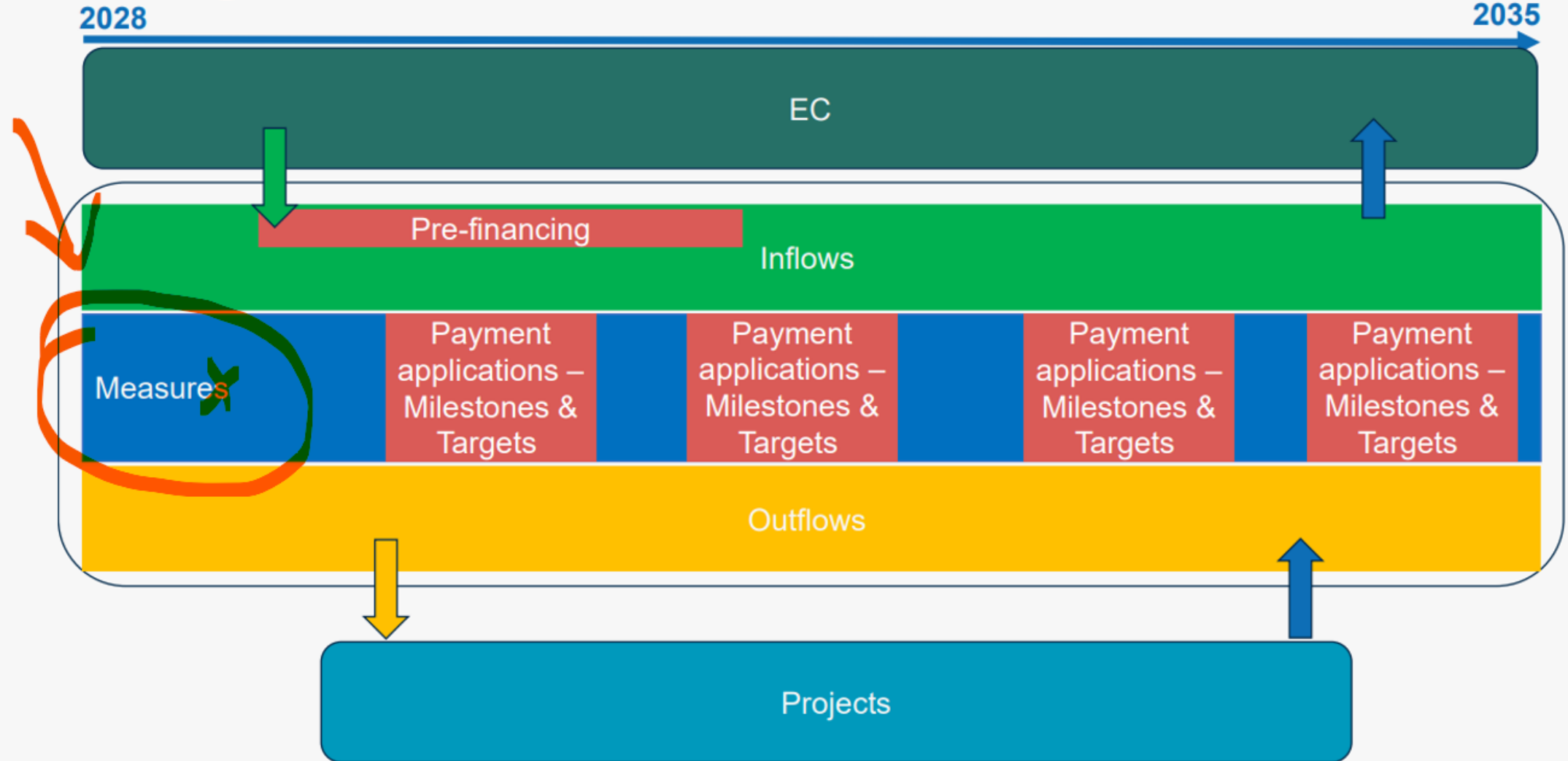
## Objective 2

Reflect on 2021-2027 costing practices & experiences potential for the future

## Objective 3

Begin detailed discussion on possible approaches for costing exercise for future Interreg chapter's measure(s)

# Programme financial flows in 2028-2034



# Agenda

**13:00 - 13:10**

**Welcome and intro**

**13:10 - 13:45**

**Costing in the post 2027 regulatory package proposal & in discussions**

**13:45 - 14:30**

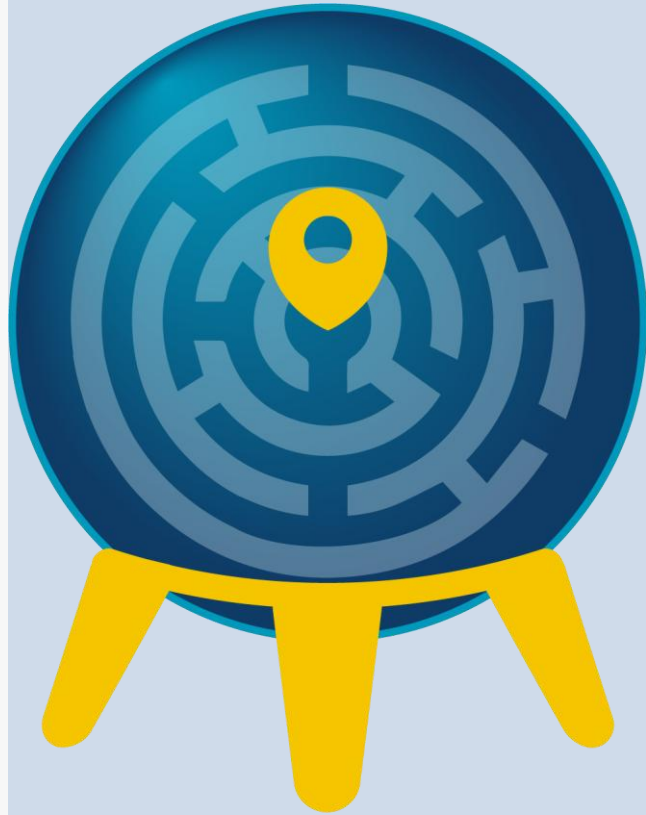
**What can we learn from current programming period?**

**14:30 - 15:15**

**Total cost estimation – Key Interreg issues**

**15:15- 15:30**

**Next steps & outro**



# Costing in the post 2027 regulatory package proposal & in discussions



# Costing – Article 8.3(d) EFRD & Article 22.2(d) NRPP

## Article 8.3(d) EFRD

- (d) set out the total estimated costs of the measures together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact;

2024/2509

26.9.2024

REGULATION (EU, Euratom) 2024/2509 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 23 September 2024

on the financial rules applicable to the general budget of the Union

## On Article 22.2(d) NRPP Requirement linked to costs

(65) 'sound financial management' means implementation of the budget in accordance with the principles of economy, efficiency and effectiveness;

**Objective: ensuring both the objectives of simplification and protection of Union financial interests**

- Setting out detailed **cost estimates of measures** (art. 22(2)d):
  - for a total amount **at least equivalent** to the sum of the Union financial contribution, any requested loans, and national contribution
  - together with information on existing or planned Union financing where relevant
  - backed up by appropriate justification and by explanations of how the amount is:
    - **Plausible** (eg. in line with the nature and the type of the envisaged reforms, investments and other interventions)
    - **Reasonable** (i.e. appropriate)
  - in line with the principle of **cost efficiency, sound financial management** (i.e. no double funding) and **commensurate to the expected economic and social impact**
- The **non-programmed amount set aside as flexibility amount** shall be considered as part of the total estimated costs of the Plan
- Estimated total costs of their NRP Plan should remain **reasonable and plausible throughout the implementation** – otherwise, request for amendment of the Plan
- 36 • Lessons learnt from the implementation of the RRF: crucial role of coordinating authority to ensure coherence across measures; similar projects implemented in the past can be a good proxy.



# Costing – on Article 22.2(d) NRPP (1)

## Costing – Required input from Member States

- **Information on the methodology used:** the underlying assumptions made (e.g. on unit costs, costs of inputs, etc.), justification for these assumptions and who conducted the cost estimate;
- **Calculations:** showing how the final estimate was obtained, including, if available, calculations for the high-level categories that are the main cost drivers;
- **Comparative cost data:** information on the actual cost of similar measures or investments that have been carried out in the past, if available from past similar projects financed via other EU funding streams (e.g. EAFRD, ERDF, Home Affairs Funds, RRF, ESF, SCF). If adjustments are required to make the costs more comparable, Member States should provide an explanation on parameters and the relevant data used to make the adjustments.

The Proposal requires the Member States to submit cost estimates *'backed up by appropriate justification'*

# Costing – on Article 22.2(d) NRPP (2)

## Costing – Required input from Member States

- **Top-down approaches:** the estimate of costs is based on similar measures, with appropriate adjustments.
  - Such approaches are often used in the very early planning stages, or for standard investments;
  - *Example: the cost for building a hospital is estimated by using the cost of other comparable hospital(s) in the past (with appropriate adjustments).*
- **Bottom-up approaches:** classic 'accounting' of different cost categories, e.g. salaries, goods & services, subsidies & transfers, capital expenditure, etc.
  - This approach is suitable if the measure can be broken down adequately into cost categories, or if is at an advanced design stage.

<ul style="list-style-type: none"><li>• <i>Accounting (draft budget) methods</i></li><li>• <i>Historical costs</i></li><li>• <i>Previous audited projects at EU level</i></li><li>• <i>Statistical data</i></li><li>• <i>Credible and robust studies from trusted bodies</i></li><li>• <i>Available simplified cost options (SCOs)</i></li></ul>	<p><i>Other objective information (examples)</i> ...representative surveys, market research, rates of reimbursement used in Member States if not discontinued, rates set at national/regional level, hourly rates set within a national labour contract, data on remuneration for equivalent work...</p>
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# Costing – Annex EFRD and Annex V NRPP

## 3. Financing and costs

For each measure:

### (a) Costing of measures

Chapter ID	Measure ID	Reform/ Investment	Estimated Total Cost (EUR )	Indicative breakdown of the total cost of the measure by intervention field	Methodology used and description of the total estimated costs including based on historical data	Justification on the plausibility and reasonability of the total estimated costs, including audit authority assessment taking into account national and regional specificities and adjustment methods	Type of territory targeted
					[3000]	[3000]	[code for territory type dimension]

## 7. Financing and costs and social target

Reference: Article 22(2), point (f), (s), Article 20

For each measure:

Chapter ID	Measure ID	Reform/ Investment/ other interventions	Unit Cost (if applicable)	Quantity / volume (if applicable)	Estimated Total Cost (EUR)	EU financial contribution	Resulting national contribution (%)	Intervention field	Result indicator (where relevant)	Methodology used and description of costs including the source and mentioning the past investment/reform projects that are benchmarks for the cost estimate and source of costs for these projects	Justification on the plausibility and reasonability of the estimated costs, where necessary, taking into account national specificities and adjustment methods
										[1 000]	[1 000]

# Technical assistance Article 13 (2) NRPP

## Technical assistance

### Applicable rules for TA at the initiative of Member States (Art 13)

#### Simplicity

##### Generalisation of the flat-rate approach

- ❖ COM disbursements not linked to actual costs incurred but based on progress in the NRP Plan implementation
- ❖ Flat rate of up to 3% and 8-10% (respectively for NRPP and Interreg Plans) applied to the amount included in each payment application
- ❖ Surplus of technical assistance received only to be returned at the time of the closure of the Plan in case of support reduction

#### Proportionality

- ❖ Balanced and proportionate distribution of technical assistance across all chapters

#### Complementarity with technical support

- ❖ Member States may request support to prepare reforms included in their NRP Plans (see also Art 22(2) (e) and section 3.4 of Annex V)

#### • Additional clarifications:

- ❖ Possibility for Member States to continue using technical assistance resources to cover staff-related expenses necessary for carrying out functions such as preparation, training, management, monitoring, evaluation, information, visibility and communication.
- ❖ Actions carried out before 1 January 2028 can be supported under the technical assistance available under the funds of the current period, as per usual practice (art. 36(1) CPR).
- ❖ Technical assistance can support actions concerning previous and subsequent programming periods (Article 13(1), without prejudice to the start eligibility date.

- **TA at the initiative of the Commission (art.12) =>** up to 0,5% of the financial envelope of the Fund (build on current CPR practices + consistent approach with other management modes).



## Interreg Plan Chapters: Preparation (3)

### Template for the Interreg Plan chapter (Annex ERDF/CF proposal)

- Table (a) under section 2 requires to identify the milestones and targets for each measure described. There is no duplication between the description of each measure under section 2 and the milestones and targets with all their needed details under point (a)
- As indicated in Article 8 ERDF/CF proposal, the Member State hosting the managing authority has to submit the chapter to the Commission including the pay-out value for each milestone or target. This has to be proposed ex-ante on the basis of the costing and it will be part of the dialogue with the Commission.
- Involvement of the audit authority in the plausibility and reasonability of the total estimated costs would give assurance to the managing authorities regarding the costing exercise when chapters are set-up.
- TA will be paid as a flat rate on top of the amounts due based on the payment application. The overall cost for investments need to cover the entire allocation (Union and national contributions) deducting the TA amount. The aggregated amount of the payout values should match the overall Union contribution to the chapter.
- The "type of territory" in Table 3(a) of the template refers to the codes of Annex II of the proposal for the Performance Regulation proposal.

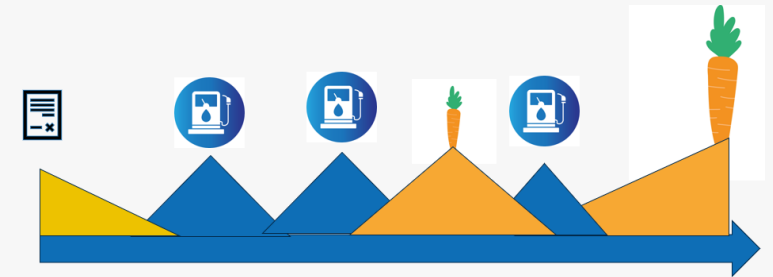
# Measure – summary of financial main steps



Determination of the ex-ante total costs



Definition of the individual milestone(s), target(s), output(s) and pay-out values,



Verification mechanisms

# Costing – some examples...

## Example – Support scheme for youth employment

### Example of methodology for estimating costs

- Unit cost based on robust historical data for the specific region taking into account the expected year of completion (2033)
- The example is a regional measure under the Youth Guarantee offering a young person who is unemployed or inactive a training within four months

## Example - Deep renovation of public social housing

### Example of methodology for estimating costs

- Analysis of recently awarded tenders for similar interventions in public social housing or deep renovation of other buildings and/or cost estimates for similar measures + adjustments based on objective assumptions (e.g. inflation accounted for by adding 2% annual deflator to the referenced amounts until the expected year of completion (2032))
- A risk analysis may be carried out to consider units with cultural/heritage value, leading to further cost adjustment (+10%).

## Costing example – Acquisition of equipment for border surveillance activities

### Methodology used and justification on plausibility and reasonability of estimated costs

- Analysis of already existing public tenders
- Price-quotations or pre-contractual discussions with potential contractors
- Past experience of similar activities, cooperation with Frontex and Frontex standards
- Needs analysis for border surveillance and previous experience with border surveillance equipment and means of transport
- Technological developments (source: studies, AI, etc.)
- Coordination activities with Frontex

## Costing example – Local development strategies

### Methodology used and justification on plausibility and reasonability of estimated costs

- The dedicated budget for the measure is established following a top-down approach, taking into account the size of the budget assigned to LAGs in the 2021-2027 programming period. The objective is to select some 50 territorial strategies that will be implemented under the measure.

# Costing – investments & reforms...

## Example 1 – Cross-border cooperation – Cross-border Healthcare

### Costing of measures - Protocol for the establishment of joint cross-border medical teams

Chapter ID	Measure ID	Reform / Investment	Estimated Total Cost (EUR)	EU financial contribution (80%)	Result indicator	Intervention field
#	1	Reform: Protocol of cooperation for the establishment and operation of joint cross-border medical teams	0	0	Annual users of new or modernised health care services	453 - Performance of health systems
	2	Investment: Operationalisation of joint cross-border medical teams and service	3.550.000	2.840.000	Annual users of new or modernised health care services	453 - Performance of health systems

## Example 2 – Transnational cooperation

### Costing of measures 1(Inv) and 2(Ref) - Enhancing Transnational Innovation

Chapter ID	Measure ID	Reform / Investment	Estimated Total Cost (EUR)	EU financial contribution	Result indicator	Intervention field
#	1(Inv)	Investments: Development of a transnational smart specialisation strategy for blue growth, and Implementation of supply chains on the basis of this smart specialisation strategy	4.000.000	3.400.000	Number of S3 partnerships created Number of solutions taken up or scaled up by organisations	142 - Member States cooperation and networks
#	2(Ref)	Reform: Official endorsement of the parties of a Transnational smart specialisation strategy	0	0	Number of S3 partnerships created	142 - Member States cooperation and networks

# Costing – ECA opinion

**OPINION 09/2026**  
(pursuant to Article 322(1) TFEU)

**concerning the proposal 2025/0240 (COD) for a regulation of the European Parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/250 (COM(2025) 565 final/2)**

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**EU budget 2028-2034**

## Cost estimation (Article 22, 23 and 25)

### Costing in the NRP plan approval

**86** EU support depends on estimated costs rather than eligible costs incurred, making the quality of estimates crucial. Our RRF audit identified shortcomings in costings, including limited evidence supporting the costings and inconsistent methodologies used to prepare

<sup>66</sup> Article 4(13) of the proposal.

<sup>67</sup> *Ibid.*

<sup>68</sup> *Ibid.*, Article 35(1)(a) to (g) and (o) to (r).

36

them<sup>69</sup>. We also identified some cases where estimated costs exceeded actual costs<sup>70</sup>, even in a high-inflation context.

**87** The proposal requires cost estimates to be plausible, reasonable and in line with cost efficiency, sound financial management and commensurate with the expected impact<sup>71</sup>. However, the NRP plan template<sup>72</sup> only requires a justification of the plausibility and reasonableness of the estimates, which risks insufficient information being provided by member states and therefore leading to an incomplete assessment by the Commission. Coherent, evidence-based costings, which are supported by verifiable documentation (audit trail), should be a requirement. Clear assessment criteria should be coherently defined (regulation and its annexes) and standardised methodologies or unit costs, where feasible, should be used.

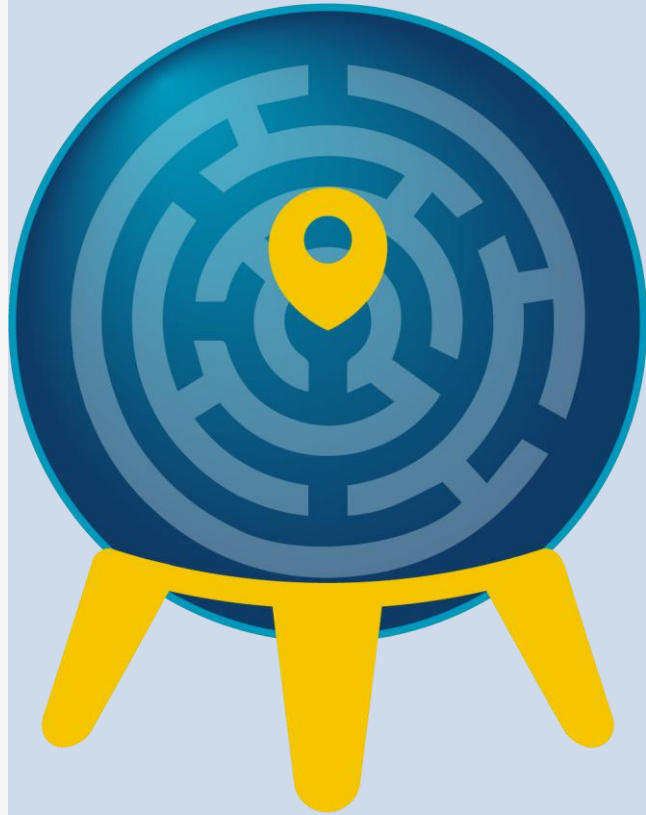
# How to estimate costs of a measure? - first questions....

✓ Is any (historical) data available (projects/ cost categories/ specific costs)?

✓ Which methodology?

✓ Reforms/Investments

✓ Can we learn from/apply any present practices (SCOs, FNLCs, RRF, other)?



**What can we  
learn from  
current  
programming  
period?**



# Experiences and lessons coming from FNLC



**Maria Constantinou** - Directorate of Financial Control of European Funds Treasury of the Republic of Cyprus



**Joana do Ó** –AD&C Cohesion and Development Agency, Portugal



# Experiences and lessons coming from FNLC

## Meetings of the Transnational Network (TN) on Simplification – 21<sup>st</sup> & 22<sup>nd</sup>



### Panel discussion on performance-based delivery modes in EU funds

#### Outcomes of the world café – topic B: Costing

##### B.1 Key issues on determining costing in performance-based schemes

1. Lack of historical data (especially for new operations) – innovative operations or operations previously implemented using SCOs (no real costs)
2. Issues with statistical data – too old, not updated
3. How to take into account force majeure or unforeseen circumstances
4. Make sure that all operations are eligible (and the costs?)
5. Risk of over estimated budget to avoid pressure on National Budget
6. Risk of underestimated budget to be conservative on compliance with sound financial management
7. Finding a balance between compliance with sound financial management and avoid decommitment
8. How to cost reforms/process indicators
9. How to incorporate “failure” in the costing
10. Lack of specific expertise and common guidance on costing

8



### Panel discussion on performance-based delivery modes in EU funds

#### Outcomes of the world café – topic B: Costing

##### B.2 Solutions for determining costing in performance-based schemes

1. Use other MS or EU historical/statistical data and modify per country by a coefficient/use an expert judgement at national level / EC to determine reliable sources of data
2. Take into account price changes and costs increases. Incorporate an inflation increase when setting up the costing/use an adjustment method
3. Costing should be based on a higher target than the final deliverable (allow for “Buffer”)
4. Ensure proportionality between intermediate deliverables and final results
5. Liaise with market experts of research institutes to set up the amounts for reforms
6. Allow for an amendment of Intermediate deliverables correlated with the costs – “Flexibility”
7. EC to provide summary of common errors/issues identified in other FNLCs
8. TN/EC guidance on how to shift from case by case to general guidance
9. Peer to peer meetings and tools/Technical assistance

9



# Experiences and lessons coming from FNLC

## Webinar on design, use and audit of FNLC in cohesion policy programmes 2021-2027 (ERDF, CF, ESF+, JTF)



**FINANCING NOT LINKED TO  
2021-2027 cohesion policy programmes  
COSTS**

Webex, 2 October 2025

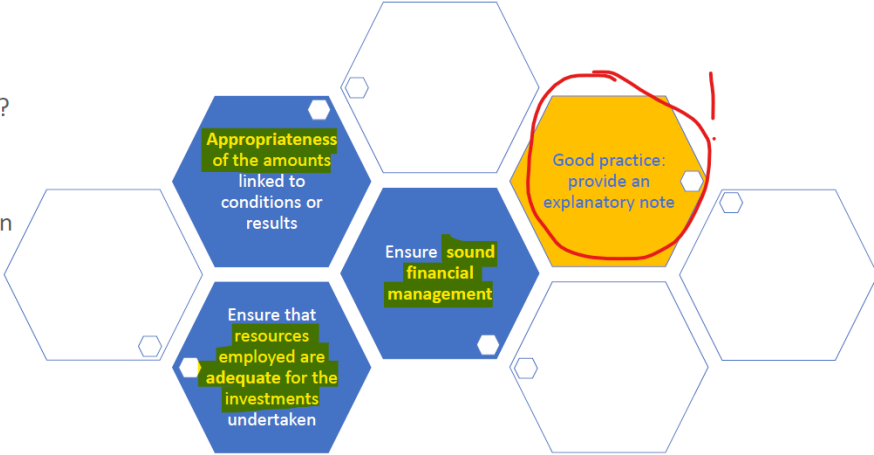
Directorate-General for Urban and Rural Policy  
Directorate-General for Employment  
Joint Audit Directorate for Cohesion

### Setting up FNLC – how to set the amounts?

Possible approaches:

- Is **historical data** available?
- What is the **amount dedicated to the priority** covered by FNLC?
- What is the **amount of savings to society** that the implementation of the operation will allow?
- ...

Legal basis:  
CPR recital 34



# Experiences and lessons coming from FNLC

## Recommendation paper on financing not linked to costs - ESF transnational network on simplification



### Annex II – Examples of methods to establish amounts

The amounts to be reimbursed by the Commission for each intermediate deliverable should be realistic and compliant with sound financial management. Member States submit calculations of the amounts to the Commission for assessment of the scheme. It is recommended that the amounts are assessed by the AA prior to submission to the Commission.

ESF+ authorities have followed three approaches for establishing amounts based on:

1. **Data from historical data sets, administrative data, market surveys or other reliable and verifiable sources.**
2. **Data already in the ESF+ programme:** while ensuring compliance with sound financial management, amounts to finance actions needed to achieve the pre-agreed conditions or/and results are set, for example, by dividing the amount for a specific objective by the target for the indicator relevant for the concerned specific objective / intervention.
3. **Savings in public expenditure** from the FNLC scheme results (e.g. reduced public expenditure for subsidies to long-term unemployed people who gained employment upon leaving).

# Experiences and lessons coming from SCOs

## Guidelines on the use of SCOs

Official Journal of the European Union EN C series  
C/2024/7467 20.12.2024  
COMMISSION NOTICE  
Guidelines on the use of simplified cost options within the Funds covered by Regulation (EU) 2021/1060 (Common Provisions Regulation)  
(C/2024/7467)

**DISCLAIMER:**  
This is a working document prepared by the Commission services. On the basis of applicable EU law, it provides technical guidance for colleagues and bodies involved in the monitoring, control or implementation of the Common Provisions Regulation Funds. This guidance is without prejudice to the interpretation of the Courts of Justice and the General Court.

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ELI: <http://data.europa.eu/eli/C/2024/7467/oj> 1/67



***OTS SCOs for certain type of costs***



***Draft budget methodology lessons***



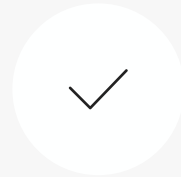
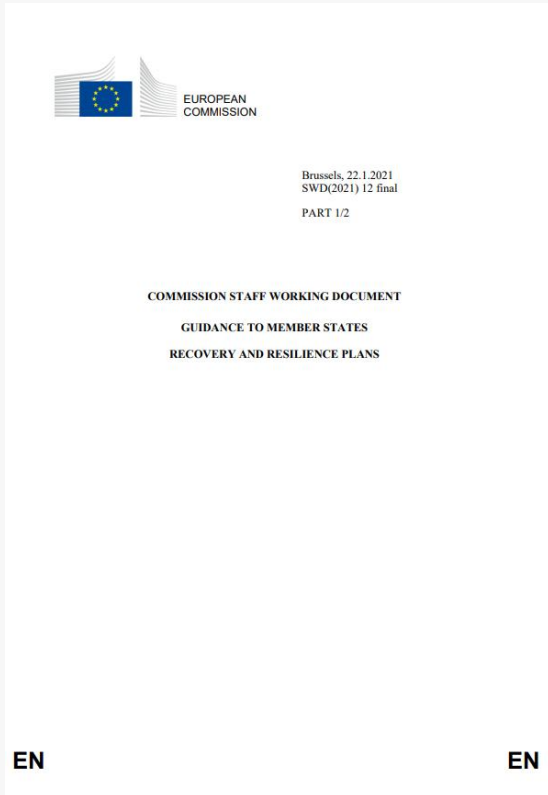
***Programme specific SCOs***



***Article 94 CPR (COM – Programme)***

# Experiences and lessons coming from RRF

## Commission staff working document guidance to member states recovery and resilience plans – Part 1 – chapter 10



### Financing and costing



*What does the RRF regulation require?*



*What is expected from MSs when they perform the cost estimates?*



*What type of information should be submitted?*

# Experiences and lessons coming from ECA

Review  
**04**

EN

The Future of EU Cohesion Policy: Drawing lessons from the past



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2025

Review  
**02**

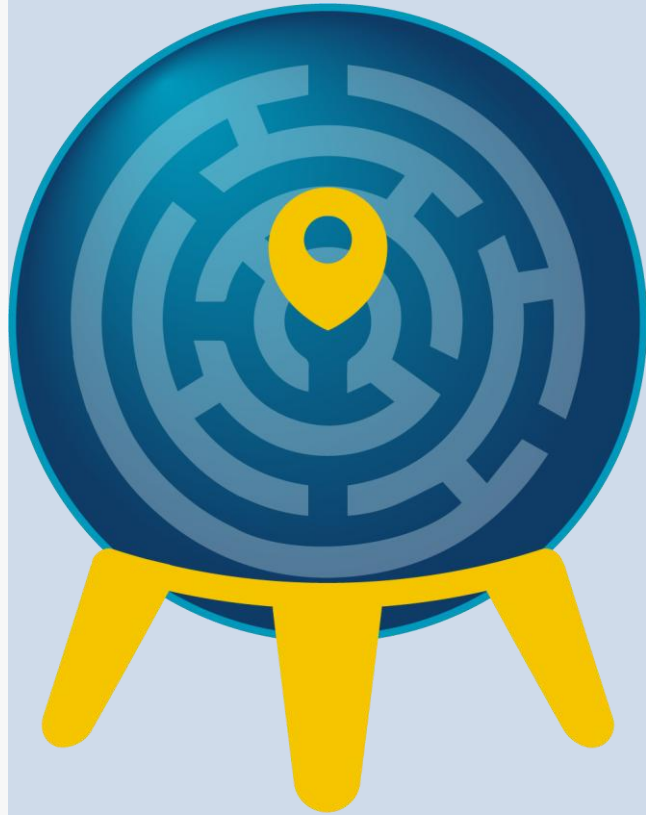
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Performance-orientation, accountability and transparency – lessons to be learned from the weaknesses of the RRF



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2025



**What's next...**





# P-BA on the la website

Cooperation can be complex;  
our job is to make it easier.

Interact



About Interact  
& our service ▾

Programme  
management ▾

Project management  
and skills ▾

Communication  
& visibility ▾

Finance  
& control ▾

Synergies  
& cooperation ▾



## Organisation

Monitoring systems

Partnerships

Procedures

Roles and responsibilities

## Implementation

Closing programmes 2014-20

Cross-border obstacles

EGTCS

Harmonisation and simplification

Localism and PO5

Programme evaluation and indicators

Small project funds

## Post 2027

Future regulatory discussions

Interreg wide consultation

Programme own consultations

Performance-based approaches

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& control ▾

Synergies  
& cooperation ▾



## Performance-based approaches

The essence of a performance-based approach (P-BA) is that it emphasizes **what** must be achieved, as opposed to how it must be done.

In P-BA, clear performance goals are defined in advance. Payments are linked to meeting these pre-agreed goals, not to expenditures or activities undertaken. The focus shifts from inputs to outputs.

Even before the Commission published the draft Post 2027 regulatory package, it was evident that we were moving toward P-BA. Now it is clear that this approach will (subject to Member State agreement) be the delivery mechanism between the Commission and the programmes. This means that success of programmes will be measured by the achievement of agreed **milestones** and **targets**.

This approach (or the use of simplified cost options) is also **recommended for payments between programmes and projects**.

As this model becomes the standard framework, it is important that we understand what it is, how it works and how to operate effectively within it.

### Where to start

Once you have read the draft regulatory package, particularly the [Performance Framework Regulation](#), you can proceed to the Interreg Knowledge Fair presentation, "An elementary Performance-based approach (P-BA) experience".

As simply going through the materials and slides does not always provide the full picture, we invite you to explore what we are currently working on below and join us.

### What we are working on

If you would like to better understand the basics of P-BA, we invite you to join our upcoming webinar P-BA in Interreg: the basics, planned for the end of April. Further details will be published soon. During the webinar, we will walk you through the basic principles of P-BA, using practical examples and key considerations.

### Who to contact

For more information, please contact [Grzegorz Golda](#).

Work on P-BA in Interact will cover the following themes (please find the contact person indicated next to each theme):

- Programme finance management (upper level) – [Grzegorz Golda](#)
- Control and audit – [Jasmina Lukic](#)
- Programme and project life cycle – [Dmitry...](#)

## Recent Events

### P-BA in Interreg: the basics #4



01 June 26 | Online

### Measures in Interreg & Intervention Logic



05-06 May 26 | Brussels, Belgium



# P-BA Teams channel & sharepoint

[join the team](#)

▼ PA Programme and project manage... ⋮

- Announcements and updates
- Artificial Intelligence and Interreg - AI e...
- Capitalisation
- Evaluation and indicators
- Informal working group on indicators
- P-BA in Interreg**
- Small projects community

SharePoint

PA Programme and project management Go to the Team Home

Documents ▾

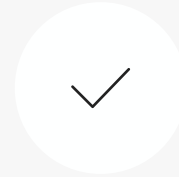
All Documents In channels

Name ▾	Modified ▾	Modified By ▾
Announcements and updates	March 21, 2025	SharePoint App
Artificial Intelligence and Interreg - AI e...	October 12, 2025	Arkam Ograk   Interact
Capitalisation	March 21, 2025	SharePoint App
Evaluation and indicators	March 21, 2025	SharePoint App
Informal working group on indicators	March 21, 2025	SharePoint App
P-BA in Interreg	Yesterday at 10:53 ...	Kevin Fulcher   Interact
Small projects community	March 21, 2025	SharePoint App

# **P-BA Programme finance management Theme 2026 work plans**



**Goodbye cost checks? The future of control and audit ....  
(29 April)**



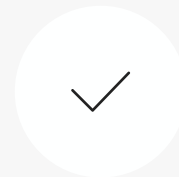
**Pay-out values webinar mid- May  
- date soon**



**P-BA dedicated sessions in  
'other Interact events  
(InterFIN 27-28 May)**



**Costing and pay-out values  
workshop**



**P-BA dedicated webinars &  
events**

# Programme finance management

## TOPICS

1. Total cost estimation per measure

2. Setting up pay-out value for M/T

3. More than one measure

4. M/T pay-out values – commitments & decommitments

5. Commitment risk

- Value for money - how to calculate?
- Is it about costs only or something more?
- Would 2021-2027 SCOs set up methods be helpful?

- How many Milestones/interrim Targets is needed for a measure
- What is the value of a milestone?
- What is the value of a (interrim/final) target ?
- What is the acceptable balance between milestones & interrime targets and the final target?
- Payment profiles/ How much fronloading ?

Cashflow profiles for different measures

How to plan multiannual programme cashflow based on different measures P-BA payment profiles?

Setting up programme annual commitments based on M/T

Advance payments

Payment schemes

TA

Risk mitigation measures

Annex IV KR 15

Payment disruptions, irregularities

# How do we work?

## Each topic – 4 steps



**STEP 1:** Preparation of agenda, the suggested discussion point of the online meeting – shared in the dedicated MS Teams P-BA in Interreg channel, after comments – the online event announced

**IMPORTANT: PLEASE JOIN PROGRAMME & PROJECT MANAGEMENT TEAM on MS TEAMS**



**STEP 2:** Online event



**STEP 3:** In-person dedicated workshop where the results of online discussions are being tested on the mock-up models



**STEP 4:** Preparation of the reflection paper

**Please share your feedback**

**THANK YOU!**

**P-BA How to ...? Measure's total  
cost estimation 16 April | online**



# Cooperation works

Interact



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# Disclaimer

Publisher

Interact Programme

Date updated

16 April 2026

Primary knowledge area

Performance-based approaches

Author(s)

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