

# Challenges in the Programming Process

## Phase 1: Strategic Launch and Visioning

### 1.1. Programming structures: composition and functioning

Set-up and function of the programming committee and programming team.

Key issues include:

- How to **select the right representative and committed members**, ensuring a good balance between expertise, engagement, and representation
- How to **involve new organisations/members** to avoid a “business-as-usual” approach
- How to involve **youth**?
- How to maintain a **lean and efficient structure** to support streamlined decision-making
- How to apply the **partnership principle** effectively in the selection process
- Large or overly diverse groups are seen as a risk, as they can **slow down decision-making and reduce efficiency**
- Approaches vary, in some cases, a **separate programming committee** is established, while in others the **Monitoring Committee (MC)** leads the process

### 1.2. Roles and responsibilities

Several programmes are considering **changes in governance structures**, such as for example, changing the hosting institution of the MA/JS

### 1.3. Programme geography

- Some programmes consider **including new territories**, which is not always supported by existing partners
- There is a need to **avoid overlaps with other programmes** and ensure harmonisation

### 1.4. Programme vision and strategic direction

- Limited information makes it difficult to **define long-term priorities with confidence** at this stage
- Challenging to foresee upcoming needs, for 2030 – to be sure we have the right measures and partners to achieve these forward-looking objectives
- Identified needs and gaps of programme area (at programme level) vs. what potential beneficiaries want to work on (at project level)

- Diverging views exist on whether to:
  - build on **continuity with 2021–2027**, or
  - shift towards **new priorities** (e.g. climate resilience, security, demographic change)
- Reaching a **shared strategic vision requires time and compromise**

### 1.5. Territorial analysis: data and methodological gaps

Territorial analysis is a key step but presents several challenges:

- Existing tools (e.g. ESPON cross-border profiles) are **useful but too general** and not always tailored to programme-specific needs
- Data may be **outdated, non-comparable, or insufficient at local level**
- Additional work is needed to combine **quantitative data with qualitative, place-based insights**

Programmes are exploring different approaches:

- Using **results from previous projects**, though these may not be sufficient
- Hiring **external experts**, with oversight from MA/JS

Key uncertainties remain:

- How to **define the scope** of the analysis
- How to proceed without **orientation papers**, which are seen as essential guidance

#### Overall observation:

Phase 1 does not raise the most critical concerns compared to later stages. However, legal uncertainty and the lack of key guidance documents (e.g. orientation papers, implementing acts) limit programmes' ability to move forward confidently with programming tasks.

At the same time, there appears to be **a need for more exchange on setting up programming committees and teams, as well as sharing experiences on strategic visioning and territorial analysis.**

## Phase 2: Thematic Scoping & Consultation

### 2.1. Performance-Based Approach (P-BA)

The Performance-Based Approach is seen as the core element of this phase and a major shift compared to previous periods. P-BA are widely seen as the central challenge, with uncertainty about how to design, apply, and manage them at different levels.

Key challenges include:

- Limited understanding and need for **additional guidance and training**
- Perception of PBA as **administratively demanding and risky**, especially for monitoring and reporting
- Need to **align PBA with evaluation and audit requirements**, including revising indicators
- Uncertainty about **control and audit implications**, particularly for applying PBA at lower levels
- Difficulty in combining **PBA at programme level with FNLC/SCOs at project level**
- Measures need to be **specific but also realistic and feasible**, while many interdependencies must be considered
- Difficulty in **calculating costs and selecting appropriate methodologies**
- Challenges in setting **milestones without a clear project pipeline**
- Need for **clearer guidance from the European Commission**, especially on performance frameworks

Programmes face significant complexity in defining **measures, indicators, and financial flow**. Without a shared understanding and agreement on PBA at this stage, **progress in later phases is at risk**.

At the same time, there is a clear need to **ensure continuity with existing tools (e.g. SCOs)** to avoid losing previous investments and requiring beneficiaries to learn again new system.

### 2.2. Selection of Policy Objectives and strategic focus

Choosing the right Policy Objectives (POs) and Interreg Specific Objectives (ISOs) is a key and sensitive task:

- Need to **limit the number of objectives** to maintain focus, while still reflecting diverse territorial needs
- Risk of **over-fragmentation** if too many objectives are selected
- Risk of **missing important needs** if too few are chosen
- POs and SOs are often seen as **broad and abstract**, requiring further clarification
- Tension between **top-down alignment** (EU and macro-regional strategies, wishes from stakeholders) and **bottom-up approach**
- Difficulty ensuring that selected objectives **match actual demand for projects**.

### 2.3. Coordination and harmonisation across programmes

There is a clear need for stronger coordination between programmes, especially those with overlapping territories:

- Early-stage exchange is critical to **avoid duplication** and ensure **coverage of key needs**

- Late coordination is less effective, as **changing thematic scope becomes difficult**

This highlights the importance of structured dialogue and harmonisation mechanisms from the beginning of the process.

#### 2.4. Stakeholder consultations: engagement and usability of input

Key issues include:

- How to differentiate from the 2024 consultation? Use of public events to bring in ideas and inputs?
- Difficulty in ensuring **objective and balanced input**, as feedback is often influenced by specific interests
- Uncertainty about **whether and when to conduct additional consultation rounds**
- **Time-consuming processes**, which need to be factored into overall planning timelines

Engagement challenges are particularly visible for certain groups:

- **Young people are difficult to reach** through traditional channels, resulting in lower participation
- It is often challenging to **translate stakeholder input into concrete priorities and measures**

Programmes also highlighted the need for:

**Exchange of practices and experiences** on how to organise and use consultations effectively

#### 2.5. Defining results and indicators

- Clearly defining **expected results from the outset**
- Selecting **efficient and meaningful indicators**
- Ensuring that indicators are aligned with **performance frameworks and evaluation systems**

#### Overall observation:

Inputs for this phase shows that the Performance-Based Approach is both central and not yet sufficiently understood. This implies that continued, practical support on P-BA is essential to successfully launch the programming process.

There is also a strong indication that early coordination between programmes should be better supported, particularly in cases of overlapping territories.

Another clear area where support is needed is in planning and implementing stakeholder consultations.

In addition, programmes would benefit from peer exchange on thematic scoping, including how to define objectives, measures, and indicators in a balanced and feasible way.

## Phase 3: Operational Framework & Budgeting

### 2.1. Designing the budget

A key decision concerns whether to **use of the Performance-Based Approach (PBA) at lower levels**, which has a direct impact on financial planning, costing and implementation arrangements. Programmes perceive this decision as very challenging at this stage:

- **Selection and budgeting of measures:** uncertainty about which measures to prioritise and how to allocate budgets. Partucally challenging seems to have limited or insufficient data for cost estimation, have appropriate methodologies.
- **Financial flow design:** complexity in aligning financial flows with milestones and targets, including compliance with rules such as N+1
- **Programme scale:** the number and scope of measures are closely linked to the overall programme budget

### 2.2. Use of Simplified Cost Options (SCOs)

- Decision-making on SCOs is complex and influenced by regulatory uncertainty
- Lack of “off-the-shelf” options in the Regulation puts pressure on programmes to develop their own methodologies
- These programme-level approaches may later be challenged by Audit Authorities, increasing administrative burden and reducing legal certainty
- There is a clear need to simplify validation processes by the European Commission and Audit Authorities

In addition, **limited clarity on technical aspects and regulatory details** makes it difficult to choose appropriate approaches. Delays in receiving this information may slow down the overall programme development process.

### 2.3. Strategic Environmental Assessment (SEA)

- How to approach SEA: In some countries thorough approach is needed, in others screening enough, including DNSH. Big challenge if full SEA required because need to be done after phase 2 finalised and time is short to submit the chapter.
- How much effort do we have to put into SEA and DNSH screenings compared to other requirements?
- Proposal to exclude Environmental assessment obligation for Interreg.
- SEA procedure is time consuming, therefore, it would be useful not to link the approval process of the Programme/Chapter. It would be sufficient to base the process on the preliminary scoping report/SEA reports or other documents. When the procedure is concluded, the EC could be informed. Many of the recommendations of SEA are more related to the implementation process, that can be approached in the implementation documents of the Chapter.
- DNSH guidance to be issued by EC is still missing but we are supposed to contract the SEA experts who will also do DNSH (at programme level), same goes for the technical specifications of the IT systems which should be interoperable with the Single Gateway and ensure automatic transfer in SFC – EC.

- Environmental assessment can take long because it is implemented by external experts.
- Effectively integrating the Strategic Environmental Assessment and horizontal principles such as the “do no significant harm” principle requires specialised expertise and close coordination, which can be difficult to ensure.

#### 2.4. Programme implementation procedures and approaches

- **Changing roles of financial officers:** less focus on traditional cost verification, but continued responsibility for compliance checks (e.g. procurement, legal requirements) and increased focus on indicators linked to payments
- **Adaptation of systems:** need to adjust tools such as JEMS to support PBA approaches
- **Financial framework development:** uncertainty in designing a coherent financial system aligned with PBA principles
- **Risk for beneficiaries:** concerns regarding longer payment cycles and increased complexity may reduce the number of applications
- **Innovation risks:** programmes may become more cautious and less willing to support innovative or higher-risk actions

#### Overall observation:

Operationalising P-BA through costing, financial flows, and implementation arrangements, and exploiting benefits of SCOs where relevant and possible.

Managing environmental and horizontal requirements.

## Phase 4: Finalisation and Submission

### 4.1. National approval processes

A major challenge relates to **national approval procedures**, which are widely seen as **time-consuming and difficult to predict**:

- Approval processes differ significantly across participating countries, requiring **continuous adjustments to timelines**
- In Interreg programmes, approval can take a long time, as it may involve **collecting agreements from 20+ countries**, often requiring **six months or more**

Processes are not limited to national authorities, as **regional partners also provide input**, further increasing complexity and duration

### 4.2. Structure and limitations of the Interreg chapter

- Difficulty in **capturing all necessary information within a limited number of pages**
- Need to find solutions, such as **annexing more detailed programming documents**, to ensure completeness while complying with formal requirements

### 4.3. Negotiation with the European Commission

- Negotiations can be **challenging**, as programmes are expected to fully comply with Commission observations
- Early and continuous **consultation with desk officers** during drafting can help reduce surprises, although
- **Interservice consultations** are outside the control of desk officers, meaning uncertainties remain
- **Rotation of desk officers**, which may affect continuity and programme knowledge
- Perception that desk officers sometimes **forward comments from other DGs** rather than addressing them directly, increasing the burden on programmes
- Need for a **more consistent and harmonised approach** across programmes in terms of expectations, justifications, and approval processes

#### Overall observation:

The approval phase is constrained by tight timelines, complex multi-level approval processes, and uncertain negotiation dynamics. Overall, national approval is a critical bottleneck that is largely outside programme control and has to be considered carefully with sufficient time buffers to possible degree. Further exchange on challenges related to this phase could be useful later on since this is early time to cover this stage, and the input from programmes in an overall was less active.