

Building up for Post27 – Management Verifications & Audit

Interact | 28 May 2026 | Tallin, Estonia

Interact



Co-funded by
the European Union
Interreg

Agenda

01

Where we are now?

02

Talking walls

03

Reporting in the plenary

04

Discussion and wrap-up

What we did so far...

15 December 2025

**Risk-based management verifications in Interreg
Lessons learned and the way forward**

29 April 2026

**Goodbye cost checks?
The future of control and audit post 2027**

06 May 2026

**Controllers workshop:
Post 2027 framework – what it means for controllers**

Technical seminar on Interreg 050526

Main characteristics of the Interreg Plan assurance framework

- **Tailored to the new objective-based delivery model**
- **Robust safeguards** for the protection of financial interests of the Union, sound financial management, compliance with applicable law
- Based on the following **4 key pillars**:

Effective and efficient functioning of the management and control systems put in place for the Interreg Plan chapter

A robust system for reasonable and plausible cost estimates

Verification of the fulfilment of milestones, targets and outputs

Ensuring compliance with applicable law

Objective: provide an assurance framework based on continuity, shared management logic, and relying on well-functioning managing and control systems while catering for the new delivery model and simplification

Verification of costs – general principles

When costs do not need to be verified

- The assessment of the actual fulfilment of milestones, targets and outputs does not require **verification of underlying costs** of the measures and the underlying operations

When costs-related information might be involved

- Payment to beneficiaries will follow standard **rules applicable depending on form of support chosen** by managing authority of the Interreg Plan chapter – SCOs, FNLC, real costs etc
- Some supporting documents containing cost-related information might still need to be used for checks on **compliance with applicable law** for example, a **public procurement** contract might need to be checked for the purposes of compliance with public procurement rules; looking into the accounting system of the beneficiary might be needed to check that the **de minimis** ceiling was observed

NRP Regulation

Article 51(1)

Functions of the Managing Authority

(b) carrying out management verifications to ensure the fulfilment of the milestones and targets set out in the Plan and the effective use of funds in compliance with applicable law; for the purposes of drawing up the management declaration, the managing authority is not expected to verify the underlying costs of the operations;



Article 74(1) CPR

a) carry out management verifications to verify that the co-financed products and services have been delivered, that the operation complies with applicable law, the programme and the conditions for support of the operation, and:

NRP Regulation

Article 4 Definitions

(2) 'applicable law' means Union law and the national law directly relating to its application



Article 2 CPR

(3) 'applicable law' means Union law and the national law relating to its application;

What is applicable law?

- Horizontal financial rules (e.g. Financial regulation, Public procurement, State aid,...)
- Horizontal principles (DNSH, Gender equality, Accessibility, Sustainable Development,...)
- Specific rules applicable for the substantive area tackled by the measure/operation (e.g. specific environmental regulations,...)

Applicable law: Financial rules

Sound financial management

- Regulated in FR Art. 63.1 FR
- NRP Art. 58.2 (a)

Prevention, detection, correction of irregularities and fraud

- Anti Fraud Architecture – data + modern technologies
- Arachne+ and EDES
- Double funding
- Corruption, fraud and Col
- Regulated in FR Art. 63.2(c)

Conflict of interest

- Use of data-mining tools
- Regulated in FR Art. 61
- NRP Art. 51.1 (c) and Art. 58.2 (g)

Double funding

- NRP Art. 51.1 (c) and Art. 58.2 (a)

Applicable law: State aid

General Block Exemption Regulation

- Current Reg. applicable until end 2026
- Draft new regulation published
- New Article 18 still based on thresholds (EUR 2,2 million, EUR 22 000 resp.)
- Comments from Interreg

De minimis

- Aid where the gross grant equivalent of the aid can be calculated ex ante
- Based on threshold (EUR 300 000)
- eAidRegister + national registers
- Applicable until end 2030

Applicable law: Public procurement

Public procurement

- Regulated in public procurement Directives (most relevant: 2014/24/EU)
- Regulated in FR Art. 160–179

Recent and future developments

- **Regulatory reform:** reform proposal for public procurement Directives
- Public consultation with more than 1000 responses from all over the world - demand for **more flexible** and strategic EU procurement framework
- Legislative proposal expected to be published in the **Q2 2026 (soon!)**

How to ensure compliance with applicable law?

Ex-ante assessment at programme level / measure level

e.g. environmental impact assessment

Evaluation of projects

e.g. State aid assessment during project evaluation (and verification of compliance with contractual obligations during MV)

Management verifications

e.g. check of compliance with public procurement laws for awarding contracts

Ex-post assessment through audits

HIT tools 21-27

Quality assessment criteria

The programme can decide to link the following criteria to their eligibility rules:

- The project makes a positive contribution to programme **horizontal principle equal opportunities and non-discrimination** based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation. – AF C.7.6
- The project makes a positive contribution to programme horizontal principle **equality between men and women, gender mainstreaming** and the integration of a gender perspective. – AF C.7.6
- The project makes a positive contribution to programme **horizontal principle sustainable development** as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Agreement and the "Do No Significant Harm" principle. – AF C.7.6

HIT tools 21-27

State aid assessment

State aid Criteria self-check

- Is the partner involved in economic activities through project?
- Does the partner or any operator receive advantage in the framework of project?

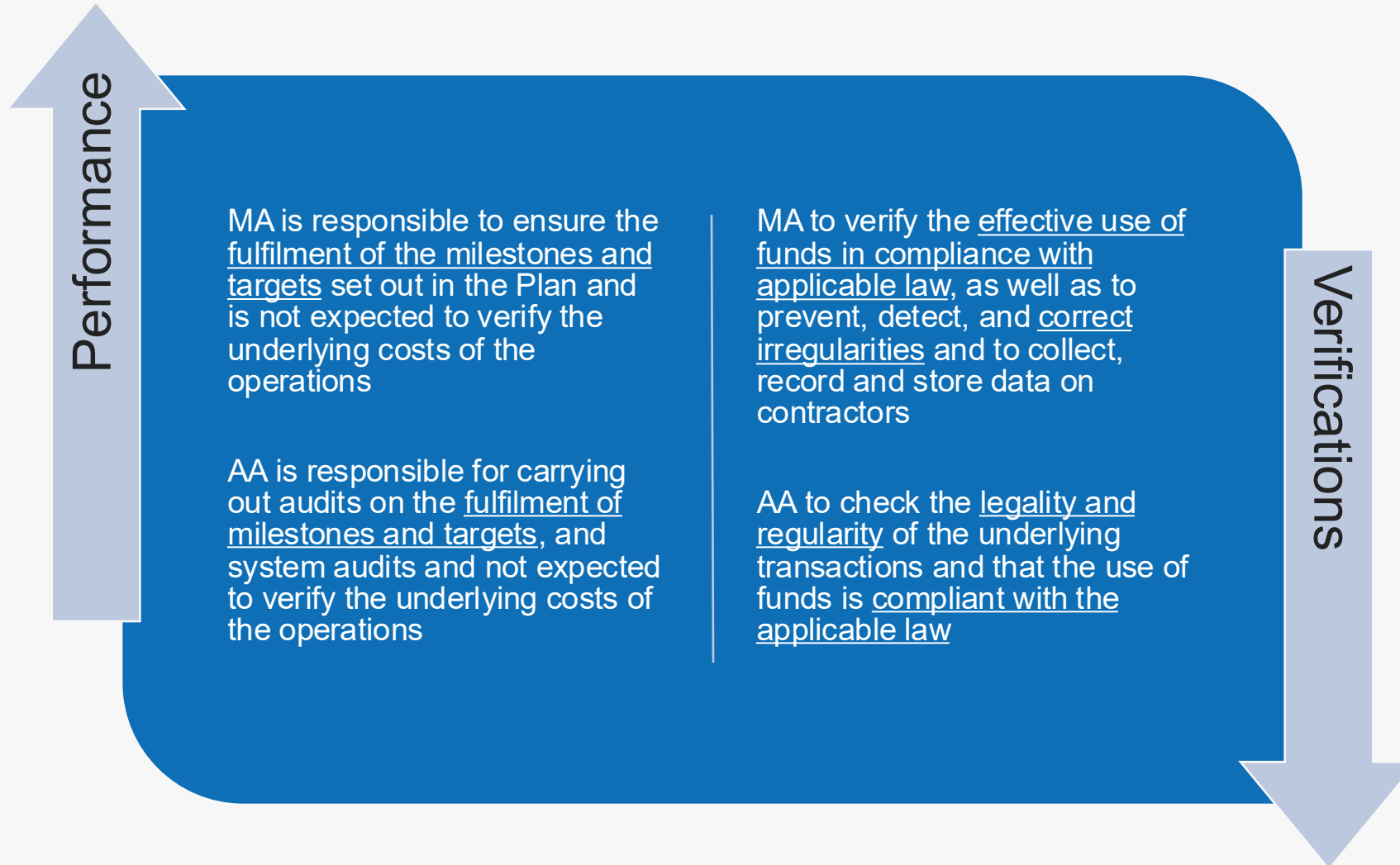
HIT tools 21-27

Control checklist

Compliance with other EU rules

- There is **no evidence** that the project activities **do not comply with the EU horizontal principle of sustainable development**.
- There is **no evidence** that equipment purchased / infrastructure and works does not comply with EU and national legislation in terms of **environmental impacts, required permits, etc.**
- **Based on the available information**, the project activities comply with the **EU horizontal principle of gender equality and non-discrimination**.
- **Based on the available information** the project activities comply with **EU and programme rules on State Aid**.

The control and audit paradox



Talking walls



1. Verification of milestones & targets (Jasmina)

Take the examples from the morning and discuss the following questions:

Milestones and targets at upper level:

- How can programme milestones be verified? What is the audit trail?
- How can interim targets and targets be verified? What is the audit trail?

Milestones and targets at lower level:

- What are appropriate milestones at lower level? What is the audit trail?
- How can targets be verified? What is the audit trail?

2. Public procurement - within P-BA lower level (Florin)

How can public procurement be checked when P-BA is used at lower level and underlying costs are not systematically checked:

- What information needs to be collected? What is the audit trail?
- What should actually be checked at what point in time?
- Who is responsible for checking public procurement?

3. State Aid - within P-BA lower level (Przemek)

How can state aid rules be respected when P-BA is used at lower level and underlying costs are not systematically checked:

- **What is needed for being able to fund state aid relevant activities?**
- **Who is responsible for verifying compliance with state aid rules?**
- **How can the procedures work?**

4. Other "applicable law" (Katja)

What other rules and laws fall under "applicable law"?

- **What are other horizontal principles that need to be checked?**
- **How can the compliance with these other rules and laws be ensured?**
- **Where is clarification from the EC needed?**

5. Establishing eligibility rules and SCOs for lower level (Greg)

If eligibility rules and SCOs are not provided in the regulations / implementing act:

- How can Interreg Programmes establish common rules?
- What is needed at regulation level to make them work? How can the hierarchy of the rules work?
- How can the verification be done and legal certainty be ensured?

6. Messages to AA network (Sanna)

Any messages that Programmes want to share with the AA network?

- **What are open questions that programmes and auditors should discuss and clarify together?**
- **Where is clarification from the EC needed?**

Talking walls



Round 1: 20 min
Round 2: 15 min
Round 3: 15 min

Cooperation works

All materials will be available on:
Interact.eu/Library

Want to discuss it? Join our MS Teams environment!
Portal.Interact.eu | Programme and Project Management

Interact



Co-funded by
the European Union
Interreg

Disclaimer

Publisher

Interact Programme

Date updated

06 May 2026

Primary knowledge area

Management verifications

Author(s)

Alexandra Kulmer, Jasmina Lukic

Unless otherwise stated,
licensed under [CreativeCommons.org](https://creativecommons.org).
For more information visit creativecommons.org

