

Public Consultation on EU funds in the area of Cohesion

Fields marked with * are mandatory.

Introduction

[Read the introduction](#)

Guidance

- **Are you replying as a as an individual in your personal capacity?** If so, please tick the first option under question 1. You will then be invited to enter your personal details and then led directly to questions 27 to 40 which relate to EU funds in the area of cohesion.
- **Are you replying as an entity or in your professional capacity?** If so, please tick the second option under question 1. You will then be invited to enter your personal details as well as information on the entity of behalf of which you are replying and then then led directly to questions 27 – 40 which relate to EU funds in the area of cohesion.
- **In both cases, you may skip the non-mandatory questions and upload a document** (1 MB max) under point 41 and enter any other comment under point 42. Please do not include any personal data in documents submitted in the context of the consultation if you opt for anonymous publication. It is important to read the specific privacy statement for information on how your personal data and contribution will be dealt with.

About you

*1 You are replying

- as an individual in your personal capacity
 in your professional capacity or on behalf of an organisation

*8 Respondent's first name

Samuel

*9 Respondent's last name

Kenny

*10 Respondent's professional email address

samuel.kenny@transportenvironment.org

*11 Name of the organisation

Transport & Environment

*12 Postal address of the organisation

18 Square de Meeus, Brussels 1050, Belgium

*13 Type of organisation

Please select the answer option that fits best.

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- International or national public authority
- Other

*22 Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

*23 If so, please indicate your Register ID number.

58744833263-19

*24 Country of organisation's headquarters

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia

- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

***26 Your contribution,**

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

EU Funds in the area of cohesion

27 Please let us know whether you have experience with one or more of the following funds and programmes

at most 6 choice(s)

- The European Regional Development Fund (ERDF)
- The Cohesion Fund (CF)
- The European Social Fund (ESF)
- The European Globalisation Adjustment Fund (EGF)
- The Fund for European Aid to the Most Deprived (FEAD)
- Employment and Social Innovation (EaSI)

28 Please let us know to which of the following one or more topics your replies will refer

at most 3 choice(s)

- Economic and sustainable development
- Employment, skills and education
- Social inclusion

29 The Commission has preliminarily identified a number of policy challenges which programmes/funds under the policy area of cohesion could address. How important are these policy challenges in your view?

	Very important	Rather important	Neither important nor unimportant	Rather not important	Not important at all	No opinion
a. Promote economic growth in the EU as a whole	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
j. Promote sustainable transport and mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
o. Other (please give degree of importance here and fill in question 30 below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

30 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

31 To what extent do the current programmes/funds successfully address these challenges?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Promote economic growth in the EU as a whole	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
o. Other (please give degree of importance here and fill in question 32 below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

32 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

33 To what extent do the current programmes/funds add value, compared to what Member States could achieve at national, regional and/or local levels without EU funds?

- To a large extent
- To a fairly large extent
- To some extent only
- Not at all
- Don't know

34 Please explain how the current programmes/funds can add value compared to what Member States could achieve at national, regional and/or local levels

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

The EU is comprised of a wide variety of countries and regions. These are not all equally economically prosperous. That is what makes the ESIF funds (CF and ERDF) so important to the future of Europe; they can provide financing to places that otherwise have no access to such money or would have to take unstable loans from elsewhere to build the infrastructure. The fact that the funds are part of the EU means that they can coordinate projects under the umbrella of different policy objectives. Decarbonising transport is one such policy objective that the ESIF funds must contribute to.

35 Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

The management of the Cohesion and European Regional Development Funds is very sporadic in comparison with other funding schemes (e.g. CEF). Management is done at local level, including the drafting of tenders and the appraisal of responses. Although language exists on sustainability in the legislation relating to the ESIF funds, it is impossible to gauge the importance of such language in the projects themselves. Applications are confidential and a harmonised Climate Impact Assessment doesn't exist for such projects. There should be a CIA developed for all EU-funded transport projects. This would help to ensure smarter spending and also make auditing simpler regarding climate spending. Furthermore, more control/management of ESIF funds at EU level could ensure alignment of projects with EU policy and objectives.

In addition, the EU should set aside specific grants for independent NGOs in ESIF countries. Civil society must be given the capacity and opportunity to monitor how EU money is being spent. This is an essential aspect of ensuring money is spent well and corruption is avoided.

36 To what extent do you consider the following as obstacles which prevent the current programmes /funds from successfully achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion

a. Complex procedures leading to high administrative burden and delays	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Heavy audit and control requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Available funding does not address the real challenges	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Insufficient administrative capacity to manage programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Insufficient information about funding and selection process	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Lack of flexibility to react to unforeseen circumstances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
g. Difficulty of combining EU action with other public interventions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Insufficient synergies between the EU programmes/funds	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Difficulty to ensure the sustainability of projects when the financing period ends	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Insufficient use of financial instruments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Co-financing rates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
l. Late disbursement of funds / delays in payments to beneficiaries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
m. Insufficient linkages of the Funds with the EU economic governance and the implementation of structural reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
n. Legal uncertainty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
o. Insufficient ownership	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
p. Insufficient involvement of civil society in design and implementation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
q. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

38 To what extent would these steps help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Alignment of rules between EU funds	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Fewer, clearer, shorter rules	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. More freedom for national authorities to set rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. More flexibility of activity once funding is eligible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
e. More flexibility of resource allocation to respond to unexpected needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
f. Simplify the ex-ante conditionalities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
g. More effective stakeholders' involvement in the programming, implementation and evaluation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

39 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

40 How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication? For example, would you consider grouping/merging some programmes/funds?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

If management of funds is maintained at a regional/national level then there should be more resources spent on auditing projects to ensure transparency and the respecting of EU policy, as well as climate objectives. There should be more involvement of civil society from the countries receiving the funds regarding design and implementation.

Document upload and final comments

41 Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

42 If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

1500 character(s) maximum

A Climate Impact Assessment that is applicable to all EU-funded transport projects should be developed to ensure that EU investment is in line with the objective to decarbonise this sector, which is now Europe's largest emitter. Money should be streamlined for decarbonisation projects and away from projects that encourage the use of fossil fuels. A Climate Impact Assessment must become an independent pillar of all Cost Benefit Analyses and should also be then made available publicly to ensure transparency and proper auditing at EU level.

The ESIF funds should be more centrally managed at EU-level to reduce the risk of being misspent. This would also better ensure that there's a corollary between EU policy and EU spending.

Contact

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