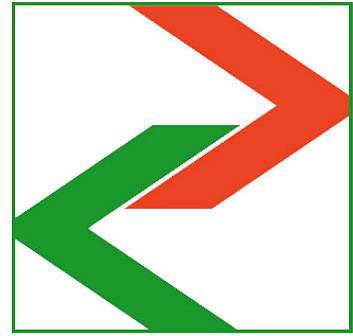


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Association des régions frontalières européennes (ARFE)  
Association of European Border Regions (AEBR)  
Comunità di lavoro delle regioni europee di confine (AGEG)  
Europæiske grænseregioners Arbejdsfællesskab (AGEG)  
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## **Position Paper**

**on the**

### **DRAFT REPORT ON OBJECTIVE 3 (2010/2155(INI))**

**Rapporteur: Marie-Thérèse Sánchez-Schmid**

**15. February 2011**

## **General**

The AEBR generally welcomes the report which has a very positive tendency. But it is only a first draft that needs to be improved and amended in some points.

This position paper is geared to the letters and numbers of the report.

**To H:** (...) is a **permanent** learning process (...)

reason: Consistently new national laws, leading to difficulties along the borders, and consistently new generations are requiring a permanent learning process.

**To I:** (...) placed at the centre of the priorities of territorial cooperation **and thus a place-based approach is needed** (...)

See Barca Report and INTERREG evaluation.

**To J** (...) territorial cooperation is dependent on progress made by European integration (...), **it also contributes very effectively to European integration and territorial cohesion** (...).

See point 2 on page 6 of the report, expressing the same in a similar way.

**Point 2:** It has to be underlined that transnational cooperation should not implement cross-border projects. Moreover, a stronger synergy between the measures of INTERREG A and B is necessary (e.g. in the field of transport, research&development/innovation, health care, see also INTERREG evaluation!).

**Point 6:** In the framework of cross-border cooperation in coastal and maritime regions, a revision of the 150 kilometres zone had to be **decidedly rejected**, unless it will be reduced.

Already now, for maritime cooperation are **evidently/verifiably** more opportunities offered as for land borders (see annex).

Furthermore, an extension of the 150 kilometres zone cannot be proved by any INTERREG evaluation. The recent INTERREG evaluation explicitly points out to bring consistency in the programmes regarding instruments

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and areas and not to make more revisions (up to now always changes). Improved results are more important!!!

In a conversation with the evaluators it was confirmed that up to now maritime cooperation over longer distances did not create added value. Many things could have been done better with the national mainstream programmes.

With exception of the Oresund and some cases in the Baltic Sea, the British Channel and eventually Ireland/Wales, maritime cooperation revealed only a few real cross-border results. In the Mediterranean area, where this extended zone mainly becomes into effect, the programme Sardinia/Corsica implemented only a very few real cross-border projects within 21 years. Similar applies to Greece/Italy.

Up to now the maritime border was extended three times without achieving better results. Cooperation that only takes place because of EU-funds does not testify real need (see text on the macro-regions).

This is accompanied by the fact that in INTERREG A along land borders the NUTS III level applies (what is important) and only with greatest difficulties a adjacent area can be included.

An equality of chances of land and maritime borders is already today not given any more.

It is interesting that the rapporteur is requesting this extension as objective, without giving any reason for this in the following text.

**Point 8:** This is explicitly welcomed. But if the funds are allocated per programme, it should not be referred anymore to national quotes. Otherwise, again every partner claims “This is my money” and splits up the joint bank account.

**NEW point 9a:** The recommendation (the AEBR already discussed this with the EU-Commission) is missed to include in the **future** Operational Programmes for cross-border cooperation in the measure “technical support” (up to now mainly for programme management and small-scale studies) the opportunity for assistance and support for less developed cross-border programmes.

INTERREG C is not suitable for this (processes are too interminable, chances for a successful project application are low).

INTERACT cannot provide this support as regards contents, it can only prepare studies. In addition, it has no strategic consulting capacities like they are available in developed border regions or in the AEBR.

In the past, the European Commission had own funds for technical support, consulting and “emergency measures” (LACE project). Today, this is not the case any more. **Therefore, the EU-Commission should receive a small budget on its own disposal on which it can lay claim flexible, quick and also without making a tender.**

**Point 13:** Generally, this is a positive idea. But similar to point 7, in cross-border programmes an intensive and parallel coordination with the neighbours have to take place. Only then national egoisms or cummulation of funds on one side of the border can be avoided.

**Point 14:** Point 14 has to be **viewed very critical**. It is not in line with the INTERREG evaluation clearly requesting not to change instruments and areas all the time (consistency, improved quality necessary). Above that, the evaluation shows that small, region-specific programmes achieve the best results.

Conversely, it means that the **A programmes are even now too large**. The EU-Commission and the European Parliament bewail a lacking decentralisation. This can only be realised by programmes along a border with relatively autonomous sub-programmes (e.g. Spain/Portugal: What has the green Galicia/Norte with the dry Extremadura/Alentejo or the sand beaches of Algarve/Andalucía in common? Similar applies to the Norwegian-Swedish border: the Lofoten, Middle Scandinavia and the Oslo Fjord). Therefore, today there are Operational Programmes with sub-programmes in these areas.

Even if experiences with national programmes in France were positive, this does not apply to cross-border cooperation. Cooperation areas like the Euroregion Baltic, the Carpathian Euroregion and the Euregio Saule, comprising several borders, have shown, that this finally fails (they do not exist anymore or have great difficulties as in reality it is worked bilateral). It is not in consistence with cross-border cooperation, which is not coincidentally defined in the EFRE-regulation:

*„(...) at least two regions along a border (...)“(exception: triangle).*

In addition, the report has to make clear where they differ to macro-regions and INTERREG IV B areas, if this scale in cross-border cooperation is considered.

**The conclusion of point 14 is contrary to the Barca Report, the INTERREG evaluation and to “best practice”.**

**Point 15:** Macro-regions should mainly be used to ensure the **necessary cooperation and coordination between national and European funds as well as sectoral policies.**

**Points 20-22:** Above all (in case of need with intervention of the European Court of Justice), it has to be ensured that the EU-regulation is better transferred into national laws. EGTC’s should not have difficulties and being rejected, because they are not in line with the national laws. This had to be revised since 4 years.

Global funding of EGTC’s is for sure an option. But in the regulation it is clearly defined that an EGTC primarily should implement European Operational Programmes and projects. Consequently, it could receive the funds for a complete programme and not only global funds.

**Points 23-25:** In cross-border cooperation are at least two member states with different structures, competences and legal systems involved. In practice, every member state explains EU-regulations in a different way (see Barca Report). In the field of cross-border cooperation this lead to “surpass each other”. So, many programmes are working with stricter rules (management and finances) than necessary what makes the implementation of INTERREG A programmes needlessly difficult. It would therefore be important that the EU defines maximum standards (for management, reporting, monitoring and audit) without neglecting inevitable minimum standards.

**Point 25:** In the next programme period from 2013 on, it has to be described in detail in the management chapter of the Operational Programmes how the private actors are going to be involved in the elaboration of the programme and project implementation. The EU-Commission can set this condition.

**Points 26-29:** The most is correct. But it does not always apply that cross-border cooperation is too little known on regional/local level.

In the small-scale, region-specific INTERREG A programmes that are managed decentralised and where the private actors are closely involved, just the opposite is the case.

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This only applies where the actors are not involved and Operational Programmes are mainly used to serve public authorities with projects.

**Page 13: Chapter „A enhanced strategic oriented and in the general approach embedded territorial cooperation“**

Please use in the following the term “Euroregions or similar structures”. Eurodistricts and also EGTC’s for cross-border cooperation are working likewise and are only different names.

Macro-regions are indeed something else.

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