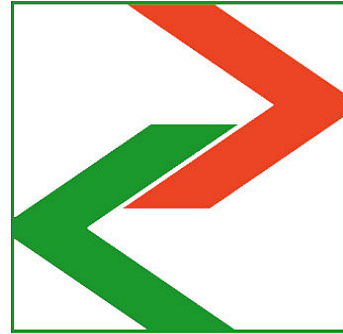


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STATEMENT

on the

PROPOSAL FOR A

**REGULATION OF THE EUROPEAN PARLIAMENT AND OF
THE COUNCIL**

**on specific provisions concerning the European Regional
Development Fund and the
Investment for growth and jobs goal and repealing Regulation (EC)
No 1080/2006**

{SEC(2011) 1138 final}

{SEC(2011) 1139 final}

14 November 2011

1. General

The Association of European Border Regions (AEBR), founded in 1971, is the only international organisation that is dealing exclusively with regional cross-border cooperation on a European-wide basis. Our more than 100 members represent more than 200 border regions.

The Association of European Border Regions (AEBR) welcomes the proposal of the EU-Commission for a “Regulation on specific provisions concerning the European Regional Development Fund and the Investment for growth and jobs goal”.

Our statement is submitted on behalf of our members and focuses therefore also on cross-border cooperation (see also AEBR statement on the proposal for a regulation on Territorial Cooperation).

It is highly appreciated that the EU-Commission realised the proposal of a common **strategic framework** for the different European policies (for a better cooperation and coordination between them). In this regard, the horizontal **cohesion policy** is the **most important European instrument** to support the objectives and priorities according to the Europe 2020 Strategy.

The AEBR explicitly supports the efforts to enhance the **added value** of the European cohesion policy, to improve the **programme planning** and to encourage the thematic **concentration** and the **institutional and administrative capacity**.

In the framework of EU programmes, funding of **all areas** despite their size and living standards (see also Territorial Agenda) is still considered necessary.

The new **financial instruments** need **flexibility/differentiation** with regard to the **peculiarities** of territorial and particularly of **cross-border cooperation**. In cross-border cooperation a wider range of measures applies as in the general regional policy (ERDF) and is essential for success. Like also the last INTERREG evaluation has shown, **soft** and **socio-cultural measures** are of great importance for effective economic cooperation. Forms of financing assuring sustainability and durability through economic projects are useful in cross-border cooperation and highly appreciated. For financing of socio-cultural projects that are often aiming at continuous mobilisation and information of the actors at place there have to be possibilities for differentiation regarding financing in the cross-border Operational Programmes.

Preferably, in the introduction to the regulation and also in **article 5 “Summary”** it has to be specifically pointed out that **partnership and subsidiarity still have to be**

improved, as European cohesion and regional policy can be **effectively strengthened** by:

- A direct and accountable **involvement of the regional and/or local authorities** in definition of objectives, management/implementation of EU programmes as well as the monitoring of the results. This is necessary given the **shortcomings** that still can be discovered in the implementation of partnership and subsidiarity.
- **Definition of clear rules** regarding the role and responsibilities of the regional/local level in the elaboration/implementation of EU-programmes.
- A considerable **simplification** of administrative procedures and **increased efficiency** of organisational processes.

The AEBR agrees with a stronger **result orientation** and the proposed **eligible areas of intervention**, but points out that in **exceptional cases** limited **flexibility** is needed, if other measures are verifiably for **utilising** the specific **endogenous regional potentials** (where the EU-Commission self refers to) leading to success and could contribute to the Europe 2020 Strategy.

Funds for **SMEs** and areas with **regressive industrial development** (structural change) are appreciated. Also, the stronger focus on sustainable **urban development** seems to be justified. But it should not be overlooked that **metropolitan areas/urban agglomeration** and **rural areas** are **mutually linked**. Metropolitan areas and urban agglomerations **can not** exist without a corresponding **urban hinterland**. On the other side, rural areas can not develop **without appropriate centrality in the nearby proximity**. This again enhances mobility, but does not necessarily cause migration from the border/rural areas (home/workplace) to the agglomeration.

Many **rural areas, particularly border regions**, are **threatened** by the new challenges, demographic change, and a weak economic structure what in turn affects their capacity for services, educational institutions, etc.

Therefore, it **should not** only be about **industrial** and **urban development** in **structural change**.

The „**Connection Europe Facility for transport, energy and ICT**“ will be supported if it is **linked with** the objectives of **TEN** that are focussing on cross-border links (especially realisation of border crossings first). But it has to be **not only** about **transeuropean links**, within the transport network also **regional connections** have to be fostered. Otherwise border areas will become only **transit zones** without profiting the **advantages** for mobilisation and labour market by improved regional transport connections to the transeuropean networks.

The AEBR underlines the necessity of targeted **interaction of the European funds** to achieve the main objectives of the Europe 2020 Strategy and supports the proposal to define **minimum shares** for the **European Social Funds (ESF)** for each category of regions as the social framework can be considered as an **essential location factor** in the regional competition.

2. ad 5. „Summary“

It is welcomed that not only **areas of intervention** will be defined, but also a **negative list** is going to be issued.

The **concentration** of funds on a few priorities for regions in transit and advanced regions as well as the possibility of a **broader range** for less advanced regions seems to be justified. In this context the **above mentioned** essential **flexibility** in well-founded and understandable cases (regarding special endogenous potentials) and the specifics of **territorial cooperation** are stressed.

The remark of the EU-Commission concerning **regions** with specific and permanent natural or demographic **disadvantages** in the Operational Programmes as well as the special rules for **ultra peripheral regions** meet approval.

In the Lisbon Treaty and in the reports on cohesion policy, besides border regions also mountain regions, island regions, and sparsely populated regions are listed as areas with specific problems. Many of them are at the same time border regions. This means that many **border regions** are **not only affected by one, but by several negative characteristics for disadvantages areas** (added by migration as well as national and sometimes even European periphery).

In general, the proposed **increase of EU-funds** for territorial cooperation is welcomed. However, especially the **percentage allocation** to the individual strands of cooperation and the extra share for ultra peripheral regions meet approval.

But it has to be pointed out that it is about **comparably small funds** and that according to the last INTERREG evaluation **considerably higher funds** are needed to realise the **headline targets**, especially by using the by far not exploited cross-border **potentials**.

3. Comments/recommendations to the individual articles

The AEBR **only refers to numbers and articles that are not discussed** up to now.

ad (10)

The AEBR welcomes that the EU-Commission is dealing with the **problems of accessibility to, and remoteness from** large markets to cope with the related special difficulties, particularly in border regions (that are showing often several negative characteristics).

ad article 3

Except to the remark that in some minor **points flexibility** is required, taken as a whole the **areas of intervention** are considered right:

- (c) In some areas and under specific conditions **cultural facilities** could be the **decisive factor** for the social infrastructure or of the complete location image of a region.

ad article 5

The listed **investment priorities** are offering a wide enough range of possibilities.

It should be considered to **include in (7) a new subitem (f)**: "Exploitation and/or new utilisation of **raw material deposits** that are or could become rentable in the course of increasing world prices".