

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

Markus

*9 Respondent's last name

Vennewald

*10 Respondent's professional email address

markus.vennewald@comece.eu

*11 Name of the organisation

Secretariat of COMECE (Commission of the Episcopates of the European Union)

*12 Postal address of the organisation

Square de Meeûs, 19
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.

47350036909-69

*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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

- Ensure access to necessary resources for all persons residing in the EU
- Combat the root causes of poverty in all its forms (including child poverty or in-work poverty)

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
o. Other (please give degree of importance here and fill in question 32 below)	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

- Reduce disparities between urban and rural regions in Europe

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 firm belief of a Europe growing together has been shaken as Member States as well as EU regions have started to diverge in their economic and social development. Cohesion policy helps to restore this promise and ensures a harmonious development of the EU as a whole.

- (1) ESF, EGF and FEAD contribute to the reduction of economic and social inequalities and, to some extent, limit the adverse effects of globalisation and deeper integration in a European single market.

- (2) Especially the ERDF, but also other funds help to exploit the full potential of cross-border cooperation in areas, such as infrastructure development and research and innovation.

- (3) Cohesion policy has played a key role in the achievement of the targets of the ongoing Europe 2020 strategy and therefore helps the EU, its Member States as well as its regions to develop based on common objectives towards a more inclusive, people-centred and low-carbon economy.

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.

- (1) There is a clear need for more flexibility in EU cohesion policy. The financial and economic crisis has revealed that the current design of the policies and funds is not yet able to face unexpected developments (such as the increase in refugees and migrants) and asymmetric shocks. To this end, funds should be kept available from the beginning of the next MFF period to tackle those unexpected situations. With regard to asymmetric shocks, COMECE encouraged EU institutions in its consultation document on the European Pillar of Social Rights to set-up for the eurozone a complementary European unemployment benefit scheme. As a complement to a national scheme, a common EU fund could stabilise national systems.

- (2) COMECE proposes to further strengthen the link between the funds and the European Semester and to use the principles of the European Pillar of Social Rights as a template for the orientation of the future EU cohesion policy.

- (3) We encourage to simplify rules and to set-up a single set of rules for EU funds. This will not just improve the access to EU funding for smaller organisations and reduce administrative costs, but also ensure the coherence with other funds.

- (4) We recommend adding new criteria that go beyond the objective of social and economic cohesion, such as demographic change, climate mitigation and adaption, migration/integration policies and (youth) unemployment.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Heavy audit and control requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Available funding does not address the real challenges	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Difficulty of combining EU action with other public interventions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Insufficient synergies between the EU programmes/funds	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Co-financing rates	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Late disbursement of funds / delays in payments to beneficiaries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Insufficient linkages of the Funds with the EU economic governance and the implementation of structural reforms	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. More flexibility of resource allocation to respond to unexpected needs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Simplify the ex-ante conditionalities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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.

In order to enhance information and access to EU funds, the unification of entry points for applicants may be considered. The entry point should then lead the applicant to relevant interlocutors for the respective EU programme. The FEAD and EGF are built on clear objectives and support in particular the most vulnerable people in the EU. Therefore, it should be ensured that attention for the specific aspects and needs related to these different programmes is not lost in big "merger programmes" and that EU funding for such crucial areas is not decreased.

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

Together with its ecumenical partner Conference of European Churches (CEC), COMECE welcomed the high-level agreement on the European Pillar of Social Rights and encouraged the EU institution to translate the principles into concrete actions using all instruments, including EU cohesion policy.

- As stressed before (cf. Q35), we expect from the EU to use the 20 principles of the Pillar as a guideline for the next MFF. In spite of new funding priorities and a likely decline in the overall budget, the EU should remain committed to its high-level agreement on the Pillar and extend the budget available in the ESF, FEAD, EGF and other related funds in order to ensure a quick implementation of the principles.

- Also in the next MFF period, the EU should earmark at least 20% of the ESF for social inclusion and combating poverty, and it should, moreover, continue to allocate at least 23.1% of the EU Structural and Investments Funds to the ESF.

- Recalling the statement of the Bishops of COMECE on Poverty and Social Exclusion in Europe (2016), we encourage the EU to adhere to the climate and poverty targets of the Europe 2020 strategy and to place the Sustainable Development Goals (SDGs) at the centre of a new agenda for 2030, which is closely interlinked with both, the European Semester and the EU cohesion policy.

Contact

Dana.DJOUDJEV@ec.europa.eu
