

# EUROPEAN NEIGHBOURHOOD INSTRUMENT CROSS BORDER COOPERATION PROGRAMME

2014-2020

## MID-TERM REVIEW (2017)

### Joint EEAS-DG NEAR document (final version)

#### I: INTRODUCTION

Cross-Border Cooperation (CBC) is an integral part of the EU's European Neighbourhood Policy (ENP) and of EU-Russia cooperation. It also features in associated regional cooperation across the whole of the external border of the EU. CBC aims to promote cooperation across the borders between EU Member States, the countries in the Eastern and Southern European Neighbourhood<sup>1</sup> and the Russian Federation<sup>2</sup>.

As programmed, the CBC has three strategic objectives:

- to promote economic and social development in regions on both sides of common borders;
- to address common challenges in environment, public health, safety and security;
- to promote better conditions and modalities for ensuring the mobility of persons, goods and capital.

It is financed from the European Neighbourhood Instrument (ENI) and the European Regional Development Fund (ERDF). It is governed by the ENI Regulation<sup>3</sup> and, in detail, by its own implementing regulation<sup>4</sup>. CBC is complementary to other sources of funding available to the partner countries from the Neighbourhood<sup>5</sup>.

CBC programmes are implemented by Managing Authorities located in Member States in accordance with the shared management principle<sup>6</sup>, and monitored by the Joint Monitoring Committees, involving national, regional and local authorities, to which the European Commission can participate as an observer.

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<sup>1</sup> Not all countries eligible for participation in the ENI CBC programmes are currently involved in the programmes. This applies, for different reasons, to Algeria, Libya, Morocco, Syria, Turkey and the United Kingdom (Mediterranean Sea Basin Programme), as well as Azerbaijan and the Russian Federation (in the context of the Black Sea Basin Programme).

<sup>2</sup> A map of the eligible areas of the current 2014-2020 ENI CBC programmes is presented in annex.

<sup>3</sup> Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11 March 2014 establishing a European Neighbourhood Instrument.

<sup>4</sup> Commission Implementing Regulation (EU) No 897/2014 of 18 August 2014 laying down specific provisions for the implementation of cross-border cooperation programmes financed under Regulation (EU) No 232/2014 of the European Parliament and the Council establishing a European Neighbourhood Instrument.

<sup>5</sup> Including the bilateral and regional programmes under the European Neighbourhood Instrument as well as from a number of other instruments such as the Instrument contributing to Stability and Peace (IcSP), Humanitarian Aid, the Partnership Instrument (PI), the European Instrument for Democracy and Human Rights (EIDHR), the Instrument for Nuclear Safety Cooperation (INSC), Macro-Financial Assistance, Development Co-operation instrument (DCI) thematic programmes and external actions under EU internal programmes for research and innovation, energy, transport, education and youth, culture, as well as the four partnership programmes of the Northern Dimension policy.

<sup>6</sup> Regulation (EU, EURATOM) No 966/2012 on the Financial Rules Applicable to the General Budget of the Union and Repealing Council Regulation (EC, EURATOM) No 1605/2002, 25 October 2012.

Unlike other ENI programmes, CBC is programmed for the full period 2014-2020; however, the CBC Programming Document 2014-2020 and article 9(1) of the ENI Regulation commit the EU to conducting a mid-term review in 2017. The purpose of this review is to take into account any changes in the cooperation priorities, socioeconomic developments, the results observed from implementation of the measures concerned and from the monitoring and evaluation process, and any need to adjust the amounts of funding available and thus reallocate the available resources across the different programmes.

The mid-term review has been developed by the European External Action Service and the European Commission services (Directorate-General for Neighbourhood and Enlargement Negotiations in association with the Directorate-General for Regional and Urban Policy) with the cooperation of all relevant stakeholders involved in CBC programmes. It has been conducted in parallel, and complementary to, the mid-term review of the European Neighbourhood Instrument. The review focuses on three main areas:

- Political Context
- Regional Context
- Progress

In their capacity of key stakeholders, the Managing Authorities and National Authorities responsible for the design and implementation of CBC programmes have participated in a written consultation launched by the European Commission and the EEAS in March 2017, the results of which have been incorporated in this review. A summary of the responses received from Managing/National Authorities is appended to this review.

At the time of writing, most ENI CBC programmes are at the inception stage (i.e. implementing the preparatory actions required to start the programme). Hence, this review will be able to offer little information on programme implementation. It therefore focuses on contextual issues and the efficiency of process, with a view to assessing whether the overall CBC strategy and approach remain relevant based on experience so far.

ENI CBC programmes are built on the experience and lessons learnt from the programmes funded by the European Neighbourhood and Partnership programmes (ENPI) for the period 2007-2013. They also draw on experience with cross-border cooperation within the EU programmes under the European Territorial Cooperation goal (also known as Interreg) and CBC between Member States and IPA beneficiaries under the Instrument for Pre-accession Assistance.

An ex-post evaluation of ENPI CBC (2007-2013) has been underway at the same time as the mid-term review. The preliminary findings of the evaluation confirm the programmes' important contribution to developing and maintaining contacts and dialogue between the EU and CBC Partner Countries administrations and stakeholders, as well as to promoting EU values across the Neighbourhood, while fostering the direct involvement of local actors. ENPI CBC offered an enabling framework for promoting socio-economic development of border areas adding an important territorial dimension to the European Neighbourhood Policy. In terms of implementation, the evaluation acknowledges important delays despite of which the programmes have managed to fund over 900 projects with a high participation of CBC partner countries, for a total contracted amount of EUR 910 million. The fact that ENPI CBC achieved these results in a sometimes unstable political and economic environment in some of the involved partner countries is a testimony to the interest and

commitment of CBC stakeholders to pursue cooperation despite external challenges and obstacles, which nonetheless affected the ability of some projects to achieve their results. It is worth noting that a major weakness identified in the management of these programmes relates to monitoring and evaluation activities, which made it difficult to measure the progress towards programmes objectives. This has been improved in the current programming period as described in point IV below.

The preliminary conclusions of both exercises, namely the ex post evaluation of ENPI CBC 2007-2013 programmes, and the mid-term review of ENI CBC 2014-2020 programmes were presented and discussed with key stakeholders at the occasion of the ENPI/ENI CBC Annual Conference held in Tallinn on 30 November 2017. There was an overall agreement with the conclusions presented in that context.

## II: POLITICAL CONTEXT

The CBC Programming Document was finalised in 2014. Since then, the policy framework for cooperation between the EU and its neighbours has been adapted to respond to the challenges and opportunities that have emerged over the subsequent four years.

The European Neighbourhood Policy was reviewed in 2015<sup>7</sup>. The review set out a new framework for building more effective partnerships between the EU and its neighbours. The review retained the ENP's focus on good governance, democracy, the rule of law and human rights whilst proposing three other joint priorities for cooperation: economic development for stabilisation, security, and migration and mobility. It also introduced a new approach that recognises the different aspirations of ENP partners, new working methods to support a greater sense of ownership and greater flexibility in the way the EU conducts its policies and funds.

The differentiated approach envisaged by the ENP review is being set out through new tailor-made agreements and partnerships between the EU and some of the Neighbourhood countries. "Partnership Priorities" have been agreed with Algeria, Jordan, Egypt and Lebanon and are in the process of being finalised for Armenia, Azerbaijan and Belarus. The EU's relationship with Tunisia is set out in a Joint Communication<sup>8</sup>. Based on the agreements reached to date, progress towards CBC priorities in both the Eastern and Southern Neighbourhood will continue to contribute to the achievement of bilateral agreements. Moreover, the ENP review provides the framework for ensuring that individual programmes have a better strategic orientation.

In terms of regional cooperation with the Eastern Partnership, the three strategic objectives of CBC correlate strongly with the four key priorities of Riga: a) economic development and market opportunities; b) strengthening institutions and good governance; c) connectivity, energy efficiency, environment and climate change, and; d) mobility and people-to-people contacts. Meanwhile, the Northern Dimension and the Black Sea Synergy focus on economic, social and environmental challenges. The EU Strategy for the Baltic Sea Region<sup>9</sup> and the EU Strategy for the Danube Region<sup>10</sup>

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<sup>7</sup> Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the "Review of the European Neighbourhood Policy, 18.11.2015, SWD (2015) 500 final

<sup>8</sup> Joint Communication to the European Parliament and the Council on "Strengthening EU support for Tunisia" of 29.9.2016, JOIN (2016) 47 final

<sup>9</sup> [http://ec.europa.eu/regional\\_policy/en/policy/cooperation/macro-regional-strategies/baltic-sea/](http://ec.europa.eu/regional_policy/en/policy/cooperation/macro-regional-strategies/baltic-sea/)

strengthen cooperation between the countries bordering the Baltic Sea and the Danube River in order to meet the common challenges and to benefit from common opportunities facing the region in areas such as connectivity, prosperity and environmental protection. Multilateral strategies e.g. on fisheries in the Black Sea and Mediterranean sea-basins have also been agreed<sup>11</sup>. Coordinated initiatives take place within the EU Arctic policy<sup>12</sup> on the fields of climate change, sustainable development and international cooperation.

Regional cooperation with the Southern Neighbourhood is pursued through a number of formats, but priority is given to the Union for the Mediterranean (UfM) due to its potential to bring partners together and deliver direct benefits in terms of youth employment, entrepreneurship, environment and infrastructure, all of which are supported by CBC programmes operating in the region. It is worth noting the emergence of sub-regional initiatives under the UfM umbrella such as the Initiative for the sustainable development of the blue economy in the western Mediterranean – WestMED Framework for Action. The Mediterranean Sea Basin programme is the biggest single coordinated effort, bringing together a great number of stakeholders from the 13 participating Member States and partner countries which have joined the programme; a certain focus on people-to-people approaches and social challenges represents here a significant outreach activity between countries, some of which have long-standing enmities or very limited bilateral cooperation.

The ENP, including CBC, makes a strong contribution to the delivery of the EU Global Strategy on Foreign and Security Policy, which places a strong emphasis on the need to invest in the resilience of states and societies to the East and South of the EU. The Global Strategy envisages resilience as a multi-faceted, multi-sectoral approach that includes strengthening and reinforcing good governance and human rights, prosperity, equality, security and the rule of law. In the context of the Neighbourhood, particular emphasis is placed on the importance of societal links for the achievement of state and societal resilience.

The Joint Communication 'A Strategic Approach to Resilience<sup>13</sup> in the EU's External Action' develops the concept of resilience as articulated in the Global Strategy. This communication recognises firstly the interdependence of the EU with the pressures, and conversely opportunities, its neighbours are facing and, secondly, that resilience needs to be built at all levels of society: individual, household, community, country or region. CBC contributes by building connections between internal and external policy and action, as well as by providing an important framework for cooperation with local authorities and civil society, on both sides of the EU border.

In recent years, Migration and Mobility have become dominant priorities for the EU. The European Agenda for Migration aims to address migration and mobility holistically, combining the imperative to save lives and protect migrants with the need to address the root causes of migration, including

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<sup>10</sup> [www.danube-region.eu](http://www.danube-region.eu)

<sup>11</sup> Strategy to improve fisheries conservation and socio-economic viability in the Black Sea basin area (Bucharest Declaration, adopted in 2016); Strategy for safeguarding the future of the Mediterranean fishermen and coastal communities (Malta MedFish4ever Declaration, March 2017).

<sup>12</sup> Joint Communication to the European Parliament and the Council on "An integrated European Union policy for the Arctic", 27.4.2016, JOIN (2016) 21 final.

<sup>13</sup> Joint Communication to the European Parliament and the Council on "A Strategic Approach to Resilience in the EU's External Action, 7.6.2017, JOIN (2017) 21 final.

through provision of development assistance and promotion of investment, and effective border management. Bilateral agreements with those countries place considerable emphasis on migration, thus the efforts made under CBC's third strategic priority (promotion of better conditions and modalities for ensuring the mobility of people, goods and capital) contributes to the achievement of this overall approach.

Cooperation with the Russian Federation remains an important feature of CBC despite the current challenges in EU-Russia relations. In the framework of the diplomatic measures taken by the EU in reaction to the illegal annexation of the Crimean peninsula and Russia's actions in destabilising eastern Ukraine, the European Council decided to maintain projects dealing exclusively with cross-border cooperation and civil society.

This importance is duly reflected in the five principles that guide EU relations with Russia, which were defined by EU Foreign Ministers in March 2016, as well as in the Global Strategy. CBC is thus one of the very few areas of cooperation that is still operational with the country and it reinforces the people-to-people component of the EU's overall approach towards Russia<sup>14</sup>.

*CONCLUSION: The policy framework guiding relations of the EU with countries involved in CBC has evolved since 2014, in some cases leading to new policy formulations (resilience) or changes in approach (the ENP review, migration). The strategic objectives of CBC remain well-placed to make substantive contributions to the implementation of these policies and therefore remain relevant. Cooperation with the Russian Federation remains an important feature of CBC.*

*Better coordination and synergies could be sought between ENI CBC and other ENP instruments (bilateral, regional and Neighbourhood-wide assistance) and EU political initiatives (Eastern Partnership, Union for the Mediterranean, Black Sea Synergy, EU Strategy for the Baltic Sea Region, EU Strategy for the Danube Region and the Northern Dimension Policy which is a common policy between the European Union, Norway, Iceland and Russian Federation).*

### **III: REGIONAL CONTEXT**

The CBC Programming Document identified a number of common issues for border areas along the frontiers of the EU. These include: different rates of economic development, income disparities and different demographic dynamics; environmental and climate issues in contexts where resources are shared across borders; public health issues, particularly related to communicable diseases; the fight against organised crime; the need for effective border management to facilitate legal mobility of goods and people; and the promotion of people-to-people cooperation as a means of building consensus and accountability around cross-border initiatives. In broad terms, these issues remain relevant and were reinforced by the ENP review and the EU Global Strategy. More specifically, however, there have been other developments in the region:

The migration crisis in the Mediterranean continues, with large scale migration along the Eastern Mediterranean Route (via Greece and Turkey) in 2015 and, more recently, continued movement along the Central Mediterranean Route (via Italy and Libya) placing strong emphasis on the need for managed mobility both on the borders of the EU and those of Neighbourhood countries.

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<sup>14</sup> Russian respondents to the consultation on this review also noted that CBC plays a particularly important role within the EU-Russia relationship, and Russia currently provides its share of co-financing for the ongoing programmes, which is a clear sign of their interest in CBC.

Since the Arab Spring, many countries of the southern Neighbourhood are undergoing complex transitions which can potentially exacerbate existing challenges and reinforce the need for cooperation and reliance between neighbours. Likewise, the thawing of previously frozen conflicts coupled with continued violence in Ukraine has increased instability in the East over the past four years.

In addition to developments in the broad regional context, relations between the EU and specific countries have the potential to affect CBC programmes.

The Western Sahara dispute indirectly affected EU-Morocco bilateral relations during 2016, following the General Court of Justice ruling of December 2015<sup>15</sup>. The judgement had also a direct impact on the CBC Mid-Atlantic programme, in which Morocco was a participating country, and whose negotiations were interrupted after the judgement. In a highly sensitive context, the inability to make progress on the definition of the participating regions led to a decision by the would-be Managing Authority in 2017 not to proceed with this programme.

The EU-Turkey relationship is also critical for advancing stabilisation and resilience in the Neighbourhood. The EU aims to deepen cooperation with Turkey as a candidate country that is expected to respect the highest democratic standards and a strategic partner for engaging in dialogue on counter-terrorism, regional security and refugees. Turkey participates in the Black Sea Basin programme and is eligible to participate in the Mediterranean Sea Basin programme.

In the north, the CBC programmes are closely linked to the Northern Dimension policy, which maintains inter alia four Partnerships between the EU, Norway, Iceland and Russia. The partnerships aim to strengthen stability, well-being and sustainable development in the region by means of practical cooperation.

The EU-Russia relationship is currently under strain and CBC provides a valuable channel for cooperation between communities on both sides of the border during these challenging times as well as laying down the foundations for deeper regional cooperation in the future.

A main feature of CBC programmes is the participating countries' strong commitment and ownership based on a balanced partnership between the countries on both sides of the border. The programmes are not only defined but also implemented in a coordinated manner, and through joint managing structures involving partners at different levels (national, regional, local) of all the participating countries. This is with no doubt an important contribution to good neighbourly relations and the creation of a climate of trust between the partners.

Programmes provide opportunities for dialogue with a number of different stakeholders: civil society organisations, local and regional authorities, academia, and the private sector. Responses to the written consultation noted that CBC offers one of the few available platforms for funding for certain stakeholders that would otherwise not have access to such cooperation, while others noted that dialogue under CBC 2014-2020 built on existing networks developed under predecessor programmes such as the ENPI CBC 2007-2013. Networks created strengthened dialogue both between neighbouring countries and regions but also within participating countries.

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<sup>15</sup> Judgment of the General Court of 10 December 2015 – Front Polisario v Council (Case T-512/12), OJ C68/26, 22.2.2016

Finally, the high number of applications submitted for the calls for proposals already launched shows that the interest of the stakeholders in the region increased after the experience of ENPI CBC. The applicants see ENI CBC as a valuable tool for cooperation with the neighbours, and an opportunity to keep and enlarge partnerships or to set-up new ones.

*CONCLUSION: Since the launch of CBC in 2014, conditions for cooperation around the Mid-Atlantic Programme have not been met and the programme has not been made operational. This will have budgetary implications (see section V below). However, as regards the other CBC programmes, any changes in the overall context have not substantially affected their implementation as they have been defined and approved in 2015 and 2016. Indeed, the fact that participating countries have continued to collaborate in the interests of advancing CBC programmes in this period highlights the value that CBC programmes hold for the partner countries and the political importance that cross-border cooperation continues to have for all of the stakeholders concerned.*

#### **IV: PROGRESS<sup>16</sup>**

##### **A challenging yet successful preparatory phase**

Much of the effort has focused on the negotiation, finalisation and inception of the Joint Operational Programmes (JOPs), which define the programme strategies (based on the analysis of the needs of the programme areas) and the framework for the programme implementation. The final definition of the programme geography, based on the programming document, was also subject to intense negotiations.

Representatives of the regional and national levels were directly involved in the process as members of the Joint Programming Committees, whereas involvement of the civil society and local and regional authorities was ensured through wide public consultation processes in all participating countries (both Member States and CBC partner countries). Responses to the written consultation reveal that Managing Authorities highly value the way in which CBC programmes promoted and sustained dialogue through this preparatory phase, thus creating a strong foundation for effective partnerships in the implementation phase.

As a result of this intense work, which started already in 2013, a total of 13 Joint Operational Programmes (JOPs) were submitted to the European Commission in June 2015 and adopted in December 2015. Two other programmes<sup>17</sup> have been submitted in 2016, and adopted at the end of the same year. The Cooperation programme for the (Interreg) Baltic Sea Region was also adopted in December 2015<sup>18</sup>. As explained above, the Mid Atlantic programme completed all the programming process but the involved parties could not reach a final agreement on the programme area and the programme was thus not submitted.

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<sup>16</sup> The cut-off date for the information related to programme implementation is 31 December 2017.

<sup>17</sup> Poland-Russia and Lithuania-Russia programmes.

<sup>18</sup> Although it is mentioned in the Programming Document, the Baltic Sea Region Programme is part of the European Territorial Cooperation goal of the EU cohesion policy, and it is thus aligned with other Interreg transnational cooperation programmes. The overall statements and conclusions related to ENI CBC do not necessarily apply to this programme.

## Gearing up for implementation

As noted by several Managing Authorities in response to the written consultation, progress of the ENI CBC programmes has been somewhat slower than initially anticipated. The application of the shared management principle requires the development of the programme management and control systems, as well as the designation of the Managing Authorities, which are new processes for the ENI CBC programmes. On the other hand, the allocation of more responsibilities to the participating countries and the need to set up the national parts of the management and control systems in all participating countries has triggered lengthy discussions, which had impact on the time needed for the negotiations on the Financing Agreements with the CBC partner countries.

At present all adopted ENI CBC programmes are completing their preparatory phase<sup>19</sup>, building the foundations for their fully-fledged implementation, which will be effectively in place after the designation of the Managing Authorities<sup>20</sup> and the completion of the signature and ratification of all relevant Financing Agreements<sup>21</sup>.

All programmes, including the ones adopted in 2016, have set up their Joint Monitoring Committees. Programme bodies (Managing Authorities, Audit Authorities, Joint Technical Secretariats, Branch Offices were applicable) are in place, although the staffing process, in particular for the Secretariats, takes place on an on-going basis in order to accommodate increasing needs, and some delays have been recorded.

To date, all but two programmes have launched calls for proposals (see table 2), while the remaining ones (Poland-Russia and Lithuania-Russia) plan to launch their first call at the beginning of 2018. The response so far in the closed calls has been extremely positive in quantitative terms (more than 1600 project proposals). The first programmes to have made decisions on the projects to be financed are the Kolarctic, Karelia and South East Finland-Russia programmes, followed by the Latvia-Lithuania-Belarus and Poland-Belarus-Ukraine programmes. The signature of related contracts will be effective after the finalisation of the designation of the Managing Authorities.

A total of 11 programmes have defined in their programmes a list of Large Infrastructure Projects (LIPs) to be selected via direct award. These projects are required to undergo a two-step approval process by the Joint Monitoring Committees and the European Commission. At the moment of the mid-term review, all but one concerned programmes have submitted summaries of their LIPs for the approval by the European Commission, and most of them have been approved. All programmes have submitted the full application forms for the approval by the European Commission by the regulatory deadline of end 2017 (see table 3).

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<sup>19</sup> The preparatory activities include the setting up of the programme bodies and authorities, the development of the programme management and control systems by the Managing Authority, its compliance assessment by the Audit authorities, the first meetings of the Joint Monitoring Committees and the preparation and launching of the project selection activities.

<sup>20</sup> At the time of the mid-term review 9 out of 15 programmes have formally sent the description of management and control system to the Audit Authority, and 8 programmes have already notified the European Commission of the decision concerning the designation of the Managing Authority.

<sup>21</sup> All relevant Financing Agreements have been signed thus allowing for the launch of the external component of all programmes.



## Learning lessons from the past

Lessons learnt from the previous period were taken into account during the programme development process.

### Thematic concentration

Building on previous experience, and mirroring the approach of the Interreg programmes, important efforts were put towards narrowing down the thematic focus of the programmes with a view of maximising impact.

Programme partners working together across the borders analysed the needs of the programme areas and identified the thematic objectives and priorities to be pursued, contributing to at least one strategic objective and a maximum of four thematic objectives. The interaction between the strategic objectives and the thematic objectives<sup>22</sup> are shown in table 4. As illustrated by table 5, most CBC programmes included into their strategy four thematic objectives, with the exception of the Latvia-Russia and Italy-Tunisia programmes that selected respectively three and the Black Sea Basin programme which chose two thematic objectives. Most preferred topics relate to the environment (TO 6) and security (TO 10), while business and SME development (TO 1) and culture and heritage (TO 3) are also largely popular. Cooperation in the energy field (TO 9) has not been chosen by any of the programmes.

The sectors of concentration and priorities for cooperation reflect the shared strategic vision of the EU and CBC partner countries. At the moment of the drafting of the mid-term review, this vision continues to be relevant and is being delivered through the roll out of the CBC programmes. These priorities appear to be streamlined compared to the ENPI CBC 2007-2013 programmes; this is explained by the fact that the objectives defined in the Programming Document involve another level of objectives below the strategic ones (i.e. the Thematic objectives), which significantly narrow down the possible fields of intervention by the programme. In addition, the programmes have further specified the fields of intervention to be addressed when defining the programme priorities.

### Better orientation on achievement of programme results

The 2014-2020 period has seen a switch towards monitoring and communication of programme results. The extensive tools and guidance provided during the preparatory phase contributed to the development of result indicators (including baseline and target values) that are considerably better defined than was the case in the previous programming period. Additionally, the existence of a limited number of common output indicators<sup>23</sup> will make it possible to aggregate results in a reasonable manner.

Some programmes did not manage to finalise the baseline and target values for the result indicators at the time of submission of the JOP for adoption, with the condition that they will have them ready before the launch of the first call for proposals. At the time of completing this mid-term review, all programmes have completed this exercise.

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<sup>22</sup> Aligned with the menu offered to the European Structural and Investment (ESIF) programmes, with some adjustments.

<sup>23</sup> A list of [common output indicators](#) for ENI CBC 2014-2020 developed by Interact ENPI was made available to the programmes during the programming phase. Out of the 38 proposed indicators, 26 were taken up by the programmes, as described in table 6.

The findings of monitoring and evaluations are taken into account not only during programming but also during the implementation cycle. For this purpose, the regulatory framework for the 2014-2020 period requests the programmes to submit an indicative monitoring and evaluation plan for the whole duration of the programme, which will then be updated on an annual basis.

Considering the early stage of implementation of programmes, the conclusions about their monitoring and evaluation activities can only be drawn based on their plans in the respective area. As far as the monitoring activities are concerned, the requirement to carry out results-oriented programmes and project monitoring in addition to day-to-day monitoring will require additional efforts from the programmes, but will potentially bring important benefits both in terms of programme monitoring and communication of results. The regulatory requirement to carry out an evaluation will substantially increase the number of evaluations in relation to the previous period<sup>24</sup>.

#### Better ownership and defined responsibilities

Following the principle of full shared management, more responsibilities have been given to national authorities implementing the programmes, and increased responsibilities and co-ownership of the participating countries have been defined. Compared with the ENPI CBC programmes, the governance system has significantly changed with the introduction of new bodies (e.g. Audit Authority), new responsibilities and new functions (e.g. National Authorities, group of auditors, control contact points) requiring the establishment of the national part of the management and the control system in each participating country (both Member States and partner countries).

The full application of the shared management principle in the 2014-2020 period requires the development of the programme management and control systems (DMCS), as well as the designation of the Managing Authorities. Audits of management and control systems of the Managing Authorities will be performed by the European Commission as necessary condition for the finalisation of the designation process. Although this is creating some delays, these procedures should provide further certainty during the implementation and avoid some problems experienced in the past.

#### Improved procedures and capacity-building measures

Bottlenecks and lessons learned from the previous ENPI CBC programme had been taken into account in the current programme, leading to more efficient and timely procedures, improved partner search tools and opportunities, the introduction of an electronic system for applications, strengthened communication and additional training provided on programme and financial management. As a matter of fact, the majority of programmes are launching the calls via on-line application systems, which should result in easier application procedure and probably faster selection of proposals.

When it comes to projects, and based on the experience of the past, the programmes are requested to pay increased attention to the project selection procedures (in particular the definition of selection criteria) in order to make sure that the projects selected deliver concrete results which contribute to the result indicators defined at programme level, and have a cross-border value added.

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<sup>24</sup> An overview of the evaluations foreseen in the Joint Operational Programmes is provided in table 7.

One key element to be taken into account is the existence since 2014 of a new Technical Assistance project, the "Technical support to the implementation and management of ENI CBC programmes" (TESIM)<sup>25</sup>, which builds on the previous "Regional and Capacity Building Instrument" (RCBI) and Interact ENPI projects. The objective of TESIM is to give support to the CBC programmes at both programme and project level focusing on improving the capacity of partner countries to participate in the CBC programmes. This increased guidance and coaching has proven very useful during the inception and programming phases, and is expected to significantly increase the capacities of all actors concerned during implementation.

### Increased visibility

Building on the experience from the past, the programmes are increasingly aware of the importance of communicating on their results. At the moment of submission of the Joint Operational Programmes, programmes submitted a communication strategy for their whole duration as well as an indicative information and communication plan for the first year, including visibility measures.

At the time of drafting of this mid-term review, the majority of the programmes have developed specific websites, considered as their main communication tool. One clear improvement is the increased use of social media to promote the programmes and their results.

In an effort to ensure that appropriate information is communicated to the public, CBC programmes have been encouraged to include all the projects financed during the period 2007-2013 in the KEEP database<sup>26</sup>. The encoding of data in KEEP has become a compulsory element of the reporting from the programmes towards the European Commission in the period 2014-2020. This is intended not only to provide increased visibility but also to allow for better coordination and capitalisation initiatives among the projects. It also allows for data aggregation across countries and programmes.

### Definition of Large Infrastructure Projects in the JOPs

As a novelty in the 2014-2020 period, programmes were requested to define the list of Large Infrastructure Projects to be implemented in the Joint Operational Programmes, within the maximum of 30% of the EU allocation to be earmarked for this type of projects. This triggered lengthy and difficult discussions but should eventually shorten the time needed for the project preparation and selection.

### **Validity of the current risk assessment**

The Programming Document identified four main types of risk:

- the partners' capacity and preparedness to enter into a programme partnership (political commitment);
- the partners' willingness and capacity to manage the programme, and notably to establish a system of joint management responsibility and to combat fraud effectively;
- the beneficiaries' knowledge and capacity to develop and implement project proposals;

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<sup>25</sup> <https://tesim-enicbc.eu/>

<sup>26</sup> [KEEP](#) is a database developed by the INTERACT Programme which is a repository of information about projects funded by Interreg, Interreg-IPA and ENPI/ENI Cross Border, provided by the programmes themselves.

- the national level's support to the establishment and management of the programme by local partners.

The original risk assessment needs to be viewed in the context that CBC is, at best, in the early stages of implementation. In response to the written consultation, Managing Authorities generally felt that the current risks remained valid but would need to be tested further during implementation. Taking each risk in turn, it is clear that some risks cannot be adequately tested given the progress made so far.

*Partners' capacity and willingness to enter into a programme partnership:* the political commitment behind CBC is strong among EU Member States and CBC partner countries. Willingness to engage is underpinned by mutual interest in delivering results against jointly-agreed objectives articulated in Joint Operational Programmes, while capacity has been strengthened through the dialogue process and the support offered to ensure that the preparatory phase has been completed successfully. Participating countries with prior experience of CBC note improvement in the process compared to previous iterations and recognise the high levels of commitment among all stakeholders. Most partners remain confident of continuing commitment. This high commitment is also proved by the fact that several countries (like Estonia, Finland, Sweden and the Russian Federation) provide their national co-financing to the programmes and some others also to projects (e.g. Bulgaria, Hungary, Greece, Italy and Romania). Moreover, some countries were even ready to increase the co-financing up to 40% to finance Large Infrastructure Projects considered essential for the development of the border region.

*Partners' willingness and capacity to manage the programmes, and notably to establish a system of joint management responsibility and to combat fraud effectively:* the partners' willingness and capacity to manage programmes and establish systems of joint management responsibility are demonstrated through the approval of all of the Joint Operational Programmes. The programmes made particular efforts to introduce in the JOPs clear division of roles and responsibilities in programme management, control and audit. This effort has been pursued during the development of the Description of the Management and Control Systems (DMCS) which are either finalised or under final or advanced phase of development.

The implementation procedures imply the need to involve several bodies, including anti-fraud and anti-corruption bodies (AFCOS in Member States and identified bodies in article 7 of Financing Agreements in the case of partner countries), tax and custom authorities in partner countries dealing with tax exemption, central banks ensuring the capacity of opening bank accounts in euro, or competition bodies dealing with state aid.

There is a significant improvement in the coordination among the programmes with shared eligible territories in partner countries. Several examples can be mentioned, such as the informal meetings of the non-yet formally set group of auditors in the Black Sea Basin Programme, the audit networking meeting of the 5 programmes with Russia adopted in 2015, or the coordination between the 4 Managing Authorities of programmes involving Ukraine aiming at increasing the operational capacity of the National Authority.

*Beneficiaries' knowledge and capacity to develop and implement project proposals:* Important efforts have been made in terms of capacity building of project applicants (lead partners) and partners (in the case of calls for proposals) or beneficiaries (in the case of LIPs), through informative and training sessions, project preparation workshops, partner search forums, launching events, and so on. Out of

the programmes that have launched calls for proposals, only a limited number have finalised the evaluation. However, more applicants submitted proposals in this round than during the previous programming period. Programmes that have not yet launched calls are receiving significant requests for information, which gives some assurance that the response to the calls will be satisfactory. Additionally, as shown in graph 4, the average of lead applicants coming from partner countries and the Russian Federation (25%) is higher than in the previous generation of programmes.

*The national level's support to the establishment and management of the programme by local partners:* Such support can be indicated by the fact that all programmes but one have been approved. However, continued support at national level will be required to ensure successful implementation of the programmes. In reality, National Authorities have a leading role in most CBC programmes. They have in fact played a crucial role at various stages in the programming process: public consultations (this was also a way of raising awareness and providing information on the upcoming programme), supporting project applicants and beneficiaries and defining the Large Infrastructure Projects. This capital should be fully used by the programme authorities.

#### *Identification of any additional risks*

In their responses to the written consultation, the participating countries highlighted a number of new risks that have emerged during CBC so far. These include:

- The risk that slower-than-expected progress reduces the momentum gained during the preparatory phase, with attendant risks for long-term political willingness to invest time and effort in the implementation of CBC programmes.
- Although some Managing Authorities highlighted the EU-Russia bilateral relationship as a potential risk, the European Council decision to exclude CBC from the restrictions to cooperation with Russia must be taken into due account. CBC is seen as an important area for EU-Russia cooperation and Joint Operational Programmes with Russia have been agreed, thus indicating willingness to cooperate in the current context.
- The impact of global issues, such as conflict, terrorism and migration, on the scope of cooperation was noted by a number of participating countries. Delivery of the strategic and thematic objectives of CBC will, in a general sense, contribute to the wider EU effort to address these issues, by promoting mobility and addressing safety and security. However, continued understanding of the impacts of these risks in border areas, where such impacts may be felt particularly acutely, should be an important implementation tool, especially in fragile states or situations.
- Several participating countries noted challenges around the complexity of procedures relating to implementation, reporting, control, audit and recoveries, the capacity of projects to create synergies with other processes and the delineation of roles and responsibilities between stakeholders, which could have impacts on the pace of implementation. The contracting procedures currently in place represent a transition from the Commission guidelines towards the approaches of the participating countries; while this adds to the complexity of the process, it is an important improvement compared to previous practice which follows the general principle to increase flexibility in the delivery of assistance.
- There are potential risks associated to the direct award procedures for the selection of Large Infrastructure Projects (LIPs). Some delays maybe expected due to the complexity of some of these projects.

## CONCLUSIONS:

*The preparatory phase of CBC has been slower than anticipated. Although improvements compared to ENPI CBC 2007-2013 have been noted, some participating countries feel that procedures are still too complicated. However, the process has resulted in the development of Joint Operational Programmes and Financing Agreements for all programmes, which meet the standards set out in the CBC Implementing Regulation and which are now moving forward to implementation. It can be assessed that no programme among those adopted faces difficulties which endanger implementation, with the only exception of the Poland-Russia and Lithuania-Russia programmes which show slower progress because of their late adoption. At project level, it is too early to draw conclusions. Nevertheless, the pre-conditions for a proper project implementation both at programme and country level are being gradually built and should be met in full by the time the projects will be selected and contracted. Additional pre-conditions applicable to LIPs have been taken into account during the approval of the project summaries and will be subject to further scrutiny during the assessment of the full application forms.*

*ENI CBC programmes are in a better position compared to their predecessors to demonstrate their achievements by using better designed output and result indicators in more focused fields of intervention. There is also a higher possibility to aggregate outputs across programmes, allowing for better information in order to assess and communicate the achievements of the ENI CBC instrument as a whole. Addressing the measurement and aggregation of result indicators remains the only challenge in this respect.*

*The management procedures seem to be carried out much faster and in a more coordinated way than in the previous programming period thanks to the improvements in the regulatory framework and the efforts of programme bodies. Nevertheless, it is too early to assess any increase in the capacity of the Managing Authority or the applicants in the implementation phase.*

*The risks pointed out in the CBC Programming Document remain relevant at the mid-term review point. Although some have been tested during the preparatory phase, all remain relevant for implementation. Based on progress and experience, the Programming Document could be amended to include additional risks around the pace of progress, impact of global risks and complexity of procedures.*

## **V: RECOMMENDATIONS**

The conclusions of this mid-term review have been presented and thoroughly discussed with all partners involved: this was carried out at first with a written consultation to Managing and National Authorities launched by the European Commission and the EEAS in March 2017, then taking consideration of the findings of an ex post evaluation of the ENPI CBC 2007-2013 programmes commissioned by the European Commission, and lastly by public discussion and exchange with all partners at the ENPI/ENI CBC Annual Conference in Tallinn in November 2017. All stakeholders have reiterated their utmost support for the continuation of the programmes and their opinion that cross-border cooperation projects need to be pursued further.

This mid-term review has found that the CBC strategy remains appropriate in the context of the EU policy framework and provides response to the developments in the region. Indeed, CBC is seen to be an important vehicle for positive collaboration between citizens, local authorities and civil society

on both sides of the EU border, even in cases where wider bilateral relationships may be challenging. Although programme development and implementation have moved slower than originally planned, there is recognition from partners that the process has improved compared to previous years and that commitment to implement successful programmes remains strong.

Although the decision has been taken to not proceed with the Mid-Atlantic programme, this does not have an impact neither on the validity of the strategic objectives of CBC nor on the likelihood that these objectives will be achieved. Adjustments will be made at the operational level to reflect the cancellation of this programme and to re-allocate unspent funds previously allocated to Mid-Atlantic.

***It is therefore recommended that no changes be made to the strategic framework for EU Support to ENI Cross-Border Cooperation (2014-2020).***

As mentioned above, funds will be reallocated as a result of the cancellation of the Mid-Atlantic programme. Following the decision not to proceed with the programme, the EU took the decision in 2017 to reallocate the EUR 50 million total ENI allocation from the Mid-Atlantic programme to meet the urgent needs for Libya and Syria through the bilateral envelopes and the EU Trust Fund Madad respectively. The contribution from the European Regional Development Fund (ERDF) has been reallocated to the internal cross-border cooperation programmes, as per article 4(7) of the ETC regulation<sup>27</sup>.

In addition to the reallocation of the Mid-Atlantic funds, additional financing of nearly EUR 125 million was made available by a number of EU Member States from ERDF for CBC programmes involving Russia and for the Mid-Atlantic programme. The article 4(5) of the ETC regulation states that ERDF funds are granted on the proviso that equivalent amounts are provided by the ENI. Given various constraints on financial resources across the ENI for the period 2018-2020, and competing claims on those resources, there is no possibility to match ERDF funds with funding from the ENI budget.

The indicative financial allocation per programme in the programming document remains valid with the exceptions mentioned above. It is to be noted however that some adjustments were made during the process mainly to take into account that two programmes were not in place in 2015 (as initially foreseen) but only in 2016.

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<sup>27</sup> Regulation (EU) No 1299/2013 of the European Parliament and the Council of 17 December 2013 on specific provisions for the support from the European Regional Development Fund to the European territorial cooperation goal.

ANNEXES:

Map 1 - ENI CBC 2014-2020 programmes

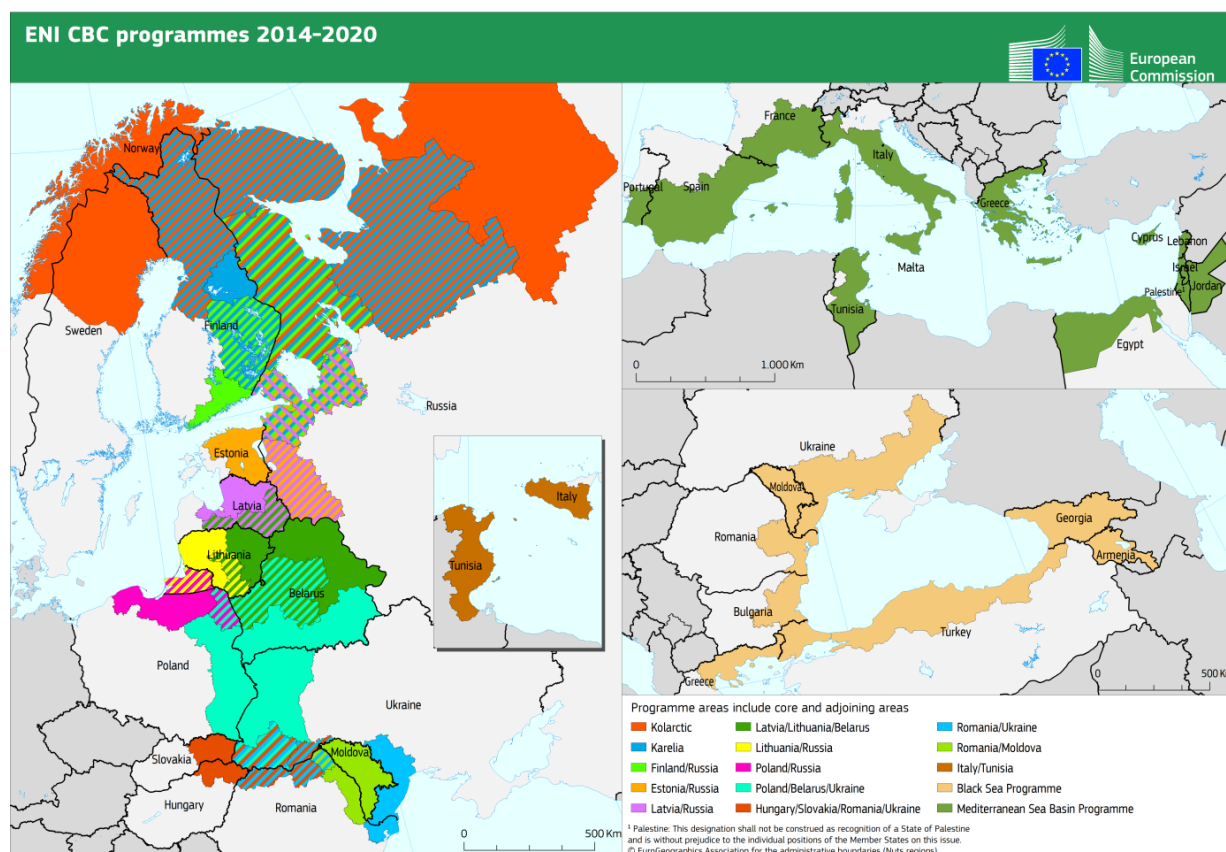


Table 1 – List of ENPI CBC 2007-2013 and ENI CBC 2014-2020 programmes

Programmes	Programming period	
Kolarctic	2007-2013	2014-2020
Karelia	2007-2013	2014-2020
South East Finland-Russia	2007-2013	2014-2020
Estonia-Latvia-Russia	2007-2013	-
Estonia-Russia	-	2014-2020
Latvia-Russia	-	2014-2020
Latvia-Lithuania-Belarus	2007-2013	2014-2020
Lithuania-Poland-Russia	2007-2013	-
Lithuania-Russia	-	2014-2020
Poland-Russia	-	2014-2020
Poland-Belarus-Ukraine	2007-2013	2014-2020
Hungary-Slovakia-Romania-Ukraine	2007-2013	2014-2020
Romania-Ukraine-Republic of Moldova	2007-2013	-
Romania-Ukraine	-	2014-2020
Romania-Republic of Moldova	-	2014-2020
Italy-Tunisia	2007-2013	2014-2020
Black Sea Basin	2007-2013	2014-2020
Mediterranean Sea Basin	2007-2013	2014-2020
Baltic Sea Region	2007-2013	2014-2020



**Table 2 – Calls for proposals launched by the ENI CBC programmes**

Programme	Call ID	Call open from-to	Applications received	Projects approved	Budget available (million euros)
Kolarctic	1 <sup>st</sup> open call	23/01/2017 15/03/2017	42	11	17.3
	2 <sup>nd</sup> open call	26/06/2017 29/09/2017	28	7	9.9 (projects awarded for 8.2)
Karelia	1 <sup>st</sup> regular (restricted) call	16/01/2017 31/03/2017	37 concept notes	8	3.7
	Micro project call	16/01/2017 23/03/2017	21	14	1
	2 <sup>nd</sup> regular (restricted) call	02/03/2017 11/05/2017	57 concept notes (33 invited to submit full applications <sup>o</sup> )	20	10.9
South East Finland-Russia	1 <sup>st</sup> open call	30/01/2017 15/03/2017	29	10	No specific allocation (projects awarded for 7.1)
	2 <sup>nd</sup> call	02/03/2017 30/06/2017	51	10	7.2
	3 <sup>rd</sup> call	Deadline 28/03/2018			6.5
Latvia-Russia	1 <sup>st</sup> restricted call	02/06/2017 28/09/2017	48 concept notes		8.7
Estonia-Russia	1 <sup>st</sup> restricted call	17/01/2017 04/05/2017	76 concept notes (45 invited to submit full applications)		10
Latvia-Lithuania-Belarus	1 <sup>st</sup> open call	21/09/2016 20/12/2016	245	30	20
	2 <sup>nd</sup> open call	22/11/2017 22/02/2018			25
Poland-Belarus-Ukraine	1 <sup>st</sup> restricted call	11/10/2016 31/12/2016	749 concept notes (416 invited to submit full applications)	48	112.4
Black Sea Basin	1 <sup>st</sup> open call	31/01/2017 31/05/2017	301		19.6
Hungary-Slovakia-Romania-Ukraine	1 <sup>st</sup> call for LIPs	15/02/2017 15/11/2017	9		22
	2nd open call	17/05/2017 30/11/2017	137		22
Mediterranean Sea Basin	1 <sup>st</sup> open call	19/07/2017 15/12/2017			84.6
Italy-Tunisia	1 <sup>st</sup> open call (restricted)	27/10/2017 15/01/2018	154 concept notes		16
Romania-Ukraine	1 <sup>st</sup> call ("hard" projects)	19/12/2017 03/05/2018			19.1
	2 <sup>nd</sup> call ("soft" projects)	19/12/2017 03/05/2018			17
Romania-Moldova	1 <sup>st</sup> call ("hard" projects)	19/12/2017 06/05/2018			32.5
	2 <sup>nd</sup> call ("soft" projects)	19/12/2017 06/05/2018			16.1

**Table 3 – Large Infrastructure Projects (LIPs)**

Programme	Project Summaries approved	Project Full Application Forms submitted
Kolarctic	3	3
Karelia	6	4
South East Finland – Russia	10	10
Estonia – Russia	5	5
Latvia – Russia	4	4
Lithuania – Russia	-	-
Poland – Russia	6	5
Latvia – Lithuania – Belarus	6	6
Poland-Belarus-Ukraine	10	10
Romania – Ukraine	5	5
Romania – Moldova	4	4

**Table 4 – Interaction between strategic and thematic objectives**

<b>Strategic Objective A:</b> Promote economic and social development in regions on both sides of common borders	<b>Strategic Objective B:</b> Address common challenges in environment, public health, safety and security	<b>Strategic Objective C:</b> Promotion of better conditions and modalities for ensuring the mobility of persons, goods and capital
<b>Thematic Objective 1:</b> Business and SME development	<b>Thematic Objective 6:</b> Environmental protection, climate change mitigation and adaptation	<b>Thematic Objective 7:</b> Improvement of accessibility in the regions, development of sustainable and climate-proof transport and communication networks and systems
<b>Thematic Objective 2:</b> Support to education, research, technological development and innovation.	<b>Thematic Objective 8:</b> Common challenges in the area of safety and security	<b>Thematic Objective 10:</b> Promotion of border management and border security, mobility and migration management
<b>Thematic Objective 3:</b> Promotion of local culture and preservation of historical heritage	<b>Thematic Objective 9:</b> Promotion of and cooperation on sustainable energy and energy security	
<b>Thematic Objective 4:</b> Promotion of social inclusion and fight against poverty		
<b>Thematic Objective 5:</b> Support to local and regional good governance		
<b>Thematic Objective 11:</b> Other areas not listed above likely to have a substantial cross-border impact		

**Table 5 – Thematic Objectives selected by ENI CBC programmes**

Programme / TO	1	2	3	4	5	6	7	8	9	10
Kolarctic	1					1	1			1
Karelia	1		1			1				1
South East Finland – Russia	1	1	1			1				1
Estonia – Russia	1				1	1				1
Latvia – Russia	1					1				1
Lithuania – Russia			1	1	1	1				1
Poland – Russia			1			1	1			1
Latvia – Lithuania – Belarus			1	1	1	1				1
Poland-Belarus-Ukraine			1				1	1		1
Hungary-Slovakia-Romania-Ukraine			1			1	1	1		
Romania – Ukraine		1	1	1			1	1		
Romania – R. Moldova		1	1	1			1	1		
Italy – Tunisia	1	1	1			1				
Black Sea Basin	1					1				
Mediterranean Sea Basin	1	1	1	1	1	1				
	8	5	8	3	3	10	6	4	0	9

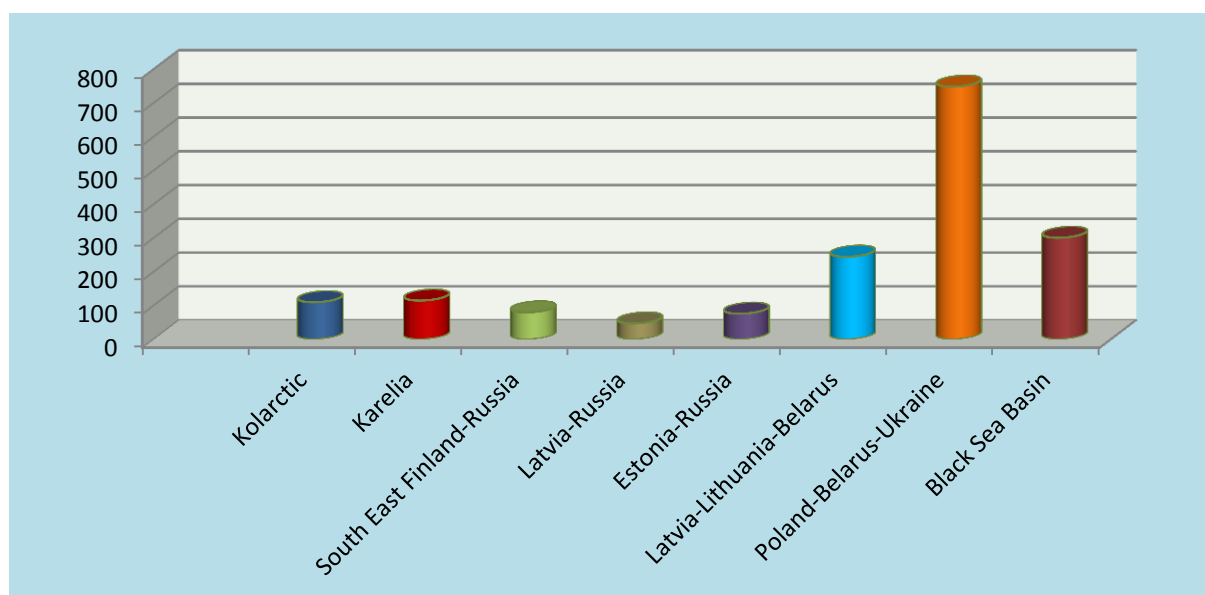
**Table 6 – Common output indicators selected by ENI CBC programmes**

	KOL	KAR	SEFR	EERU	LVRU	LLB	LTRU	PLRU	PBU	HSRU	ROJA	ROMD	BSB	ITTU	MSB	Total
COI1					■								■	■	■	4
COI2	■	■		■	■									■	■	6
COI3			■										■		■	3
COI4		■		■							■	■	■	■	■	7
COI5			■											■	■	3
COI6		■		■	■		■	■		■	■	■				8
COI7				■			■	■	■	■	■	■	■		■	9
COI8							■	■	■	■	■					4
COI10		■														1
COI13							■	■							■	2
COI14				■			■	■								2
COI15										■	■				■	2
COI16	■	■												■	■	2
COI17	■	■	■	■	■					■	■		■			6
COI18				■											■	2
COI22															■	1
COI26									■	■	■					2
COI27	■	■	■	■			■	■	■	■	■	■				8
COI29	■	■								■	■		■			3
COI30								■	■	■	■	■				4
COI31										■	■	■	■			3
COI32										■	■					1
COI35	■	■		■	■	■	■	■	■	■	■	■				6
COI36	■	■														1
COI37		■		■												2
COI38	■	■					■	■	■	■	■	■				4
COI used	8	8	4	8	5	1	6	5	7	11	6	6	6	5	10	

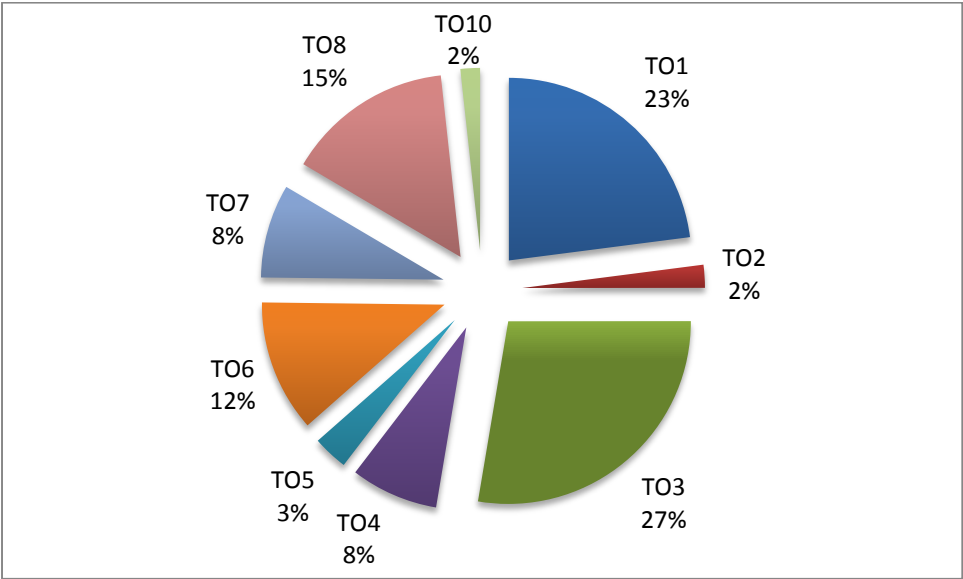
**Table 7 – Evaluations foreseen in the ENI CBC Joint Operational Programmes**

Programme	Mid-term evaluation	Ex-post evaluation	Other ad hoc or specific evaluations
Kolarctic	<i>If necessary</i>	Yes	<i>Possible</i>
Karelia	<i>If necessary</i>	Yes	
South East Finland – Russia	<i>If necessary</i>	Yes	
Estonia – Russia	Yes	Yes	
Latvia – Russia	Yes		<i>Possible</i>
Lithuania – Russia	-	Yes	
Poland – Russia	Yes	Yes	<i>Possible</i>
Latvia – Lithuania – Belarus	Yes	Yes	<i>Possible</i>
Poland-Belarus-Ukraine	Yes	Yes	<i>Possible</i>
Hungary – Slovakia – Romania – Ukraine			<i>Ex-ante, on-going evaluation, possible other evaluations</i>
Romania – Ukraine	<i>Possible, based on mid-term review of ENI CBC</i>		
Romania – Moldova	<i>Possible, based on mid-term review of ENI CBC</i>		
Italy – Tunisia	Yes	Yes	<i>On-going evaluation</i>
Black Sea Basin	<i>Possible, based on mid-term review of ENI CBC</i>		
Mediterranean Sea Basin	Yes	Yes	

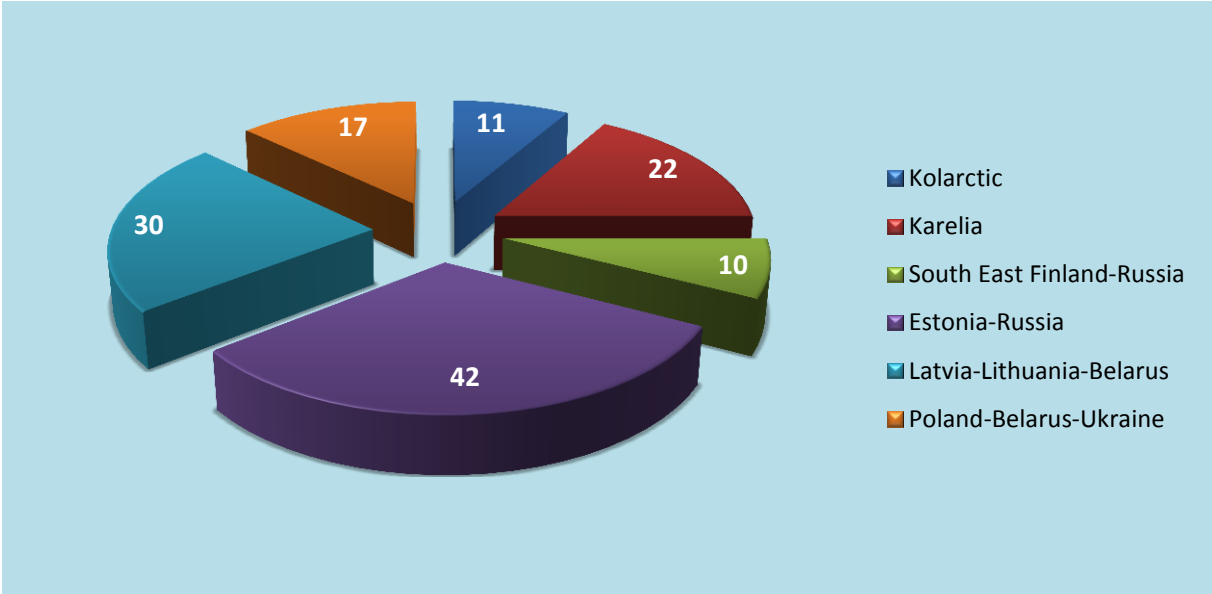
**Graph 1 – Number of applications received in the closed calls for proposals**



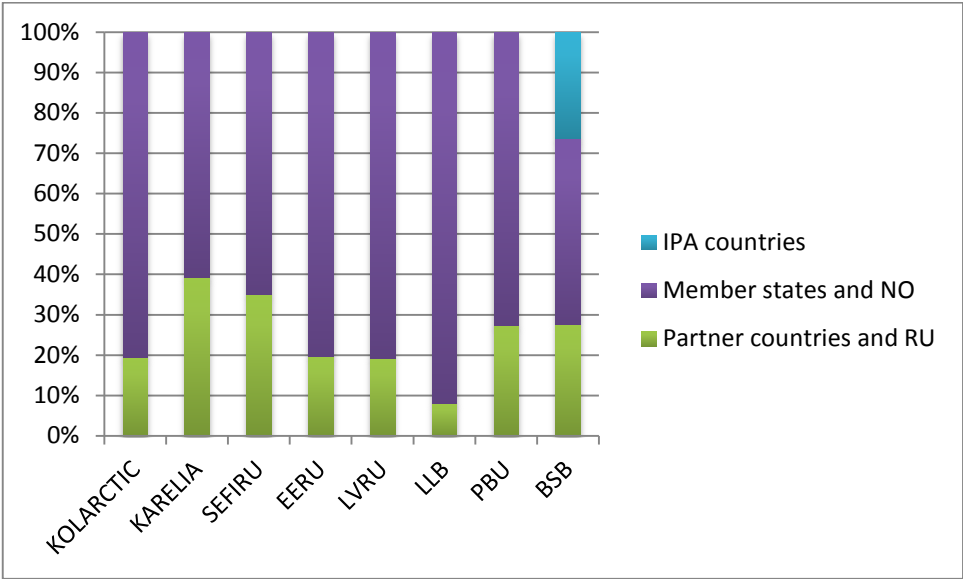
**Graph 2 – Applications per Thematic Objective (TO) (in %) submitted in the closed calls for proposals**



**Graph 3 – Number of projects approved in the calls for proposals where applicants have been selected**



**Graph 4 – Lead applicants per type of country (Member States, partner countries, IPA countries) in the closed calls for proposals**



## **APPENDIX: ENI CBC 2014-2020 Mid-Term Review: Summary of the Consultation with Managing and National Authorities<sup>28</sup>**

In the context of the 2017 mid-term review of the ENI Cross-Border Cooperation Programme 2014-2020, the EEAS and Commission (DG NEAR) asked Managing Authorities of CBC programmes (and through them, National Authorities of the participating countries) to respond in writing to five questions. This paper presents their main conclusions. Information was received on 11 (out of 17) programmes from representatives of 20 (out of 39) countries.

**Summary:** Managing/National Authorities did not note major changes in the context of the regions covered by CBC programmes beyond potential shifts in national policy agendas or broader geopolitical issues (i.e. EU-Russia). CBC programmes have provided a strong platform for dialogue and cooperation between local authorities, civil society and other stakeholders but there are risks that such cooperation could be negatively impacted by the fact that, half way through the programming period, no projects have started delivering. Risk frameworks remain broadly valid but will need to be tested through implementation. However, the pace of progress itself poses risks for the credibility of programmes. Managing/National Authorities do not see a need to substantially revise the CBC Programming Document 2014-2020, unless financial allocations are amended.

**Question1: Have there been any significant changes in the overall situation of the regions covered by ENI CBC programmes that may affect our capacity to implement the programmes and which should be considered in the CBC strategy?**

Overall, Managing/National Authorities did not specify any significant changes. Norway (Kolarctic programme) noted the launch of its High North (Arctic) Strategy, which complements the EU's Joint Communication on the Arctic, while Finland highlighted that health, social services and regional administration reforms will be undertaken in 2019, with a potential impact in the management of the programmes which should not however change the priority allocated to them. Egypt noted some difficulties associated with the implementation of economic and social reforms and encouraged labour-intensive projects under the Mediterranean programme.

**Question 2: How have ENI CBC programmes been a tool for enhanced dialogue and cooperation between the authorities (local, regional, national) and civil society organisations of the EU and CBC partner countries?**

Managing/National Authorities highly valued the way in which CBC programmes promote and sustain dialogue in the preparatory phase. Russia made an overall comment on the importance of CBC for cooperation between the EU, EU Member States and the Russian Federation, given the challenges in the wider relationship. Some respondents, i.e. Finland for the Karelia programme, noted that cooperation built on strong relationships developed between authorities under previous (ENPI CBC) programmes. The importance of public consultations (Karelia) and dialogue with the Private Sector (Mediterranean) was also stressed.

However, many respondents also noted that, while there are reasonable grounds to assume that existing dialogue and cooperation will continue, CBC programmes have not started delivering yet. It

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<sup>28</sup> This appendix is a summary of responses received to the written consultation and it reflects the views at a particular moment of time (March-April 2017). It does not reflect the views of the European External Action Service or the European Commission.



is important, therefore, to move swiftly to the implementation phase in order to sustain momentum and goodwill secured during the preparatory phase.

**Question 3: Has progress in the implementation of ENI CBC programmes been satisfactory in the period 2014-2017?**

Bearing in mind responses to Q2, the position of the Managing/National Authorities on this point was mixed. While many respondents reiterated that the preparatory phase was satisfactory, many noted that the process took too long and that the late adoption of the regulatory framework, and in particular the complex and cumbersome procedure for the conclusion of Financing Agreements had contributed to an overall delay. Many also reiterated their concern that some calls for proposals (Mediterranean<sup>29</sup>) have not been launched at the half-way point of the programming period while other projects were not yet established due to delays in initiating calls (Karelia, Latvia-Lithuania-Belarus, Poland-Belarus-Ukraine)<sup>30</sup>. On a positive note, Bulgaria, Georgia, Romania, Turkey and Moldova reported that problems identified with the process for the predecessor ENPI CBC programmes had been addressed and improved for ENI CBC.

**Question 4: How are risks identified at the outset of 2014-2020 ENI CBC programmes manifesting themselves, and are there any new or emerging risks that should be taken into account for the period 2018-2020?**

Again, Managing/National Authorities raised concerns over risks posed by delays in implementation. Many respondents noted that the risks identified during the preparatory phase remained valid, but added that they would need to be tested during implementation. Finland (SE Finland-Russia) noted the risks posed by the EU-Russia relationship, while Poland highlighted risks to the Poland-Belarus-Ukraine programme associated with the conflict in Crimea. For the Mediterranean programme, Cyprus noted that the political situation in the Mediterranean region is unstable and could affect programme delivery, while Tunisia highlighted the need to take account of risks posed by terrorism. Poland, Lithuania (on behalf of Belarus), Malta, France, Tunisia, Egypt and Italy all noted new/existing risks around the complexity of procedures and delineation of roles and responsibilities between stakeholders. Finland noted that its regional administration reforms may cause delays in the future.

**Question 5: In your view, does the current Programming Document 2014-2020 remain appropriate, or is there a need to make substantial revisions?**

Most Managing/National Authorities feel that the Programming Document remains appropriate. Latvia (Latvia-Russia) and Poland (Poland-Belarus-Ukraine) referred to the need to amend the CBC budget to incorporate additional ERDF allocations proposed since 2014. Italy noted that the Mediterranean programme under the ENPI CBC 2007-13 received a major budget increase and proposed that this should happen again if funds were available for reallocation. Egypt requested updated socio-economic data in the Programming Document to reflect "positive developments" taking place there.

Managing/National Authorities were also asked to provide any other feedback, whereby the Russian Federation (Karelia, Kolarctic and South East Finland-Russia) welcomed the positive impacts of Large Infrastructure Projects.

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<sup>29</sup> At the date of the mid-term review the Mediterranean Sea Basin programme has launched the first call for proposals.

<sup>30</sup> It is worth mentioning however that the programmes raising concerns are at the same time the ones that have launched the calls first and are completed (or about to complete) the evaluation and selection processes.