

Technical proposals for Interreg B (transnational) 2028 - 2034

This paper was prepared in the Interreg B Working Group, i.e. by the chairmen of the German committees of the six transnational Interreg B programme areas with German participation¹ (representatives of the German federal states) and by the Federal Institute for Research on Building, Urban Affairs and Spatial Development (BBSR) under the chairmanship of the Federal Ministry for Housing, Urban Development and Building (BMWSB).

The headlines are based on the structure of Interreg Regulation (EU) 2021/1059. Aspects referring to the Common Provisions Regulation and the ERDF Regulation were placed under "fundamental considerations" or in the specific Interreg sections. The proposals refer to all three Regulations. The authors refer to the decisions of the Conference of Ministers for European Affairs of the German Federal States (EMK)[cf. EMK] and of the German Standing Conference of Ministers Responsible for Spatial Development (RMK) (formerly MKRO) [RMK].

PART I Fundamental Considerations and Content Matter

Interreg B	Demands
FUNDAMENTAL CONSIDERATIONS ABOUT TRANSNATIONAL COOPERATION	1. Against the background of current and future challenges, including green, digital and demographic change, climate change and its consequences, the need for sustainable competitiveness, geopolitical instability, the authors of this paper ask the European Commission to develop proposals for the European Territorial Cooperation after 2027 that shall allow all regions to use transnational cooperation as an effective tool to tackle these challenges, to take the associated opportunities and to achieve a good quality of life for citizens.
	2. Due to its high added value for Europe, Interreg shall remain an essential part of cohesion policy. It promotes the European idea by enabling a wide range of actors to cooperate across national borders, learn from each other and develop joint solutions for managing cross-border challenges. In doing so, it creates trust and promotes cohesion and integration within Europe. <i>Transnational cooperation</i> happens in macro-regions and other large functional regions throughout Europe. Interreg is the only programme of its kind, has 35 years of experience and has built up citizen-oriented cooperation structures that may contribute to reducing dissatisfaction in certain regions. An independent Interreg regulation has shown that it can strengthen Interreg's position.
	3. European Territorial Cooperation proves to be an important pillar of cohesion in the EU as it helps reduce disparities between regions within the programme areas, promote spatial integration and use the untapped potential of less dynamic regions. <i>Especially transnational cooperation</i> contributes to spatial integration by involving a large number of regions, among them rural and economically weaker regions, in European cooperation. In order to further strengthen the spatial impact of Interreg B, the regulation should be clearly linked to the goals of the Territorial Agenda 2030 "A future for all places" (see item no. 19).

¹ Alpine Space, Danube Region, Central Europe, North Sea Region, North-West Europe, Baltic Sea Region

- 4. In view of various internal and external crises and nationalist tendencies, European cooperation as a fundamental value is more important than ever. Interreg promotes the resilience of regions preventively which is why a mediumand long-term orientation of projects, e.g. towards climate change and energy transition, is important. By allowing for a wide range of transnational project formats, such as small projects and strategic operations, Interreg can respond flexibly to needs.
- 5. A higher Interreg budget in the 2028 2034 multiannual financial framework, which is able to provide additional investment funds in current prices, is essential to strengthen the impulses resulting from the programmes, their local visibility and the associated cohesion in Europe. The fact that the *transnational funds* are rapidly allocated in the current funding period and that the project stakeholders' strong demand for funding goes far beyond what is available, shows the high need for financial support (see items no. 25 27).
- 6. Harmonised and simple funding procedures should allow beneficiaries fast and unbureaucratic access to financial resources. Beneficiaries should be able to focus on the project work and be relieved of complex administrative provisions in the best possible way. Programmes are to be managed efficiently and unnecessary expenditure be avoided. Priority is to be given to the results of transnational cooperation and detailed checks are to be made unnecessary.

SUBJECT MATTER, SCOPE AND INTERREG STRANDS

7. Interreg's focus on cross-border, transnational and interregional programmes has proven itself and reflects the territorial needs of all regions involved. Transnational cooperation plays an important role within the Interreg structure. Unlike cross-border programmes, it covers all regions of Europe and thus enables everyone to participate in cooperation projects. At the same time, the "macro-sized" programme areas enable more spatially specific approaches and consistent cooperation patterns even outside the centres. Transnational cooperation is to be continued and strengthened in its present form while covering all regions in Europe.

GEOGRAPHICAL COVERAGE/TRANSNATIO NAL PROGRAMME AREAS

- 8. The geography of the programmes has proven itself and shows the territorial needs of all regions involved. **Interreg B shall, in principle be continued in the proven transnational programme areas**, which does not rule out smaller programme adjustments. Fundamental changes would "torpedo" successes in terms of transnational cohesion and identity of the programme areas in recent decades. Cooperation requires trust, time and consistency, which is why the existing programme areas must be maintained in principle.
- 9. Due to their geography and functional relations, some regions cannot always be clearly assigned to just one transnational area. Programme areas, that consequently overlap, complement each other thematically and offer project actors additional opportunities for cooperation.
- 10. Partners from outside the transnational programme areas should still be able to participate and be increasingly admitted by the programmes.
- 11. All Interreg programmes are based on territorial analyses and strategies that serve as a basis for programme implementation. *Transnational programmes* with and without macro-regional strategy should be regarded equivalent.

SYNERGIES AND COMPLEMENTARITY WITH OTHER PROGRAMMES

- 12. An important part of transnational *Interreg B projects* is the exchange with other projects at regional, national and European level. It helps project leaders to take current findings into account and to contribute to networks and communities like Horizon Europe, other Interreg programmes and regional ERDF programmes. Synergies arise specifically when programmes clearly differ and complement each other in their way of working. It is therefore important to strengthen the unique selling points of Interreg B, which includes to involve a variety of local and regional institutions ensuring direct relations to a region and to citizens, to consider place-based approaches and bottom-up initiatives and to involve decision-makers.
- 13. Networking between the transnational programmes, which currently mainly happens via projects and project partners, supports the exchange of "best practices" at project and programme level, creates synergies and strengthens the visibility of the programmes. In addition, programme structures may promote synergies, for example between projects with similar topics funded by different programmes. In the future, closer networking formats, realised for example through joint calls for funding or communication formats, are to be tested.
- 14. For transnational Interreg B programmes, synergies with their related macroregional strategies are important. Better than before, it shall be ensured that the objectives of macro-regional strategies are financed with regional, national and European funds beyond *Interreg B*.

SHARED MANAGEMENT

15. In the context of EU funding, Interreg programmes have to be considered complementary to centrally managed European programmes and to regional and national programmes. European regions and member states shall continue to be responsible for implementing transnational Interreg B programmes according to the specifics of the programme areas based on the principle of shared management. It strengthens the identification and awareness of the local people and supports the bottom-up approach. This kind of implementation is a unique selling point and enables to jointly finance projects without losing friction through different procedures, timelines or regional interests.

POLICY OBJECTIVES (PO), INTERREG-SPECIFIC OBJECTIVES (ISO) AND THEMATIC CONCENTRATION UNDER INTERREG B

- 16. The policy objectives of the ERDF form the basis of transnational cooperation. *Transnational Interreg B programmes* shall further contribute to the ERDF objectives by focusing on topics or challenges where *transnational cooperation* promises high added value and which use place-based and citizen-oriented approaches. The thematic orientation of the policy objectives shall allow transnational *Interreg B programmes* to have a transformative, forward-looking impact according to the specifics of the related programme area.
- 17. Interreg Specific Objectives should be continued complementary to the policy objectives of the ERDF. Governance is one of the Interreg Specific Objectives (ISO) presently addressed by *Interreg B*. Not all programmes have incorporated an Interreg Specific Objective in their funding priorities. The fact that this objective allows cross-thematic and place-based project approaches that aim, for example, at better cooperation between regions with functional relationships, participatory decision-making processes (e.g. public participation, quadruple helix), better digital management or integrated spatial development strategies, e.g. in the fields of demographic change, services of general interest, tourism, culture or accessibility, is rated positively. It is also used to support

- macro-regional strategies. Although this priority gives the programmes greater flexibility, for example to respond to unexpected issues, it requires close steering and careful communication since it covers a large thematic variety.
- 18. The specific objectives are very differently addressed and implemented by the transnational programmes, which reflects their different spatial priorities and sets individual trends in each programme area despite thematic concentration and harmonisation. The specifications for thematic concentration must continue to give the transnational *Interreg B programmes* sufficient leeway so that they can work according to the specifics of each programme area.

TERRITORIAL DEVELOPMENT

- 19. Interreg B should in future be linked to the objectives of the Territorial Agenda 2030 "A future for all places", strengthening the spatial impact of Interreg. In line with this, a certain proportion of Interreg funds should be reserved for integrated actions in non-urban and urban areas that support relations between functional areas. The approach of cooperation between public institutions at different administrative levels, research institutions, private actors, associations and the civil society (quadruple helix), pursued in Interreg B, increases the spatial impact of projects and their orientation towards citizens.
- 20. The implementation of the policy objective "A Europe closer to citizens" is to be simplified by no longer tying it to the use of territorial instruments. Interrea B supports a spatially integrated and citizen-oriented approach and can significantly contribute to the implementation of the policy objective. However, the current requirements for small-scale funding mechanisms and decisionmaking contradict the transnational logic, because transnational cooperation cannot just take place locally. The lack of feasibility of PZ5 is reflected in the fact that transnational Interreg B programmes do not currently address this objective due to the implementation requirements, despite substantive support. ISO1 allows for thematically integrated approaches, while PO5 focuses on urban and non-urban areas, i.e. it is spatially oriented, which is the core of territorial cooperation. A large number of successful transnational Interreg B projects show that spatial and citizen-oriented projects can also be implemented without formal territorial instruments. By simplifying PO5, Interreg B would be able to demonstrate a significant contribution to a Europe closer to citizens through actually addressing the policy objective.
- 21. The interaction between dynamic and less dynamic regions is to be increased by making participation in *Interreg B* more attractive to public actors, small towns, regions and areas in so-called "development traps", that have so far been less involved. Attractive funding rates, local issues and unbureaucratic cooperation formats like subpartner structures, urban-rural partnerships, replicator and leader-follower approaches are essential for these actors to participate and to strengthen the spatial impact of Interreg B. Actors with low capacities report that both the availability of own resources and the lack of staff make it difficult to participate in territorial cooperation. A consequence is the declining participation of authorities whereas universities and research institutes are the biggest group participating in most programmes. In order to ensure spatial impact, actors with sufficient capacities should be required to actively integrate public actors into cooperation partnerships.

	22. In the present programming period, transnational <i>Interreg B Programmes</i> test small scale projects as a new format. In addition to regular funding calls, small scale projects offer the opportunity to involve new and smaller players in a fast and unbureaucratic way, to initiate knowledge exchange and practical activities and to prepare larger projects in the context of Interreg, which is why they should be continued. Small project funds to implement small scale transnational projects – which can only be transnational to a limited extent – are not considered necessary.
PARTICIPATION OF THIRD COUNTRIES, PARTNER COUNTRIES	23. Participation of third countries bordering the EU in transnational <i>Interreg B</i> programmes was successful and shall be continued. This makes it possible to continue, intensify or newly build cooperative relations with third countries. The project actors express an ongoing interest in cooperation and exchange with British partners within transnational Interreg B projects.
	24. Candidate countries shall further be considered to supplement the geographies of transnational programme areas. A balanced cooperation between member states and candidate countries within the programmes allows neighbouring actors to cooperate intensively and trustfully with institutions and involves that various intensities of participation should be possible.

Part II Programme implementation

Interreg B	Demands
RESOURCES AND CO-	25. The demand of the Conference of Ministers for European Affairs of the German
FINANCING RATES	Federal States (Europaministerkonferenz EMK) for a higher budget that goes
	beyond inflationary compensation and provides additional investment resources
	is essential to transnational cooperation:
	26. As in the previous programming period, more projects would be needed and possible with the appropriate financial resources. A high budget commitment already in the first third of the current programming period in many programmes with German participation shows that the demand for transnational cooperation projects is consistently high. The demand for more promising projects could not be met in the past, and it is already clear that it will not be met in the current funding period.
	27. Investments coming directly from transnational projects can significantly increase the direct impact of transnational measures. Generally, investments as part of transnational projects are already possible, although, due to limited budget, they are often planned as follow-up financing from other sources. The procedure is welcome, even though it often leads to an interruption of the impact chain of projects, since it is difficult to trace to what extent these investments are actually implemented. Increasing investments as part of the project budgets would reduce the number of executed projects, which again would be in contrast to the abovementioned high demand. This is why additional investment funds are to made available to strengthen impetus and cohesion in Europe resulting from the programmes.
	28. Investments in transnational projects are a very good way to implement new and innovative solutions directly and promptly as part of piloting. Related experience and knowledge from many parts of Europe and from a wide variety of actors are

	combined. They often shorten lengthy local processes and decisions and accelerate transformation in the regions involved.
	29. Involving other non-EU member states is absolutely necessary in view of the common challenges and the potential of <i>transnational cooperation</i> . This is why financial instruments (e.g. NDICI, IPA) must ensure sufficient financial resources.
	30. The various Interreg strands shall be equipped with sufficient financial resources to allow an equal co-existence. The relative distribution of budgets among the strands and transnational Interreg <i>B programme areas</i> should therefore be maintained.
	31. The maximum rate of 80% EFRE co-funding as well as the associated flexibility for programme areas to fix one or several rates, has proven its worth. The general conditions for transnational projects in several transnational programme areas prevent a co-funding rate of less than 80%.
PREPARATION, APPROVAL AND AMENDMENT OF TRANSNATIONAL INTERREG B PROGRAMMES	32. During implementation, fast and unbureaucratic procedures are to be used to adapt to changing requirements. Following an agreed minimum term, minor changes below certain thresholds, for example, should be considered approved for transnational projects as well as for programmes. It would save valuable time for implementation within the funding period, and set clear and reliable standards.
	33. The so-called carry-over procedure , important for <i>transnational managing authorities</i> and related areas to transfer commitment appropriations to a new funding period without additional and bureaucratic approval procedures, has proven itself and is to be maintained. The transnational programme bodies were able to start their work rather quickly and realise initial project calls faster.
TECHNICAL ASSISTANCE	34. Adjusting the technical assistance to 8% has proven its worth and has in particular helped the <i>transnational programmes</i> with small financial resources to better meet the growing demands related to digitisation, communication, project consulting and selection. A sufficient amount of technical assistance in view of the various financial resources of the <i>transnational programmes</i> is nevertheless considered important. Evaluating the level and adequacy of technical assistance flat rates would help to make related discussions more transparent. Altogether, the parties involved do not see any need to increase the technical assistance of the transnational programmes beyond 8%.
	35. At the same time, the general, comparatively very strong cost increases also have an impact on the technical assistance of the <i>transnational programmes</i> . This is why the EMK requirement to increase the Interreg budget in absolute terms is also very important.
	36. In order to reduce the dependence of technical assistance payments on the payment of project bills, especially in the first half of the programming period, an increase of the pre-financing of the transnational programmes should be considered. In addition, a maximum duration from applying for funding to starting a project should be set. These measures can prevent excessive payment of funds at the start of the transnational programmes and avoid a cash flow risk for the technical assistance.

TRSNATIONAL INTERREG B PROGRAMME AUTHORITIES, MANAGEMENT, CONTROL AND AUDIT

- 37. Although many requirements have already been successfully implemented within the *transnational programmes*, **digitisation**, **simplifications and the reduction of unnecessary management procedures and structures** remain important goals.
- 38. At the same time, the increased use of lump sums reduces the necessity to check expenditure within *transnational projects*. Size and scope of audits and audit mechanisms must be adapted to realities in *transnational programme areas*, e.g. by centralising audit authorities. This would also result in significant cost savings.
- 39. Artificial intelligence (AI) is on the advance and using it in *transnational projects* is already a reality, according to stakeholders. The possibilities of AI to influence the work of transnational programmes are considered to be very high. The use of AI when applying for funding, assessing and selecting project applications or when managing and monitoring projects funded under transnational programmes should therefore be discussed and taken into account as soon as possible. Its role in the application process shall be assessed, related procedures shall be adjusted in a timely manner to ensure fair application procedures and good projects in the context of transnational programmes. This does not mean that the possibilities of AI are rated fundamentally negative.

Part III Simplification of management and control regulations

Interreg B	Demands
ELIGIBILITY	 40. Simplified cost options have significantly supported the project implementation and management in all transnational programme areas and are strongly welcomed by projects and programmes. It would be helpful if Interact evaluated the simplified cost options and if the transnational Interreg B programme areas were harmonised accordingly. However, there should be country-specific exceptions, e.g. with regard to travel costs. 41. An achievement-oriented reimbursement of funds to projects is new to most of the transnational <i>Interreg B programmes</i>. It can increase the attractiveness of the programmes and simplify implementation by putting the focus on project results instead of just measuring the progress of implementation. Against this background, performance-based approaches are increasingly to be used in the new funding period and are to replace the cost-based approach, taking the risks for project managers and programmes, where possible, into account. In a performance-based approach, milestones and result categories appropriate to transnational <i>Interreg B projects</i> must be defined in order to minimise the risk to projects. It shall also be ensured that transnational projects may continue to involve and implement experimental elements.
FINANCIAL MANAGEMENT	42. State aid: For the time being, the revised Article 20 "General Block Exemption Regulation" seems to be working since it takes the variety of possible partners in transnational Interreg projects into account and allows clear definitions in dealing with the aid.
INDICATORS FOR INTERREG PROGRAMMES	 43. Interreg-specific indicators are generally welcome. They improve visibility and add value to projects with transnational orientation. 44. The current Interreg-specific indicators do not allow to track transnational project results systematically beyond the project implementation and the

	funding period. This is why relevant target groups and sectors can often only partially perceive long-term strategic effects. Current monitoring processes should therefore be adapted and in addition, where appropriate, project results be controlled in the long term, taking into account the probably more performance-based programme approach. In doing so, the added value of reporting and the additional effort for the project partners have to be reconciled.
IMPLEMENTATION OF TRANSNATIONAL PROJECTS	 45. Long application processes and selection procedures create planning uncertainty and prevent desired target groups, especially public and civil society actors from less dynamic regions, which have been less involved so far, from participating as project partners. Where possible, therefore, the duration from submitting an application to deciding on approval or rejection should be limited to a necessary degree, both in one- and two-step procedures. 46. In order to encourage new and smaller players to participate in transnational Interreg B projects in addition to established project partners, other options for fast and unbureaucratic financial support through the programmes, e.g. by granting preparation- or pre-financing of approved projects, should be examined. 47. In order to limit the bureaucratic effort of financial and progress reporting for the project partners and at the same time enable a regular flow of funds, possibilities and advantages of more flexible reporting should be taken into account, harmonised and implemented in the programme areas.