

Partners' involvement during EU funds programming: left-out on crucial questions

The negotiations on the EU funds for 2014–2020 coming to an end, NGO partners from CEE countries conclude on their involvement during the “programming”, the process of elaboration and consultation of the future EU Cohesion Policy spending plans. Whereas some improvements compared to the previous period can be stated, an even formal compliance with the European Code of Conduct on Partnership is not always guaranteed. Especially on questions of strategic importance partners were not consulted. This is undermining the credibility of the programming process and threatens to squander the benefits that the comprehensive involvement of all stakeholders can deliver.

For more information

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The partnership principle in Cohesion Policy is supposed to provide for a comprehensive and early stage involvement of all stakeholders into the planning, implementation, monitoring and evaluation of EU funds' investments. Such involvement and engagement can foster various benefits and added value such as enhancing collective commitment and ownership of the EU policies and investments, increasing knowledge, expertise and viewpoints in project design and selection, and efficient project implementation, as well as ensuring greater transparency in decision making processes and the prevention of fraud and misuse of taxpayers' money.

The Cohesion Policy legislation stipulates, in article 5 of the Common Provisions Regulations, the introduction of a so called “European Code of Conduct on Partnership” (ECCP). This ECCP, laid down via a Delegated Act, should give guidance to member states and promote best practice in the field of partnership regarding: partners' involvement and dialogue with decision makers; their selection process; access to information, to time lines and planning documents; reporting on consultation and partners' role and added-value during programming, and; flexibility on specific procedures, combined with the responsibilities to ensure a transparent and participatory process (including the reporting of actions taken in that regard). Thus it aims to address one of the main weaknesses of the current application of the partnership principle –

diverse practices and qualities of involvement in different member states, leading often to low-standard partnerships.

In December 2014, with all draft Partnership Agreements having been submitted to the European Commission, and many of the Operational Programmes in their final stage, partners in **the Czech Republic, Estonia, Hungary, Latvia, Poland and Slovakia** have assessed their experience during the programming in regard the compliance with the provision stipulated in the ECCP:

I. The overall arrangements regarding the requirements of the European Code of Conduct on Partnership

1. ***Timely disclosure of and easy access to relevant information couldn't always and everywhere be guaranteed***

In **Latvia** at the beginning of the programming process the single Regional Development Programme (RDP) was presented to partners in bits and pieces only, preventing partners to get an integrated view of the programme in an early stage. The first complete version of the RDP publicly available was published in summer 2013. The next significantly changed and updated version was distributed to the members of the RDP Monitoring Committee on 27th of January 2014. The last version of RDP was made available to public only by the time it has been sent to EC on March 2014.

In **Hungary** bodies representing civil society, such as environmental partners, non-governmental organisations (NGOs), were not identified as "partners" according to the Code of Conduct. For stakeholders such as NGOs the Hungarian government organised public consultations on the Partnership Agreement and operational programmes in the framework of public consultations open, to the wider public. NGOs did not have any additional possibility to get involved in the programming process. NGOs didn't get the opportunity to participate in any working group (except one on S3 innovation strategies).

In most cases Ministries in **Slovakia** provided information within formal timeframes of commenting procedures or few days before session of working groups. Members of the NGO working group for Programming EU funds were not notified separately when new documents entered the procedure. Only thanks to the office of the Plenipotentiary for Civil Society this information service was provided. Timely access to information took place only through individually established relationships with officials, the provision of information did not happen proactively by the authority if NGOs did not establish working relationships with them. E.g. the Central Coordination Authority/Department for Methodology communicated initial draft versions of several documents with NGOs, as well the Ministry of Environment and the Office of Government (CCA) was open to share their information and documents.

Authorities in the **Czech Republic** shared programming documents with the partners. Important supporting documents though, i.e. the strategy for the waste sector or ex-ante analyses were not shared and thus could not inform partners on the overall strategic approach and coherence towards important sectors.

Most relevant information in **Estonia** was made available on www.strukturifondid.ee.

Most of the relevant information was made public and available in advance and via different

channels in **Poland**. Some problems occurred though with the Partnership Agreement consultation process, at times the information had to be requested and arrived late. It was working more smoothly with the Operational Programmes.

*2. In several cases there was not **sufficient time for partners to analyse and comment** on key preparatory documents and on the draft Partnership Agreement and draft programmes*

Environmental NGOs in **Latvia** approached the Ministry of Environment regularly asking to be given the opportunity to contribute to the draft Annex to the OP once it became available from the Ministry of Finance. Finally, on July 9, it was received at 14:05, with a request for reactions by 17:00 that same day. The document is 367 pages long and it was the first time NGOs had seen it.

During the public consultation process sufficient time was granted in **Hungary**, except that the consultation of the Partnership Agreement took place in August, the month of vacation.

NGOs in **Slovakia** used channels through Plenipotentiary for Civil Society or direct contacts to ministries to gain timely access. Official procedures did not allow for more than 5 days (in best cases) to analyse the documents. Only NGO experts following the documents through their whole life-cycle could keep up. But this was the group of stakeholders that the process was designed for.

In the case of the elaboration of the Partnership Agreement in the **Czech Republic**, given the extent of the document, times for commenting were considered extremely short by the partners; regarding the Operational Programmes, the time frame has been set wide enough.

Many partners in **Estonia** have expressed that they were not informed enough about the actual content of the decision in question or the timescale of the whole process.

In general the timeframe set in **Poland** was satisfactory, although there were some instances reported (particularly in the working groups for the Operational Programmes) where the time pressure meant that the partners involved in the working group had very little time to comment on documents.

*3. **Available channels through which partners may ask questions, may provide contributions and will be informed of the way in which their proposals have been taken into consideration were mainly established***

During the programming period in **Hungary** the proposals could be sent on an open online forum, where everybody could see the proposals and the comments of others. The stakeholders who commented on the Partnership Agreement and Operational Programmes already received or will receive detailed feedback how their proposals were integrated in the documents, according to official announcements. However, in both cases, environmental partners are still waiting for the feedback regarding their proposals; it is expected that partners will receive this feedback only the moment the Hungarian government adopts the programmes.

The **Slovakian** Office of the Plenipotentiary for Civil Society has taken as a conscious effort to provide service to civil society. In addition, official procedures lead to information being provided to those who participated in the process of commenting, including explanations and the possibility to further negotiate.

In the **Czech Republic** public meetings of OP programming platforms were established. On specific

issues, partners had to push for individual advocacy meetings, and in some cases, such as CLLD in urban areas, this proved to be very difficult.

Relevant contact persons from leading ministries in **Estonia** were open to answer questions from partners.

In the case of some **Polish regions** – Dolnośląskie, Małopolskie, Podlaskie – there was a multitude of different channels through which partners could get involved and participate in the programming process. These included: the creation of formal working groups, which all included representatives of the CSO community, and at least one environmental NGO representative; the set-up of sub-groups within those groups, which worked on specific issues and later presented the results of their discussion to the plenary working group, which facilitated and focused the process; holding official, wide public consultation, with either a web-based platform or a document based form provided for submitting comments. In other, less exemplary cases (both regional and national-level OPs), there was formal online consultation held, and the working groups were present, but were mainly a forum for information and document sharing and didn't allow for real discussion (more like conferences with presentations). Regarding the Partnership Agreement – there were 12 regional seminars, presenting the theses and structure of the document, with information available that there was going to be an online consultation. Some technical issues with commenting via the internet form has been reported – it only allowed one comment in one session, which meant that when submitting many comments to different sections it took very long and turned out to be complicated and de-motivating.

4. *The dissemination of the outcome of the consultation has been overall satisfactory*

Often, the communication in **Latvia** can be described as one-way, meaning that there is no justification why a comment or proposal has not been taken into account. Many questions and comments proposed by NGOs have been moved to a later programming stage with comments such as “We will discuss this at the next level when preparing regulations in the Cabinet of Ministers”. It should be stressed that while the European Commission requires the partnership principle to be integral to the development of the OP, there are no such requirements for the development of ‘Cabinet of Ministers regulations’ in Latvia, and it is often very difficult for NGOs to be able to comment on that set of regulations. However, there are reports made available comprehending all the comments submitted to the authorities related to PA and OPs; these reports are attached to each relevant document.

The **Hungarian** government published all submitted comments related to OPs in pdf-form.

The partnership process enabled **Slovakian** partners involved in the commenting procedure to access authorities directly and to discuss those comments that did not get incorporated into the text. Those negotiations lead to a changing the texts and the setup in several cases. So the negotiations were not only pro-forma, but a constructive dialogue.

Comments of **Czech** partners have been settled, but often in a very formal way, rather than engaging in a discussion or addressing the content of partners’ argumentation.

Partners in **Estonia** felt that the insufficient feedback to the comments was the weakest part of the consultation process.

A list of partners involved in the programming process was included in all **Polish** OPs. Reports outlining the general outcomes of the consultations were also made public, although not all regional authorities chose to include the list of submitted comments with feedback within the documents, or

even publish it at all. Some regional reports include an analytical part and acknowledge the added value of the consultation; some only include numbers and graphs. Most responses and outcomes were delayed. In the case of participation in working groups, feedback was given instantaneously, with the authorities usually giving reasons for including or excluding a comment or request, or (often) leaving a specific comment for the stage of the implementation documents.

II. Assessment of the partners involvement regarding the Partnership Agreement programming process

5. *The analysis of disparities, development needs and growth potential mainly took place without partners' involvement*

Latvian NGOs were involved into the process of planning the National Development plan of Latvia 2020 which is the basic National Strategic Planning document of the Operational Programme.

In **Hungary** everybody could comment on these areas during the public consultation process. However, as the Partnership Agreement describes it, partners were principally excluded: "In the first stage of the preparation of the Partnership Agreement, a top-down approach was applied, basically by sectoral ministries. At this stage the main development needs were identified, the results, the indicative allocation of funds, a list of the internal structure of the institutional system and the implementation of operational programs were planned by the ministries."

Formal talks within the Partnership group took place before the PA has been drafted in **Slovakia**. Two meetings took place this regard. A high level stakeholder council has been created without direct representation of NGO sector. It is hard to trace the results of the discussion to the final setup of the PA. The situation analysis has been drafted by a contracted company. The final analysis has been subject to commenting by partners within the official structure of a working group.

Development needs of the **Czech Republic** were decided politically in 2012 without prior public discussion or involvement of partners.

In **Estonian** this exercise was rather following a broader approach, sometimes not well communicating the aim of neither the consultation nor the plan for the final decision-making process.

The Partnership Agreement for **Poland** in general is not a document which was elaborated in partnership (in cooperation with civil society partners). The main structure, including the analyses and the choice of thematic objectives (and particularly the allocations) was prepared centrally by the governmental body. The partners were later asked to comment and provide feedback to the draft document. However, there was no structured forum for meaningful discussions, and no working group; the consultations were held in the form of conferences, where participants were informed about the process and the structure and content of the draft document, but there was little possibility for dialogue.

6. *Summaries of the ex-ante conditionalities of the programmes and its key findings were made public, its elaboration didn't involve partners though*

Summaries of ex-ante conditionalities of the **Hungarian** programmes and its key findings were published together with the draft OPs, and could be commented during the public consultation

process.

In **Slovakia** the ex-ante conditionalities were closed procedures when it comes to NGOs. Non-state actors became part of ex-ante working groups only on specific request.

Despite **Czech** NGO partners provided their comments to settlement of European Commission's comments on ex-ante conditionalities, the Ministry of Regional Development considered this as a closed "technical" process relevant only for the programming authorities.

Summaries of the topics were presented during public hearings in **Estonia**.

7. The selection of the thematic objectives, the indicative allocations of the ESI Funds and their main expected results was made without partners

For **Hungary**, the allocations and thematic objectives were decided beforehand, even the government said that the public consultations are not about financial allocations.

A process of public consultation did take place this regard in the **Slovakia** and the results were presented to the working group for PA. The process of incorporation of the results into the PA was not clear. The structure of the PA was relatively final by the time the consultation did take place. Thus it is very hard to prove or disprove the effect of the public consultation.

Partners were not able to exercise any involvement in the division of allocations in the **Czech Republic**. In most cases, they were also not able to get into an exchange on the thematic objectives and results.

Those decisions were made on a political ground in **Estonia**, but before that public had different possibilities to express its opinion.

8. The list of programmes and the mechanisms to ensure coordination of the ESI Funds with one another and with other Union and national funding instruments and with the European Investment Bank has not been consulted with partners

No particular involvement of NGOs in **Hungary** on this topic. There was the possibility to provide input this regard during the public consultation processes.

This coordination was solely done by the **Slovak** government.

In the **Czech Republic** NGO partners were so far not involved in the setup as very little is known about financial instruments so far.

9. The arrangements for ensuring an integrated approach among ESI Funds have been made without partners

Those arrangements are still weak in **Latvia**.

No particular involvement of NGOs in **Hungary** on this topic. There was the possibility to provide input this regard during the public consultation processes.

In **Slovakia** these arrangements was reserved to the government. In general the partners did not have a say on the structure and the frame setup of the policy, only on content issues within the set framework.

In areas such as environmental education or green jobs, demands of Czech partners for coordination among the OPs and other ESI funds were not taken into account.

10. The arrangements for ensuring an integrated approach to addressing the specific needs of geographical areas most affected by poverty and of target groups at the highest risk of discrimination or exclusion, with special regard to marginalised communities are not made sufficiently clear to partners

The minimum requirements have been fulfilled in **Latvia**.

No particular involvement of NGOs in **Hungary** on this topic. There was the possibility to provide input this regard during the public consultation processes.

These arrangements have been defined in the **Estonian** programme, but the background of the selection has not been sufficiently described.

11. The implementation of the horizontal principles referred to in Articles 5, 7 and 8 of Regulation (EU) No 1303/2013, i.e. climate, resource efficiency and nature protection mainstreaming has been declared, reality check on its achievement is still to come though.

Some **Hungarian** NGOs dealing with horizontal issues were involved in the process, being consulted on sustainability issues.

The cooperation between programming authorities and civil society partners on the preparation of the Horizontal principle chapter in the OP Quality Environment can be considered as a good example in **Slovakia**. Central Coordination Authority approached partners, with the possibility to contribute to the setup of the chapter significantly. The only issue is how this will be translated into real implementation arrangements within the system of EU funds management and individual OPs.

In the **Czech Republic** sustainable development was mainstreamed in a very formal way. Although partners were involved, the final result is a list of existent legislation and procedures that do not drive ESIF investments to an added value in sustainability.

Estonia described its concept environmental sustainability, but it did not sufficiently explain the according selection of investment measures.

12. The list of partners involved in the preparation of the Partnership Agreement (PA) has been published, in some cases relevant partners not meaningfully involved though

There is a list of **Latvian** partners involved are attached to the OP and PA, together with the most significant contributions made by partners.

A long list is included in the PA in **Hungary**.

The **Slovak** PA declares the whole spectrum of partners being covered and names several types of

working groups. These groups indeed operated and gave the possibility to comment and receive information. A system of interconnection between the main political forum (Government council for the Partnership Agreement) and the programming group was missing though. The political group dictated the priorities, the working group commented within the existing structure. No NGOs were presented in the political group.

In the **Czech Republic** the list is published.

The list of partners has been published in **Estonia**, listing a wide range of stakeholders.

The list of partners initially invited for consultation only included local and regional governments in **Poland**; after the intervention of the Polish National Federation of NGOs (a strong organisation, very involved in the programming process, especially in promoting good solutions for partners') some NGOs were include.

13. The actions taken to ensure the active participation of the partners, including actions taken in terms of accessibility, in particular for persons with disabilities, remain weak

Latvian authorities aim to strengthen the administrative capacity of ESI Funds management, using Technical Assistance to ensure the effectiveness of planning and implementing ESI Funds and the orientation towards results, providing for support to increasing capacity of the institutions involved in the administration, including partners which is a significant factor determining the successful introduction of the Funds. Plans on how to support partners and NGOs in **Latvia**, especially for those taking part in the Monitoring Committee, are under preparation; the aim is to increase the capacity of members of the Monitoring Committee by organizing specific study courses and trainings. Salaries and other support for participation in the Committee are not planned as it is considered to be a risk of conflict of interest. The Ministry of Finance declared that there is a need to do research to find more information about the best practice examples how to provide the support for NGOs in order to strengthen cooperation between authorities responsible for spending EU Structural and investment funds. However there is already enough information available on the best practices on implementation of partnership principle and it is necessary for Managing Authority to take action as soon as possible, especially regarding the regulations of Cabinet of Ministers programming for each project tenders. At the moment there are proposals for NGOs to take part in the project evaluation processes by evaluating the projects funded by Society Integration Foundation. It is planned that in the evaluation team there will be 4 persons in total: 2 persons representing NGOs and other 2 persons from the Ministry of Culture and Society Integration Foundation each. In this situation for the same duties administrative staff will receive the salary for evaluating project whereas NGOs expected to the same task are not reimbursed. Environmental NGOs consider this situation as unfair and are looking forward to receive any kind of support to ensure partners are effectively involved in all phases of the process, i.e. from the preparation and throughout the implementation, including monitoring and evaluation, of all programs.

The **Hungarian** Partnership Agreement takes a positive approach in the description of the actions to involve partners, in reality there is no involvement happening.

In **Poland**, according to a provision of the partnership agreement, all working groups should include representatives of organisations for people with disabilities; the form for submitting comments was made available in a version for blind people; a CSO document containing recommendations on making ESIF available to people with disabilities was endorsed and said to be included in the programming of the Ops.

14. The role of the partners in the preparation of the Partnership Agreement was to wait for a later stage to get involved

It has been much welcomed by **Latvian** partners that draft programming documents have been made available in various stages of the process and public consultations have been conducted on the Partnership Agreement (PA) and the Operational Programme (OP).

A long and detailed description reflecting the reality of the process can be found in the **Hungarian** Partnership Agreement.

According to their political power and ability to negotiate, partners were not part of the drafting of the **Slovakian** Partnership Agreement, but contributed to it in a later phase.

The role of partners regarding the Partnership Agreement was formal in the **Czech Republic** **Estonian** partners have been able to express the opinion, but the explanation about if and how the opinions are taken into account has been scarce.

In **Poland** no collaboration with partners in the preliminary planning stages, only at the later stage the formal consultation process was held; however, very little comments were included in the final draft

15. The results of the consultation with partners and a description of its added value in the preparation of the Partnership Agreement have been reported, an added value was not contested, not confirmed

The **Hungarian** Partnership Agreement provides for a realistic description of the process: the Partnership Agreement identifies municipalities which have the potential to contribute to its elaboration. It also identifies several not so important issues, which could potentially be influenced by NGOs.

The description on this topic was very general, but not contradicting the **Czech** reality.

In **Poland** there is a chapter included in the PA, acknowledging the need for the Ministry to prepare (in partnership) clear uniform guidelines for regional governments on strengthening the partners' involvement in the monitoring process.

III. Assessment of the partners involvement regarding the process of elaboration of Operational Programmes

16. The analysis and identification of needs for the Operational Programmes was done with rather less involvement of partners

During the public consultation in **Hungary** everybody could comment on these areas, but it was in a later stage when mainly these were decided. NGOs were not involved actively in the programming. It well illustrates the attitude that the OP can list only 5 "partner" events at this stage of the programming: a NGO forum about programming, a Monitoring Committee meeting, a NATURA 2000 forum, and the Partnership Agreement public partnership process and some non-public workshops.

The OP Quality Environment in **Slovakia** stated the impactful contribution of partners. In the **Czech Republic** this was the area of major involvement of partners, with varying impact. In cases where there was a consensus from the authorities, partners inputs to identification of needs were taken into account. Major influence here was exercised by cultural NGOs who managed to list the needs of "creative businesses". On the other hand, needs in social enterprise going beyond pure employment for the disabled and marginalised were not included, as well as the need to support community energy project or CLLD in urban areas.

In some regional cases in **Poland** the programming process followed the preparation of a regional development strategy which was done with the involvement of partners; for most other OPs however the overall structure came from the top.

17. The definition or selection of priorities and related specific objectives for Operational Programmes remained in governments' hands solely

In **Latvia** consultations with area/sectoral professionals were organised in order to discuss specific objectives and activities. This principle is also continued in the Monitoring Committees and Subcommittees – experts are asked to join to discuss specific issues related to specific activities

The structure of the OPs in **Slovakia** was setup by the state and did not change significantly because of the arguments of partners but rather because of requirements of the European Commission. No special procedure existed for the definition and selection of priorities.

This was the area where **Czech** partners were most active. In some cases, such as energy efficiency in the OP Environment or non-formal education in OP Science, Research, Education significant changes were made reacting on partners' demands, in many other areas, such as CLLD in urban areas, social enterprise, renewables or waste arguments and contributions of partners were not taken into account. Many times the reaction was that this is impossible because of EU funding rules or European Commission's observations, or that there would be no interest from beneficiaries (CLLD-U, renewables). These explanation are considered as a smokescreen for the interest of the state to finance some areas rather than others.

18. The allocation of funding was not discussed with partners

Some of the **Latvian** partners were asking to increase the funding for some specific activities, without any response though. These decisions were exclusively taken by the Ministries and Managing Authorities, without consulting partners. The request to include NGOs as beneficiary in some of the Specific support activities was taken into account though.

The **Slovak** government did not consult partners regarding the allocations

Partners in the **Czech Republic** did not play any role in these decisions. One thing that partners managed to agree on is the rate of maximum co-financing by NGOs, which dropped to max. 5%.

Financial questions were considered a prerogative of the managing authority in **Poland**, allocations weren't subject to consultations, and in many cases they were only made public with the final draft of the OP submitted to the European Commission.

The question of budgetary allocations towards priorities has also been a matter of political decision in **Estonia** that has not been sufficiently explained.

*19. The **definition of programmes' specific indicators** was often no particular topic of consultation*

Indicators were commented during the official procedures as any other part of the Ops in **Slovakia**. There was no special procedure on indicators.

The **Estonian** Ministry of Environment succeeded in identifying indicators in cooperation with the partners.

In **Poland** there are few cases where indicators were consulted, even fewer where comments were taken into account and a different, better indicator was adopted; the prevalent argument was the inability to measure something or lack of data available which would allow to adopt a better suited indicator.

*20. The **implementation of the horizontal principles as defined in Articles 7 and 8 of CPR** is postponed.*

One particular NGO in **Hungary** had the opportunity to provide input to the horizontal principle topic, mainstreaming environment and sustainable development, but this consultation is considered to be more the acknowledgement of the organisation and about personal relationships, rather than an official recognition as a relevant partner according to the Code of Conduct on Partnership.

In **Slovakia** the OP quality environment states full compatibility with the principle. Only during the preparation of implementation documents one will be able to assess the real compliance and analyse the proposed instruments and processes.

The application of the sustainable development principle has been quite weak in **Estonia**.

Partners were able to participate in the discussion on horizontal principles in **Poland**, but despite comments and suggestions made by CSOs on how to mainstream principles such as climate proofing in all axes, this issue was not well (or not at all) reflected in the OPs. The general reply to comments regarding the inclusion of sustainable development mainstreaming was that these questions will be resolved at the stage of preparing detailed implementation documents.

*21. The **composition of the monitoring committee** is underway, with CSO participation*

The **Latvian** managing authority is very much looking forward to strengthen the capacity of the NGOs taking part in the new monitoring committees. There was a discussions organised by Latvian Green Movement to ensure that more NGOs are aware of this processes. When forming monitoring committees NGOs were consulted in order to develop a cooperation platform.

This process did not take place yet in **Slovakia**. In case of OP Environment, based on partners request, more NGO representatives will be members of the MC in Czech Republic

In **Estonia** it has remained unclear how the number of representatives in committees has been decided and what will be the decision-making process in the committees.

In **Poland** the guidelines for the set up and composition of Monitoring Committees, prepared by the Ministry, were consulted with the public and many constructive comments were included. There is a marked improvement compared to the previous period, although CSOs still have less seats ensured than other socio-economic partners. There are to be at least 4 seats for CSO representatives in all monitoring committees (might be more for bigger OPs), one for each of the horizontal principles of

sustainable development and inclusion and non-discrimination, one seat related to the subject of the OP, one for a cross-sectoral federation of NGOs. Each managing authority holds an open election for NGO representatives, where only organisations working in a specific field can propose candidates, and all NGOs can vote. Much of the improvements in this field are the result of active advocacy by a coalition on NGOs led by OFOP.

22. There were actions taken to involve the relevant partners in the preparation of the programmes and their amendments

In **Latvia** this involvement was organised through personal meetings, e-mails to invite partners, cooperation with network organisations. Partners submitting comments were asked to take part in the public discussions in total more than 30 public consultation events during the year. Clear reference is made to the National planning document development which was also elaborated in the cooperation with NGOs.

The Operational Programme Quality Environment in **Slovakia** describes the process naming specific areas where it negotiated and altered the OP according to results of the communication with partners.

The authorities' reporting on those actions covers more or less the process as it was, but there is no overall picture on how many partners' comments were actually taken into account in **Estonia**.

23. The planned actions to ensure the participation of the partners in the implementation of the programmes are not going beyond formal standards

In **Latvia** those actions are related more to monitoring committees, to take part in the supervision of the implementation of the OP and PA as well to do the evaluation of the results.

A standard setup of monitoring is foreseen in **Slovakia**. The statute of expert committees under the monitoring committee could provide additional space for monitoring and public control. The rest will show during the monitoring structure setup in late 2014 and early 2015.

Involvement in monitoring committees as well as regional strategies, ITIs and CLLD is planned, but not going above the necessary minimum in the **Czech Republic**.

Poland varies greatly in regions; some cases where the regional managing authority made little effort to involve partners, after finding and inviting to the working group some token representatives who weren't always prepared to offer constructive input; although, the managing authority were usually open to candidates volunteering to join the consultation. In general the information was disseminated in a correct matter, via email or mail; on national level the MAs directly contacted a range of civil society partners. Currently the Ministry is holding open consultation on the guidelines for the preparation of the detailed implementation documents, which in turn will all be subject to public consultation.

Estonia started to prepare for the new programming period in quite early stage and in the beginning the involvement of partners was wide and disputes around priority setting were quite open. As some of EU regulations were not in place the government failed to explain to the partners the exact extent and the framework of the discussions held. The decisions related to the priority setting were made politically by the government and there was no clear feedback to the partners about how the results of the public discussions were taken into account during the decision-making. The planning of the specific interventions has been more focused and clear process as it has been under the

coordination of the relevant ministries (the whole process is coordinated by the Ministry of Finance). The last stages of the planning have again been more closed so the future beneficiaries have not been able to discuss some practical questions as the required co-financing of the projects etc. as the preparing of the documents has been under a time pressure (there is a great wish to open first calls for projects already in 2014).

24. GENERAL ASSESSMENT OF THE WHOLE PROCESS – improvements and fall-backs

If comparing the previous period a lot has been improved. **Latvia** fulfils the minimum requirements in all sections, in some it is looking forward to find better solutions how to cooperate. NGOs are considered as relevant partners and experts. Managing authorities are always open to listen to comments, finding solutions and looking for networking activities.

A step back in **Hungary** at the early involvement compared to the previous period, public consultation for the citizens took place, though without giving enough time, organizing events and providing for feedback.

The **Slovak** state did not proactively reach out to the public. Stakeholders had to create their position within the process so the whole process can be described as lobby oriented.

As clearly illustrated by the evaluations in the different categories, the **Czech Republic** has ensured that partnership principle is implemented in the PA and OP preparation and plans to continue to do so in the implementation phase. However, no bigger attempts to use partnership beyond the formally required minimum were done. However, taking into account the overall political culture and habits of the administration, even this level of involvement of NGO partners can be taken as a success and creates a good precedence for involvement of civil society in decision making.

There is improvement in relation to last programming period, but there are still a lot of possibilities to improve in **Estonia**.

In **Poland** there is an improvement in involving the partners, especially on the regional level, which is mainly the result of the introduction of EU-level regulations and the guidelines prepared by the Ministry.

25. SUGGESTIONS WHAT SHOULD BE IMPROVED DURING IMPLEMENTATION: acknowledge CSO partner, increase their capacity and involve them in all stages and especially in strategic questions.

In **Latvia** it is important to find some solution how to strengthen the capacity of NGOs to take part in the meetings, commenting and to spend their time in monitoring committees and other related meetings. Organizing workshops alone is not sufficient, there needs to be some practical help – providing the venue for meetings, covering communication costs, etc.

NGOs should finally be recognised as relevant partners in **Hungary** during the implementation. Probably this will happen as member of MC/MCs. HU

The general mind-set of state administration needs to change in **Slovakia**. Some good cases start to appear (Policy on urban development, communication with Central Coordination Authority) but it is far from a general trend in strategic planning. Within the lobby oriented approach not much can be

improved.

Compared to previous programming period, it is necessary to ensure that more NGO partners who specialise on different issues can take part in monitoring in the **Czech Republic**. With current wide definition of activities in OPs, it is impossible to follow them in one person. Technical assistance should be provided for capacity building, networking, expertise and reimbursement of time and travel costs for the partners. Partners need timely and systematic information on the progress of EU funding, including project application pipeline. This data should be made public in a machine readable form of open data.

In **Estonia** the partnership could be improved by increasing of clearness of the scope of the question in debate, how the comment will be taken into account, and how the decision-making process will be organised. Also it should be clear how and in what extent the costs of partners related to the participation in committees will be covered.

The partnership principle and practice should be applied from the very beginning of the planning process in **Poland**, including setting up the framework and selecting the key themes and targets. Partners shouldn't only be given a complete draft to comment and try to influence, but should be involved in setting up its structure. Also, partners should have channels to communicate with the European Commission during the process of consultation, and be involved in the programming from the beginning until the end. In the current set up, the final document after being negotiated and approved by the European Commission is no longer subject to consultation with partners, and may be a very different document from the one elaborated in partnership with the civil society. That in a way negates the principle of the civil society's involvement at all stages and the citizen's ownership of their development. In addition there should be unified internal rules governing the involvement of civil society partners in the planning and decision-making processes and their implementation should be monitored and evaluated.



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