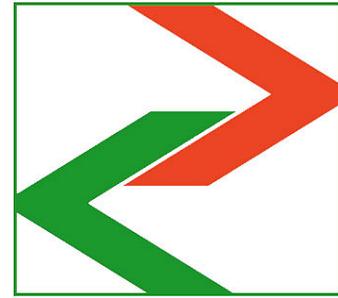


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Opinion of the AEBR on the 6th Report on economic, social and territorial cohesion (6th Cohesion Report)

General remarks:

The Association of European Border Regions (AEBR) welcomes the publication of the 6th Cohesion Report and thanks for the opportunity to present its remarks and opinions.

In our opinion, the report goes in the right direction. Main statements in chapters “Investment for jobs and growth“, „Smart, inclusive and sustainable growth“, „Public investment, growth and the crisis“, „Good governance“ and „Development and Cohesion Policy“ are supported by the AEBR. The Association underlines that the Cohesion Policy and the corresponding Programmes must help to achieve the objectives of the Europe 2020 Strategy.

The general provisions for the ERDF, ESF and the Cohesion Policy for the years 2014-2020 define two main objectives:

- Investment for jobs and growth,
- European territorial cooperation.

It is understandable that main attention in the report is paid to the 1st objective (also due to its much higher financial volume). However it is hardly understandable why **territorial cooperation** (and in particular its main component: cross-border cooperation) is **hardly taken into account and considered** in the summary and in chapters 1 to 7. Only in chapter 8 this topic is briefly mentioned in one of the subchapters. Also in the **index** there is no **title** including the subject „**territorial cooperation**.“

Only on pages 86, 186, 201, 202 and 222 the territorial/cross-border cooperation is briefly mentioned and in chapter 8 described in greater detail.

From the quantitative point of view, such consideration can hardly be in line with one of the main objectives of the Cohesion Policy, with the Treaty of Lisbon, neither is with Article 175 of the Treaty on the Functioning of the European Union (TFEU).

As a consequence, the report **does not use the opportunity** to explain **the problems and potentials, in particular of cross-border cooperation**, that are briefly described in chapter 8. The **results have not been presented** at all.

With few exceptions, the **qualitative aspects are completely missing**, even though the text offers enough possibilities to consider them (see specific boxes on single topics/areas as cities, maritime and outermost regions). Also from the thematic and qualitative point of view the inclusion of cross-border aspects would have had an enriching effect on the contents of the individual chapters, as for example: infrastructure, labour market and mobility, environment, water use and disposal, waste management, health care, research and development, tourism, public services and governance. All of these areas include remarkable cross-border elements and potentials.

In line with **chapter 8** of the report that concludes in **sub-item 1.1** that the European territorial cooperation **can provide an important contribution to European integration** (and the AEBR adds further: cross-border cooperation is the foundation of the European house!), it would have been necessary to **demonstrate it** adequately in the 6th Cohesion Report **from the quantitative and qualitative perspective**.

The **AEBR** presents below its opinion on the section “Investment for jobs and growth” and on every individual chapter. Understandably, this opinion **concentrates on cross-border aspects**.

Regarding the section „Investment for jobs and growth“

The AEBR **supports the analysis of the crisis and the necessary conclusions**, in particular the statements referring to the macroeconomic political strategies, a favourable business environment, efficient institutions, investment fields having their foundation in good strategies and projects that are based on these strategies.

While focusing on the Europe 2020 Strategy it is necessary to concentrate on selected **priorities and programmes with clear objectives and results**. The **Cohesion Policy** will be measured by its **success**. Accordingly, the AEBR would appreciate it, if **in the future more attention is paid to the achievement of objectives and results** in the implementation of programmes (correct allocation of funds etc. is an important condition, but not an objective or result in itself). This is also true for **Territorial Cooperation Programmes: they could be further improved** (cross-border added value, shared management, etc.). It would be, thus, **desirable** not only to refer in one subchapter to the programmes for urban areas (3.4), but also to pay attention to **Territorial Cooperation Programmes** in one **subchapter**. In this context it would also have been possible to mention the necessity to establish more efficient institutional capacities and to improve the effectiveness of cross-border administration as well as to refer to the opportunities of an effective training, in particular as regards the programmes in the new Member States and at the external borders, through CBC programmes within the European Neighbourhood Policy and the Instrument for Pre-Accession Assistance (IPA).

That such sub-item is missing becomes obvious also while reading the conclusions and the summary that do not mention at all neither the territorial cooperation nor border regions (not even for chapter 8), while urban areas, capital regions, etc. are considered in the text.

Chapter 1

In this chapter the impact on metropolitan regions and rural areas is described. But **the particular conditions in cross-border regions are not mentioned. Cross-border aspects** would have been relevant in particular as regards texts focusing on “Commuters and functional geographies”, “Innovation and research”, “Filling the gaps in digital and transport networks.” Even in parts referring to TEN and CEF border regions are not mentioned, although this is considered as key issue in the respective regulations.

Chapter 2

Also in this chapter main attention is paid to urban areas that of course are confronted with great problems. But also the conditions in cross-border regions are very difficult (cross-border employment and problems of commuters, health strategy and public services). However, they are not mentioned at all, neither in the boxes nor in the summary. Border regions are mentioned only twice, in texts referring to the population in EU-13 and to crime rates.

Chapter 3

Also in this chapter **cross-border aspects could have been considered** in texts focusing on the territorial dimension of **the climate change**, the intensity of **disastrous natural hazards**, the **ecosystems (all this does not stop at the border)**, the shifting to more sustainable **transport** as well as the **accessibility** (cross-border transport networks, missing cross-border connections / links in the transport network).

Chapter 4

This chapter is not written in line with the Lisbon Treaty that considers **border regions** (including outermost regions, mountain regions, maritime regions) as regions **with particular problems**. It would have been helpful to get more information on public investment, growth and overcoming of the crisis in these regions.

Chapter 5

In the past decades, **cross-border cooperation** in more advanced border regions has been **an example for „new governance“** under particularly difficult conditions resulting from different structures and competences. Governance deficits can be most easily identified in cross-border cooperation. An additional box presenting good examples of cross-border governance would have been very helpful (and relevant, in terms of real multi-level governance in practice).

Chapter 6

Nevertheless, for the first time particular attention is paid to INTERREG in a box.

Under 2.4 „**Territorial cohesion**“ the territorial dimension of the Common Agricultural Policy (CAP) is mentioned, **but not the territorial cooperation** itself, even though it is an own objective and, following the 6th Cohesion Report, it makes a contribution to **European integration**. Sub-item 4.1 refers to the **EU Treaty** that defines areas requiring special attention. To these regions belong also border areas.

In the box „Territorial Cohesion and the Treaty of Lisbon (2007)“ **border regions are described as „functional geographies“, what is missing in the previous chapters.**

Chapter 7

In the parts focusing on transport, environment, labour market and the strengthening of institutional capacities, we miss a reference to **cross-border aspects** and to the **evaluation of INTERREG programmes**.

Chapter 8

Under 1.11 this chapter specifies for the first time the European **territorial cooperation as one of the two main objectives of the Cohesion Policy**, mentions **border regions in texts referring to CEF (what was not the case in previous chapters)** and **presents a map of INTERREG areas**.

Under 1.6 „A strategic approach to public administration reforms“ a remark could have been included referring to the **necessity of coaching and training for less developed border areas**. Such training was carried out quite successfully by the EU Commission in the years 1996-2002 for “old EU“ cross-border regions, and also for accession candidates (LACE programme).

Conclusions:

Even if in some parts of the 6th Cohesion Report the second main objective of the Cohesion Policy is mentioned, generally too little attention has been paid to this subject.

In any case, the general challenge posed by this Report means an enormous task to be implemented at all levels in our continent.

We are fully convinced that European border and cross-border regions are going to show a higher degree of performance in the new adventure that Europeans will face in the running period 2014-2020 to grow smarter, more inclusive and sustainable over the crisis. And produce evidences of this.