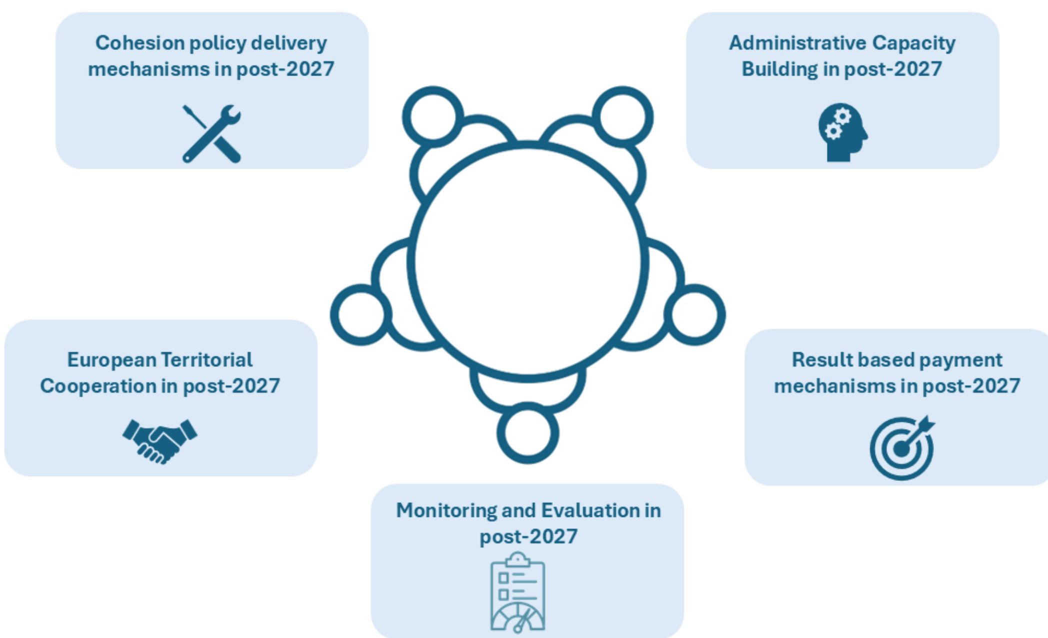
Building on experience, grounded in practice: Collective reflections on the European Commission's Post-2027 Proposal

On 13 June 2025, to mark **t33's eighteenth anniversary**, we brought together **around 50 experts** from **7 European countries** and diverse professional backgrounds – **academia; national and regional administrations; managing authorities and intermediate bodies; and independent specialists** – united by a deep knowledge of **cohesion policy**. Five thematic roundtables – on **administrative capacity, financial instruments, evaluation, cross-border cooperation, and Financing-Not-Linked-to-Costs (FNLC)** – invited participants to reflect on key aspects of Cohesion Policy, paying particular attention to its future.

Building on the valuable insights shared in these discussions, and in light of the **European Commission's draft proposal for the 2028–2034 Multiannual Financial Framework (MFF)**[1], we present the **main takeaways** and explore how they connect to the forthcoming MFF.



[1] Proposal for a Regulation of the European parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509. COM/2025/565 final.

From compliance to results: the post-2027 shift in cohesion policy

2028-2034 MFF proposal	What we heard: workshop insights
The new long-term EU budget will rely extensively on **performance-based approach.** **Article 78** of the draft proposal states that where the total estimated cost of an operation does not exceed €400.000, the public support provided to the beneficiary by the MS shall take the form of FNLC or SCOs. For operations related to a crisis situation, this requirement shall apply only to those operations of which the total cost does not exceed €100.000. Results-based financing, where funding can be disbursed for the completion of intermediary steps, should ensure that EU funding reaches the real economy faster. A more widespread use of SCOs and FNLC aims to significantly reduce the reporting obligations on recipients of funds by focusing checks and controls on the deliverables of the projects rather than on the costs. The Commission should be allowed to recover amounts previously paid for interim steps of a measure if the final milestone or target of the given measure is not fulfilled and to take action in case of a reversal of a milestone or a target occurring up to five years after the date of the corresponding Commission payment.	FNLC is not just a simplification measure or a cash-flow device. When used effectively, it is a key lever to boost the EU value added of Cohesion Policy. However, it demands a step-change in programming capacity—from logic models and indicator design to verification, data systems, and risk management. **Programming with precision**. Define results, methods, data sources, and verification up front. Involve beneficiaries early to test feasibility and sustainability of milestones and targets. Invest in capacity building for Managing Authorities and digital reporting to reduce burden. **Build on what we've learned to measure results and output.** The use of Cohesion Policy common indicators as payment triggers can be a solution, contingent on their careful calibration to ensure suitability for disbursement mechanisms. **Align incentives of all actors involved.** Applying the results-based mechanism at EU-national level, and national-beneficiary level, to strive to the same direction. **Build in flexibility.** Set target ranges, failure margins, re-programming windows, and corrective paths to maintain high ambition while allowing course correction. Consider offering bonuses for overperformance and proportionate responses for persistent underperformance. In **R&I, avoid discouraging risk-taking**. Where appropriate, use staged milestones, portfolio success bands, non-binary scoring (partial credit), and learning outcomes.

European Territorial Cooperation (ETC)

2028-2034 MFF proposal

A unique plan will be prepared for Interreg, to be implemented outside the National and Regional Partnership Plans, in the form of a **single Interreg Plan**.

The Interreg Plan will include chapters, each corresponding to a single cooperation strand in a specific geographical area.

The Member State hosting the Managing Authority shall submit an Interreg Plan chapter to the Commission at the latest six months after the entry into force of the Regulation on behalf of all participating Member States and non-Member States.

The proposed allocation to the Interreg Plan amounts to €10.264 billion, **bringing a 10% budget increase**, as reported in **Article 10(c)** of the draft proposal regulation.

The national contribution rate at the level of each Interreg chapter shall be no lower than 20%. The rate shall be decreased by 5% for chapters supporting outermost regions' cooperation and cross-border cooperation on external borders.

ETC is set to be more strategically aligned to Union priorities. **Simplified procedures and small-scale project formats should broaden participation**, particularly by smaller actors. At the same time, common indicators and a performance-based framework will make programmes more accountable and results-oriented, while preserving cross-border experimentation and innovation.

What we heard: workshop insights

ETC plays a vital role in fostering peace and stability in border regions with histories of conflict by building trust, mutual understanding, and lasting relationships—crucial in the context of EU enlargement and relations with neighbouring non-EU countries. As an area where EU action brings clear added value, ETC should prioritise specific cross-border and transnational projects that address shared challenges and deliver tangible impact.

Strengthen cooperation through understanding. Interreg programmes need to devote emphasis and funding to language learning and youth cross-border exchanges, to deepen mutual understanding and sustain cross-border cooperation.

Empower bottom-up action from communities. Community-Led-Local-Development (CLLD) enables cross-border communities in Interreg programmes to co-design and implement projects through participatory approach, bottom-up governance, making cooperation more inclusive despite administrative and legal complexities.

Enhance coordination between Interreg strands and national and regional Cohesion Policy programmes through joint programming, thematic alignment, and harmonised rules to reduce fragmentation and enhance cooperation's impact.

Simplify to broaden access. Interreg's perceived complexity can discourage smaller or new applicants, underscoring the value of introducing small-scale, more straightforward projects that are widely welcomed.

Cut burden with digital tools. Use SCOs and more advanced, harmonised digital tools to boost accessibility and reduce administrative burden (e.g. extended use of Jems).

Administrative Capacity Building (ACB)

2028-2034 MFF proposal	What we heard: workshop insights
The new NRP Plan must detail its measures and implementation arrangements, which should also aim to contribute to better governance by enhancing the efficiency of public administration, and the institutional capacity of public authorities and stakeholders in Member States, regions and local communities. **Articles 50, 51** and **56** of the draft proposal mention ACB when outlining the functions of the coordinating authority, the Managing Authority, and the Monitoring Committee. They are tasked, among others, with monitoring implementation, ensuring sound governance, managing the Plan, and strengthening the capacity of authorities, stakeholders, and beneficiaries, while promoting policy learning and experimentation. The new framework is intended to reduce administrative burden and enhance simplification, in line with the key lessons learned emerged from the evaluations and studies of programmes and strategies implemented in the 2014-2020 and current programming period. **Administrative capacity is therefore framed as a strategic objective in its own right**, going beyond fund management to underpin democracy, the rule of law, and core Union values. Indeed, NRP Plans must include concrete measures to improve governance and enhance institutional capacity at all levels. This reorientation makes capacity building a policy goal in its own right, expanding beyond simplification and burden reduction.	The importance of ACB is frequently underestimated across all levels of public administration, with the lack of political will or investment reflecting this limited recognition. **Prioritise ACB**. Capacity building activities are investments, not costs. Prioritise them in the policy agenda and activate them promptly. Defining ACB measures without a clear strategy undermines their impact. **Take a systemic approach**. Embed ACB into the programming cycle through a structured, systemic approach, recognising it as encompassing organisational development and institutional strengthening, not just recruitment and training. **Modernise tools**. Peer2Peer activities are more effective than training programmes. ACB tools need to be more modern and engaging, addressing the current needs and challenges of the Managing Authorities. **Track the progress**. Measuring the results of ACB interventions is challenging. The monitoring system needs to be able to track the progress of ACB actions.

Cohesion policy delivery mechanisms

2028-2034 MFF proposal

An expanded use of financial instruments (FI) and budgetary guarantees will increase leverage and allow the EU budget to play a stronger role by being accompanied by simplified governance.

Articles 71 and **72** lay down the rules for Member States that plan to include existing or newly created FI in their Plans.

The use of FI and their possible combination with grant support shall be justified with regard to the corresponding market needs and their capacity to de-risk and leverage private capital.

Resources repaid to FI before the end of the eligibility period shall be re-used. They may finance new investments in final recipients, cover losses in the Fund's contribution caused by negative interest (despite active treasury management) or pay management fees linked to such reinvestments.

FI are being reframed as mainstream tools with tighter rules on reuse and more strategic framing. Grants remain central, but the toolbox of delivery mechanisms is becoming more balanced and policy-driven.

Member States must also ensure that, for eight years after the end of the eligibility period, returned resources are re-used in line with the Plan's objectives, in FI or other forms of support.

What we heard: workshop insights

Financial instruments leverage public funds, attract private investment, and provide more sustainable and efficient financing for projects than traditional grants alone, however, delivery mechanisms and support tools have to reflect policy, sectoral, and territorial needs.

Be flexible. The choice between grants and FI should consider both the managing authority's capacity and potential long-term administrative savings. The diversity of tools underscores Cohesion Policy's core strength: flexibility in responding to local needs.

Think strategically. Delivery choices are shaped by path dependency. It is essential to encourage strategic thinking and openness to new approaches. Stronger assessments and analytical capacity are crucial for improving delivery.

Base decisions on evidence. Good decisions require time, reflection, and existing evidence from research and evaluations. Policymakers need this knowledge to ensure decisions are evidence-based. Ex-ante assessments can guide the choice between support options, including, where appropriate, the option of non-intervention, based on market failures or identified gaps.

Explore cross-border solutions. In territorial cooperation, grants and services often remain the most practical tool, but cross-border FI could be explored, e.g. through financial bodies operating at EU or transnational level to help coordinate implementation.

Monitoring and Evaluation

2028-2034 MFF proposal

In the new MFF proposal, the **role of monitoring and evaluation is implicit**: while evaluation is not explicitly mentioned, its functions are embedded both as a governance tool and as a financial conditionality mechanism and learning instrument.

A **Performance Regulation**, yet to be published, will set rules for expenditure tracking and the budget's performance framework, ensuring uniform application of the principles of 'Do no significant harm' and gender equality. It will require both an implementation report during the programme and a retrospective evaluation afterward.
However, as such operational rules are still to be laid down, it is uncertain how evaluation will actually be implemented, whether focusing mainly on outputs or ensuring greater focus on results/impacts. .

As funds will no longer be disbursed based on eligible expenditure but instead upon verification of milestones and targets, evaluation and monitoring become essential for budget execution, linking performance frameworks to funding conditionality.

Articles 63 and **64** require MS to collect and transmit standardised electronic data on beneficiaries, operations and partnerships, ensuring security and interoperability. For evaluation, this data must link financial contributions, beneficiary characteristics and performance indicators, including for CLLD. Transparency is guaranteed through regularly updated open-access publications by both Member States and the Commission.

What we heard: workshop insights

Capturing systemic impacts means measuring not just results at project level but cumulative changes across time and territories, using clear communication of impact pathways.

Measure real impact. Evaluations should assess changes in wellbeing, social inclusion, environmental impact, and territorial cohesion, aligning with long-term EU strategies like the Green Deal.

Build trust, encourage institutional learning, support empowerment and cooperation, which are often overlooked, but central to policy success.

Embed qualitative and participatory methods (e.g., storytelling, focus groups) into evaluation design from the start. Surveys should be used to gather perceptions from the target groups.

Use proxy indicators and combine quantitative and qualitative approaches to evaluate intangible effects. These methods ensure greater credibility and interpretability of results.

Focus on the actionable, not just on what's been achieved. Moreover, findings should be timely and visually accessible (e.g. dashboards, infographics).

Evaluations influence policymaking when evaluators engage directly with policymakers in co-creation processes, and when evidence is clearly linked to upcoming policy or funding decisions.