

CRII and CRII+ - questions from Interreg programmes

Adoption of Regulations 2020/460 and 2020/558 allow Member States to counteract against negative consequences of COVID-19 health crisis through non-utilised funds within Programmes. After analysis of provisions of both regulations, amending CPR and ERDF regulations, Interreg programmes raised issues referring to practical consequences of introduced amendments. Please find below the most important ones.

1. What, in practical terms, are the most important consequences and flexibilities of regulations that apply for Interreg programmes?
2. Several Interreg programmes predict problems with achieving in the year 2020 decommitment limits. Should programmes refer to force majeure and follow procedure described in Art 87(1b) of the CPR, referring to COVID-19 or there will be introduced other extraordinary approach?
3. Following provisions of Art 2(1) regulation 2020/460 (amount transfers between priority axes) do limits of 8% and 4% of the total programme budget refer to all potential transfers within a programme? Does it mean all (if more than one) transfers executed should add to maximum limits of 8% and 4%?
4. The provisions of Art 1(1.1) of regulation 2020/558 introduce the possibility of applying 100% co-financing rate for one or more priority axis during the account year 1 July 2020 – 30 June 2021.

What does it mean in practice? In particular:

- How does it affect co-financing rate per priority axes particularly at the closure of a programme? Will this affect co-financing rates of other PAs?
- For which operations programmes can use the increased co-financing rate? New ones, or also for on-going operations with additional activities?
- Does eligibility period for expenditures of such operations start from 1 February 2020?
- New operations, as well new actions within the on-going operations responding to the COVID-19 must be in line with the provisions of CPs (in particular programme logic – including selected thematic objectives, investment priorities and activities). If there are none they must be introduced to programmes following the CP change procedure. Such changes will have to be accepted by the COM. Does the COM

foresee any extraordinary (meaning speed -up) procedure of approval of such changes?

5. Taking into consideration the nature of Interreg programmes and projects where most of activities is implemented in cross border, transnational or inter-regional partnership, current situation hinders significantly implementation of projects. Projects are not only facing delays but simply can implement activities on very limited scale (online). But some activities and outputs simply cannot be delivered within originally forecasted time frame.

- Are there any other recommendations from the COM on how programme institutions can support projects on the basis of CRII and CRII+ regulations?
- If not all problems with projects will be solved and will implicate also programme underperformance, what are the communication channels programmes should use with the COM to report on progress/challenges in the programme implementation?