

Gold plating in management verifications

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Management verifications 2021-2027



- Understanding gold-plating
- When gold-plating occur
- Root causes and types of gold-plating
- Examples
- Discussion

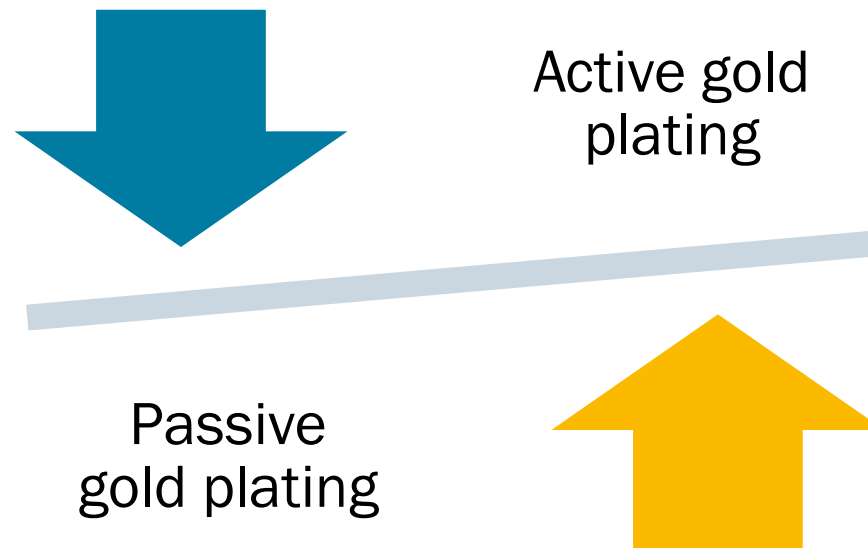


What is gold-plating?

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Gold-plating in the context of ESIF refers to imposing **additional administrative obligations** on top of the minimum requirements set by the ESIF regulatory framework.

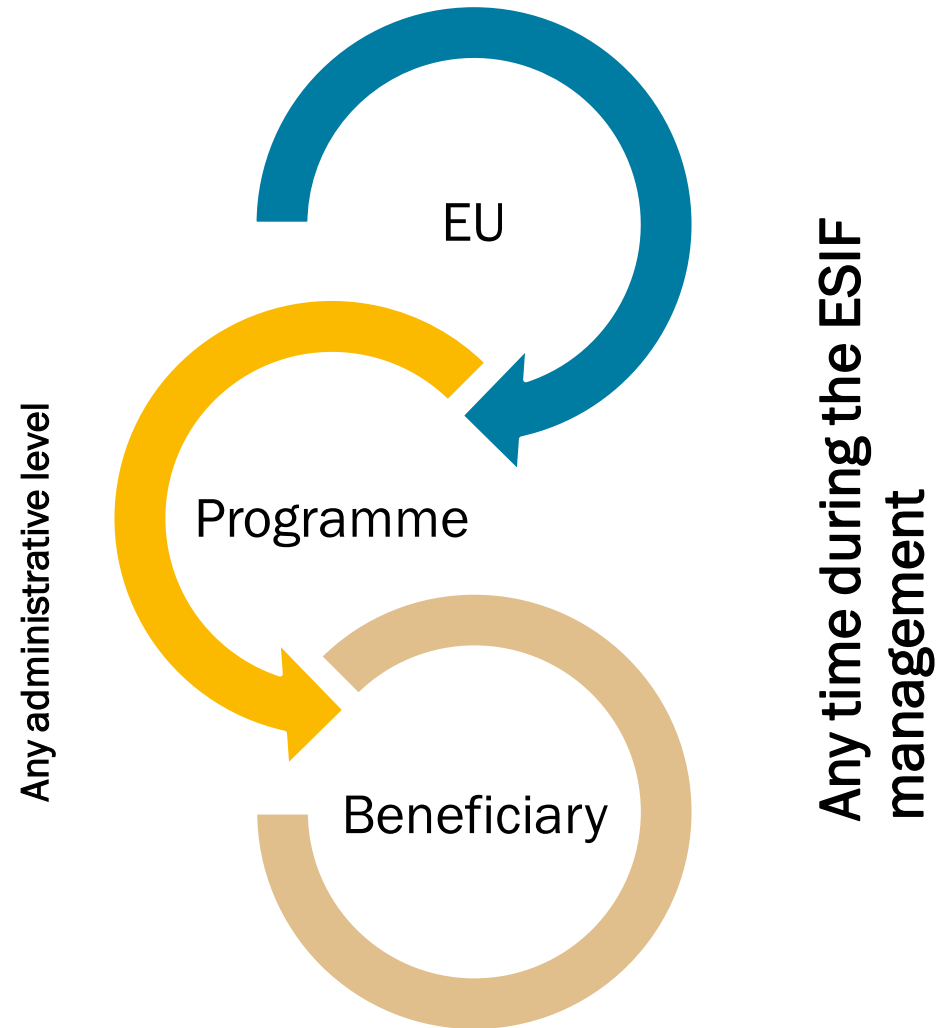
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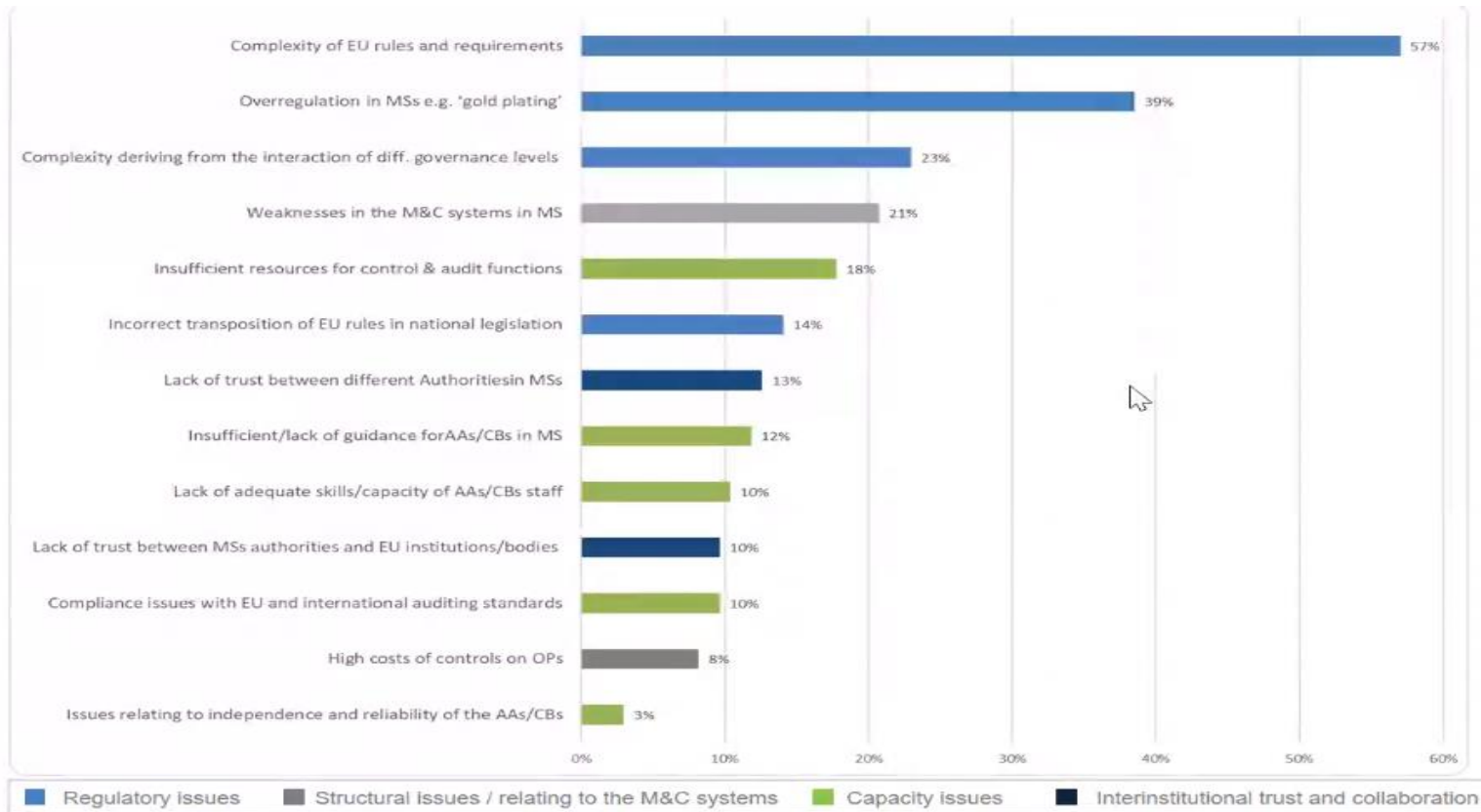
Gold-plating in Interreg covers all cases in which:

- National, regional or programme bodies **extend the scope of the EU legislation** implementation
- There are **inconsistencies between different legislations**
- National, regional or programme authorities **introduce sanctions, enforcement mechanisms and burdens of proof**
- Auditing practices and rules **do not meet the rules of proportionality**

Can occur

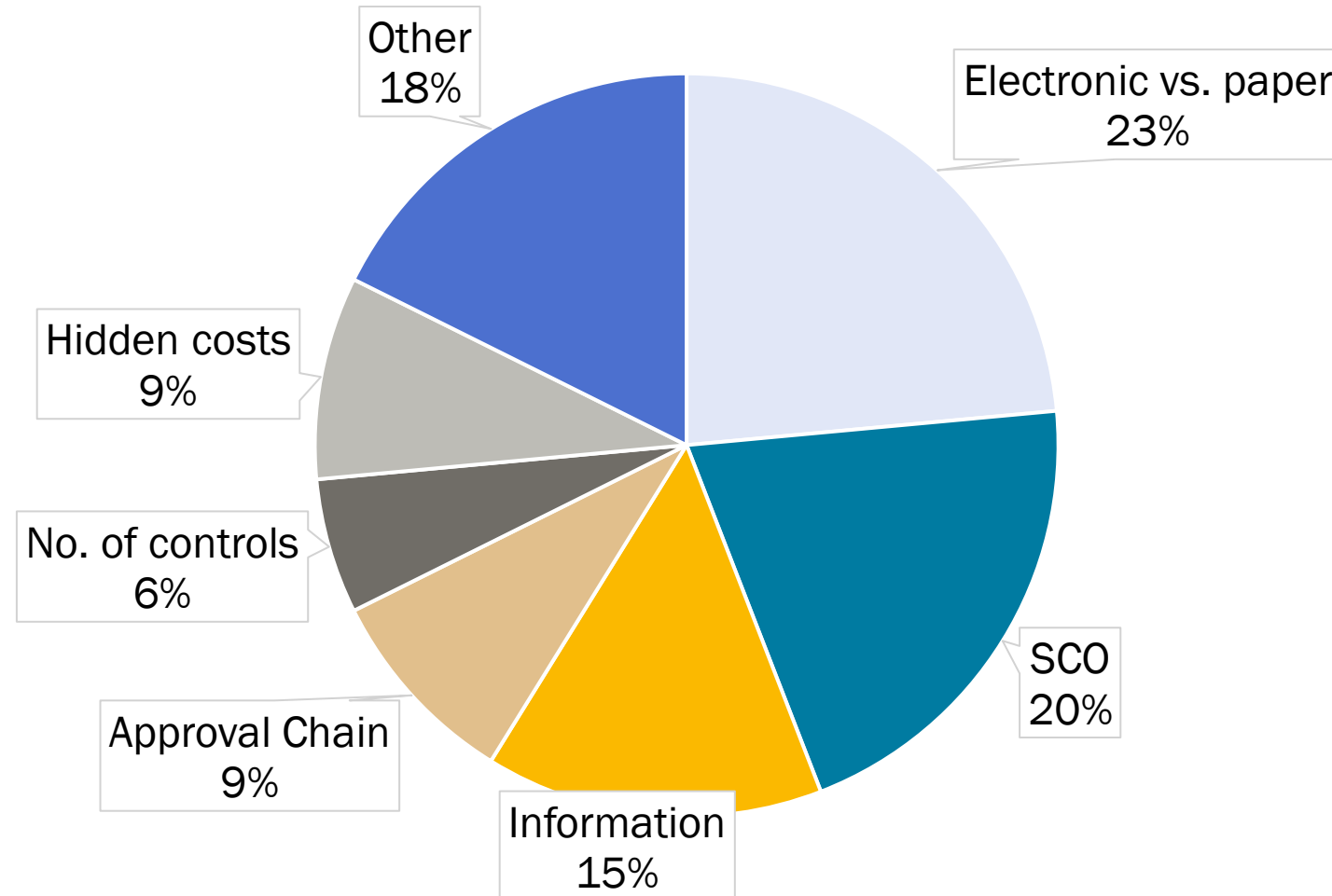


Root causes of problems in implementation



Source: [Study requested by the Committee on Budgetary Control - Single Audit Approach - Root Causes of the Weaknesses in the Work of the Member States' Managing and Audit Authorities](#)

Types of Gold plating



Examples

Related to management verifications

- Despite the use of electronic systems, in some cases hard copies are still required
- Beneficiaries asked to provide additional inputs in national online filling systems
- Requests for repeated submissions
- Additional documents are required
- Additional controls (Controllers; MA)
- Audits from different levels of control are more overlapping than complementary



Examples (2)

Related to management verifications

- Additional statements from beneficiary's legal representative
- Application of lower thresholds or stricter rules when conducting public procurement procedures
- Beneficiaries are controlled ex-ante before launching public procurement
- Bid-of three rule at programme level
- Expenditure which are eligible according to the EU rules, are interpreted as ineligible by national rules
- Presence of specific national rules on public procurement
- Rigid interpretations of EU rules on public procurement
- Translation of all documents in more than two languages (self-imposed by programme)

Discussion

- What cases of Gold plating can you identify when performing management verifications in your Member State?
- What practical solutions to cut down/ avoid gold plating can you propose?



Cooperation works

All materials will be available on:

www.interact-eu.net

