

Post 2027 | Consultation Report

5. Flexibility and adaptability

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Flexibility and adaptability in Interreg

This report is part of Interact's [Post 2027 Consultation reports](#)

Overview

Flexibility and adaptability have become critical for shaping effective public policies, including the Interreg and Cohesion Policy frameworks, as EU regions face increasingly complex and unpredictable challenges (from the COVID-19 pandemic and climate change to digital transformation and the war in Ukraine). These global challenges demand collective action and adaptation.

However, programmes also face local and regional implementation challenges where flexibility is often constrained by the demanding programme amendment procedures required under the legal framework. The ability to remain flexible and adaptable is essential for Interreg programmes to stay resilient, responsive, and effective in the face of evolving circumstances.

Moreover, the need for the flexibility was emphasised in the working group for the performance-based approach. For more details, please refer to the respective discussion paper.

Methodology

With input from the programmes, we aimed to explore whether Interreg programmes framework is flexible and adaptable enough, what factors may be hindering this, and what proposals can be made for the future.

Interact first introduced this topic at the Interreg Knowledge Fair. To further explore flexibility and adaptability in the current legal framework Interact conducted 12 interviews with programmes across different geographies and strands (CBC and transnational, IPA, NEXT and TESIM). Participants were briefed on the Knowledge Fair outcomes and encouraged to share their programme experiences. Each interview lasted 45-60 minutes and focused on key questions related to flexibility.

This discussion paper summarises the most often occurring ideas and suggestions, which were explored further at the Harvesting event.

The outcomes from the two work group sessions held during the Harvesting event are summarised in the final chapter of this document.

We acknowledge that this discussion may have limitations, mainly if there are significant changes to the framework, such as adopting a performance-based approach. However, this is a starting point – a self-reflection on the current situation – and we can continue working on these issues as needed.

What is working

- Over the past 30 years, Interreg programmes have developed extensive experience in building trust among communities and partners, which has been recognised as an important precondition for flexibility at all levels.
- The current legal framework is generally **viewed positively as it provides certain operational flexibility and adaptability** compared to the previous programming periods. For example, programmes can adopt operational approaches that best match the needs of the territory (place-based approach) and have the necessary flexibility to implement the chosen strategy. This flexibility includes selecting the most beneficial type of operations and types of calls, focusing on specific themes (such as resilience) or making a suitable mix of the SCOs in the programmes.
- Wide use of SCOs has allowed greater implementation flexibility for programmes and reduced the burden for partners.
- A risk-based approach to control is seen as positive, as it provides simplification and flexibility based on each programme's situation.
- Having Interreg specific policy objective and indicators was seen as a beneficial change introduced in 2021-2027 period.

The general conclusion emphasised the importance of maintaining what works well in the current legal framework regarding flexibility and adaptability, with the possibility of introducing minor adjustments to enhance it further.

What is missing and needs improving

- Specific measures (for example, the CLLD process) require a different approach, which might lead to slower absorption of funds during the start of the programming period. Therefore, a greater flexibility in applying decommitment rules during the first two implementation years might be beneficial.

- Unpredictability, inconsistency, and delays in the approval of the legal framework, along with adding new requirements at late stages (DNSH, Bauhaus initiative), were identified as critical factors hindering flexibility and adaptability. Participants also noted that understanding and applying these requirements need streamlining across EC staff and units.
- The legal framework for the Cohesion Policy and Interreg undergoes significant changes every programming period, requiring substantial effort and resources for preparation and capacity building for programmes and beneficiaries. Consequently, fewer resources are available for simplifications, which are essential for enhancing flexibility and adaptability.
- Audit authorities often interpret legal requirements more rigidly than intended, complicating implementation. This increases programme insecurity, limits the scope for simplifications, and ultimately reduces opportunities to enhance flexibility and adaptability.
- The application of state aid rules in the context of Interreg is seen as impractical and counterproductive. Interreg co-financed cooperation initiatives and pilot solutions pose little risk of distorting the market, particularly given the limited financial volume of Interreg programmes.
- The rigid formulation of SOs in the regulation limits cross-sectoral and holistic approaches. Allowing for more open thematic objectives, such as combining topics like renewable energy and energy efficiency, would provide greater flexibility.
- Using intervention codes as a policy tool for monitoring is generally appreciated. However, the categories of intervention codes are too rigid and do not align with the nature of Interreg interventions.
- Requirements for the investments were found restricting to the flexibility in several programmes having investment elements.
- Programme evaluations (both internal and external, operational and impact) are not currently fully serving as tools for flexibility and adaptability in Interreg, and there is space for improvement.
- The Strategic Environmental Assessment process was found to be not relevant to a high-level strategic document and not bringing added value.

What would be your vision for the future?

Interreg programmes should keep the strategic focus

While some programmes expressed a desire for greater flexibility to address crises, there was a consensus that Interreg should maintain its focus on long-term strategic planning, grounded in territorial needs, with limited capacity to adapt to territorial needs and changing situations.

Stability and continuity of the implementation framework should be safeguarded

Although changes to the legal framework are still to be discussed, it is important to retain the operational flexibility currently in place, as it has been positively assessed by programmes and contributes to their effectiveness. Significant changes to the implementation framework caused delays in the previous funding periods, reducing project quality and requiring additional resources to update existing monitoring tools, reducing resources for simplifications, flexibility and adaptability.

Increased thematic flexibility through fewer, broader objectives

While the current legal framework allows some flexibility to choose the thematic focus based on territorial needs, many SOs are too narrowly defined, making them less suitable for the Interreg interventions. The need for greater thematic flexibility was also highlighted in the Greener Europe network discussions in preparation to the Harvesting event (e.g. re-prioritisation, see more in the discussion paper on Greener Europe).

Measures to increase the thematic flexibility:

- **Broader SOs:** Interreg programmes could benefit from having a single (e.g. ISO1) or fewer broadly defined priorities, with specific variations depending on the programme type. The current division into specific objectives (SOs) has not supported an integrated, holistic approach.
- **Define programmes at the policy objective level only, leaving out SOs:** this would provide more room for adaptability and reduce constraints imposed by predefined SOs.
- **Allow SOs to be defined at the programme level by, e. g., MC:** need for formal programme amendments would be reduced, giving programmes greater flexibility to adjust objectives as needed.
- **Adopt fewer broadly defined or a single priority (e.g., ISO1):** it could streamline processes and further enhance adaptability. Several programmes mentioned that these priorities should still permit necessary investments to address specific territorial needs.

Greater financial flexibility to increase focus to the quality of interventions

Most of the interviewed programmes acknowledged that the current level of flexibility is appreciated and helpful, but they suggested the need for even more flexibility in the future. They proposed the following approaches:

- **Greater flexibility between priorities:** in programmes with multiple priorities, the current level of financial flexibility is insufficient. More flexibility should be allowed.
- **Reassess the n+3 rule:** while the need for faster spending and efficiency is generally recognised, the application of the n+3 rule has revealed several adverse effects. It sometimes forces

programmes to compromise on project quality to meet financial targets. The n+3 rule contributes to long funding gaps as programmes try to allocate all funds in the early years of the programme implementation. For ENI programmes, new with the n+3 rule, bottlenecks are likely to arise, particularly in programmes involving multiple partner countries or in regions experiencing military conflicts. Additionally, the rules become unclear and restrictive when additional funds or programme amendments are introduced.

- **Legislation for risk-free testing of new ideas:** include legal provisions that allocate funds for testing new ideas without risk, as a preparation for the next programming period. This could be supported by risk capital – funds not yet committed to specific projects – to promote a mindset of flexibility, adaptability, and innovation, and trying new ideas and models in a smaller environment.

Built-in flexibility in the regulation for a crisis situation

While programmes generally recognize there is significant administrative flexibility in organising procedures, they still face challenges in quickly responding to bigger crises and uncertainties (such as COVID-19, the war in Ukraine, etc.). Given the ongoing military conflicts and the likelihood of future crises or disruptions and uncertainty, it is proposed to explore further built-in flexibility into the regulation or revise the current formulation of article 20 CPR. This would allow the agreement on triggers that activate pre-agreed response measures between the European Commission and the programme (for example, similar to Disruption Regulation (2022/2192) or the CARE Regulation (2022/562), enable quicker adaptation to evolving situations and reduce administrative burdens.

Outcomes of the Harvesting session

The session was designed to verify the key messages and by voting to assign to the following categories:

- **KEEP** the messages which are good and suitable as they are included in the discussion paper
- **EXCLUDE** the messages with which participants do not agree and would suggest excluding from the final report
- **DEVELOP** 3 ideas which are good in general but require further development
- **NEW** ideas.

Participants were invited to provide additional comments after the session and via emails after the event, but no additional comments or proposals were received.

Further, we will present the division of the ideas according to categories, including the explanations provided during the sessions:

KEEP

Interreg – a long-term strategic planning instrument

While some interviews and IKF highlighted the need for greater flexibility to address a crisis, the discussions during the Harvesting event sessions revealed a strong consensus that Interreg should remain a long-term strategic planning instrument rather than a mechanism for crisis response. Consequently, the proposal to incorporate built-in flexibility into regulations for crisis situations was not subject to detailed discussions. Some participants shared the opinion that the current regulatory framework already allows sufficient adaptability to address crisis situations effectively without programme amendments. Participants emphasized the importance of maintaining a thematic strategic focus even in times of crisis, while supporting the inclusion of flexibility in implementation mechanisms to address the specific needs of the programme area when necessary.

Greater financial flexibility to increase focus on the quality of interventions

It was agreed that greater financial flexibility is needed between priorities to ensure the relevance and effectiveness of the programme implementation and avoid sometimes artificial achievements of the financial indicators and reducing the need for administratively demanding programme amendment procedures.

Stability and continuity of the implementation framework

Participants emphasised the importance of maintaining continuity in the implementation framework to ensure that effective elements are preserved. Continuity serves as a crucial precondition for enabling flexibility, adapting to local contexts, and introducing simplifications. Significant changes to the implementation framework demand substantial resources from programmes, leaving fewer resources available for fostering flexibility. Additionally, stability within the framework is even more critical for beneficiaries, ensuring they can operate effectively. Moreover, certain stability speeds up programming and start up of the programme implementation and, in such a way, mitigates the challenges created by de-commitment requirements.

Risk-free testing of new ideas

Interreg should continue supporting the testing of new ideas in a safe way. This requires further exploration – the programmes discussed whether to include certain provisions in the legislation, or to explore and use the available opportunities at the programme level. A proposal was made that a certain portion of the programme budget could be allocated for this purpose, as it is an important step in preparing for the new period – testing and improving some ideas on a smaller scale before implementing them accross the whole framework. Trying innovative ideas is important not only at the programme level, but also at the project level. However, trust and competence are crucial in evaluating whether “failure” is a valid result.

DEVELOP

Greater thematic flexibility

In general, it was agreed that greater thematic flexibility is needed, but there was no clear consensus on how to achieve this. A significant share of the participants supported the idea of broader SOs to allow for a more integrated holistic approach. However, the idea that SOs could be defined at the programme level was not supported.

SOs were considered a valuable tool for demonstrating Interreg programmes achievements within a wider EU policies context. Therefore, participants supported the need to define broader SOs at the EU level to avoid artificial division/fragmentation between related topics (e.g., energy efficiency and renewable energy). However, it was noted that it is important to allow Interreg programmes the flexibility to define their own approach to supporting the selected POs and SOs. If changes on SOs level are needed, this could be made without formal programme amendments in the future.

Some participants supported the idea of having fewer and more broadly defined priorities, though limiting the programme to a single priority in the future was rarely seen as useful, particularly as this option is already permitted under the existing legal framework.

Mitigation of the challenges related to n+3 rule

The participants acknowledged that the n+3 rule is challenging within the context of Interreg, although programmes appreciated the principles underlying this measure. The programmes proposed several alternatives that would help the programmes to respond to territorial needs better and work on strategic operations. Proposals made: allow programmes to decide on yearly commitments, agree on prefinancing of the programmes, consider n+5 for some of the programme types, or reduce targets for the first years.

NEW

New ideas brought during the discussions related to challenges and proposals for the future. However, in general, not many new ideas were introduced.

- Thematic concentration was mentioned several times during the Harvesting sessions, with discussions questioning whether it should be determined at the programme level rather than imposed by EU regulations. Participants highlighted that the current approach makes Interreg programmes too similar, causing them to lose their unique identity and limit their ability to address the specific needs of their programme area. It was noted that this approach detracts from the local based approach that is central to Interreg's purpose and also considered to be important in the future Cohesion policy.
- Interservice consultations to be skipped.
- Approach intervention codes in a different way to avoid restricting impact to flexibility and adaptability.
- Fast track financing tools.

Conclusions

The implementation framework was generally appreciated for providing **a certain level of operational flexibility and adaptability**. However, some potential areas for improvement were identified. The importance and need for greater flexibility were also emphasized in other working groups during the Harvesting event, including the performance-based approach, the Greener Europe thematic network, and the field of synergies.

Initiatives aimed at increasing flexibility and adaptability should also be assessed from the beneficiaries' perspective to ensure that the proposed measures provide added value, enable more effective local interventions, and offer meaningful simplification and flexibility for the beneficiaries.

While the legal framework and governance are important, also the **programme's flexibility and adaptability during its programming phase are equally crucial**. This includes ensuring sufficient resources are allocated to support them, to embrace flexibility and adaptability mindset, and to adopt adaptive management practices are equally important.

For flexibility and adaptability to be truly effective, all elements of the program framework must consistently support these principles. If one part of the framework encourages flexibility while another imposes rigid, restrictive rules, the overall adaptability is compromised. Therefore, discussions on flexibility and adaptability must take a holistic approach, addressing the entire framework – including implications from both CPR regulations and Interreg. For instance, while programs may have the flexibility to adjust priorities and tailor approaches to meet the specific needs of a territory, this can be undermined by requirements to support specific types of operations or adhere to rigid intervention codes.

While it is acknowledged that legislative requirements under CPR are not easily modified by Interreg, mitigation measures should still be identified for the most critical constraints. This will ensure that programs remain focused on the quality, relevance, and effectiveness of interventions.

It was suggested that we come back to this topic discussion when the framework is available.

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