

CONSIDERAZIONI GENERALI

- Lo schema proposto mette a sistema le indicazioni che emergono rispettivamente dagli articoli della proposta di Regolamento Comune e dalle Fiches 5A e 5B.
Nel Position Paper (PP) predisposto dai servizi della Commissione dedicato all'Italia per lo sviluppo dell'Accordo di Partenariato (Ref. Ares(2012) 1326063-09/11/2012), si afferma: *"The structure of programmes should take into account the division of competences for relevant policies between regional and National levels. Distribution of responsibility between the national and the regional level should assure overall coherence while respecting at the same time local conditions (avoid "one size fits all approach")*.
Avendo al momento a riferimento unicamente la Fiche n. 4 per la struttura dell'Accordo di Partenariato¹, lo schema di PO proposto potrebbe risultare perciò "rigido" e non sufficiente a dare conto dei diversi livelli di integrazione richiesti dai servizi della Commissione stessa nel PP.
- Si evidenzia che la struttura di PO proposto tiene conto dell'approccio territoriale integrato, ma non fornisce indicazioni su come raccordare i PO a fronte dell'eventuale attivazione di Joint Action Plan da parte degli Stati Membri (Piano di azione comune, art. 93 Regolamento Comune).
- Un ulteriore commento deriva dall'affermazione che viene fatta al secondo capoverso della prima pagina, laddove la Commissione esplicita che saranno fatti necessari aggiustamenti del template per i PO relativi all'obiettivo Cooperazione Territoriale europea che probabilmente conterranno peculiarità diverse fra PO transnazionali e Transfrontalieri. Poiché il draft template prevede che per i PO dell'obiettivo CTE siano fatti aggiustamenti, è quantomeno necessario conoscere al più presto il draft template per questa tipologia di programmi.
- Rispetto al punto 3.A.2 è opportuno ribadire, come peraltro si evince dal testo, che le azioni che verranno descritte in tale sezione hanno carattere esemplificativo e non vincolante.
- Rispetto agli Strumenti Finanziari (3.A.2.3), non si fa riferimento alla VEXA richiesta dai Regolamenti. Questo farebbe intendere che la VEXA potrà essere predisposta anche successivamente al PO. Sarebbe opportuno avere contezza di quale sia il momento di presentazione della VEXA per SF
- Rispetto al tema degli indicatori, questi vengono trattati in numerosi punti, con la richiesta di numerose tabelle (tab. 3, 5a, 5.b, 13, 18) che non risultano sempre chiare e che in generale creano una certa confusione su come le stesse possano essere lette in maniera integrata.

¹ Lo schema proposto nella fiche prevede alla tabella 1 una allocazione indicativa di ciascun fondo per obiettivo tematico e alla tabella 3 il concorso di ciascun fondo all'approccio integrato per aree particolarmente colpite da fenomeni di povertà e svantaggio sociale.

PROPOSED EMENDAMENTS

SECTION 1. PREPARATION OF THE OPERATIONAL PROGRAMME (OP) AND INVOLVEMENT OF PARTNERS (ART. 23(2) AND ART. 87(5)(C) CPR)

A short summary of the process of the preparation of the operational programme, with a specific focus on partnership, including:

- ☐ *the authority which has coordinated the preparation of the OP; and the public institutions directly involved in this exercise (such as, for example, the ministries); provide a short description of their role in the preparation;*
- ☐ *the key stages of the preparation process;*
- ☐ *a description of the involvement of the partners referred to in Art. 5 CPR in the preparation of the operational programme. This description should include:*

This description should include:

emendament 1

o how Regions and Local Administrations have been involved and have expressed their agreement on objectives and priorities selected, in particular regarding the Integrated approach to territorial development and the identification of ITIs, taking into account the division of competences for relevant policies between Regional and National levels

o how partners have been selected;

o the list of the partners involved (annexed)

o the actions taken to facilitate a wide involvement and an active participation of the partners, including in terms of accessibility;

o the main contribution of partners to the elaboration of the operational programme inter alia in regard to;

- ☐ *the ex-ante evaluation, which analyses the challenges and needs to be addressed by the ESI Funds, in line with the Europe 2020 Strategy;*
- ☐ *the determination of objectives and priorities;*
- ☐ *the determination of the architecture and the governance of the programme;*
- ☐ *the mechanisms of coordination and integration between the ESI Funds and with other EU policies and instruments;*
- ☐ *the implementation of the horizontal principles as defined in Article 7 and 8 of the Regulation (EU) No [CPR]*

o an overview of main concerns, comments and recommendations put forward by partners and an explanation of how these have been taken into account in the OP;

emendament 2

- ☐ *an overview of the organisation of the ex-ante **and SEA** evaluation process and how the results of **these processes** have been taken into account;*

- ☐ *where appropriate, an overview of the use of studies and expert groups.*

Motivation

Emendament 1

In line with PP recommendations, Regions and local administration have to be actively involved in the decision making process as far as integrated territorial approach is concerned

Emendament 2

An overview of SEA process, explaining how its results have been taken into account in the Programme, should be included, in order to clarify how the relevant environmental issues have been

considered during the strategic programming phase. The EC “Guidance document on ex ante evaluation” recommends a strong integration between programming process and SEA and between Ex ante evaluation and SEA. Also for this reason SEA can’t be forgotten in the context of section 1.

SECTION 2. Strategy for the operational programme’s contribution to the Union strategy for smart, sustainable and inclusive growth

Observation 1

2.1 Strategy for the operational programme's contribution to the Union strategy for smart, sustainable and inclusive growth

The needs should be checked with reference to the context analysis in order to the thematic objectives identified. The section of the context analysis should be separated from the section on strategy (see Fiche n. 5)

Observation 2

Table 2: Overview of the programme investment strategy

Column 6 “ Union support - EUR “ : Financial breakdown should be broken down, ex ante, by thematic objective / funding priorities/ specific objective in order to link relevant result indicators (see DPS – Metodi ed obiettivi)

emendament 3

~~2.2 * Relevant identified needs not addressed by the operational programme~~

~~Where applicable, an explanation of why important relevant national and regional needs, particularly those covered by relevant country specific Council recommendations, are not addressed by the operational programme.~~

~~{a maximum of x characters}~~

~~This explanation should be proportionate and reflect the total amount of programme resources. It should identify how the Member State will address the national and regional needs relevant to the operational programme in question, which not covered, e.g. with reference to national means, other EU instruments, regulatory interventions, etc.~~

Motivation

Article 87 (2) ii) CPR does not contemplate this section. Moreover this explanation give no added value to the content of the OP. For these reasons it should be deleted.

3.A.2. Actions to be supported under the investment priority (by investment priority)

3.A.2.1

emendament 4

A description of the type ~~and example~~ of actions to be financed and their expected contribution to the corresponding specific objectives, including, where appropriate:

- ☐ ☐ the identification of the main target groups;
- ☐ ☐ specific territories targeted;

□□types of beneficiaries.

[a maximum of x characters]

(Article 87 (2) (b) (iii) CPR)

Where appropriate, this description should also include steps to be taken to take into account the principles of equality between men and women, non-discrimination and sustainable development.

NB: Where appropriate, this description should include an indication that the entire priority axis is dedicated solely to community-led local development in the meaning of Article 28 of the CPR (which allows an increase in the EU co-financing rate by 10% as set out in Article 110 (5) of the CPR).

Motivation

Since examples are not binding, as far as implementation of action is concerned, it is proposed to delete in order to stick to simplification criterion.

Observation 3

3.A.2.1 A description of the type and examples of actions to be financed and their expected contribution to the corresponding specific objectives, including, where appropriate:

The financial breakdown on the single action should be indicated. It is linked with the result

Observation 4

Table 6: The performance framework of the priority axis

Column 1 : Would be appropriate to divide the implementation step, financial from output or result indicators in two different columns.

Observation 5

3.A.6. Where appropriate, a summary of the planned use of technical assistance including, where necessary, actions to reinforce the administrative capacity of authorities and beneficiaries (by priority axis) (Article 87 (2) (b) (vii))

Should be clarified if the resources have to be found in Technical Assistance Axes or specific Assis.

Observation 6

Section 3.B. A description of the priority axes for technical assistance (Article 87 (2) (c) CPR)

The Axis Technical Assistance is to be linked to the thematic objective 11?

**SECTION 5. INTEGRATED APPROACH TO TERRITORIAL DEVELOPMENT -
ARTICLE 87(3) CPR**

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emendament 5

~~Table 21: The indicative financial allocation to each ITI set up under Article 7 (2) of the ERDF Regulation from each priority axis~~

Motivation

Eliminate tab. 21. Is better to postpone the details to the phase in which POs are already been defined. This would permit the definition of POs to be more flexible.

5.4. *The mechanisms to ensure coordination with cooperation activities and macro-regional and sea-basin strategies

emendament 6

to add: Where relevant the arrangements for interregional and transnational actions, within the operational programme, with beneficiaries located in at least one other Member State.

Motivation

In this respect it is highly recommended to make available the relevant OP template

SECTION 10. * EX-ANTE CONDITIONALITIES (ARTICLE 87(6) (B) CPR)

Table 25: Identification of applicable ex-ante conditionalities and assessment of their fulfilment

emendament 7

Add to the table a column in which it must be defined the body responsible for fulfillment.

Applicable ex ante conditionality	Priority axis or axes to which conditionality applies	Ex ante conditionality fulfilled (Y/N/Partially)	Criteria	Criteria fulfilled (Y/N)	Reference	Explanations	Bodies responsible for fulfillment
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Motivation:

It should be specified when the conditionalities are partially fulfilled, in line with table below, so to make clear who has the responsibility to complete the fulfilment process

SECTION 11. *REDUCTION OF THE ADMINISTRATIVE BURDEN FOR BENEFICIARIES - ARTICLE 87 (6) (C) CPR

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emendament 8

~~Table 28: Main actions planned to achieve a reduction in administrative burden with an indicative timeframe and expected results~~

Motivation

Eliminate Tab. 28. Is better to postpone the main actions planned to the phase in which POs are already been defined.

SECTION 12. HORIZONTAL PRINCIPLES - ARTICLE 87(7) CPR

12.1. Sustainable development

A description of specific actions to take into account environmental protection requirements, resource efficiency, climate change mitigation and adaptation, disaster resilience and risk prevention and management, in the selection of operations.

[a maximum of x characters]

emendament 9

*A description of how the aspects listed above **have been taken into account in the programme design and** are taken into account in project selection.*

This section should cover arrangements which extend to the entire operational programme or multiple priority axes. Arrangements specific to a priority axis or an investment priority should be included under the description of that axis ("principles for selection of operations").

If the Member State considers that the horizontal principle is not relevant for the operational programme concerned, this section should provide a justification for such an assessment.

Motivation

Among the “arrangements which extend to the entire operational programme”, an important issue is to stress the fact that environmental matters are taken into account.