



To:  
The Government of Sweden  
The European Commission  
The European Parliament

Adopted at Europaforum Norra Sverige XXI, Östersund 13 March 2015

## **Europaforum Norra Sverige's views and recommendations on the European Structural and Investment Funds' programming process in Sweden.**

Europaforum Norra Sverige (EFNS) is a network for politicians at the local and regional levels from Norrbotten, Västerbotten, Jämtland and Västernorrland. EFNS is a meeting place and knowledge arena where EU policies are analysed and discussed as regards how they affect northern Sweden. EFNS monitors European issues to influence EU legislation, the EU's strategies and action programmes and the EU's budget. The objective of EFNS is to safeguard the interests of northern Sweden both in the European arena and in relations to the national level in matters with a clear European perspective.

The European Structural and Investment Funds (ESI) are a very important resource contribution in the regional development efforts and strengthen northern Sweden's possibilities of contributing to a cohesive Europe. The ESI funds, which are coordinated under a joint superior structure fund regulation, comprise the European Regional Development Fund (ERDF), the European Social Fund (ESF), the European Agricultural Fund for Rural Development (EAFRD) and the European Maritime and Fisheries Fund (EMFF).

Prior to and during the Swedish programming work, Europaforum Norra Sverige (EFNS) has become involved in structure, planning and content in future funds and programmes for the period 2014-2020. EFNS has also followed the work during earlier programme periods and there are many lessons learned and experiences gleaned. At the end of 2014/beginning of 2015, EFNS followed up on the programming work for the ESI funds in Sweden, see appendix.

*In connection with the intensive programming work for the new structure fund period 2014-2020 having been concluded, Europaforum Norra Sverige (EFNS) wants to submit its opinions on the process implemented and recommendations for the future. EFNS hopes that the opinions, together with EFNS' evaluation, will form a basis for continued dialogue and constructive discussions between the EU, national and regional level on the Swedish programming work for the ESI funds.*



## **Weak breakthrough for European Commission's new points of departure**

In earlier position statements, EFNS has been positive to the European Commission's new points of departure for the programme period 2014-2020 such as the intentions with the Partnership Agreement, fund coordination, regional adaptation, territorial tools and multi-level governance in programme preparation and implementation. However, EFNS considers that the Swedish programming process has been handled based on the same "thinking" as earlier programme periods and that there is all reason to question whether Sweden has understood and utilised the new approaches that the European Commission sought.

EFNS' impression is that Sweden, at the time of the programmes' submission, did not live up to the European Commission's points of departure and that it did not suffice to serve the national documents to the European Commission for approval. The Swedish programming process therefore became very pressed for time. EFNS considers that the conditions to be able to deliver in accordance with the European Commission's points of departure would have benefited from a structured dialogue and gradual knowledge build-up with a more joint and open process both at the national level and towards the European Commission. The collective governing role that was the intention of the so-called Partnership Agreement (PA) between Sweden and the European Commission for the ESI funds' direction and forms for dialogue on the preparation of them was thereby lost. The PA became more of a collective document for what was the outcome of the various programmes for the respective ESI fund.

EFNS considers that the Swedish approach also entails that the regional level loses new opportunities and potentials for the programme period 2014-2020 in the regional and local growth work. In extension, this has consequences for both the regional development as well as the ability of the Nuts II areas to contribute to Europe's growth and employment in accordance with the EU 2020 goals. EFNS wants to emphasize the significance of all levels planning for a future development of how the structure funds will better contribute to growth and employment in the Nuts II areas.

***EFNS recommends that the national level in dialogue with the regions and authorities concerned should follow the intentions and the direction of will that the European Commission and European Parliament have expressed.***



## **Little regional influence in the programme preparation**

EFNS considers that the programming process in Sweden has been characterised by a lack of dialogue with the regional political level. It is very unclear if and in what way the national level desired cooperation with the regional level. In general, it can also be pointed out that time pressure and deficient transparency have characterised the programming process and entailed limited feedback, little advanced planning and ambiguities regarding direction, which has impeded the regional level's possibilities of contributing expertise and experience.

EFNS wants to especially emphasize that the process on the preparation of the Partnership Agreement (PA) was planned without knowledge and understanding to include the regional political level. When this is done, after strong pressure, the actors concerned considered that the inclusion primarily consisted of general information provisioning. The regional political level seeks dialogue and joint action, which is also the intentions of the ordinance and the approach is described in the Code of Conduct. It is clear that national actors do not have a collective view of what parties at the regional level it is important to conduct a dialogue with and how the regional political representation looks to reach the right dialogue partners for such joint action.

EFNS also wants to direct criticism at the complete exclusion of the regional political level in the dialogue on the national Regional Fund programme (ERDF), the national Social Fund programme (ESF) and the national Rural Development programme (EAFRD).

***EFNS recommends that the national level, ministries and authorities, should strengthen their knowledge of how the regional level, with responsibility for regional growth and development, is organised in Sweden and what mission the respective parties have. This is so that the right actors, politicians and service persons will be invited to participate in dialogues and joint action on important prioritisations that affect the regional level.***

***EFNS recommends that the next programming process be started well in advance and be characterised by joint action between the levels and correct information and that transparency and good scheduling with a clear joint direction should be matters of course.***

***EFNS recommends that the national level strengthens and develops arenas for dialogue with the regional political level with representation from all Nuts II areas, such as the Eight-man Group.***



## **Minimal territorial regional adaptation**

EFNS is very positive to the point of departure in the joint strategic framework to take into account the geographic and demographic features that exist in each country and to address the specific challenges each territory has to really free up the development potential in each region. *EFNS* therefore finds it to be very serious that the territorial adaptation in the Swedish ESI programmes is weak.

From EFNS' perspective, there are many examples of the specific territorial challenges in the region not having been taken care of. The national programmes lack adequate points of departure in territorial differences and regional challenges. The regional structure fund programmes for the European Regional Development Fund (ERDF) are structured based on national frameworks already defined - "*the government's guidelines for programme preparation*". Guidelines that were presented to the programmers without any possibility to partake of the grounds on which they were prepared. A national programme is created for ERDF, but primarily enables financial and coordinating tools for Swedish national authorities and with weak points of departure in the regional interests. In connection with this, there is also a shift of resources from regional to national programme level both for ERDF and for the European Social Fund (ESF). The national programmes for ESF and the European Agricultural Fund for Rural Development (EAFRD) are applied to the regional level via regional action plans and implementation strategies, which only marginally enables territorial adaptation.

EFNS considers it to be particularly serious that the clear features that apply to Northern Sparsely Populated Areas (NSPA) have not been taken into account and that the EFNS region thereby loses valuable directions. EFNS' impression is that the Member State does not really understand the challenges and potential in the NSPA geography and therefore reasoning is also not enabled between the Member State and the European Commission, within and between ministries, with concerned authorities and with regional growth agencies on how NSPA need to be made visible and what priorities are important in the programming work.

***EFNS recommends that the European Commission and the Member State Sweden prepare a development that strengthens the territorial adaptation of future structure fund programmes. EFNS wants to see that the European Commission is serious about the subsidiarity principle to ensure that additionality is achieved.***

***EFNS strongly recommends dialogue between the European Commission, the Member State and affected regions on the challenges and potential in the NSPA area.***



## **Fragmented Swedish programme structure**

EFNS also wants to point out the complexity in the Swedish fragmented programme structure with fund responsibility divided over different ministries, with several different administering authorities, different programme geographies (NUTS levels), where some programmes are formulated regionally while others are formulated nationally with associated regional plans. The structure in itself impedes both regional influence and fund coordination.

EFNS considers that the Swedish programming process has not made it possible for the regional level to plan and implement the ESI funds based on a coherent regional sustainable growth. By dividing the fund responsibility over three different ministries and applying the principle of one fund one programme, the Swedish fund coordination is unable to bridge national sector politics, but rather focuses solely on avoiding overlaps between the funds and fails to create interaction between the funds for greater added value at the regional level (additionality).

EFNS also wants to bring it to light that dialogue has been lacking on possible advantages or disadvantages with the new territorial tools, as well as the arrangement on Locally Lead Development (LLD). It is positive that LLD enables programme implementation with several funds, even if it occurs for the programme level that has the least capacity to coordinate and grasp a complex multi-fund solution. EFNS' impression is overall that the possibility of the territorial tools was not earnestly investigated and that potentials have not been utilised.

***EFNS recommends that the Member State Sweden review the fragmented programme structure and investigate the possibilities of going in the direction of regional multi-fund programmes.***

***EFNS recommends a coordinated and cohesive action from the national level, through one ministry with a clear responsibility for the whole for all ESI funds and programmes, for a well-functioning programming work.***

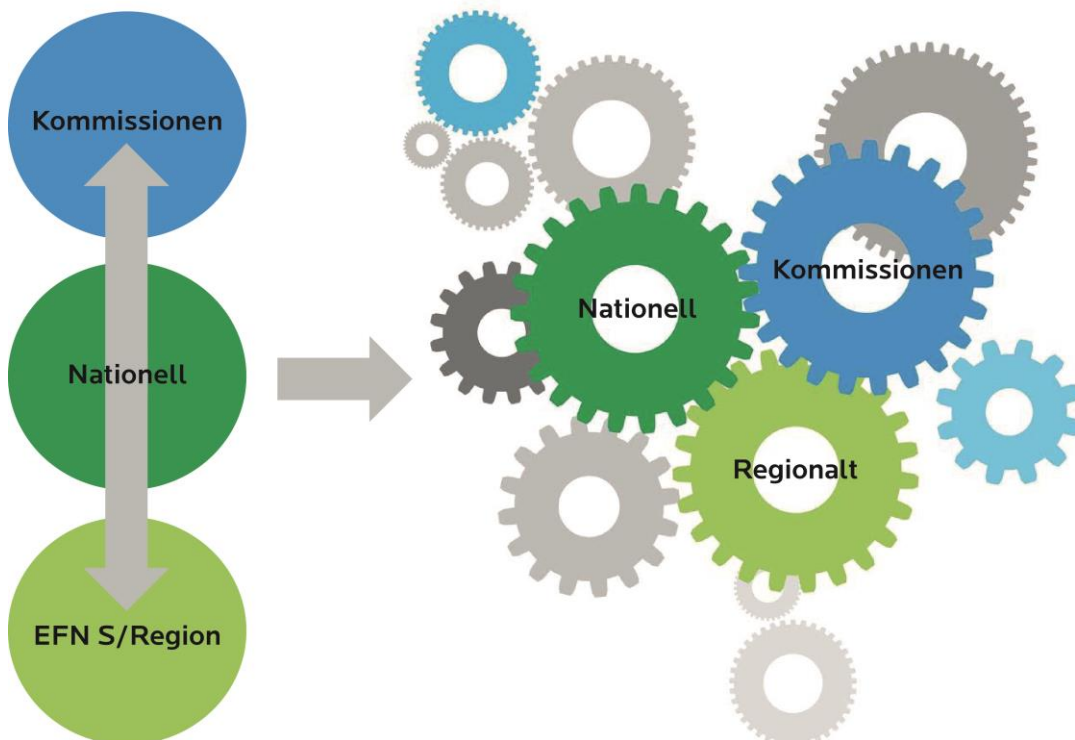
## **Conditions for functioning multi-level governance**

EFNS welcomes the Commission's intentions for strengthened multi-level governance, but considers that the Swedish programming work has unfortunately been characterised by deficient understanding of multi-level governance and joint action.



There is a lack of knowledge about the basic intentions and advantages of multi-level governance. This leads to the multi-level governance being deficiently taken into account based on a notion that it is about information transferring between the levels. EFNS sees the multi-level governance as a very important tool in the regional development and growth work and therefore believes the issue also needs to be taken seriously. The follow-up shows that multi-level governance is an important tool in the programming work, i.e. in the policy process' early phases. EFNS therefore wants to emphasize that multi-level governance between the European Commission, responsible national level and regional level needs to be supplemented with location-based knowledge (regional features, needs and challenges) and joint action between the actors. Only then can the programmes be formulated in a manner that frees up the regions' development potential. The location-based knowledge is provided by the regional representatives, and in dialogue and joint action, the right instruments and efforts can be formulated that provide the best effect.

***EFNS recommends that multi-level governance according to a traditional view (top-down/bottom-up) be developed into a “cog wheel” through the entire policy process - from analysis, planning and strategy to implementation and follow-up. The European Commission, the Member State and the regions act interactively and location-supportively for the adaptation of tools (thematic prioritisations) for the territorial needs and challenges (features such as being sparsely populated).***





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### **Europaforum Norra Sverige - The four northernmost Swedish counties' for dialogue with the EU**

Europaforum Norra Sverige coordinates northern Sweden's dialogue with the EU. Europaforum Norra Sverige spreads knowledge about and anchors EU policies at a local and regional level. The cooperation is headed by leading politicians in the four northernmost counties in Sweden. The current chairman of Europaforum is Erik Bergkvist who is also the Chairman of Region Västerbotten.