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| Suggested Answers for the Public consultation on EU Funds in the area of investment, research, innovation and the single market |
| European Cyclists’ Federation |
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The Public Consultation in the area of investment, research, innovation and the single market

Link to the consultation: <https://ec.europa.eu/info/consultations/public-consultation-eu-funds-area-strategic-infrastructure_en>

ECF calls on its partners to reply to the above public consultation (link) by Thursday the 8th of March to advocate for more budget for cycling in the most relevant EU programmes of the upcoming Multiannual Financial Framework 2021-2027, which is currently under negotiation.

The aim is to share the same message: Cycling must be linked to the EU priorities , included in the EU programmes and benefit from specific actions within the new generation of Fuding Instruments.

You are invited to use the text below when replying to the open ended questions in the consultation.

**Q34: Please explain how the current programmes/funds can add value compared to what Member States could achieve at national, regional and/or local levels.**

The European Programme for the Competitiveness of the Small Medium Sized Enterprises, COSME, has brought to European tourism actors the possibility to receive direct European financially support for international tourism initiatives, which cannot be financed through national and regional schemes. Through subsequent calls for proposals COSME has financed the development of transnational thematic and sustainable tourism products, where tourism SMEs, their DMOs, associations, clusters and regional entities have been beneficiaries.

However, the impact of the COSME action in tourism can be measured as insufficient due to the following reasons:

• Tourism related calls for projects face a lack of specific focus as they have been combined with culture and creative industries;

• The grant amount per project is limited to 250.000 to 350.000€;

• The duration of the projects, being in average 15-18 months is not sustainable as it does not entitle the consortia the necessary time to i) go through a cyclic approach ii) see the return of the investment;

• The human investment in terms of project administration is unbalanced compared to the grant received.

The solution would be to design COSME calls for tourism proposals

• specific to reply to the challenges of this industry

• with a longer time frame

• provide them with a more substantial monetary allocation

• create direct connections and synergies compatible with other programmes such us INTERREG and the overall European Structural and Investment Funds following a systematic approach. If this synergy would be made since the origin of the process the impact of those projects could be multiplied.

• Indeed, COSME is the only direct source of fund for interregional cooperation in tourism beyond INTERREG and ESIF to which Tourism SMEs can access to and can cover the whole of Europe (not a certain micro region only).

**Q35. Is there a need to modify or add to the objectives of the programme/funds in this policy area? If yes, which changes would be necessary or desirable? Please clearly indicate to which policies, programmes and funds your answer refer.**

Yes, we believe there is indeed scope for improvement with regard to a smarter financing model to support the challenges that the European Tourism industry faces now and in the future, mainly through the programmes COSME and the future Framework Programme for Research and Innovation (current H2020).

Those changes would be:

• COSME and H2020 would embedshould have specific calls for proposals targeting specifically the tourism industry: boosting its competitiveness and stimulating research and innovation. Indeed, by its horizontal nature, tourism can easily be considered as a cross-sectorial industry. However, this should not affect negatively the scope of those calls targeting European tourism actions;

• The financial resources for tourism calls and granted amountsfinancial subsidies should be substantially increased and the duration of the projects should be extended to at least a 2-3 year timeframe;

• The whole COSME, and even more the tourism action specific line, should be linked to the ESIF following a systematic approach: when applying to COSME and H2020 beneficiaries would think immediately on the follow up of their initiative by complementing it with other national/regional in order to ensure long term effect;

• More agility and flexibility should be granted through the whole process, especially in H2020, to avoid that project ideas get obsolete from the application to the implementation phases. Tourism supply chain must reply to a constantly changing pattern’s demand therefore the business environment must be dynamic and resilient and requires flexible mechanisms to finance what the market situation demands.

• SubsidiesGrants should be arewarded and finally approved according to proven beneficiaries’ involvement and objectives reached out, rather than calculated on the bases of the percentage invested moneyof the eligible costs. Premium subsidiesreward should be allocated to those projects which succeed in meeting the targets. This entitles proper monitoring and impact measurement from the side of the grant donor and a more balanced monitoring approach: less monitoring on expenditure and more monitoring on impact.

**Q39. If you have identified another way to simplify and reduce burdens, please specify it here.**

Simplification of the financial reporting: more lump sums in case the action is justified and more flexibility between budget lines of the project without the need for a very administrative and time consuming process of an amendment.

Simplifying the application procedures. Instead of asking for a complete, detailed application follow a multi-step approach from project ideas to complete documentation. Continuously advising the applicants and eliminating the low quality / not feasible proposals in different stages would lead to better projects and less useless preparation works.

**Q40. How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication? For example, would you consider grouping/merging some programmes? Please clearly indicate to which policies, programmes and funds your answer refer.**

Indeed, we would only see advantages in strengthening synergies among programmes and grouping them in a systematic approach along a project idea, which can be supported in a sort of “cascade” system meaning a range of instruments which can support its continuity.

In the field of tourism this would be applicable as follows:

Combination of COSME tourism calls with INTERREG and ESIF as described in our answer 35.

Each programme which would target tourism should provide specific calls for the nature of tourism:

• COSME to support European tourism product development, promotion, marketing focusing on European level initiatives (beyond certain macro-regions which can be covered by other Funds).

• H2020 to support innovation and research in European tourism in those areas which are relevant for the whole tourism industry all over Europe (not only for a certain geographic area).

The fact that tourism is eligible in several programmes but without dully specific calls causes overlapping of areas of action in the projects. A line to differentiate the scope of action of both programmes in tourism could be that H2020 would be eligible until reaching the layer “proven in operational environment”. Beyond this line further action would be covered by COSME.

Blending approach to support a long term vision and the different phases of the implementation, E.G:

The idea of a European tourism initiative gets launched through H2020, which entitles research and innovation. Then the COSME action would support its launch to the market, while its implementation phase would be supported by macro-regional strategies and instruments and the ESIF, to be completed by further public and private investments.

EU- financed tourism projects should be connected to each other in a systematic way. Once a tourism priority is defined within both the future COSME and Framework Programme for Research and Innovation, a projects data base should be created to i) inform applicants before they develop applications which might duplicate existing initiatives ii) share results, knowledge in terms of experience and technology, without getting in conflict with IP rights.