



# **New assessment of ESIF administrative costs and burden**

Final Report – October 2018

Contract: 2017CE16BAT036



**EUROPEAN COMMISSION**

Directorate-General Regional and Urban Policy  
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# **New assessment of ESIF administrative costs and burden**

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Luxembourg: Publications Office of the European Union, 2018

ISBN 978-92-79-93030-0]

doi: 10.2776/36663

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This is the final deliverable of the study on the new assessment of ESIF administrative costs and burden, commissioned by Directorate-General for Regional and Urban Policy (Contract: 2017CE16BAT036).

The study established a new baseline concerning the administrative costs and burden of the current ESIF programming period, with a common approach for all five ESI Funds. Furthermore, the study compared the baseline to results of previous studies and assisted the Commission Services with simulations on how possible regulatory changes for post 2020 might affect administrative costs and burden.

### **Key words**

ESIF, ERDF, CF, ESF, EMFF, EAFRD, ETC, Interreg, administrative costs, administrative burden, workload, 2014-2020, simplification, post-2020, 2021-2027, Simplified cost option, SCOs, administrative tasks

### **The team**

The study was led by Spatial Foresight in cooperation with t33.

The underlying information has been collected in cooperation with national experts in each EU Member State. These experts are ACZ Consulting (RO), Berman Group (CZ, SK), BGI Consulting (LT), E-Cubed (MT), EPRC (IE, UK), EPSEC Foundation (PL), EUPOLIS Groupa (HR), RKK (HU), Infyde (ES), IPoP (SI), LKN (CY, GR), MDI Public (FI), ÖIR (AT), ProInfraConsult (BG), Spatial Foresight (BE, DE, LU, NL), SWECO (DK, SE), Tiia Johansson (EE), t33 (BE, FR, IT), University of Latvia (LV), IGOT (PT).

### **Acknowledgements**

This study would not have been possible without the hundreds of people in the European Structural and Investments Funds Community who offered their insights, provided data and information, commented and checked draft results. More than 1 100 different people have directly contributed to the study, and many more have been involved indirectly. The project team would like to thank all those who gave their time to support this work, including the representatives of the national administrations in charge of the coordination of ESIF Programmes and related national policies, the drafting teams of the current programming documents, the managing authorities and intermediate bodies, the certifying authorities, audit authorities, beneficiaries, external experts and the staff at DG REGIO, DG AGRI, DG EMPL and DG MARE. Without your constructive support this study would not have been possible!



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## Acronyms

AA:	Audit Authority
CA:	Certifying Authority
CB:	Certification Body
CF:	Cohesion Fund
CLLD:	Community-led local development
CP:	Cooperation Programme
CPR:	Common Provisions Regulation (Reg. 1303/2013)
DA:	Delegated Act
EAFRD:	European Agricultural Fund for Regional Development
ERDF:	European Regional Development Fund
EMFF:	European Maritime and Fisheries Fund
ESIF:	European Structural and Investment Funds
ESF:	European Social Fund
ETC:	European Territorial Cooperation
FTE:	Full Time Equivalent
IOs:	Information Obligations
ITI:	Integrated Territorial Investment
JAP:	Joint Action Plan
MA:	Managing Authority
MEUR:	Million Euro
MS:	Member State
NA:	National Authority
OP:	Operational Programme
PA:	Paying Agency
SCO:	Simplified Cost Options
SFC:	System for Fund Management
SSUC:	Standard Scales of Unit Costs
TO:	Thematic Objective
ToR:	Terms of Reference

## Abstract

The study (Contract: 2017CE16BAT036) established a new baseline concerning the administrative costs and burden of the current ESIF programming period, with a common approach for all five ESI Funds.

Although managing and implementing ESIF programmes is a highly complex and demanding task, the overall administrative costs are judged to be reasonable. Given that transparent and responsible handling of public money and ensuring high-quality investments requires the commitment of considerable administrative resources, 4% of administrative costs (average aggregated costs, taking into account the weighted allocation of Funds) that are some 26 billion EUR or 610 000 FTE over a programming period handling 646 billion EUR are not considered excessive. This corresponds to 40 300 EUR respectively 0.95 person years per million Euro of eligible budget including national co-financing. These costs are also consistent with the volume of support granted under technical assistance.

Overall, there are considerable variations in administrative costs between ESI Funds and types of Operational Programmes. The programme characteristics influencing administrative costs the most are the financial volume, the number of beneficiaries and the thematic focus of the programme.

Clear reductions of administrative costs and burden resulting from regulatory innovations found in the post-2020 CPR proposal are expected. The most effective simplifications are the reduction of the number of verifications and the increased uptake of Simplified Cost Options (SCOs).

## Extrait

L'étude (contrat : 2017CE16BAT036) établit de nouvelles données de référence sur les coûts et les charges administratifs encourus sur la période actuelle de programmation, adoptant une approche commune pour les cinq Fonds ESI.

Bien que la gestion et la mise en œuvre des programmes des Fonds ESI soient une tâche extrêmement complexe et exigeante, les coûts administratifs observés au niveau global sont jugés raisonnables. Étant donné qu'un traitement transparent et responsable des deniers publics et des investissements de qualité nécessitent des ressources administratives considérables, 4% de coûts administratifs (coûts agrégés moyens, en tenant compte de l'allocation pondérée des Fonds) soit 26 milliards EUR ou 610 000 ETP sur une période de programmation couvrant 646 milliards EUR, ne sont pas considérés comme excessifs. Cela correspond respectivement à 40 300 EUR et 0,95 années-personnes par million d'euros de budget éligible, et comprenant le cofinancement national. Ces coûts sont également compatibles avec le plafond mis en œuvre pour l'assistance technique au titre de la future période.

Dans l'ensemble, les coûts administratifs varient considérablement selon les Fonds ESI et les types de Programmes Opérationnels considérés. Les caractéristiques du programme qui influent le plus sur les coûts sont le volume financier, le nombre de bénéficiaires et l'orientation thématique du programme.

Les innovations réglementaires détaillées dans la proposition de dispositions communes post-2020 permettront d'engager des réductions significatives des coûts et des charges administratives. Les simplifications les plus conséquentes attendues sont la réduction du nombre de vérifications demandées et l'adoption plus systématique des options de coûts simplifiés (OCS).

## Executive Summary

Managing and administrating public funds worth EUR 646 billion under European Structural and Investment Funds (ESIF) demands financial and personal investments from all those involved. Public authorities at EU, national and regional levels as well as beneficiaries all deploy staff, cover overhead costs and make for external costs to ensure investments in job creation and a sustainable and healthy European economy and environment. Providing an insight into the costs for managing and administrating these public funds supports discussions on transparent policies and policy results.

This report presents the results of the new assessment of baselines for administrative costs and burden of ESIF 2014-2020, for the first time following a common approach for all five ESI Funds.

- *Administrative costs* represent the total staff, overhead and external costs borne by national and regional authorities to manage and administer ESIF, fulfilling the tasks described in the EU regulatory framework for ESIF. This includes preparing, managing, certifying and auditing individual ESIF programmes, as well as the related national coordination tasks.
- *Administrative burden* encompasses the total staff, overhead, and external costs for beneficiaries to comply with obligations resulting from the legislation, in particular obligations imposed by the ESIF regulations as well as regulations related to the ESIF support received, such as State aid, public procurement and environmental legislation.

## New baselines for administrative costs and burden

The baselines for administrative costs and burden are calculated based on extensive data collections. Data on the costs incurred for administrative tasks were collected via surveys of programme authorities, national coordination bodies and interviews with beneficiaries. Responses cover 818 authorities, representing a response rate of 39% of all ESIF authorities, and 269 responses from beneficiaries. Final baselines for administrative costs were established after filling gaps and performing estimations on missing data. In addition, there were verifications with programme authorities and national coordination bodies. Plausibility checks have been conducted, and comments and feedback have been collected to make the new baselines more robust. Baselines for administrative burden have been established using a sample-based analysis. These new baselines for both administrative costs and burden are expressed in terms of monetary resources (Euros) and workload (full time equivalents - FTEs).

The key findings of the study are as follows:

- **Modest administrative costs.** Although managing and implementing ESIF programmes is a highly complex and demanding task, the overall administrative costs are judged to be reasonable. A comparison made in 2010 (SWECO 2010) shows that the European Bank for Reconstruction and Development (EBRD) has a comparable level of administrative costs to EU Cohesion Policy, while other examples have up to two or three times higher administrative costs. Given that transparent and responsible handling of public money and ensuring high-quality investments requires the commitment of considerable administrative resources, 4% of administrative costs that are some 26 billion EUR or 610 000 person years over a programming period handling 646 billion EUR are not considered excessive. Overall there are considerable variations in administrative costs between ESI Funds and types of Operational Programmes.
- **The focus should be on FTEs.** Focusing on person years (full-time equivalents or FTEs) is in most cases more meaningful than assessing administrative costs in

monetary terms. This is mainly due to the huge variation of staff costs and price levels across Europe. On average, the administrative costs amount to 0.95 FTE per million Euro of eligible funding<sup>1</sup> (taking into account EU funding and national co-funding). Including additional private co-funding would reduce the figure further. Also for administrative costs expressed in FTE there are considerable variations between ESI Funds and types of Operational Programmes.

- **Reasons for variations of administrative costs.** The variations in administrative costs between programmes as well as between funds are influenced by a number of factors related to the characteristics of the programmes. The most important factors are the following:
  - **Financial size of a programme.** As many tasks are not related to the size of a programme, smaller programmes tend to be relatively more costly than financially larger programmes (see Figure 0.1).
  - **Number of beneficiaries.** The total number of operations supported as well as the time span of individual operations funded by a programme matter. More beneficiaries and shorter operations imply more administrative workload. This is not directly linked to the financial volume of the programme, but rather to the type of operations funded.
  - **Thematic focus of programme.** The thematic objectives of a programme have a considerable impact on its administrative costs, as some objectives are more work-intensive than others, e.g. as they, by their nature, involve more small scale actions or larger number of beneficiaries. The thematic objectives with the highest administrative costs are TO 11 (Enhancing institutional capacity of public authorities and stakeholders and efficient public administration), TO 5 (Promoting climate change adaptation, risk prevention and management), and TO 3 (Enhancing the competitiveness of SMEs).

Variations in administrative costs are strongly influenced by the three aspects outlined above. Accordingly, proportionality – both in terms of financial volume and thematic focus of a programme – needs to be a key element of any assessment or discussion about administrative costs.

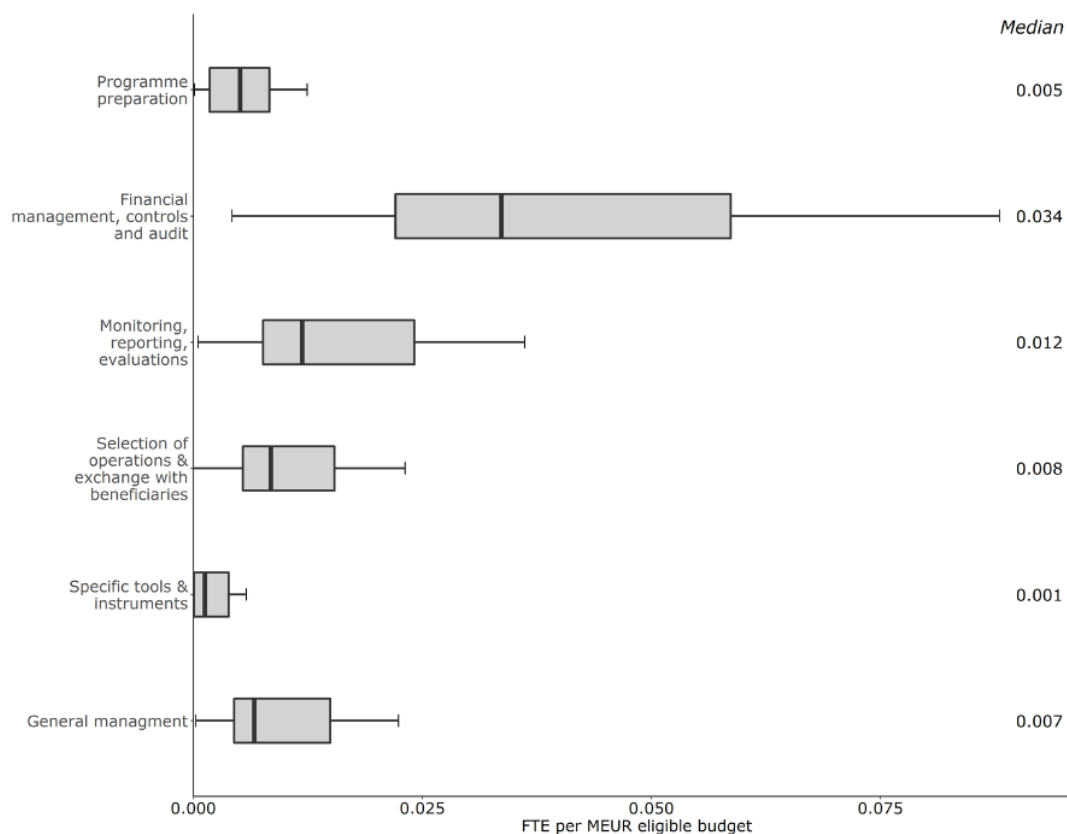
- **Most costly are financial controls and selection of operations.** The study analysed administrative costs for 42 individual tasks specified in the CPR. Grouping these tasks thematically shows that some 45% of the administrative costs concern financial management, controls and audits (see Figure 0.2). Although these tasks are often considered critically as burdensome, they are to ensure transparent and sound spending of taxpayers' money. The two individual tasks with the highest administrative costs are 'verifications for reimbursement of beneficiaries', followed by 'selection of operations and information of beneficiaries'. While the first is related to financial controls, the second is decisive for the quality of outcomes and results of a programme, i.e. ensuring that the best possible operations are selected and funded.
- **Administrative costs are no performance indicator.** Administrative costs solely provide information about how much workload or money is used to administer the funds. As indicated above, there are various reasons why not all programmes can have the same level of administrative costs. To judge whether administrative costs are appropriate, they should be compared to programme achievements. For ESIF, this has not been done so far. Therefore, we strongly advise against using administrative costs information – out of context – to compare programmes or Member States or even draw conclusions on performance or efficiency.

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<sup>1</sup> Eligible funding in this study is defined as the respective Operational Programme amount to which figures refer. This includes ESIF grants and the share of national co-financing. Additional private funding is not taken into account. Including that as well would lower the administrative costs per million EUR even further.

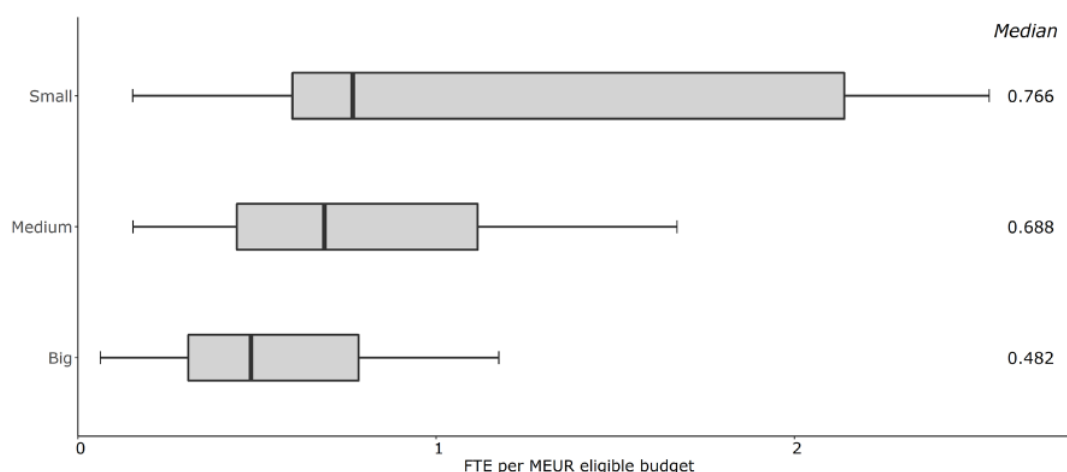
- **Administrative burden lower than often perceived.** Complaints about excessive administrative burden borne by beneficiaries are widely shared in the ESIF community. The analysis of a limited sample shows that also here the size, duration and thematic complexity of an operation have a direct impact on the administrative burden. However, overall it appears that the financial burden is around 11% of total eligible funding. This corresponds to EUR 107 800 or 1.5 FTE per million EUR of eligible funding. Given the relatively small sample of 269 operations, these figures are just indicative.

**Figure 0.1 Workload in FTE by group of tasks per MEUR ESIF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 0.2 Administrative costs by programme financial volume (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## Outlook post 2020

The post-2020 CPR proposal<sup>2</sup> of the 29th of May 2018 contains about 80 simplification measures for Cohesion Policy 2021-2027. The new baselines have been used to review the impact of eight key simplifications from the proposal. These are: simplified programming; light Operational Programme review; simplified designation of authorities; no specific rules for revenue generating projects; no specific rules for major projects; reduced number of verifications; simplified reporting; and extended scope of SCOs.

Given that the eight changes presented in this study only cover a part of the 80 simplification measures included in the proposal for a new CPR, the total reduction of administrative costs and burden will be higher than the figures provided in this study. For example, the elimination of the performance reserve, single audit arrangements and more proportionate approaches to audits will trigger further reductions of administrative costs and burden.

- **Reductions are expected.** The tentative assessment of the impact of the proposed regulations for ESIF post-2020 reveals that a reduction of administrative costs by about 7% can be expected – based on conservative estimates (i.e. taking into account that regulatory changes are met with inertia). The most effective simplifications are the reduction of the number of verifications and the increased uptake of Simplified Cost Options (SCOs). Some administrative burden reductions are also expected.
- **SCOs can be the key to further reductions.** The simulations indicate that the highest potential for reductions of administrative costs and burden lies with a massively increased uptake of SCOs, following an extension of their scope. At the utmost this could reduce administrative costs by up to 26% – although this is highly unlikely.
- **Continued variations.** Also in the 2021-2027 period, administrative costs will vary depending on the complexity of operations and the type of beneficiaries funded. Considerable variations of administrative costs are expected, depending on the programmes' financial volumes and thematic focuses. A first indicative estimation of administrative costs for the five Policy Objectives presented in the regulatory proposal for 2021-27, suggests considerable variations in administrative costs

<sup>2</sup> COM(2018) 375 final

between them. Policy Objective 3 (A more connected Europe - mobility and regional ICT connectivity) is expected to have the lowest administrative costs. Whereas Policy Objectives 2 (A greener, low-carbon Europe) can be expected to have the highest administrative costs, about twice as high as Policy Objective 3.

In addition to the above estimations, a tool has been developed to enable quick estimations of the main impacts of envisaged regulatory changes.

Overall, the actual reduction of costs will also depend on the Member States' capacity and willingness to maximise the effectiveness of the simplification measures and options offered by the regulation (referred as 'passive' gold-plating).

## In conclusion

Managing and implementing ESIF programmes is a highly complex and demanding task. The study has shown that, overall, administrative costs are reasonable, in particular given the level of transparency and accountability with these funds. Administrative burdens are higher and vary more, which may require more in-depth research to understand fully.

Reductions of administrative costs and burden resulting from regulatory innovations found in the post-2020 CPR proposal are possible, albeit most likely rather modest. Most regulatory changes have limited impact on the overall administrative costs and burden, and new routines and regulatory frameworks require time and manpower, possibly creating new uncertainties. However, major regime shifts such as a higher uptake of SCOs hold the potential for substantial reductions in administrative costs and burden.

Discussing administrative costs and burden and possible simplification measures, a few general points should be taken in consideration:

- **Proportionality is important.** There are considerable variations of administrative costs and burden related to the financial volume of programme and operations and their thematic focus. Therefore, proportionality – both in terms of financial volume and thematic focus – should be an important feature in any discussion about administrative costs and burden.
- **Trade-off between administrative costs and money well spent.** Administrative procedures are always a trade-off between (a) ensuring accountability and the best use of taxpayer's money; and (b) making the necessary procedures as simple and lean as possible for all involved.
- **Change is costly.** Complying with regulatory requirements demands learning and finding ways to implement (new) requirements in established systems. Indeed in many cases changes – including simplifications – meet a strong inertia. This implies that changes are often implemented with a considerable time delay and in the short run the simple fact of change risks to create additional administrative costs and burden.

### Selected key figures and conclusions per ESI Fund

**ERDF** administrative costs are on average 22 600 Euro per million Euro or 0.53 FTE per million Euro of eligible funding, though with considerable variations between programmes depending on their financial volume and thematic focus. Interreg programmes have generally higher administrative costs and workload due to their complex programme geography.

- **Most demanding tasks:** The selection of operations demands the highest workload, followed by verifications for reimbursement of beneficiaries and ensuring an adequate audit trail.
- **Potential for reduction:** Mainly two regulatory changes have the potential to reduce administrative costs after 2020. Reducing the number of verifications may reduce the workload by 2 to 4%. Greatly expanding the scope of SCOs to cover 50% of the budget would allow to decrease the workload by 12% to 18%.

**CF** administrative costs are on average 18 400 Euro per million Euro or 0.40 FTE per million Euro of eligible funding. This is the lowest average across the five ESI Funds which may be explained by the relatively large budgets for the programmes:

- **Most demanding tasks:** Verifications for reimbursement of beneficiaries and the selection of operations and information of beneficiaries demand the most workload.
- **Potential for reduction:** Mainly two proposed regulatory changes may contribute most to cost savings. Reducing the number of verifications could reduce the workload by 2 to 4%. Greatly expanding the scope of SCOs to 40% of the budget would allow to decrease the workload by 12% to 17%.

**ESF** administrative costs are on average 27 600 Euro per million Euro or 0.67 FTE per million Euro of eligible funding, though with considerable variations between programmes depending on their financial volume and thematic focus.

- **Most demanding tasks:** The selection of operations demands the most workload, followed by verifications for reimbursement of beneficiaries and on the spot verifications.
- **Potential for reduction:** Mainly two proposed regulatory changes contribute most to cost savings. Reducing the number of verifications may reduce the workload by 3 to 5%. Greatly expanding the scope of SCOs may decrease the workload by 19% to 26%. As SCOs are already more widely used in ESF than in other funds, this would require 100% of the budget to be covered by SCOs.

**EAFRD** administrative costs are on average 83 100 Euro per million Euro or 2.18 FTE per million Euro of eligible funding, though with considerable variations between programmes depending on their financial volume and thematic focus. The figures are comparable with data received by DG AGRI. Administrative costs in both monetary and workload terms are more than double the overall ESIF figure. The comparably high figures are explained by the very high number of small operations, making up a large part of EAFRD funding.

- **Most demanding tasks:** Administrative costs are highest for the Paying Agency, which not only certifies expenditures, but also covers tasks covered by Managing Authorities in the other funds. Verifications for each application of reimbursement require the highest workload, followed by the selection of operations and information to beneficiaries.
- **Potential for reduction:** Mainly two proposed regulatory changes may contribute most to costs savings. Reducing the number of verifications could reduce the workload by 4 to 6%. Greatly expanding the scope of SCOs to cover 50% of the budget would allow for more substantial decrease the workload by up to 38%.

**EMFF** administrative costs are on average 44 200 Euro per million Euro or 0.93 FTE per million Euro of eligible funding, though with considerable variations between programmes depending on their financial volume and thematic focus. Administrative costs in both monetary and workload terms are higher than ERDF, CF, and ESF, but roughly half of the figures for EAFRD, and in line with the overall ESIF figure. The relatively limited size of EMFF programmes is likely to play a role in the high costs in relation to eligible funding. Including private contribution as well would further lower the administrative costs per million Euros.

- **Most demanding tasks:** The selection of operations requires the highest workload, followed by verifications for reimbursement of beneficiaries and audit of operations. Two proposed regulatory changes may contribute most to cost savings.
- **Potential for reduction:** Opportunities for future reductions in administrative costs are limited following current legislative proposals. Reducing the number of verifications could reduce the workload by 2 to 4%. Greatly expanding the scope of SCOs to cover 30% of the budget would allow for more substantial decrease the workload by up to 20%.

Overall, the average administrative costs for the 2014-2020 period are lower than the ceilings applied for technical assistance for each Fund, except for EAFRD, under the future period (e.g. 2.5% for ERDF and CF), and they are expected to be further reduced.

## Synthèse

La gestion et l'administration de fonds publics, d'une valeur de 646 milliards d'euros au titre des Fonds structurels et d'investissement européens (Fonds ESI), exigent des investissements financiers et personnels de la part de tous les acteurs concernés. Les pouvoirs publics aux niveaux européen, national et régional, ainsi que les bénéficiaires engagent des ressources humaines, couvrent des frais généraux et prennent en charge les coûts externes qui garantissent les investissements dans la création d'emplois et pour une économie et un environnement européens durables et sains. Fournir un aperçu des coûts de gestion et d'administration de ces fonds publics, permet d'assurer la transparence des politiques et d'alimenter les discussions sur ses résultats.

Ce rapport présente les résultats relatifs à la nouvelle évaluation des données de référence sur les coûts et les charges administratifs des Fonds ESI 2014-2020, suivant pour la première fois une approche commune aux cinq Fonds ESI.

- *Les coûts administratifs* représentent l'ensemble des coûts de personnel, les frais généraux et les coûts externes pris en charge par les autorités nationales et régionales pour gérer et administrer les Fonds ESI, en référence aux tâches décrites dans le cadre réglementaire de l'UE pour les Fonds ESI. Cela comprend la préparation, la gestion, la certification et la vérification des programmes ESI, ainsi que les tâches de coordination nationales correspondantes.
- *La charge administrative* englobe l'ensemble des coûts de personnel, les frais généraux et les coûts externes pour les bénéficiaires tenus de respecter les obligations dérivant de la législation, en particulier les obligations imposées par les règlements des Fonds ESI ainsi que les règlements relatifs aux aides, telles que les aides d'État, et la réglementation relative aux marchés publics et en matière d'environnement.

## Nouvelles données de référence pour les coûts et charges administratifs

Les valeurs de référence pour les coûts et la charge administratifs ont été calculées à partir d'une collecte étendue de données. Les données sur les coûts concernant les tâches administratives ont été recueillies au moyen d'enquêtes auprès des autorités responsables des programmes, d'organismes de coordination nationaux et d'entretiens avec les bénéficiaires. Les réponses obtenues proviennent de 818 autorités publiques, représentant un taux de retour de 39% sur l'ensemble des autorités des Fonds ESI, ainsi que des bénéficiaires (269 réponses parvenues). Les références définitives pour les coûts administratifs ont été établies après estimation des données manquantes. En outre, ces chiffres ont été l'objet d'une vérification auprès des autorités des programmes et les organismes nationaux de coordination. Leurs commentaires et réactions ont été recueillis, dans le cadre d'une analyse de robustesse, pour rendre les nouvelles données de référencement encore plus solides. Enfin, soulignons que les données sur la charge administrative ont été établies à l'aide d'une analyse sur échantillonnage. Ces nouvelles valeurs, pour les coûts et la charge administratifs, sont exprimées en termes monétaires (euros) et en fonction de la charge de travail (équivalents temps plein - ETP).

Les principales conclusions de l'étude sont les suivantes :

- **Coûts administratifs modestes.** Bien que la gestion et la mise en œuvre des programmes des Fonds ESI soient une tâche extrêmement complexe et exigeante, les coûts administratifs au niveau globale sont jugés raisonnables. Étant donné qu'une gestion transparente et responsable des finances publiques et des investissements de qualité nécessitent un certain investissement, 4% des coûts administratifs, soit 26 milliards EUR ou 610 000 années-personnes sur une période de programmation disposant de 646 milliards EUR, ne peuvent être considérés comme excessifs. En général, on observe des variations substantielles dans les coûts

de gestion entre les Fonds ESI et les différentes catégories de Programmes Opérationnels.

- **L'accent devrait être mis sur les ETP.** Se concentrer sur les années-personnes (équivalents temps plein ou ETP) est dans la plupart des cas plus significatif que d'évaluer les coûts administratifs en termes monétaires. Ceci est principalement dû à l'énorme variation des coûts de personnel et des niveaux de prix observés en Europe. En moyenne, les coûts administratifs s'élèvent à 0,95 ETP par million d'euros de financement éligible<sup>3</sup> (en tenant compte à la fois du financement de l'UE et du cofinancement national). Inclure le co-financement privé supplémentaire réduirait encore ce chiffre. De même, pour les coûts administratifs exprimés en ETP, il existe des variations substantielles entre les Fonds ESI et les types de Programmes Opérationnels.
- **Raisons des variations des coûts administratifs.** Les coûts administratifs varient considérablement d'un programme et/ou d'un fonds à un autre. Ces fluctuations sont influencées par un nombre de facteurs liés aux caractéristiques des programmes. Les facteurs les plus importants sont les suivants:
  - Le volume financier d'un programme. Comme de nombreuses tâches ne sont pas liées à la taille d'un programme, les programmes les plus petits ont tendance à être relativement plus coûteux que les programmes financièrement plus importants (voir la figure 0.1).
  - Le nombre de bénéficiaires. Le nombre total d'opérations bénéficiant d'un soutien ainsi que la durée de financement des opérations individuelles d'un programme importe. Plus il y a de bénéficiaires et d'opérations de courte durée, plus ils impliquent une charge de travail administratif. Ce n'est pas directement lié au volume financier du programme, mais plutôt au type d'opérations financées.
  - Les objectifs thématiques d'un programme. Les objectifs thématiques d'un programme ont un impact considérable sur ses coûts administratifs, et certains objectifs nécessitent une plus grande intensité de travail que d'autres ; par exemple, suivant leur nature, ces objectifs thématiques impliquent des actions à plus petite échelle ou un plus grand nombre de bénéficiaires. Les objectifs thématiques ayant les coûts administratifs les plus élevés sont l'OT 11 (Renforcement des capacités institutionnelles des pouvoirs publics et des acteurs et administration publique efficace), l'OT 5 (Promouvoir l'adaptation au changement climatique, prévention et gestion des risques) et l'OT 3 (Améliorer la compétitivité des PME).Les variations dans les coûts administratifs observés sont fortement influencées par les trois aspects décrits ci-dessus. En conséquence, la proportionnalité - à la fois en termes de volume financier et d'orientation thématique d'un programme - doit être un des éléments clés concernant toute évaluation ou discussion liée aux coûts administratifs.
- **Les contrôles financiers et la sélection des opérations sont les plus coûteux.** L'étude a analysé les coûts administratifs de 42 tâches individuelles spécifiées dans le RPDC (Règlement Portant Dispositions Communes). Le regroupement thématique de ces tâches montre qu'environ 45% des coûts administratifs concernent la gestion financière, les contrôles et les audits (voir Figure 0.2). Bien que ces tâches soient souvent considérées comme les plus assujettissantes, elles visent à assurer une dépense transparente et pertinente de l'argent des contribuables. Les deux tâches individuelles présentant les coûts administratifs les plus élevés sont les « vérifications pour le

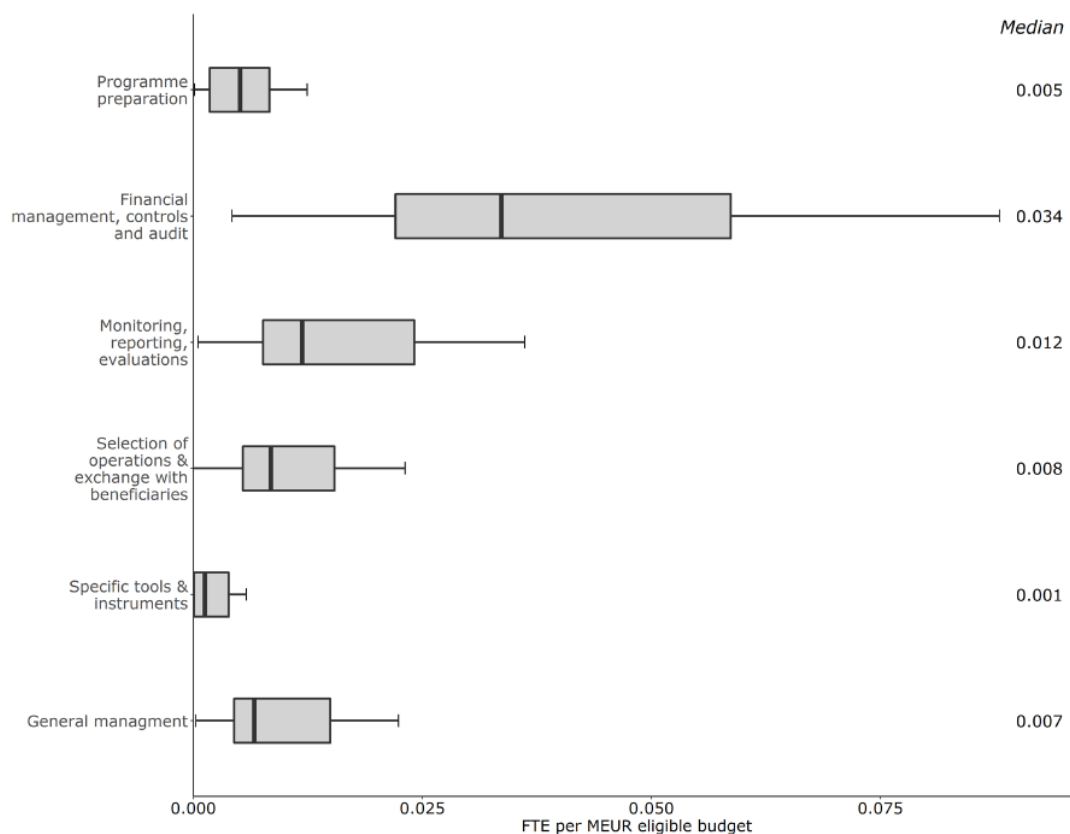
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<sup>3</sup> Dans cette étude, le financement éligible est défini comme le montant du Programme Opérationnel auquel se rapportent les chiffres. Cela inclut les subventions Fonds ESI et la part du cofinancement national. Le financement privé supplémentaire n'est pas pris en compte, car s'il était inclus, les coûts administratifs seraient encore abaissés de millions d'euros.

remboursement des bénéficiaires », suivies de la « sélection des opérations et de l'information des bénéficiaires ». Alors que la première tâche est liée aux contrôles financiers, la seconde est décisive pour la qualité des résultats d'un programme, cette dernière assurant que les meilleures opérations possibles soient sélectionnées et financées.

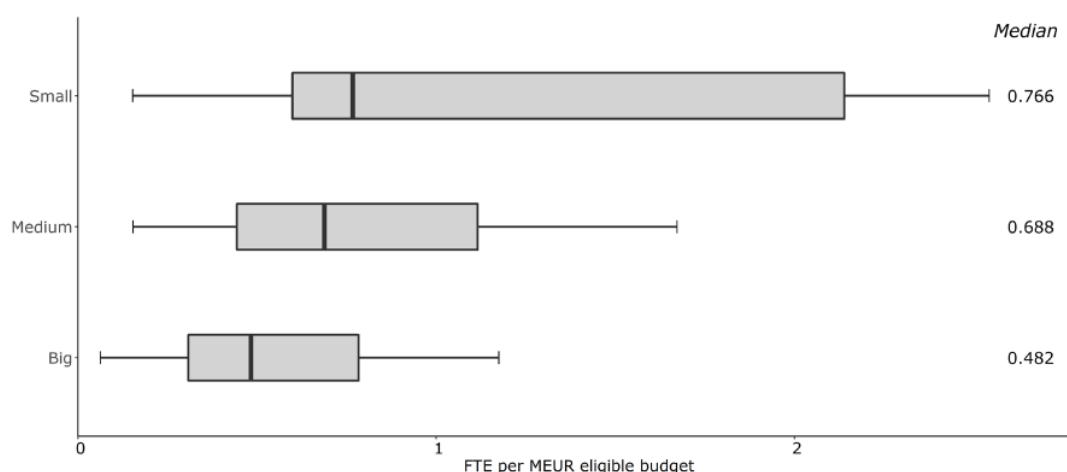
- **Les coûts administratifs ne sont pas des indicateurs de performance.** Les coûts administratifs fournissent uniquement des informations sur la quantité de travail ou d'argent utilisée pour administrer les fonds. Comme indiqué ci-dessus, il existe plusieurs raisons pour lesquelles tous les programmes ne peuvent pas avoir le même niveau de coûts administratifs. Pour juger si les coûts administratifs sont appropriés, ils devraient être comparés aux réalisations du programme. Pour les Fonds ESI, cela n'a pas été fait jusqu'à présent. Par conséquent, nous déconseillons fortement d'utiliser des informations sur les coûts administratifs - hors contexte - pour comparer des programmes ou des États membres, ou même tirer des conclusions sur la performance ou l'efficacité d'un programme.
- **Charges administratives plus faibles que perçues.** Les plaintes concernant des charges administratives excessives sont largement partagées dans la communauté des bénéficiaires de Fonds ESI. L'analyse d'un échantillon limité montre qu'ici aussi la taille, la durée et la complexité thématique d'une opération ont un impact direct sur la charge administrative supportées. Cependant, dans l'ensemble, il semble que la charge corresponde à environ 11% du financement éligible total. Cela correspond à 107 800 EUR ou 1,5 ETP par million d'EUR de financement éligible. Compte tenu de l'échantillon relativement restreint, 269 opérations analysées, ces chiffres sont à considérer comme indicatifs.

**Figure 0.1 Charge de travail en ETP par groupe de tâches par MEUR Fonds ESI**



(Source: de l'auteur, basée sur la base de données 2018 pour les coûts et charges administratifs des Fonds ESI)

**Figure 0.2 Coûts administratifs par volume financier du programme (ETP)**



(Source: de l'auteur, basée sur la base de données 2018 pour les coûts et charges administratifs des Fonds ESI)

## Perspectives après 2020

La proposition de RPDC post-2020<sup>4</sup> du 29 mai 2018 contient environ 80 mesures de simplification pour la Politique de Cohésion 2021-2027. Les nouvelles valeurs de référence ont été utilisées pour examiner l'impact de huit simplifications établies dans la proposition. Les simplifications sont les suivantes : une programmation simplifiée; un examen allégé du Programme Opérationnel ; une désignation simplifiée des autorités; une absence de règles spécifiques pour les projets générateurs de revenus; une absence de règles spécifiques pour les grands projets; un nombre réduit de vérifications; des comptes-rendus simplifiés; une plus grande portée dans l'utilisation des OCS.

Étant donné que les huit changements présentés dans cette étude ne couvrent qu'une partie des 80 mesures de simplification incluses dans la proposition d'un nouveau RPDC, la réduction totale des coûts et des charges administratives devrait être supérieure aux évaluations fournis dans cette étude. Par exemple, l'élimination de la réserve de performance, la mise en place d'un système d'audit unique et l'adoption d'approches plus proportionnées en matière d'audit entraîneront de nouvelles réductions des charges et des coûts administratifs.

- **Des réductions sont attendues.** L'évaluation provisoire de l'impact des règlements proposés pour les Fonds ESI après 2020 révèle qu'une réduction des coûts administratifs d'environ 7% peut être retenue, basée sur des estimations prudentes et avisées (en prenant en compte que les modifications réglementaires peuvent rencontrer des inerties, des immobilismes administratifs). Les simplifications les plus efficaces sont la réduction du nombre de vérifications et l'augmentation de l'adoption des options de coûts simplifiés (OCS). Certaines réductions du fardeau administratif sont également attendues.
- **Les OCS peuvent être la clé de nouvelles réductions.** Les simulations indiquent que le potentiel le plus élevé de réduction des coûts et des charges administratives réside dans le recours accru aux OCS, à la suite d'une extension de leur champ d'application. Plus important encore, cela pourrait réduire les coûts administratifs jusqu'à 26% - bien que cela soit toutefois improbable.

<sup>4</sup> COM(2018) 375 finale

- **Variations continues.** De plus, au cours de la période 2021-2027, les coûts administratifs varieront en fonction de la complexité des opérations et du type de bénéficiaires financés. Des variations dans les charges et coûts administratifs sont aussi attendues en fonction des volumes financiers et des priorités thématiques des programmes. Une première estimation indicative des coûts administratifs des cinq objectifs politiques (c'est-à-dire *policy objectives*) présentés dans la proposition de réglementation pour 2021-27, suggère l'existence de variations considérables dans les coûts administratifs supportés. Ainsi, l'objectif politique 3 (Une Europe plus connectée - mobilité et connectivité régionale des TIC) devrait enregistrer les coûts administratifs les plus bas ; tandis que les objectifs de politique 2 (Une Europe plus verte et à faible émission de carbone) devraient avoir les coûts administratifs les plus élevés, environ deux fois plus élevés que ceux de l'objectif général 3.

En plus des estimations citées ci-dessus, un outil a été développé pour permettre une estimation rapide des principaux impacts des changements réglementaires envisagés.

Dans l'ensemble, la réduction effective des coûts dépendra également de la capacité et de la volonté des États-Membres à maximiser l'efficacité des mesures de simplification et des options offertes par le règlement (se référant à l'expression « passive - gold-plating », qu'on pourrait traduire par le fait de « recouvrir d'or » les charges réglementaires européennes qui freinent le développement économique).

## En conclusion

La gestion et la mise en œuvre des programmes Fonds ESI sont une tâche extrêmement complexe et exigeante. L'étude a montré que, globalement, les coûts administratifs sont raisonnables, particulièrement lorsque l'on prend en compte le niveau de transparence et l'obligation de rendre compte qui caractérisent ces fonds. Les charges administratives sont plus élevées et varient davantage, ce qui peut nécessiter des recherches plus approfondies pour comprendre au mieux la problématique.

Les innovations réglementaires détaillées dans la proposition de dispositions communes post-2020 sont censées déterminer des réductions des coûts et des charges administratifs, bien que ces réductions soient probablement très modestes. La plupart des changements réglementaires ont un impact limité sur coûts et les charges administratifs en général, et la mise en place de nouvelles procédures et de cadres réglementaires exigent du temps et des ressources humaines, pouvant alors créer de nouvelles incertitudes. Cependant, des changements de régime majeurs tel qu'un recours accru aux OCS, peuvent potentiellement entraîner des réductions substantielles des coûts et des charges administratifs.

Afin de discuter des charges, des coûts administratifs et d'éventuelles mesures de simplification, ces quelques points doivent être pris en considération :

- **La proportionnalité est importante.** Les charges et les coûts administratifs varient substantiellement en fonction du volume financier du programme et des opérations, de même que leur orientation thématique. Par conséquent, la proportionnalité - à la fois en termes de volume financier et d'orientation thématique - devrait être une caractéristique majeure et devrait concerner toute discussion sur les coûts et les charges administratifs.
- **Un compromis entre les coûts administratifs et l'argent bien dépensé.** Les procédures administratives sont toujours un compromis entre (a) assurer l'obligation de rendre compte et la meilleure utilisation de l'argent des contribuables ; et (b) rendre les procédures nécessaires aussi simples que possible pour toutes les personnes impliquées.
- **Procéder à un changement est coûteux.** Se conformer aux exigences réglementaires exige d'apprendre et de trouver des moyens de mettre en œuvre de (nouveaux) prérequis dans les systèmes établis. En effet, dans de nombreux cas, les

changements - y compris les simplifications - rencontrent une forte inertie. Cela implique que les changements sont souvent mis en œuvre avec un retard considérable et qu'à court terme, un simple changement risque de créer des coûts et des charges administratives supplémentaires.

### Conclusions et chiffres-clés sélectionnés par types de Fonds ESI

**FEDER:** Les coûts administratifs du FEDER sont en moyenne de 22 600 euros par million d'euros et de 0,53 ETP par million d'euros de financement éligible, mais avec des variations considérables entre les programmes suivant leur volume financier et leur orientation thématique. Les programmes Interreg ont généralement des coûts administratifs et une charge de travail plus élevés en raison de la géographie complexe de leurs programmes.

- **Les tâches les plus exigeantes.** La sélection des opérations exige une plus grande charge de travail, suivie de vérifications pour le remboursement des bénéficiaires et la certification d'une piste d'audit adéquate.
- **Potentiel de réduction des coûts.** Principalement deux changements réglementaires ont la capacité de réduire les coûts administratifs après 2020. La réduction du nombre de vérifications peut contribuer à réduire la charge de travail de 2 à 4%. L'élargissement substantiel du champ d'action des OCS pour couvrir 50% du budget permettrait de réduire la charge de travail de 12% à 18%.

**FC (Fonds de Cohésion) :** Les coûts administratifs des FC sont en moyenne de 18 400 euros par million d'euros et de 0,40 ETP par million d'euros de financement éligible. C'est la moyenne la plus basse des cinq Fonds ESI, ce qui peut s'expliquer par des budgets de programme relativement importants.

- **Les tâches les plus exigeantes.** Les vérifications pour le remboursement des bénéficiaires et la sélection des opérations et des informations des bénéficiaires exigent le plus de travail.
- **Potentiel de réduction des coûts.** Principalement deux propositions de modifications réglementaires pourraient contribuer le plus à une diminution des coûts observés. Réduire le nombre de vérifications pourrait réduire la charge de travail de 2 à 4%. L'élargissement substantiel du champ d'action des OCS pour couvrir 40% du budget permettrait de réduire la charge de travail de 12 à 17%.

**FSE:** Les coûts administratifs du FSE sont en moyenne de 27 600 euros par million d'euros et de 0,67 ETP par million d'euros de financement éligible, mais avec des variations considérables entre les programmes suivant leur volume financier et de leur orientation thématique.

- **Les tâches les plus exigeantes.** La sélection des opérations demande la plus grande charge de travail, suivie par des vérifications pour le remboursement des bénéficiaires, puis les vérifications sur le terrain.
- **Potentiel de réduction des coûts.** Principalement deux propositions de changements réglementaires contribueraient le plus à la réduction des coûts. La réduction du nombre de vérifications peut réduire la charge de travail de 3 à 5%. L'élargissement substantiel du champ d'action des OCS pourrait réduire la charge de travail de 19% à 26%.  
Comme les OCS sont déjà plus largement utilisées dans le cadre du FSE que dans les autres fonds, 100% du budget devraient être couverts par les OCS.

**FEADER :** Les coûts administratifs du FEADER sont en moyenne de 83 100 euros par million d'euros et de 2,18 ETP par million d'euros de financement éligible, mais avec des variations considérables entre les programmes suivant leur volume financier et de leur orientation thématique. Les coûts administratifs en termes d'investissement et de charge de travail représentent plus du double du chiffre global des Fonds ESI.

Les chiffres peuvent être comparés aux données dont dispose la DG AGRI. Ces chiffres relativement élevés s'expliquent par le grand nombre de petites opérations, qui constituent une part importante du financement du FEADER.

- **Les tâches les plus exigeantes.** Les coûts administratifs sont plus onéreux pour l'Agence de Paiement, qui non seulement certifie les dépenses, mais couvre également certaines tâches couvertes par les autorités de gestion des autres fonds. La sélection des opérations nécessite la charge de travail la plus élevée, suivie par des vérifications pour le remboursement des bénéficiaires.
- **Potentiel de réduction des coûts.** Principalement deux propositions de modifications réglementaires pourraient contribuer le plus à des économies au niveau des coûts de gestion. Réduire le nombre de vérifications pourrait réduire ainsi la charge de travail de 4 à 6%. L'élargissement considérable du champ d'action des OCS pour couvrir 50% du budget permettrait de diminuer de manière substantielle la charge de travail jusqu'à 38%.

**FEAMP :** Les coûts administratifs du FEAMP sont en moyenne de 44 200 euros par million d'euros et de 0,93 ETP par million d'euros de financement éligible, mais avec des variations considérables entre les programmes suivant leur volume financier et leur orientation thématique.

En termes de volume et de charge de travail, les coûts administratifs concernant le FEAMP sont plus élevés que pour le FEDER, le FC et le FSE, mais représentent approximativement la moitié des chiffres du FEADER et sont conformes au chiffre global des Fonds ESI. La taille relativement limitée des programmes du FEAMP est susceptible de jouer un rôle dans les coûts élevés par rapport aux financements éligibles. Inclure une contribution provenant du secteur privé réduirait encore les coûts administratifs de quelques millions d'euros.

- **Les tâches les plus exigeantes.** La sélection des opérations nécessite la charge de travail la plus élevée, suivie par des vérifications pour le remboursement des bénéficiaires et l'audit des opérations.
- **Potentiel de réduction des coûts.** Les possibilités de réductions futures des coûts administratifs sont limitées à la suite des propositions législatives actuelles. La réduction du nombre de vérifications pourrait réduire la charge de travail de 2 à 4%. En élargissant substantiellement le champ d'action des OCS pour couvrir 30% du budget, jusqu'à 20% de la charge de travail pourrait être réduite.

Globalement, avec l'exception du FEADER, les coûts administratifs pour la période 2014-2020 sont inférieurs au plafond mis en œuvre pour l'assistance technique au titre de la future période (2,5 % pour le FC et le FEDER par exemple), de plus il est attendu que ces coûts soient davantage réduits encore.

## 1 Introduction

Managing and administering public funds worth EUR 646 billion, of which EUR 454 billion are EU funding, that cover a wide range of policy fields and sectors is not an easy task, and it certainly comes at a cost. Being aware of the costs and improving management of the funds is a constant trade-off between: (a) ensuring accountability and best use of taxpayer's money; and (b) making the necessary procedures as simple and lean as possible for all stakeholders.

In that sense, administrative costs and burden of ESI Funds are a matter of continuous discussion. This covers both the authorities involved in shared management of the funds as well as the beneficiaries receiving funding from ESIF programmes.

This report presents new baselines for ESIF administrative costs and burden covering each task performed by authorities and beneficiaries for the implementation of ESIF.

Administrative costs are costs of ESIF implementation tasks carried by bodies in charge of ESIF implementation at national or programme level. This includes preparing, managing, certifying and auditing individual ESIF programmes and related national coordination tasks. The administrative costs comprise costs for the staff working with implementation, costs for external services and overhead costs. This study addresses administrative costs for tasks defined in the ESIF regulatory framework. The figures on administrative costs are presented in monetary terms and as FTE. Given the variation of salary levels and purchasing power the figures in person years (FTE) are normally better suited for comparisons. To increase comparability and cross-analysis most figures are presented as Euros or FTE per million Euros of total eligible budget (including national co-financing).

Administrative burden describes the costs of ESIF beneficiaries for complying with the information obligations of government-imposed legislation, in particular obligations imposed by the ESIF regulations as well as regulations related to the ESIF support received, such as State aid, public procurement and environmental legislation. The assessment of administrative burden in this study focuses on the costs of personnel working with ESIF implementation, costs for external services and expenditure on overheads.

Several studies have assessed administrative costs and burden related to ESI Funds in recent decades. However, no baselines applying a single and coherent approach covering all five ESI Funds with the same definition of administrative costs and burden had been established so far.

This report presents key findings to assess new baselines for the first time using a coherent approach for assessing ESIF costs and burden covering all five ESI Fund. Hence, several steps were included during the study to ensure robust baselines. These steps included expanding the data collection time and performing plausibility checks with national and programme authorities. In addition, comparison with previous baselines enabled verifications of the newly established baselines and to ensure they are more robust. Furthermore, the new baselines have been tested on applicability by assisting the Commission Services with simulations on how proposed regulatory changes for post-2020 might affect administrative costs and burden.

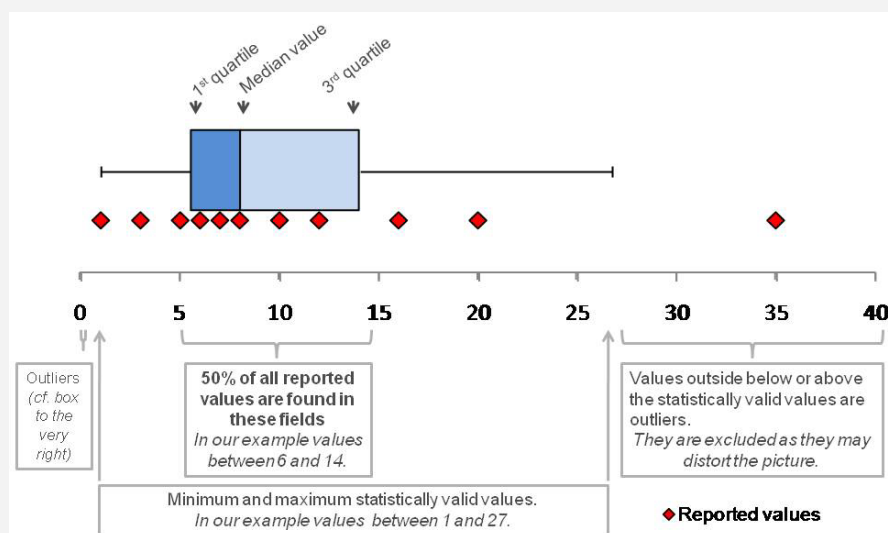
While the study is based on administrative costs for 818 ESIF programme authorities and 269 beneficiaries, the focus is on understanding the figures at EU level and understanding reasons for the variations. Indeed, the analysis identifies underlying factors linked to the character and focus of the programme or the operation funded. This implies that there is no universally valid benchmark for administrative costs or burden, and that comparisons between programmes or Member States are of limited value. This is even more the case as administrative costs or burden do not say anything about performance, which would require cross-analysing administrative costs or burden with the results and achievements of the funded operations.

The newly assessed baselines are presented in the form of box-plots. These box-plots illustrate the cost range the bulk of responses / programmes as well as the range of the more unusual figures. Extreme values, so-called outliers, have been omitted from the illustrations. The text box below provides a quick guide on how to read box-plots.

### Understanding box-plots

The figure below provides a general explanation for interpreting box-plots. The red dots are reported values, i.e. the data in the database. The central vertical line (inside the blue box) marks the median of the reported values, i.e. the middle value above and below which there are the same number of reported values. The (blue) box as a whole contains all the results which fall between the 25th and 75th percentiles, i.e. the central 50% of all results. The horizontal lines at the end of each box, called 'whiskers', represent the lowest and highest values that are statistically valid. Values to the left of the 1st quartile and the right of the 3rd quartile are never more than 1.5 times the length of the box. Reported values outside the 'whiskers' are thus considered to be outliers.

#### Example – How to interpret box-plots



Box-plots are particularly useful when comparing data sets. The position of the boxes illustrates different cost levels and the length of the boxes demonstrates different cost ranges (degree of dispersion). In the above graphic, the cost range is significantly wider in category 1 than in category 2. The median cost level is however the same. Both data sets are positively skewed, i.e. the variation in cost levels is higher above than below the median. Cost levels are generally higher in category 3 than in category 4 as the box in category 3 is located farther to the right in the figure. The cost range is however the same since the length of the boxes and whiskers is the same. These datasets are also positively skewed.

The main methods for assessing the new baselines are described in Chapter 2. This includes a description of methods for data collection as well as methodologies for assessing the new baselines, comparing new and previous baselines and developing a model to simulate the effects of regulatory changes on the newly established baselines. All data are in a database containing detailed baselines per ESI Fund and EU Member State, which is briefly described in Annex II.

Chapter 3 presents the new baselines for administrative costs and burden. These include overall baselines as well as by ESI Fund and by function, and a cross analysis by programme characteristics. Furthermore, new baselines for single tasks are presented in fact sheets allowing a quick and comprehensive overview of the administrative costs per task, including differentiation by ESI Fund and stage of the programme life cycle. All factsheets on the administrative costs for each task assessed are presented in the Annex.

Chapter 4 compares administrative costs and burden for the 2014-2020 programming period to information on the 2007-13 programming period from earlier studies. This shows that – as far as earlier studies allow a comparison – administrative costs and

burden are lower today than in previous programming periods, at least in monetary terms.

Chapter 5 provides a first outlook on administrative costs and burden in the forthcoming programming period, post 2020. Based on early information on proposed regulatory changes, this section provides initial insights into what these changes might imply for future levels of administrative cost and burden.

Finally, Chapter 6 presents key findings and conclusions.

## 2 Methodology

Establishing robust new baselines for ESIF administrative costs required different methods. These included collecting extensive data to build a database for current administrative costs and burden; filling data gaps to complete the database for all ESI Funds covering all types of programmes; performing quality and plausibility checks; comparing the newly established baselines with previous baselines; and testing the baselines by simulating the effects of regulatory changes post 2020 on administrative cost and burden. The methods for these steps are presented in the following sections.

### 2.1 Data collection

To establish new baseline values for administrative costs and burden in a coherent and comparable way across all ESI Funds, primarily required data collection. The work was split into collecting data on administrative costs (by function and fund) and administrative burden. Additional information was collected through literature studies to cross check the data and to fill data gaps.

#### 2.1.1 Administrative costs

Administrative costs can occur in different authorities in the Member States. The CPR stipulates a number of functions for which, in every Member State or at programme level, appropriate authorities need to be assigned and where administrative costs can thus occur. In the Member States, ESIF administrative costs may occur at the levels of the Managing Authority, Certifying Authority / Paying Agency in the case EAFRD, and the Audit Authority / Certification Body for EAFRD, as well as in different Intermediate Bodies involved. In addition, a number of obligations regulated in the CPR need to be performed at Member State level, which suggests that in each Member State there is also a national coordination level probably split by funds.

Different tasks have been defined for each authority following the ESIF regulatory framework. A list of the tasks per authority is included in the annex. The list was agreed with the European Commission in several rounds during the inception phase of the project, and it includes links to the applicable regulation. A separate list of tasks was developed for EAFRD: most tasks are identical to the ones for other funds, but they are distributed to different authorities.

To ensure comparable data collection, questionnaires in the form of semi-locked Excel files were developed detailing administrative tasks per function. EAFRD respondents received a separate set of questions.

The questionnaires were administered in English. In order to ensure a high response rate despite language barriers, the questionnaires were shared with authorities by national experts. The use of national experts engaged authorities in their native language by introducing the purpose of the survey, answering specific questions, and, in sometimes, providing translations of the questionnaires. Communication by the national experts was centrally coordinated to ensure a common understanding of the tasks and data sought. Therefore, different guidelines were drafted for the national experts, including a frequently updated FAQ document.

The questionnaires were launched on 1 October 2017 and various reminders were sent to increase the response rate. This included sending amended questionnaires with reference values for administrative tasks of programme authorities in November 2017, and simplified questionnaires targeting only key information from February 2018. The last completed questionnaires were received in May 2018.

Despite extending the deadline and frequent reminders to programme authorities from the national experts, there were fewer responses than expected. Indeed, the national experts met severe resistance and negative responses from some programme bodies,

sometimes motivated by surveys fatigue among ESIF bodies. This affected the complexity of data collection and in particular the unfortunate timing. As shown later in the analysis, 2017 and 2018 are the busiest years in the programme cycle. Multiple information requests for EC studies were generally not appreciated and sometimes resulted in harsh responses. Nevertheless, the data are considered sufficient to calculate the baselines.

The dataset for administrative costs underwent major updates with each interim report, and another after a workshop with EC colleagues to simulate the impacts of legislative innovations. Changes to the dataset have been mostly due to coverage of more Operational Programmes, with the overall response rate of authorities rising from 28% in the January 2018 version of the database, to 39% in the final version.

### Responses for administrative costs

Overall, 624 questionnaires were collected from authorities and national coordination bodies, of which 611 were considered valid and used in the analysis. Of these 22 questionnaires from national coordination bodies cover 20 countries. In some cases, national coordination is organised in different bodies responsible for certain funds, whereas, in other cases, one body is responsible for all ESIF coordination.

Programme authorities could reply for multiple programmes. In total, questionnaires included data for:

- 157 programmes for programme preparation tasks (30% of all 526 Operational Programmes)
- 238 programmes for programme management tasks (45%)
- 197 programmes for certification tasks (37%)
- 226 programmes for audit tasks (43%)

A total of 370 Programmes were covered by at least one authority (71%).

Table 2.1 and Table 2.2 provide the detail of response rates, split by fund and by function. The numbers relate to covered Operational Programmes, with the share of covered Operational Programmes vis a vis the total per ESI Fund or Member State in brackets.

**Table 2.1 Response rates – administrative costs by Fund**

	Programme preparation	Managing Authorities	Certifying Authorities and Paying Agencies	Audit Authorities and Certification Bodies	Total number of authorities covered <sup>5</sup>
ERDF (excl. ETC)	32 (31%)	52 (50%)	62 (60%)	54 (52%)	200 (48%)
CF	2 (67%)	2 (67%)	3 (100%)	3 (100%)	10 (83%)
ESF	17 (18%)	35 (37%)	24 (25%)	38 (40%)	114 (30%)
ERDF	24 (21%)	42 (37%)	15 (13%)	21 (18%)	102 (22%)
EMFF	10 (37%)	15 (56%)	13 (48%)	13 (48%)	51 (47%)
Multi-fund <sup>6</sup>	46 (43%)	62 (58%)	54 (51%)	76 (72%)	238 (56%)
ETC	26 (34%)	30 (39%)	26 (34%)	21 (28%)	103 (34%)
Overall	157 (30%)	238 (45%)	197 (37%)	226 (43%)	818 (39%)

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

<sup>5</sup> Percentages refer to the total number of authorities per fund, i.e. 4 authorities for each Operational Programme

<sup>6</sup> In this table, multi-fund includes ERDF & CF Programmes, ERDF & CF & ESF Programmes, and ERDF & ESF Programmes

Table 2.1 illustrates the responses from covered Operational Programmes of the total for each combination of fund and authority. This table is closely related to Table 2.7, which shows the share of administrative costs which had to be estimated due to lack of data. Therefore, Table 2.1 shows the rate of individual responses, while Table 2.7 highlights the weight of covered responses.

**Table 2.2 Response rates – administrative costs by Member State**

	Programme preparation	Managing Authorities	Certifying Authorities and Paying Agencies	Audit Authorities and Certification Bodies	Total number of authorities covered <sup>7</sup>
Austria	3 (75%)	3 (75%)	3 (75%)	2 (50%)	11 (69%)
Belgium	1 (10%)	4 (40%)	2 (20%)	4 (40%)	11 (28%)
Bulgaria	7 (78%)	7 (78%)	7 (78%)	9 (100%)	30 (83%)
Croatia	3 (75%)	2 (50%)	3 (75%)	4 (100%)	12 (75%)
Cyprus	4 (100%)	3 (75%)	1 (25%)	3 (75%)	11 (69%)
Czech Republic	9 (90%)	9 (90%)	8 (80%)	9 (90%)	35 (88%)
Denmark	3 (75%)	3 (75%)	3 (75%)	3 (75%)	12 (75%)
Estonia	2 (67%)	2 (67%)	2 (67%)	1 (33%)	7 (58%)
Finland	5 (100%)	5 (100%)	3 (60%)	5 (100%)	18 (90%)
France	2 (3%)	21 (30%)	16 (23%)	0 (0%)	39 (14%)
Germany	1 (2%)	4 (9%)	4 (9%)	12 (26%)	21 (11%)
Greece	6 (30%)	8 (40%)	1 (5%)	20 (100%)	35 (44%)
Hungary	6 (67%)	6 (67%)	0 (0%)	9 (100%)	21 (58%)
Ireland	1 (20%)	1 (20%)	2 (40%)	0 (0%)	4 (20%)
Italy	16 (22%)	38 (51%)	20 (27%)	29 (39%)	103 (35%)
Latvia	2 (67%)	2 (67%)	3 (100%)	2 (67%)	9 (75%)
Lithuania	1 (33%)	3 (100%)	1 (33%)	2 (67%)	7 (58%)
Luxembourg	2 (67%)	2 (67%)	0 (0%)	3 (100%)	7 (58%)
Malta	0 (0%)	2 (50%)	4 (100%)	0 (0%)	6 (38%)
Netherlands	1 (14%)	2 (29%)	6 (86%)	7 (100%)	16 (57%)
Poland	19 (79%)	22 (92%)	22 (92%)	24 (100%)	87 (91%)
Portugal	8 (50%)	12 (75%)	13 (81%)	16 (100%)	49 (77%)
Romania	5 (63%)	6 (75%)	0 (0%)	7 (88%)	18 (56%)
Slovakia	7 (78%)	7 (78%)	9 (100%)	8 (89%)	31 (86%)
Slovenia	1 (33%)	2 (67%)	3 (100%)	2 (67%)	8 (67%)
Spain	3 (5%)	16 (26%)	22 (35%)	3 (5%)	44 (18%)
Sweden	11 (85%)	11 (85%)	9 (69%)	13 (100%)	44 (85%)
United Kingdom	2 (12%)	5 (29%)	4 (24%)	8 (47%)	19 (28%)
ETC	26 (34%)	30 (39%)	26 (34%)	21 (28%)	103 (34%)
Overall	157 (30%)	238 (45%)	197 (37%)	226 (43%)	818 (39%)

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

A good mix of responses were from most funds and authorities, and Member States were generally well represented. Key groups, such as Managing Authorities, and some funds (ERDF, CF, EMFF, and multi-fund) exceed 45%. Overall, the average of 39% is sufficient to scale up the figures to the whole of ESIF, using the gap-filling procedure described in section 2.2.

<sup>7</sup> Percentages refer to the total number of authorities per country (or ETC), i.e. 4 authorities for each Operational Programme

## 2.1.2 Administrative burden

Administrative burden occurs at the level of ESIF beneficiaries complying with the information obligations of ESIF regulation, especially for six main tasks:

- gathering information on the progress and results of the project;
- preparing and submitting a payment claim, with supporting documents;
- fulfilling information and publicity requirements including labelling with logos;
- keeping records;
- preparing and submitting data and documentation for control purposes;
- preparing/ providing / sending information for evaluation purposes, including participant-related data collection for ESF.

Data were also collected on the administrative burden for the application process and other administrative tasks.

The sample balanced coverage of ESI Funds, Member States and the eleven thematic objectives (TOs). A pre-selection of potential programmes was based on programme expenditure and commitment per TO from *cohesiondata*<sup>8</sup>.

The final selection of beneficiaries to approach was agreed with the Managing Authorities and national experts. Prior to launching the questionnaire on 18 September 2017, Managing Authorities were asked to select 2-5 beneficiaries of their programmes to be included in the sample. When discussing these beneficiaries with the programme authorities, a few secondary criteria helped enrich the sample. The aim was to include different sized operations, different types of beneficiaries and for EAFRD differentiated by area- and animal-related measures as well as non-area- and animal-related measures.

Subsequently, national experts conducted interviews in national languages following the structure of the questionnaire.

## Response rates for administrative burden

A total of 612 beneficiaries from all Member States were contacted by the project team. Of this total, 343 did not provide a usable response. The baseline for administrative burden in this report is based on replies from 269 beneficiaries, including 20 from Interreg programmes. More specifically 8 beneficiaries from transnational cooperation programmes, 12 from cross-border cooperation programmes, and none from interregional cooperation programmes.

Table 2.3 summarises the data by country (and ETC) and by the Fund supporting the project.

**Table 2.3 Response rates – administrative burden by Member State and Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
Austria	2		2	2	1	7
Belgium	2		4	2		8
Bulgaria	5		2	2	1	10
Cyprus	2	1				3
Czech Republic	5	2	3		2	12
Germany	7		5	2	4	18
Denmark			3	1		4
Estonia	1	1	1	4	3	10
Spain	2		1			3
Finland	2		2	2	2	8
France	9					9

<sup>8</sup> [cohesiondata.ec.europa.eu](http://cohesiondata.ec.europa.eu)

Greece			1			1
Croatia	3	1	5	3	2	14
Hungary		3	1		2	6
Ireland			2	1	2	5
Italy			1		3	4
Lithuania	5		6	1	2	14
Luxembourg	4		2			6
Latvia	4	1	5	1	1	12
Malta	1		1	3	3	8
Netherlands	2		1		4	7
Poland	5	5	3	1	2	16
Portugal	4	6	1	1		12
Romania	6	2	2	2	3	15
Sweden	6		3	2	3	14
Slovenia	3		3			6
Slovakia	1	7	2	1		11
United Kingdom	1		4		1	6
ETC	20					20
<b>Total</b>	<b>102</b>	<b>29</b>	<b>66</b>	<b>31</b>	<b>41</b>	<b>269</b>

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

It is important to underline that, as for administrative burden, the reference sample is by definition limited compared the overall number of beneficiaries at EU level. So, while administrative cost baselines are based on information provided by many administrations, the baselines for administrative burden are based on a sample which, however numerous (i.e. 269 beneficiaries) is only a limited part of the total number of ESIF beneficiaries. The approach used to calculate the administrative burden reflects this limited sample and implies that baselines for burden strongly reflect the sample considered. However, the beneficiaries cover all thematic objectives and funds.

**Table 2.4 Number of beneficiaries by Fund**

Fund	Number of projects
ERDF	82
CF	29
ESF	66
EAFRD	31
EMFF	41
ERDF-ETC	20

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Table 2.5 Number of beneficiaries by TO**

TO	Number of projects
1	28
2	23
3	26
4	15
5	10
6	46
7	26
8	29
9	25
10	26
11	15

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## 2.2 Filling data gaps

To develop a complete database for administrative costs, data gaps needed to be filled. This does not apply to administrative burden, since the baselines are based on a sample.

The data collected for administrative costs were analysed and where necessary gaps have been filled. The approach for filling missing data (i.e. data on the administrative costs of authorities who didn't reply) is based on proxies and filling gaps with data from 'similar' respondents. Six types of missing data were identified and for each a specific proxy was defined (see table below). Filling gaps and checking plausibility was enhanced through literature studies on staff and overhead costs.

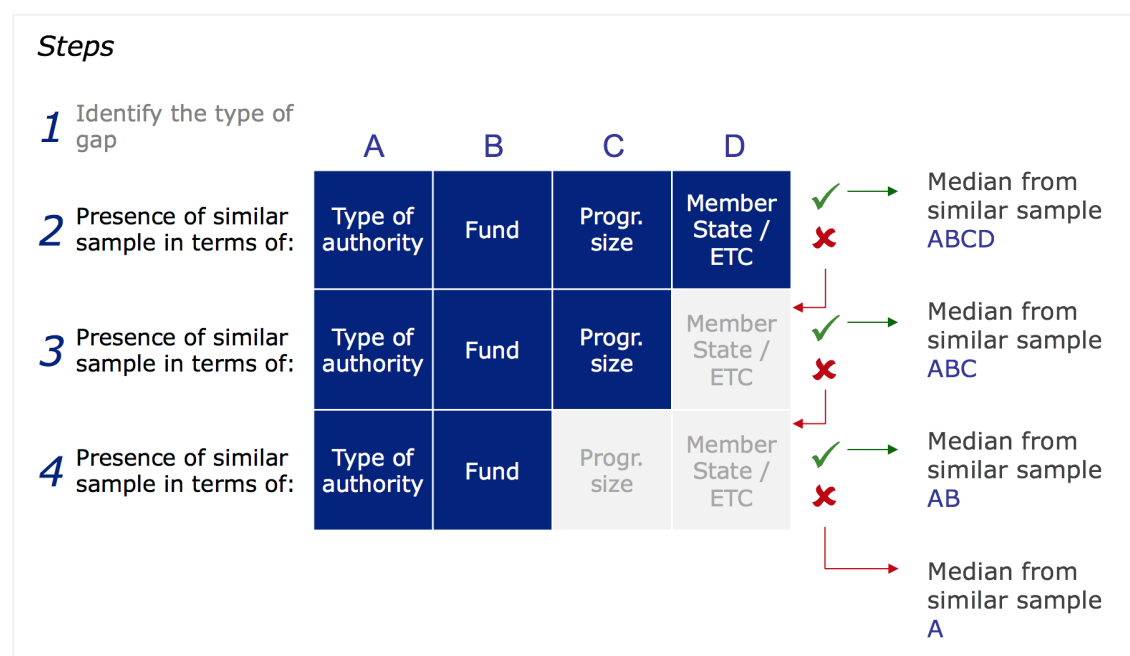
**Table 2.6 Missing data and related proxies**

Type of missing data	Proxy
<b>Staff costs (in €/national currency)</b>	Sample median staff costs as a share of total eligible funding (incl. EU and national co-funding)
<b>Staff numbers (in number as fulltime equivalents per function)</b>	Sample median FTEs as a share of total eligible funding (incl. EU and national co-funding)
<b>Overhead costs (% per function)</b>	Sample median share per function
<b>External costs per tasks (in €/national currency)</b>	Sample median external costs per task share total eligible funding (incl. EU and national co-funding)
<b>Share of total workload over single tasks (% per function)</b>	Sample median workload per task
<b>Share of total workload over time (% per function)</b>	Sample median workload over time

(Source: own elaboration from methodology presented in the inception report)

For each authority type in each Operational Programme, this missing data was filled based on valid answers from 'similar' respondents. As the figure shows, the criteria to calculate the proxy are:

- i. Type of authority: i.e. if the gap is on programme management the proxies are managing authorities;
- ii. Fund: i.e. if the gap is on ERDF the proxies are ERDF authorities;
- iii. Programme size. Based the *cohesiondata* database, we identified three categories of programmes: small, when the budget is in the first quartile of the distribution; medium, when the budget is in the second or third quartile and large, when the budget is in the fourth quartile of the budget distribution. A gap for a small programme is filled based on valid answers from other small programmes.
- iv. Member State: if the gap is on French authorities it is filled using valid answers from French authorities.

**Figure 2.1 Method for filling data gaps**


(Source: own elaboration from methodology presented in the inception report)

The table below illustrates for each Fund and function the 'weight' of the estimations. As opposed to Table 2.1, these figures refer to the financial weight of the estimation, and not the number of Operational Programmes covered. Percentages are the share estimated costs to 'real costs' declared by respondents. For example, National Coordination administrative costs are 59% based on the estimates (i.e. responses cover 41% of the costs at EU level). As illustrated in the table the 'weight' of estimates varies across Funds and functions.

**Table 2.7 Gaps on administrative costs: Share of estimated costs**

	National Coordination	Programme preparation	Managing Authorities	Certifying Authorities and Paying Agencies	Audit Authorities and Certification Bodies
ERDF	59%	56%	27%	34%	39%
CF		60%	32%	29%	34%
ESF		64%	26%	48%	51%
EAFRD		72%	53%	69%	63%
EMFF		70%	42%	32%	60%
ETC		61%	43%	70%	77%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## 2.3 Quality control for data collection

There was a continuous effort to verify the quality and consistency of responses across the whole data collection period. For administrative costs, a total of 88 requests for clarifications were sent to the national experts, and, in most cases, respondents gave satisfactory responses. These clarification requests produced improvements in data quality and contributed to the progressive adjustment of final results of the study.

Starting from February 2018, a comprehensive plausibility check covered both administrative costs and burden. Factsheets for each Member State detailed the data collection outputs, response rates and the assumptions behind the results. The factsheets were shared, via national experts, with respondent authorities. Feedback was received from 12 Member States, helping to correct mistakes and incorrect estimates from respondents. Moreover, the exercise helped encourage additional responses.

Additional cross checks as the database progressively stabilised, checked for outliers in particular groups and on certain topics. These checks included, for each questionnaire:

- plausibility check of the reported budget compared to eligible funding of the Operational Programme(s);
- plausibility check of staff costs in relation to the budget;
- plausibility check of reported overhead costs in relation to the budget;
- cross verification between the work distribution reported for tasks and:
  - budget distribution,
  - staff cost distribution,
  - FTE distribution (which was in a different section of the questionnaire for cross checking);
- cross verification between the reported composite distribution of workload across different staff types for each task, and the overall reported FTEs for staff types;
- verification of the credibility of staff costs in relation to reported FTEs, salary levels in each country and the composition of staff types;
- verification of total staff costs, external costs, and overhead costs with respect to the reported budget; and
- verification of final FTE per million Euro and overall final costs per million Euro of eligible funding for each Member State, against EU averages.

These checks prompted the requests for clarifications discussed above.

Additionally, given the particularly high levels of the EAFRD figures, data were checked with DG AGRI, which confirmed the reliability of the figures. In particular, the Paying Agency costs are in line with costs identified by DG AGRI through internal surveys.

## **2.4 Approach to compare new and previous baselines**

To assess the scope of the new baselines, they were compared with baselines for 2007-2013 administrative costs and burden. This helped assess the robustness of the new baselines based on a single method and approach for all five ESI Funds combined.

The objective is to understand how administrative costs and burden have changed compared to the previous programming period (i.e. have they increased or decreased?) by providing insights on the variation of costs at function level (i.e. have Managing Authorities' costs decreased compared to 2007-2013?) and for the most significant tasks (i.e. have the costs for selecting projects decreased compared to 2007-2013?).

Several studies provide information on baselines for 2007-2013 (see Table 2.8).

Comparing baselines is only possible when considering the following.

- Baselines are calculated as FTE and EUR including national co-financing. It is not possible to compare baselines expressed in absolute values without precise information about the ESIF budget to which they refer.
- Baselines refer to comparable lists of information obligations and tasks. Based on the CPR and fund-specific regulations, this study builds on a list of information obligations and tasks which ESIF authorities and beneficiaries must carry out to meet the 2014-2020 legal obligations. This implies that comparisons are possible with studies that estimated costs and burdens on the basis of a similar list for the 2007-2013 period.

- Baselines are calculated using a similar data sample. Baselines on administrative costs for the 2014-2020 have been calculated using questionnaires covering more than 40% of the authorities managing ESIF funds at EU level. While for administrative burdens, baselines were estimated with data from 269 beneficiaries covering all ESI Funds and Member States.

Only some studies on the 2007-2013 period meet these three criteria.

**Table 2.8 Baselines collected by previous studies**

		ERDF-CF	ESF	EAFRD	EMFF
2007-2013	Admin. costs	SWECO (2010)	EPEC/COWI (2012)	n.a.	n.a.
	Admin. burden	SWECO/t33 (2012)		CAPGEMINI, DELOITTE, RAMBOLL (2011)	

(Source: own elaboration)

**Table 2.9 Comparability with previous studies on 2007-2013**

	ERDF-CF	ERDF-CF	ESF	EAFRD
	SWECO 2010	SWECO/t33 2012	EPEC/COWI 2012	CAP GEMINI, DELOITTE, RAMBOLL 2011
Baselines as FTE per MEUR/ EUR per MEUR	✓	✓	Partially	✓
Comparable list of information obligation and tasks	✓	✓	✓	
Similar data sample	✓	✓	Partially	
Comparability of administrative costs	✓		✓	
Comparability of administrative burden		✓		

(Source: own elaboration)

As illustrated by the table above, the methodology in the two studies on ERDF-CF is fully consistent with the approach used in this study. The previous study on ESF had a different method for estimating costs and for data sampling on administrative burden. These differences prevent comparison of the administrative burden. For EAFRD, baselines related to the administrative burden in 2011 cannot be used due to differences in the methods. In particular these baselines do not estimate overall administrative burdens but only EAFRD measures 111, 121, 311 and 214.

In conclusion, taking into account the different methods, comparisons with the previous period focus on the baselines for administrative costs under ESF and ERDF-CF and on baselines for administrative burdens for 2007-2013 under ERDF-CF.

Finally, it is also important to underline that in 2017 SWECO carried out a study on the use of simplification in the early phases of the 2014-2020 programming period (SWECO 2017). The objective was to estimate the potential impact of the simplification measures introduced for 2014-2020 in reducing the administrative costs and burdens. Quantification of the impacts of simplification measures also allowed a preliminary estimate of the baselines for 2014-2020. These baselines were calculated as absolute monetary values (i.e. data on the workloads in terms of FTE were not considered in this study) compared to the available baselines for 2007-2013 (i.e. SWECO 2010, SWECO/t33 2012, EPEC/COWI 2012). For EAFRD and EMFF, where no references on the 2007-2013 baselines were available, the baselines were based on information provided by a sample of Managing Authorities. These differences limit comparisons of baselines in the current study with the preliminary baselines identified in 2017.

## 2.5 Simulation methodology

The aim of the simulation is to provide first insights on what changes in the ESIF regulatory framework post 2020 might imply for administrative costs and burden. The simulation combines baselines for ESIF administrative costs and burden with expert knowledge and judgments on potential impacts on different administrative tasks.

The simulations were carried out prior to publication of the draft regulations, and they were subsequently adapted to take the new proposal into account. All changes considered in this study have been confirmed in the new draft regulations. Indeed, the draft regulations refer to the simulations findings from a draft version of this study.

Building on the experience of earlier studies – mainly the study on ‘measuring the impact of changing regulatory requirements on administrative costs and administrative burden of managing EU structural funds (ERDF and CF)’ (DG REGIO 2012), and the study on ‘Use of new provisions on simplifications during the early implementation phase of ESIF’ (DG REGIO 2017) – the following approach has been used for the simulations.

1. **Establishing an understanding of the intended changes.** Based on an e-mail exchange with DG REGIO, eight regulatory changes were assumed:
  - a. Simplified programming
  - b. Light Operational Programmes review
  - c. Simplified designation of authorities
  - d. No specific rules for revenue generating projects
  - e. No specific rules for major projects
  - f. Reduced number of verifications
  - g. Simplified reporting
  - h. Extended scope of SCOs.
2. **Estimating the tasks affected.** For each change, the study team assessed which tasks in the baseline might be affected. This assessment also considered the results of earlier studies. The earlier studies included many interviews and survey responses from programme authorities, so the information was particularly valuable.
3. **Quantification of the effects.** For each task affected by a change, the study team estimated the direction (plus or minus) and the magnitude of the effect (in steps of percentage changes). This also took into account types of programmes or Member States. The results of previous studies were also checked.
4. **Aggregation of the expected changes by fund and change.** Based on the tasks and the expected effect on individual tasks, the total effect was simulated for each fund and change.
5. **Quality control through a workshop.** As the simulation is purely based on the insights and expectations of the core study team, the assumptions and findings were discussed at a workshop with Commission staff from DG REGIO, DG MARE and DG EMPL. Originally, a workshop with some national experts and possibly a few programme authorities was envisaged. However, the simulation task was brought forward in the timing for the study, so this was not possible.

Simulating the impact of the intended change 'extended scope of SCOs' was based largely on the results of the previous study (DG REGIO 2017). This approach has been adopted due to the different focus of this intended change, which is more on an increased uptake of SCOs than on regulatory changes.

To facilitate the above steps and calculations, the project team has developed an excel tool to enable step-by-step simulations for administrative costs.

The tool is annexed to this report and can be used for quick scans by European Commission officials to run simplified estimates at a later stage. This tool is linked to the database with all baseline values, by fund and task.

### 3 NEW BASELINES FOR ADMINISTRATIVE COSTS AND BURDEN

This chapter presents new baselines for the five ESI Funds jointly as well as a cross-analysis comparing these baselines across the ESI Funds, by function and task as well as programme characteristic. Details on administrative costs for each task are in the annex.

#### 3.1 Administrative costs by Fund and function

The total administrative costs for ESIF is 40 300 EUR per million Euro of eligible budget and a total workload of 0.95 FTE per million Euro of eligible budget.

Administrative costs vary considerably between ESI Funds (see Table 3.1). In monetary terms as a share of eligible budget including national co-financing, CF has the lowest costs. That is followed by ERDF, ESF and EMFF. ETC has considerably higher costs which can be partly explained by the small financial volumes and multi-national structures. EAFRD has the highest cost share.

Considering person years (FTE) per million Euro of eligible budget including national co-financing, CF has the lowest figures, followed by ERDF, ESF, ETC and EMFF. According to the current figures, the administration of EAFRD requires the highest workload.

**Table 3.1 Administrative costs by Fund**

	ESIF (total)	ERDF	CF	ESF	EMFF	ETC	EAFRD
TOTAL							
EUR per MEUR	€ 40 300	€ 22 600	€ 18 400	€ 27 600	€ 44 200	€ 66 700	€ 83 100
FTE per MEUR	0.95	0.53	0.40	0.67	0.93	0.84	2.18

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

Table 3.2 provides an overview of administrative costs by function. As will be shown later in the report, these are mean values and for each Fund and function there are considerable variations.

Overall, the tasks related to programme management are by far the highest share of administrative costs. This applies to all funds, except EAFRD, where the administrative costs of Managing Authorities come second after the costs for Paying Agencies. This is because the division of labour between EAFRD Managing Authorities and Paying Agencies differs from other funds.

Audit Authorities and Certification Bodies (for EAFRD) have much lower administrative costs than Managing Authorities and Paying Agencies. For ERDF (including ETC), ESF and EMFF they have the second highest costs after Managing Authorities (albeit with a considerable difference). CF and EAFRD Certification Bodies have the lowest administrative costs of the three bodies (Managing Authorities, Audit Authorities and Certifying Authorities).

For ERDF (including ETC), ESF and EMFF, Certifying Authorities have the lowest administrative costs among the three bodies (Managing Authorities, Audit Authorities and Certifying Authorities). For CF, the Certifying bodies come second albeit with an enormous distance to the Managing Authorities.

The higher costs for EAFRD authorities can be explained by the relatively small size of most operations. EAFRD has many beneficiaries (i.e. over 3 300 000 per year<sup>9</sup>) and small operations, but due to protect the overall performance of the policy, paying agencies carry out administrative checks on 100% of beneficiaries, regardless of the size of the operations.

**Table 3.2 Administrative costs by function**

	ESIF (total)	ERDF	CF	ESF	EMFF	ETC	EAFRD
National coordination							
EUR per MEUR	€ 820						
FTE per MEUR	0.01						
Programme preparation							
EUR per MEUR	€ 1 300	€ 1 000	€ 800	€ 1 200	€ 800	€ 2 200	€ 1 900
FTE per MEUR	0.03	0.02	0.02	0.02	0.08	0.07	0.06
Managing Authorities							
EUR per MEUR	€ 21 700	€ 17 700	€ 14 300	€ 22 200	€ 31 500	€ 50 400	€ 26 600
FTE per MEUR	0.56	0.44	0.32	0.56	0.68	0.56	0.91
Certifying Authorities							Paying Agencies
EUR per MEUR	€ 13 200	€ 1 200	€ 1 800	€ 700	€ 5 400	€ 6 000	€ 52 200
FTE per MEUR	0.30	0.02	0.02	0.03	0.10	0.11	1.18
Audit Authorities							Certification Bodies
EUR per MEUR	€ 3 200	€ 2 700	€ 1 500	€ 3 500	€ 6 500	€ 8 100	€ 2 400
FTE per MEUR	0.05	0.05	0.04	0.06	0.08	0.10	0.04

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

Information provided by the programme bodies suggests that approximately 68% of the overall administrative costs (presented in the above table) are paid for out of the Technical Assistance budget. The remaining approximately 32% are financed by national or regional resources.

<sup>9</sup> Data provided by DG AGRI.

## 3.2 Administrative cost by task

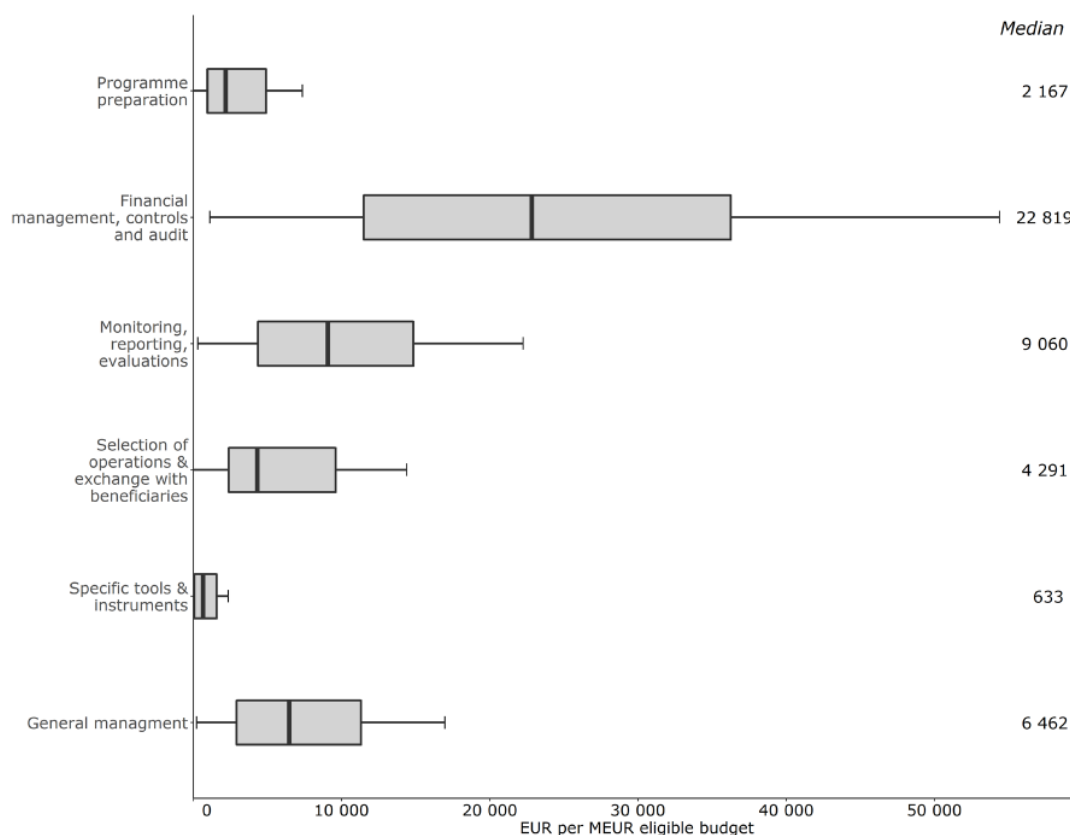
This section provides more detail on administrative costs for individual tasks performed by the various bodies. The first figures provide an overview on groupings of related tasks. This is followed by overviews on the costs covering each task for ESI Funds collectively and individually.

Figure 3.1 and Figure 3.2 provide a quick overview of administrative costs in monetary terms and workload by groups of tasks. Figure 3.1 shows that at ESIF level tasks related to financial management, controls and audit are the most costly in monetary terms (with 45% of the total monetary costs).

As illustrated in Figure 3.2, this is also true for workload (with 48% of the total workload). Individual tasks in this group cover a wide range of audit and control measures. These include ensuring an adequate audit trail, adequate management verifications, administrative verifications for each for reimbursement application from beneficiaries, on-the-spot verifications, drawing up the management declaration and annual summary of final audit reports and of controls carried out.

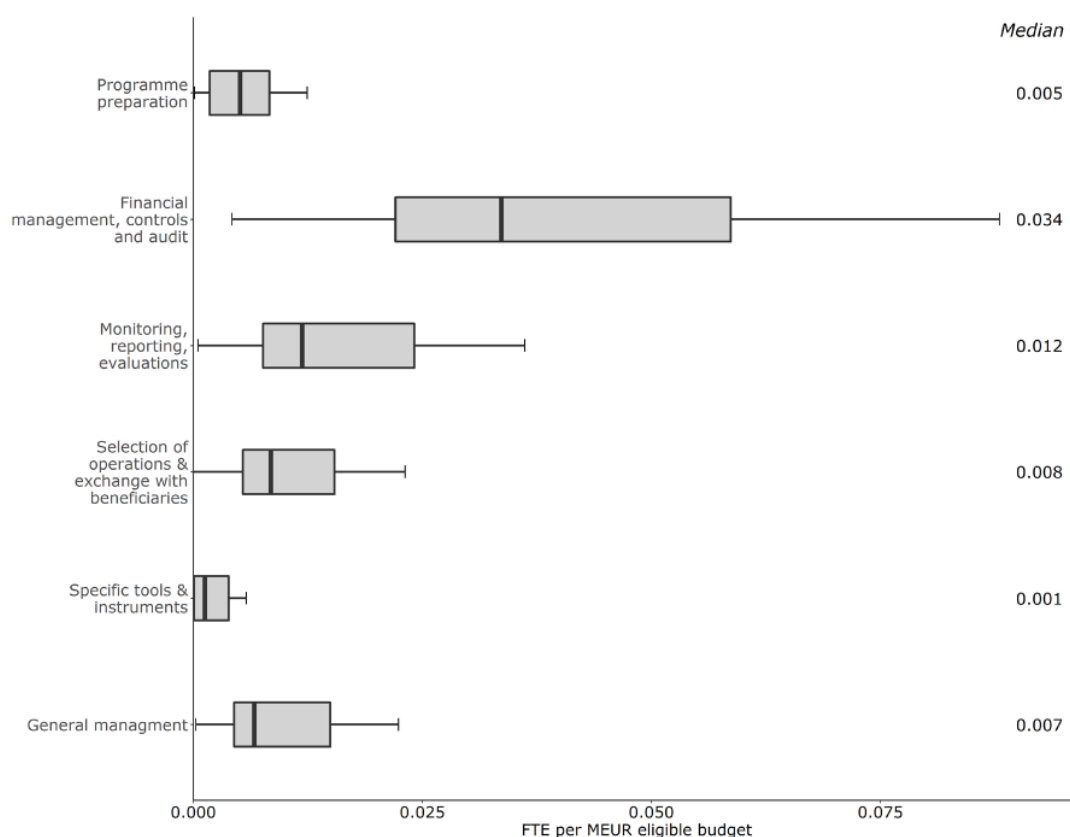
This group of tasks is followed by monitoring, reporting and evaluation tasks with 20% of the monetary costs and workload. These tasks include information and communication, ensuring adequate separation of functions and systems for reporting and monitoring, setting up and using electronic exchanges of information with beneficiaries, reporting on the controls, preparation of annual implementation reports, and monitoring and evaluation.

**Figure 3.1 Administrative costs by group of tasks per MEUR ESIF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.2 Workload in FTE by group of tasks per MEUR ESIF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

Considering the administrative costs for ESIF in total, Figure 3.3 shows that the five most costly tasks in monetary terms are 'verifications for reimbursement of beneficiaries', followed by 'selection of operations and information of beneficiaries', 'ensuring an adequate audit trail and verifications', 'information and communication' and 'on the spot verifications'. The picture is basically the same when looking at the five most work intensive tasks (Figure 3.4). The only difference is that 'information and communication' is more workload intensive than 'ensuring an adequate audit trail and verifications'.

More detailed information on each task is in the annex factsheets of administrative costs per task.

The patterns vary somewhat when looking at each ESI Fund separately.

**ERDF**, 'verifications for reimbursement of beneficiaries' is the most costly task in monetary terms, followed 'selection of operations' (Figure 3.5). These are followed by 'establishing, guiding and running the monitoring committee', 'audit of operations' and 'ensuring an adequate audit trail and verifications'. Also here the workload is similar, with Figure 3.5 showing the top-five tasks being 'selection of operations', 'verifications for reimbursement of beneficiaries', 'ensuring an adequate audit trail and verifications', 'information and communication' and 'ensuring a system for collecting, recording and storing data'.

**CF figures** in Figure 3.7 and Figure 3.8 show the most work-intensive task is 'verifications for reimbursement of beneficiaries', followed by 'selection of operations and information of beneficiaries', 'ensuring an adequate audit trail and verifications', 'audit of operations' and 'ensuring a system for collecting, recording and storing data'. While in

monetary terms the most costly tasks are 'selection of operations and information of beneficiaries', 'verifications for reimbursement of beneficiaries', 'ensuring an adequate audit trail and verifications', 'information and communication' and 'on the spot verifications'.

**ESF figures** show the most costly tasks in monetary terms (see Figure 3.9) are 'selection of operations and information of beneficiaries' followed by 'verifications for reimbursement of beneficiaries' followed by 'information and communication', 'audit of operations' and 'monitoring and evaluation during the programming period'. The most work-intensive tasks (see Figure 3.10) are also 'selection of operations and information of beneficiaries' and 'verifications for reimbursement of beneficiaries'. This time followed by 'on the spot verifications', 'ensuring a system for collecting, recording and storing data' and 'ensuring a system for collecting, recording and storing data'.

**EAFRD figures** are generally higher than for the other funds. In monetary terms (see Figure 3.11) the most costly task is 'verifications for reimbursement of beneficiaries' followed by 'on the spot verifications'. At some distance follow 'selection of operations and information of beneficiaries' and 'ensuring that adequate information was received from the MA'. For workload (Figure 3.12), the most intensive tasks are 'verifications for reimbursement of beneficiaries' and 'selection of operations and information of beneficiaries'. They are followed at some distance by 'on the spot verifications', 'ensuring an adequate audit trail and verifications' and 'draw up and submit payment application to the EC'.

**EMFF figures** show that the most costly task (see Figure 3.13) is 'selection of operations and information of beneficiaries'. This is followed by 'verifications for reimbursement of beneficiaries', 'on the spot verifications', 'ensuring a system for collecting, recording and storing data' and 'ensuring an adequate audit trail and verifications'. The most work-intensive task is (see Figure 3.14) 'selection of operations and information of beneficiaries' followed by 'verifications for reimbursement of beneficiaries', 'audit of operations', 'ensuring an adequate audit trail and verifications' and 'on the spot verifications'.

**European Territorial Cooperation** (Interreg) has its own group as the programmes and actions differ substantially from other programmes. This is also reflected in the administrative costs. The most costly tasks (see Figure 3.15) are 'information and communication', followed by 'selection of operations and information of beneficiaries', 'verifications for reimbursement of beneficiaries', 'setting up an e-cohesion system for the exchange with beneficiaries' and 'establishing, running and guiding the Monitoring Committee'. The most work-intensive tasks (see Figure 3.16) are 'selection of operations and information of beneficiaries', 'verifications for reimbursement of beneficiaries', 'information and communication', 'certification of expenditures' and 'audit of operations'.

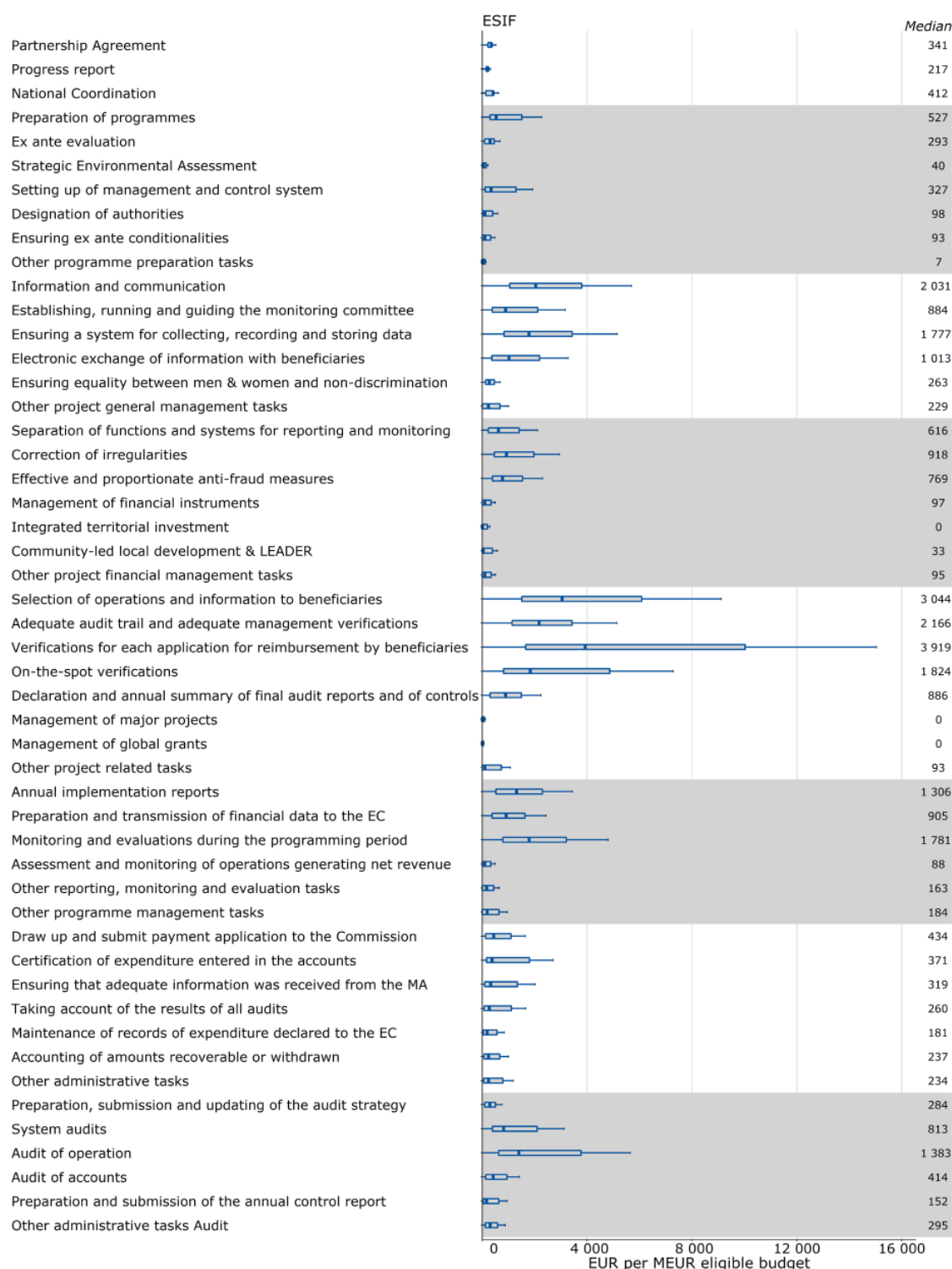
Table 3.3 summarises the five most work-intensive tasks for each fund.

**Table 3.3 Most work-intensive tasks by fund**

	ERDF	CF	ETC	ESF	EAFRD	EMFF
Selection of operations and information to beneficiaries	1	2	1	1	2	1
Verifications for reimbursement of beneficiaries	2	1	2	2	1	2
Ensuring an adequate audit trail and verifications	3	3		4	4	4
Information and communication	4		3			
Ensuring a system for collecting, recording and storing data	5	5		5		
Audit of operations		4	5			3
Certification of expenditures			4			
On the spot verification				3	3	5
Payment applications to the EC					5	

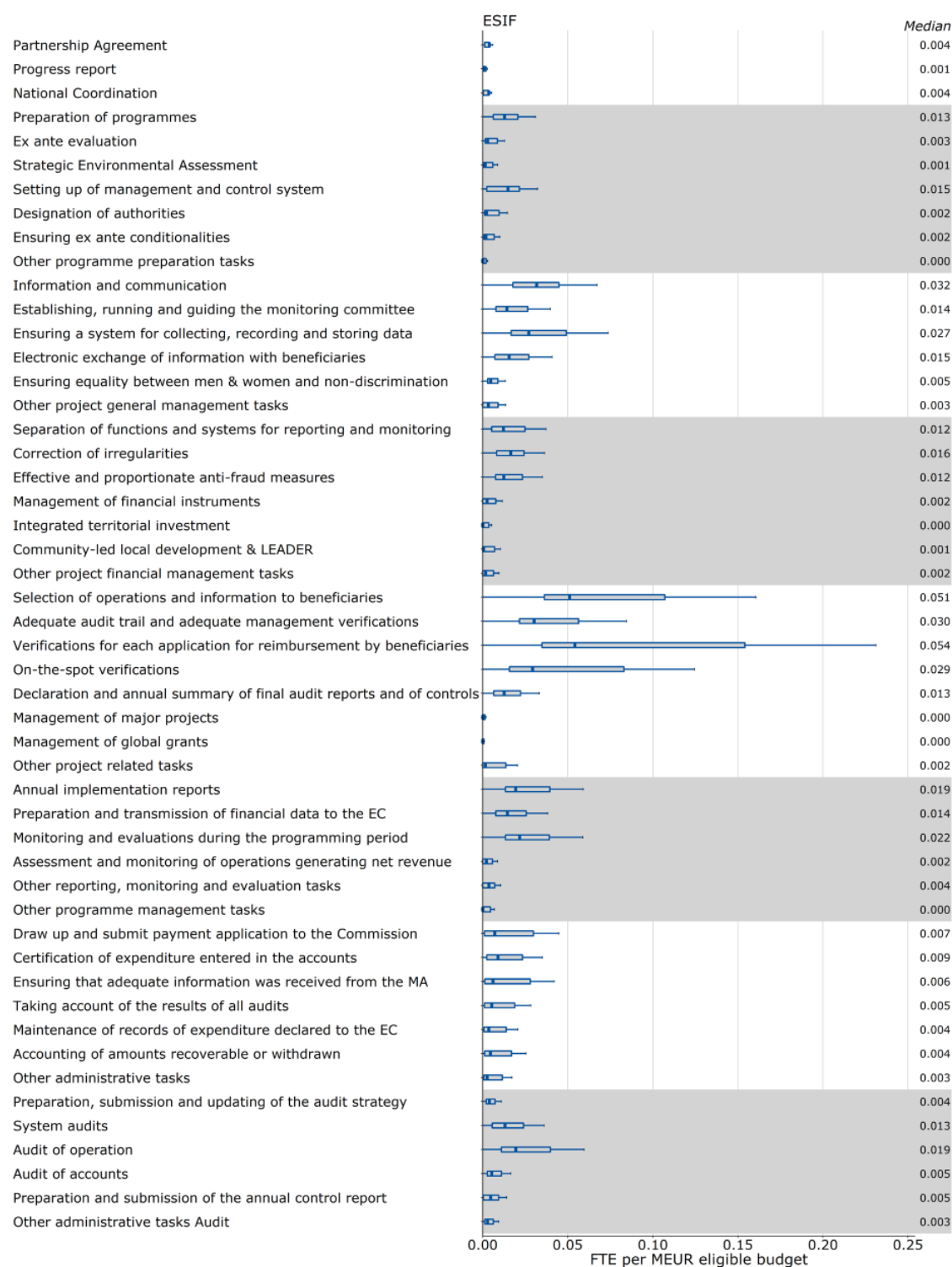
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.3 Administrative costs per MEUR ESIF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.4 Workload in FTE per MEUR ESIF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.5 Administrative costs per MEUR ERDF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.6 Workload in FTE per MEUR ERDF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.7 Administrative costs per MEUR CF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.8 Workload in FTE per MEUR CF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.9 Administrative costs per MEUR ESF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.10 Workload in FTE per MEUR ESF**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.11 Administrative costs per MEUR EAFRD**



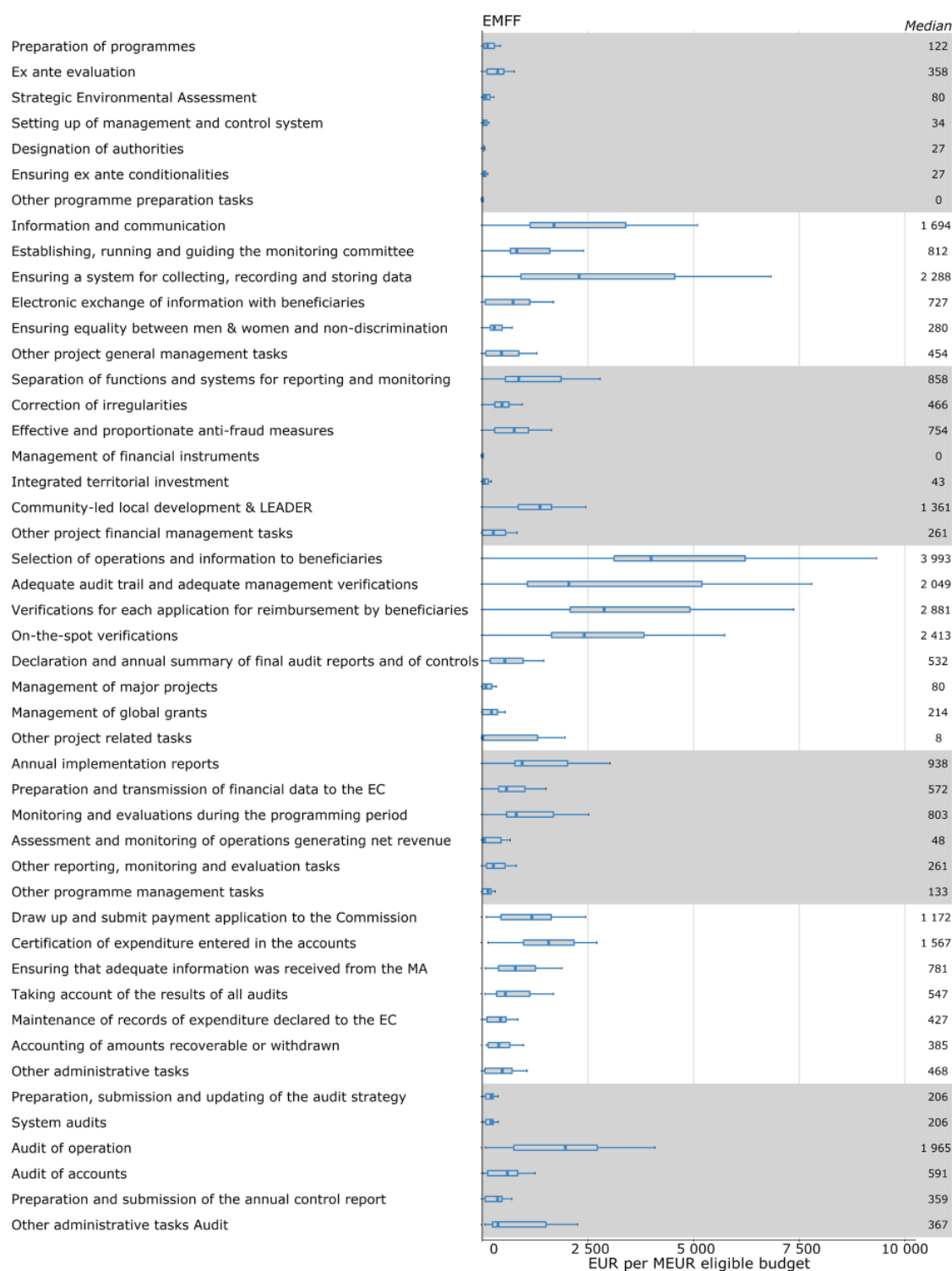
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.12 Workload in FTE per MEUR EAFRD**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.13 Administrative costs per MEUR EMFF**



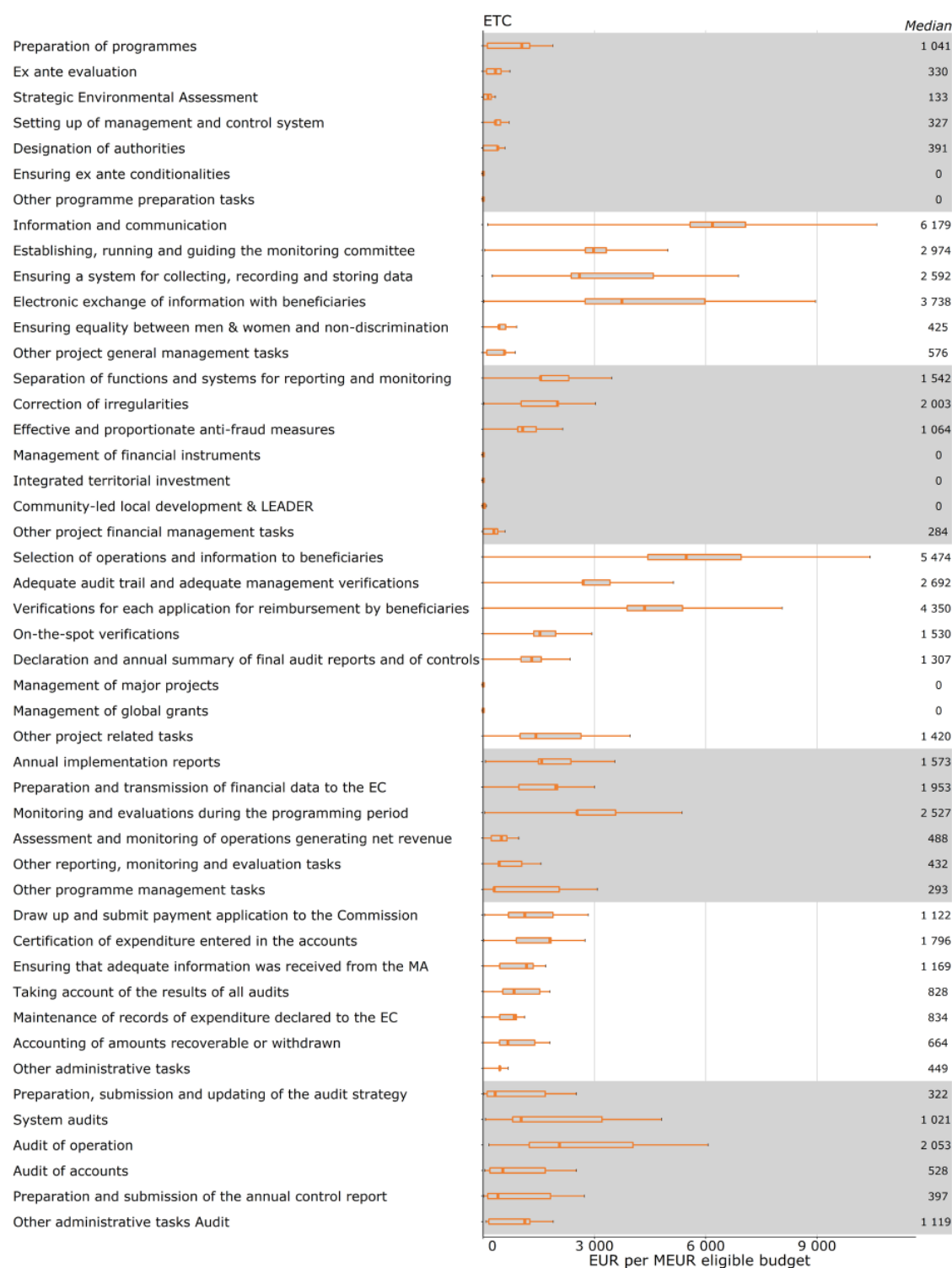
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.14 Workload in FTE per MEUR EMFF**



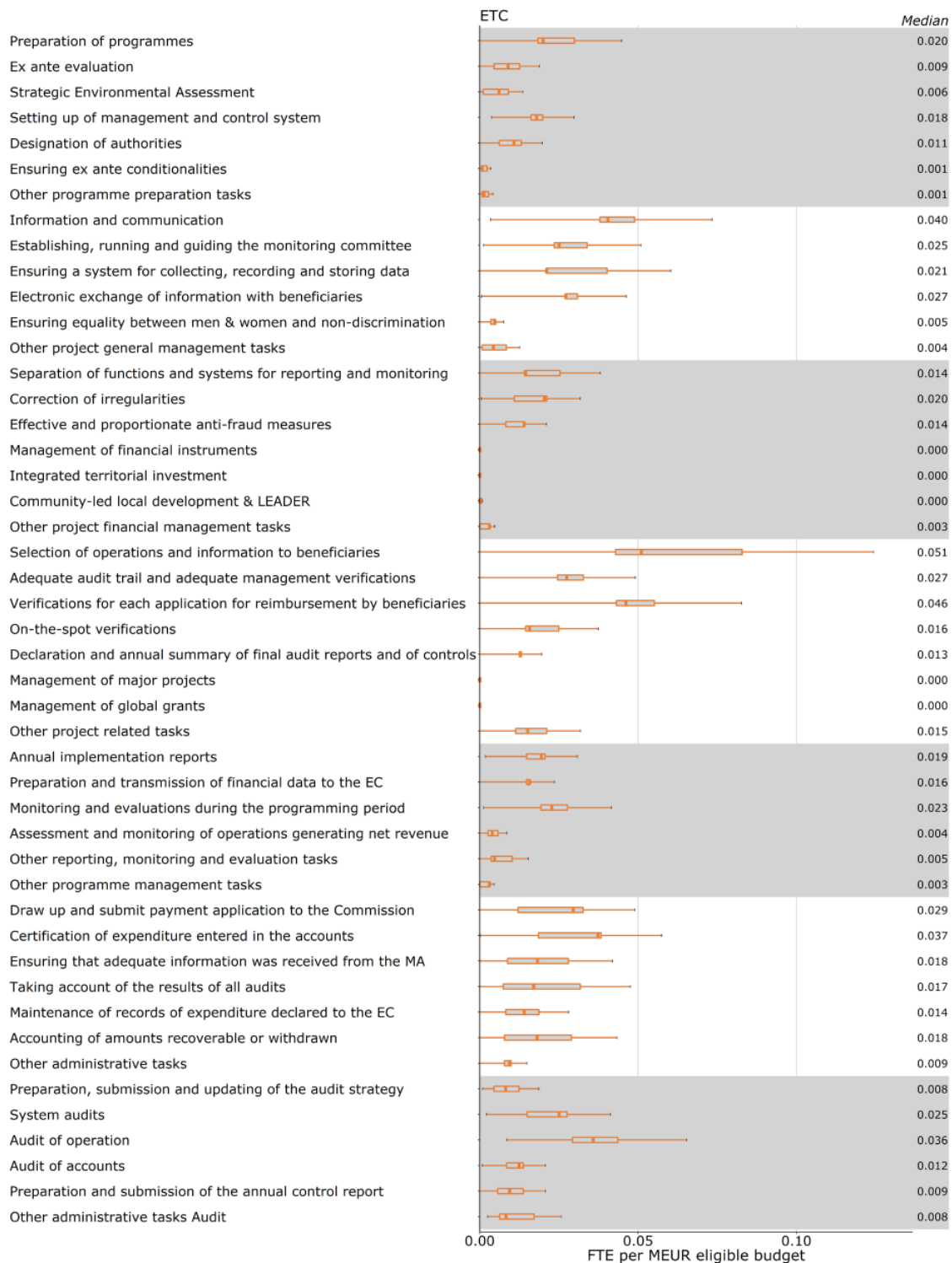
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.15 Administrative costs per MEUR ETC**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.16 Workload in FTE per MEUR ETC**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## Gold-plating

One of the key characteristics of ESIF is its decentralised delivery system. ESIF is implemented within the context of shared management and multi-level governance. This means that programmes are managed at Member State, regional and local level, so the operations selected respond to the priorities at those levels and a large number of relevant stakeholders are involved in their implementation.

Member States and regions are also responsible for setting up appropriate management and control systems to ensure that funds are used appropriately. However, the final responsibility for implementation remains with the Commission, before the EU budgetary authorities, hence shared management entails supervision by the Commission to make sure Member States fulfil their obligations in relation to the management of funds. Furthermore, Member States need to ensure compliance with other Community and national rules, such as those on public procurement, state aid and environmental legislation.

In this context, there are various reasons for administrative costs and the variations thereof. One question is whether all administrative costs for the 42 tasks selected actually derive from the EU regulatory framework or whether some parts of it also derive from additional national, regional or programme specific regulatory frameworks which come on top or due to possible overly cautious interpretations of the EU framework by Member States and programme bodies. This question – widely referred to as gold-plating – has not been part of the present study. Hence administrative costs and burden have been assessed without differentiating between costs stemming from effective and efficient implementation of the regulatory framework, and costs deriving from additional layers of complexity linked to specific national rules, specific implementation routines or administrative culture. Still, the results of the study might give some hints concerning gold-plating.

**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. Gold-plating can be divided into 'active gold-plating' and 'passive gold-plating'. 'Active gold-plating' describes the additional administrative procedures and regulatory obligations that go beyond the ESIF requirements set out at EU level. 'Passive gold-plating' occurs when the national, regional or local players fail to apply simplification measures proposed in ESIF regulations. (see SWECO 2010 and Böhme et al. 2017)

Information collected from Managing Authorities<sup>10</sup> suggests that mainly tasks on setting up the administrative systems for programme implementation are potentially subject to active gold-plating. The tasks mentioned in this context include in particular 'ensuring adequate separation of functions and systems for reporting and monitoring', 'set up and use of a system for the electronic exchange of information with beneficiaries' and 'ensuring a system for collecting, recording and storing data'. The figures indicated for the share of the administrative workload or costs for these tasks being linked to gold-plating vary widely. For the two tasks 'ensuring adequate separation of functions and systems for reporting and monitoring', 'set up and use of a system for the electronic exchange of information with beneficiaries' some Managing Authorities indicated that up to 15-20%, and in once case even 50% of the administrative costs are due to national or regional regulations. Such overregulation is often seen as symptomatic of deficient administrative culture and public governance, for instance in Member States suffering from strong 'fear of auditors' syndromes and multiplying unnecessary and counterproductive verifications and controls for sole self-protection purposes. For 'ensuring a system for collecting, recording and storing data' the indications of the share

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<sup>10</sup> About 10% of the Managing Authorities provided hints on the presence of additional national rules going beyond the EU regulations.

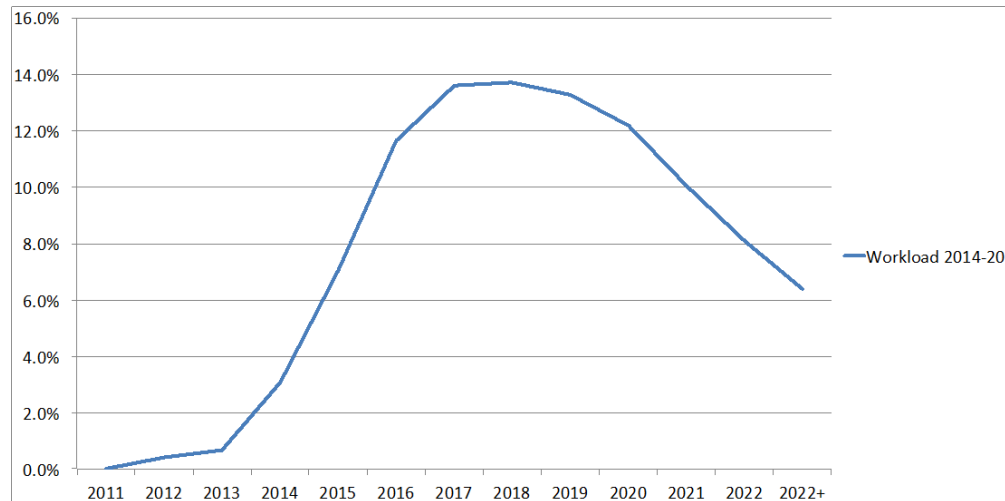
of administrative costs deriving from national or regional regulations reach 10 to 12%, and in one case even 20%. Given that these tasks are rather influential in shaping the management systems of the programmes, it might be possible that gold-plating cascades from these to other tasks in the course of programme implementation. Among others this becomes visible in the considerable differences as regards the frequency of reporting and amount of documentation requested from beneficiaries for applications, reporting and payment claims. Although the current study cannot quantify these differences, the information collected suggests that a fair share of administrative costs and burden is due to gold-plating.

Member States and programme bodies could be encouraged to identify and counteract such practices, and learn from other programmes and Member States with similar pre-conditions. For instance, this could be done through peer-to-peer assistance.

### Administrative costs over time

Administrative costs also vary over time. Information collected on past and expected future workload, shows how the administrative workload for this programming period builds up from the start of programme preparation to a peak in 2017-2018 and then decline towards closure after 2022. Figure 3.17 shows the workload share for each year. Although the programming period officially runs from 2014 to 2020, the related workload began about two to three years earlier and is unlikely to be concluded until after 2023. Consequently, there are substantial overlaps in time between the different programming periods.

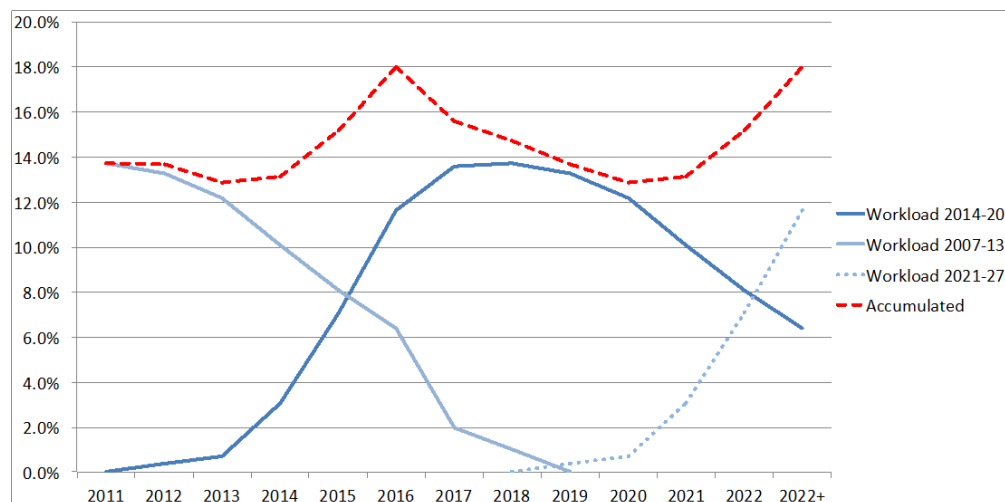
**Figure 3.17 Overall workload over time**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

Figure 3.18 presents the aggregated workload for the three periods 2007-2013, 2014-2020 and 2021-2027. The picture is based on data for the current programming period presented above and assumes similar workload cycles for all programming periods. It shows that in the first years after the beginning of a programming period, the overall workload peaks due to coinciding high levels of workload from different programming periods.

**Figure 3.18 Overall workload assuming similar workload cycles for all programming periods**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 3.3 Understanding variations in administrative costs (cross-analysis)

Differences between programmes need to be considered to provide a better interpretation of the overall picture of administrative workload and costs for ESIF. In particular, differences in the geographical coverage of a programme, the financial volume and thematic focus have a considerable impact on the administrative workload and costs.

The complexity of a programme and its actions in terms of geographical coverage and thematic orientation affect administrative workload and costs. In general, the more complex the intervention, the higher the requirement for administrative input from the programme level and the final beneficiaries. There are considerable differences, therefore, in the administrative workload for funding of large infrastructure investments compared to complex, small scale interventions, aimed at broad regional development support.

The budgetary volume of both the programme and its funded activities also influence the administrative workload and costs. Each programme and each funded activity have a number of administrative tasks which are not related to financial volume. Accordingly, small programmes must commit a higher share of their budget to administration than larger ones.

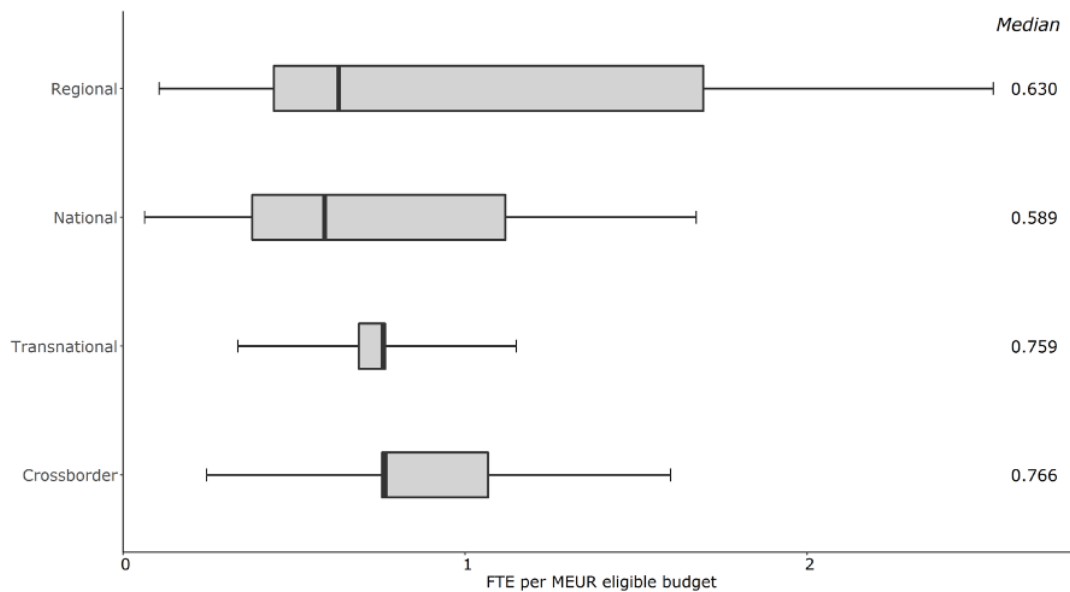
#### **Making sense of differences in administrative costs: the example of Bulgaria**

Bulgaria reports notably high workloads for ERDF, ESF, and CF programmes, while monetary figures are largely in line with the EU average. In this country, particularly high Technical Assistance budgets are allocated to Operational Programmes under these funds. The monetary cost for ESIF management is largely similar to other Member States. In Bulgaria, as in Romania, two effects appear to influence the FTE figures: salaries largely below the EU average; and their relatively recent entry in the ESIF system. These effects mean that the type of programme officials differ. In Bulgarian ERDF and ESF Managing Authorities, staff were 7% more likely to be 'desk officer/administrator' or 'assistant/secretary' staff than the EU average. Bulgaria is a clear example of how factors such as low salary levels and low seniority of officials can affect the figures.

#### **3.3.1 Administrative costs by programme geography**

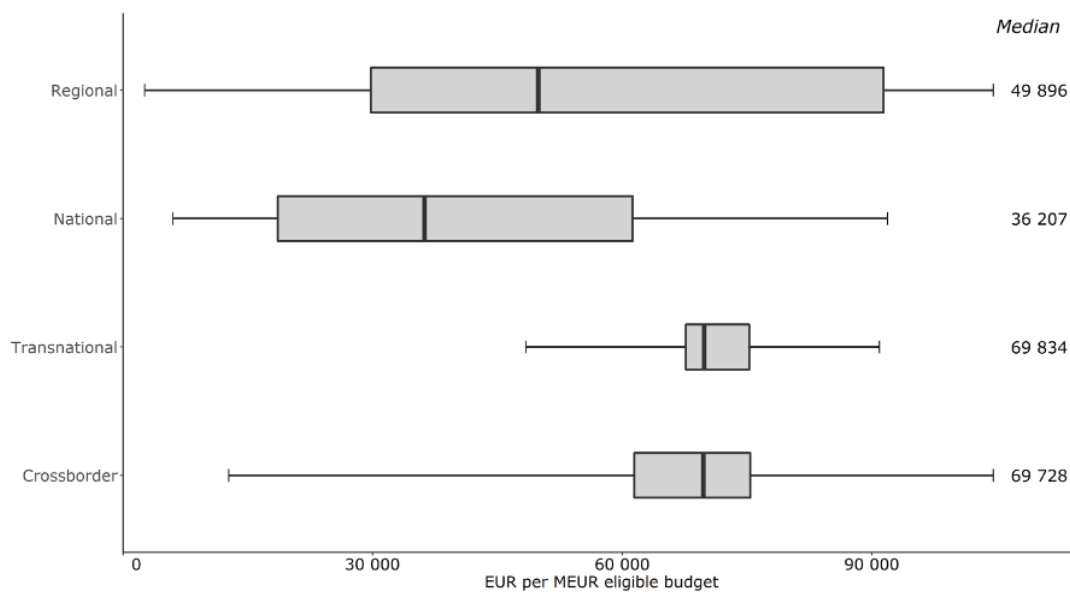
The smaller or more complex the geographical area covered by a programme, the higher the relative administrative costs. Earlier sections revealed that Interreg (ETC) programmes have higher costs than programmes in a single Member State. This is partly explained by the more complex administrative context with different national systems, and the type of activities funded (see below). Furthermore, regional programmes tend to have higher administrative costs than national programmes, largely because of their smaller size. Regional programmes are also much more frequently used in EU-15, where programmes often are smaller and staff costs higher. This impacts negatively on both parts of the ratio between administrative costs and eligible funding. It also explains why the difference between regional and national programmes is higher in monetary terms than in person years (see Figure 3.19 and Figure 3.20).

**Figure 3.19 Administrative costs by programme geography (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.20 Administrative costs by programme geography (EUR)**

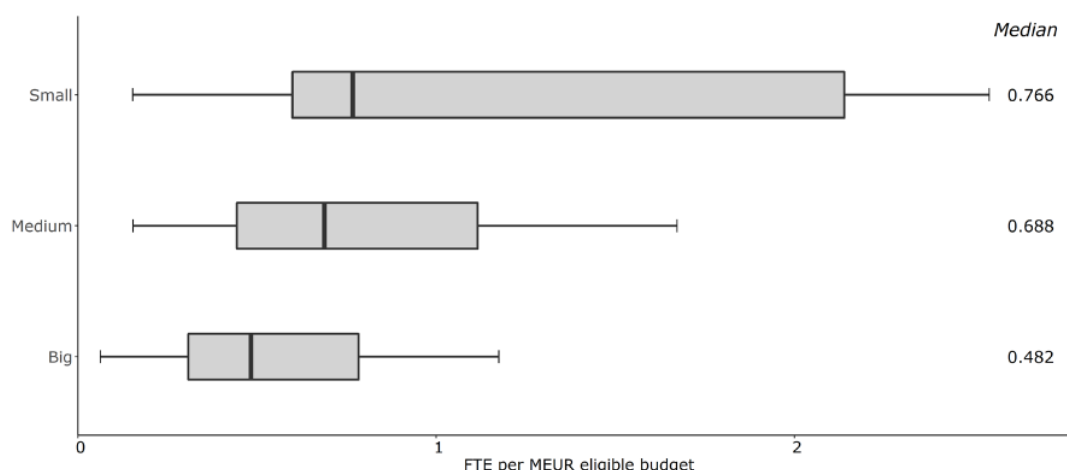


(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 3.3.2 Administrative costs by programme financial volume<sup>11</sup>

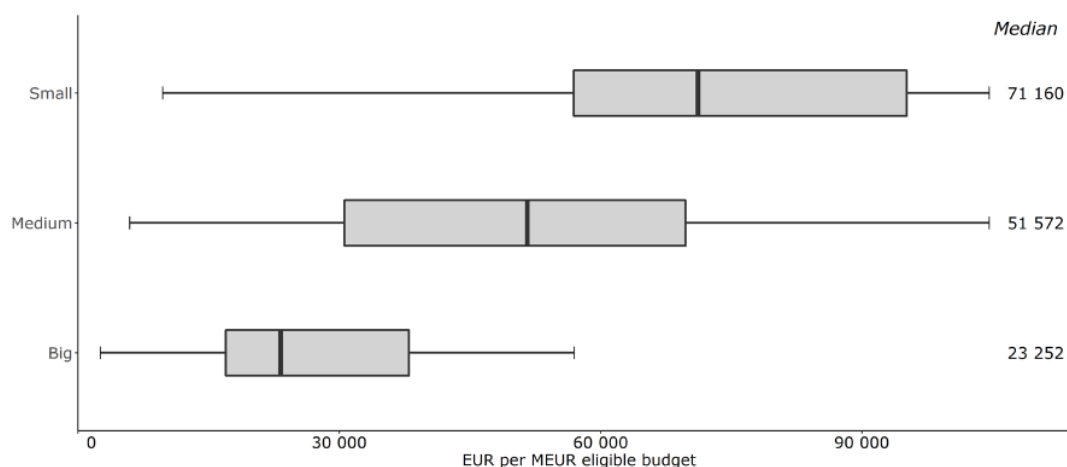
Overall, the financial volume of a programme influences the administrative workload and costs. Small programmes usually have a higher share of administrative workload and costs than larger programmes. In general terms, the administrative costs (per million Euro of eligible budget) for small programmes is about 2.5 times higher than for large programmes (see Figure 3.21 and Figure 3.22). The difference is less pronounced for person years per million Euro of total budget, as smaller programmes are often located in Member States with higher salary levels.

**Figure 3.21 Administrative costs by programme financial volume (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.22 Administrative costs by programme financial volume (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

<sup>11</sup> Based on budget allocation information on *cohesiondata*, for each ESI Fund we defined thresholds to identify small, medium and large programmes. Thresholds are: small size programmes have a budget in the first quartile of the distribution of total budget allocation (e.g. for EAFRD, programmes below 300 million EUR of total budget); medium size programmes have a budget in the second and third quartiles of the distribution (e.g. for EAFRD, programmes above 300 million EUR and below 1 400 million EUR of total budget); large programmes have a budget in the fourth quartile of the distribution (e.g. for EAFRD, programmes above 1 400 million EUR of total budget).

### Making sense of differences in administrative costs: the example of Austria

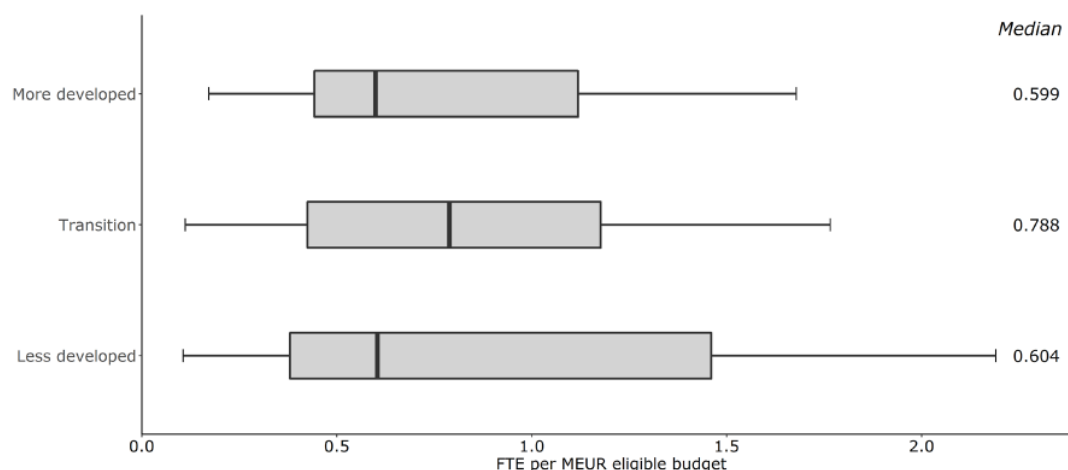
The 13.93 million Euro EMFF fund in Austria is by far the Fund with the lowest grant amount in the whole ESI Funds system. The management of one EMFF Programme requires a workload of 4 FTE per year. This, combined with the relatively high salary levels and high seniority of staff in Austrian ESIF management, results in an administrative cost almost eight times the EU figure for EMFF per million Euro of eligible funding. The FTE figure per million Euro of eligible funding is more than four times the EU average. This case, though an exception, is a landmark example of the low 'efficiency' of small Operational Programmes. This effect is even more notable when considering that the cost of ESIF funding management in Austria is overall relatively low, at two thirds of the EU figure for FTE per million Euro of eligible funding.

The same pattern is particularly visible in other programmes with a small financial package, such as Czech Republic's EMFF, and all Operational Programmes in small economies like Cyprus, Malta, and Luxembourg. For Luxembourg, the combination of small Programme size and high wages means an average estimated administrative cost across all funds almost three times higher than the EU figure, among the highest in all Member States.

### 3.3.3 Administrative costs by type of programme region

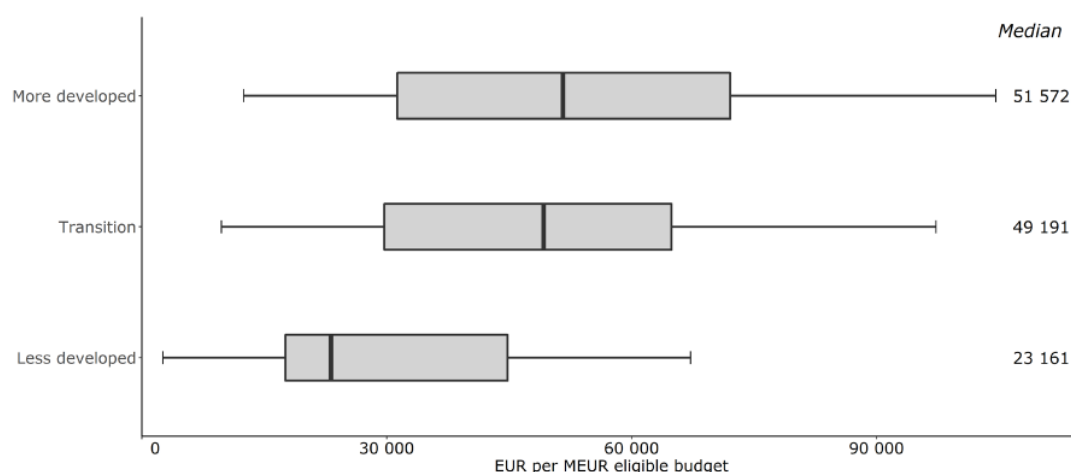
Analysis of administrative costs by programme geography and financial volume suggests that these costs are influenced by the economic performance of the Member State. The same is observed at the regional level. Using the Cohesion Policy regional typology shows that less developed regions have considerably lower administrative costs than more developed regions (see Figure 3.24). This is in line with findings above that financially smaller programmes usually have higher administrative costs than larger programmes. Differences in salary levels between countries imply that the difference is more pronounced in monetary terms than in person years, whereas the workload (see Figure 3.23) does not show considerable differences.

**Figure 3.23 Administrative costs by type of programme region (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.24 Administrative costs by type of programme region (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 3.3.4 Administrative costs by programme thematic focus

Administrative costs also depend on the complexity and type of activities funded by a programme. Administrative costs by thematic objectives provide an indication of this complexity as they bring together various features (e.g. different financial sizes, duration or geographical coverage of the activities supported).

The least work intensive thematic objective (TO 4) requires about one third of the person years per million EUR budget than the most work intensive (TO 11) (Figure 3.25). Overall, the thematic objectives with the highest administrative costs in terms of both workload and monetary costs are:

- TO 11 Enhancing institutional capacity of public authorities and stakeholders and efficient public administration;
- TO 6 Preserving and protecting the environment and promoting resource efficiency;
- TO 3 Enhancing the competitiveness of small and medium-sized enterprises (SMEs).

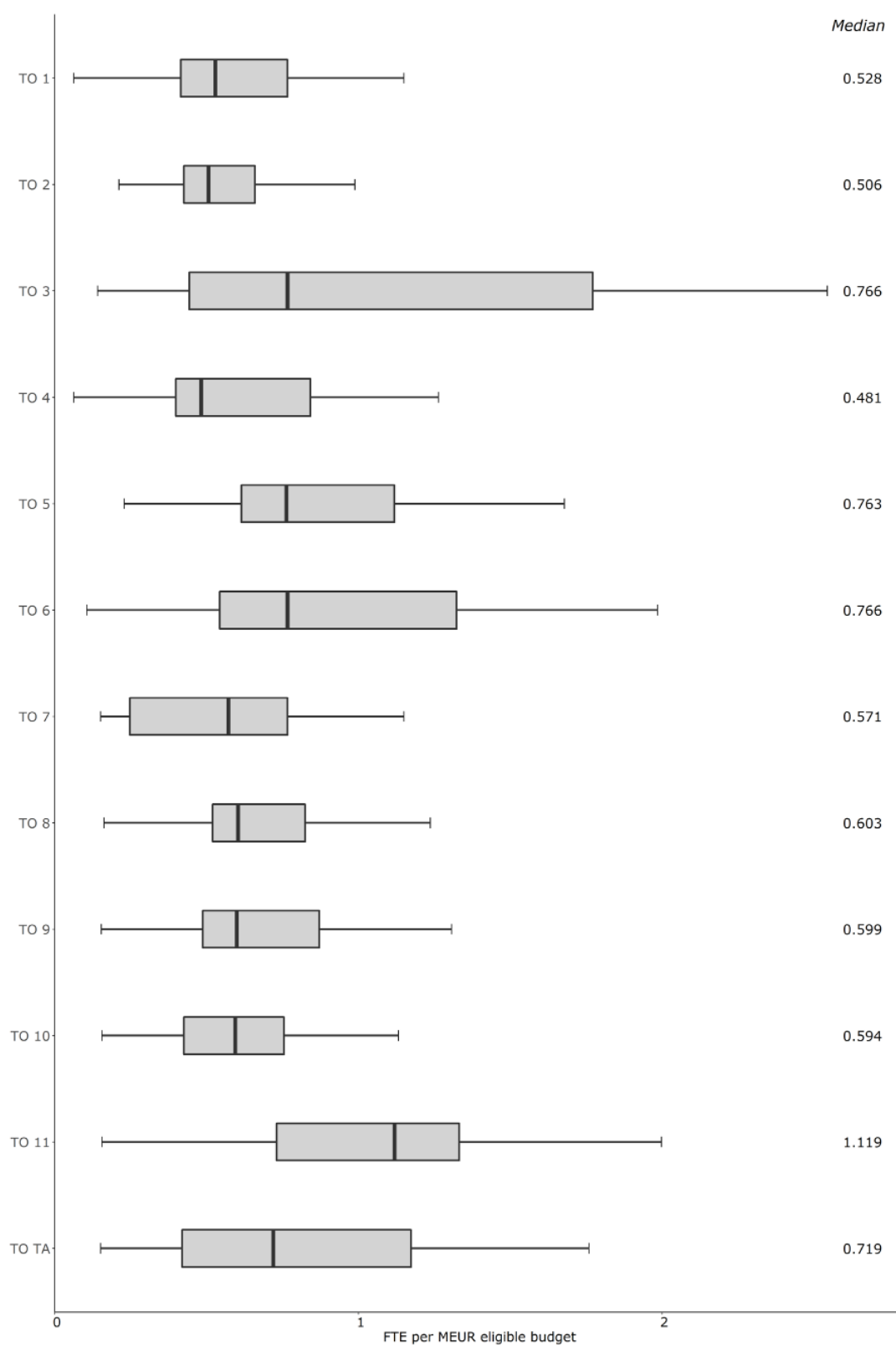
The least workload intensive thematic objectives are:

- TO 4 Supporting the shift towards a low-carbon economy in all sectors;
- TO 2 Enhancing access to, and use and quality of information and communication technologies (ICT);
- TO 1 Strengthening research, technological development and innovation.

The least costly thematic objectives mainly address large scale infrastructure investments (Figure 3.26):

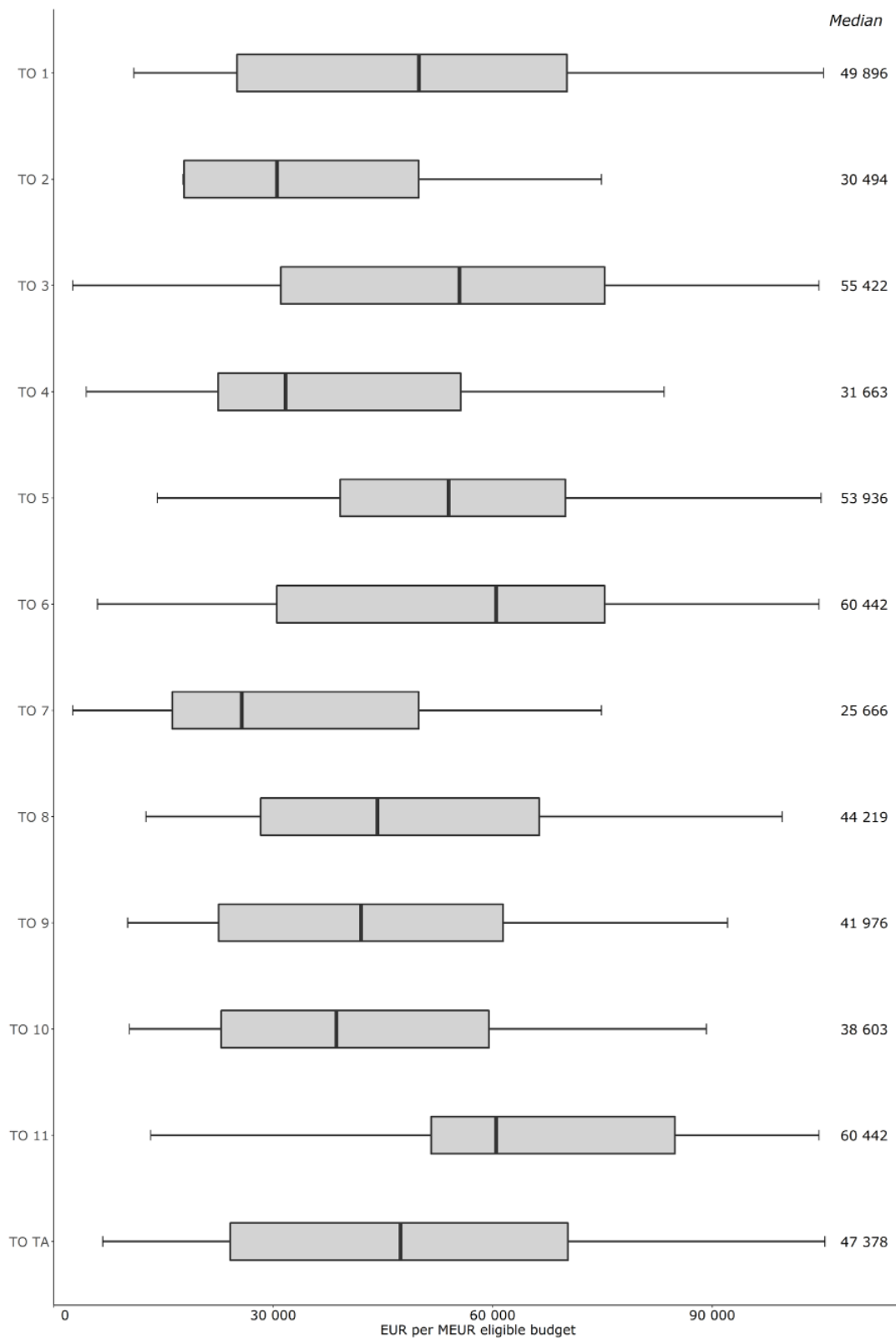
- TO 7 Promoting sustainable transport and removing bottlenecks in key network infrastructures;
- TO 2 Enhancing access to, and use and quality of information and communication technologies (ICT);
- TO 4 Supporting the shift towards a low-carbon economy in all sectors.

**Figure 3.25 Administrative costs in FTE by thematic objective (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.26 Administrative costs in EUR by thematic objective (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Making sense of differences in administrative costs: the example of Croatia

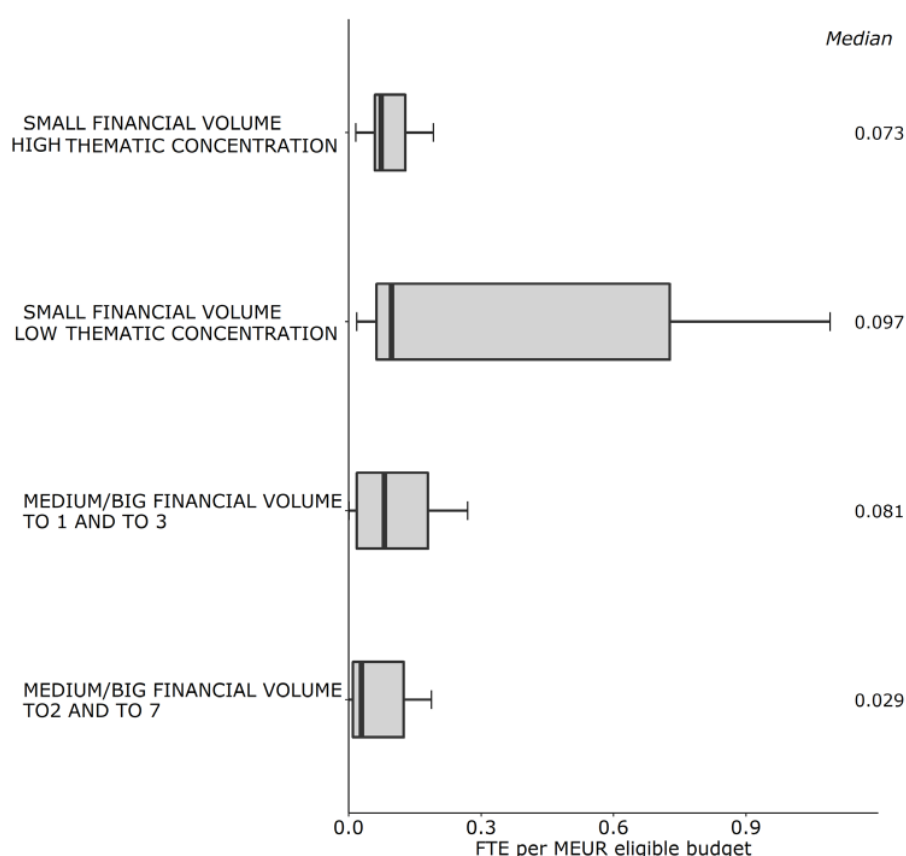
Figures from Croatian Operational Programmes have low levels of FTE per million Euro of eligible funding. There is a peculiar situation in the country: a ban on new hires in public administration meant Croatian programmes had to work with a sub-optimal number of employees for most of the 2014-20 programming period. This has a seemingly positive effect on the FTE figures; however, there was no analysis on programme effectiveness in this study so the actual performance of ESIF management cannot be judged.

### 3.3.5 An emerging programme typology of administrative costs

The various variations of administrative costs together allow for a simple typology of programmes based on their patterns of administrative costs. The main factor for this typology is the financial volume of programmes (see also section 3.3.2). For each of the three classes of programmes based on financial volume different secondary characteristics have been identified.

In the case of financially small programmes, programmes with higher levels of thematic concentration (i.e. maximum three thematic objectives) have lower administrative costs than programmes covering a large number of thematic objectives (i.e. more than six thematic objectives selected).

**Figure 3.27 Administrative costs by types of programmes (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

In the case of financially medium sized programmes, programmes focusing on thematic objectives 1 (Strengthening research, technological development and innovation) and 3 (Enhancing the competitiveness of SMEs) have higher administrative costs than programmes mainly focusing on other thematic objectives. More concretely, the person years are 0.08 FTE per million of EUR programme medium and large programmes

focusing on TO 1 and 3, compared to 0.03 FTE per million of EUR for medium and large programmes focused on TO 7 (Promoting sustainable transport and removing bottlenecks in key network infrastructures) and 2 (Enhancing access to, and use and quality of information and communication technologies).

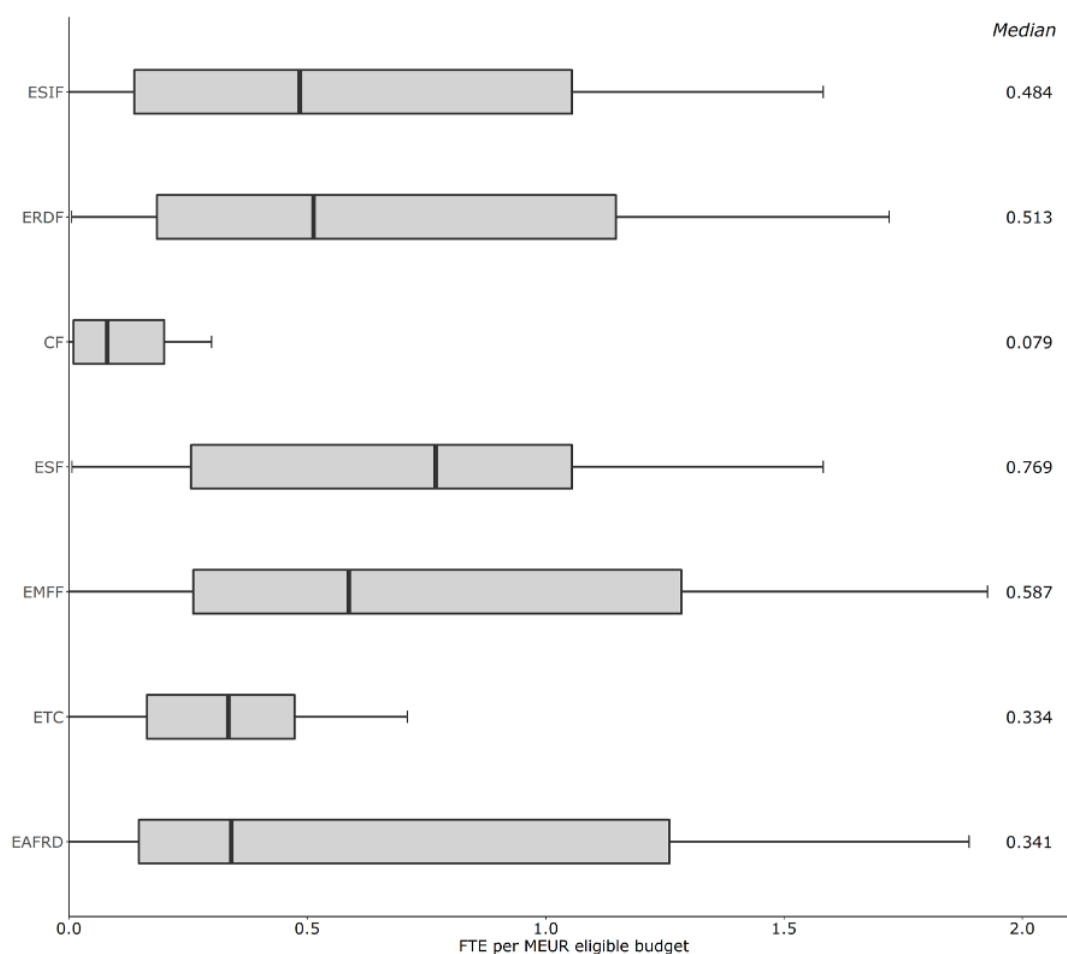
### 3.4 New baselines for administrative burden

This section provides a picture of administrative burden based on a sample as detailed in section 3.4. The figures are based on the sample of 269 beneficiaries from 105 ESIF programmes. As this sample is comparatively small, the figures are to be considered merely indicative. The data presented are not necessarily representative given the large variations in administrative burden between different types of operations. More extensive data collection should be carried out in order to obtain significant results on this topic.

#### 3.4.1 Administrative burden for applications

The estimated administrative burden for applications differs widely between ESI Funds (see figures below). On average, the burden required for preparing a funding application was about one FTE working for half a year per million Euro of eligible project costs. This cost about 19 900 EUR per million Euro of eligible project costs.

**Figure 3.28 Application process - Administrative burden (FTE)**

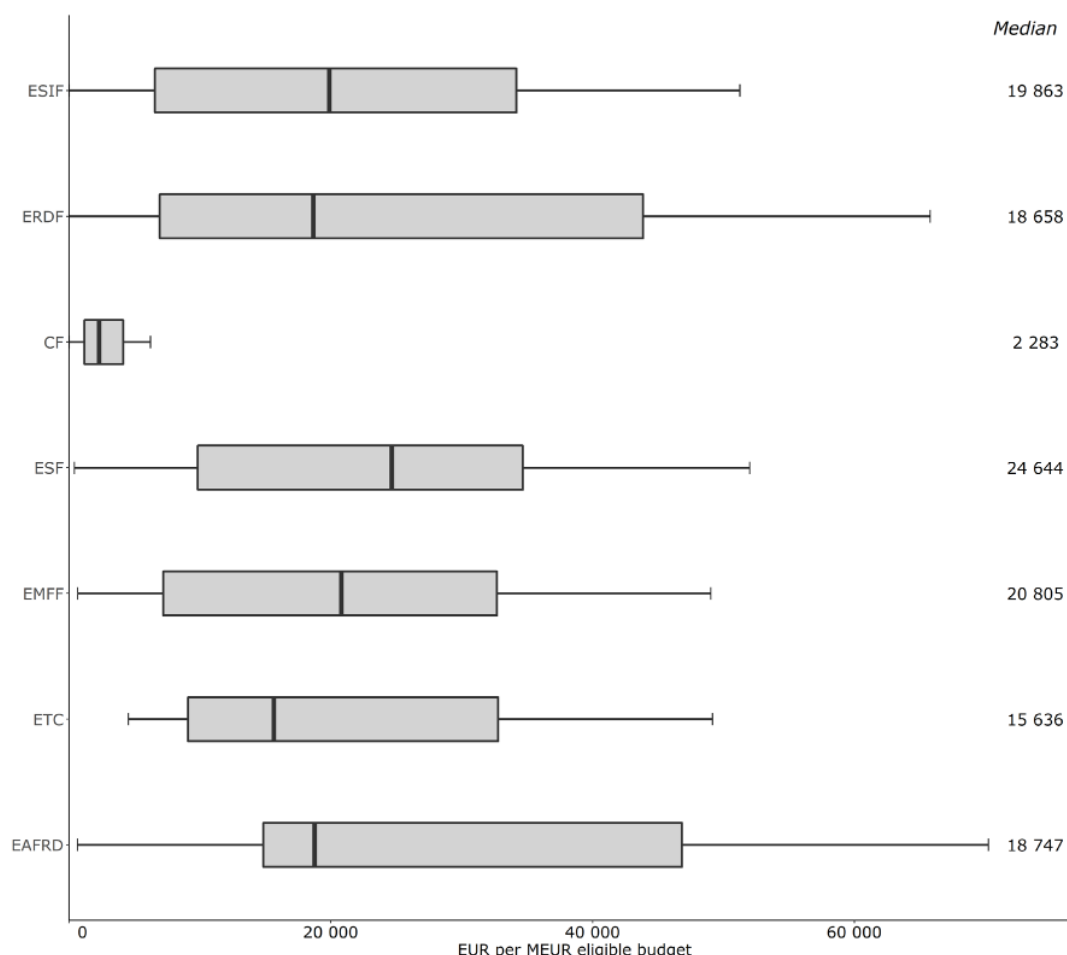


(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

There are however, considerable variations across ESI Fund, with Cohesion Fund by far the lowest. This is followed by Interreg (ETC) at some distance. The most expensive applications are in ESF and EMFF.

Figure 3.28 and Figure 3.29 are based on responses of beneficiaries with successful applications. The figures do not take into account that a fair share of applications do not lead to positive funding decisions.

**Figure 3.29 Application process - Administrative burden (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

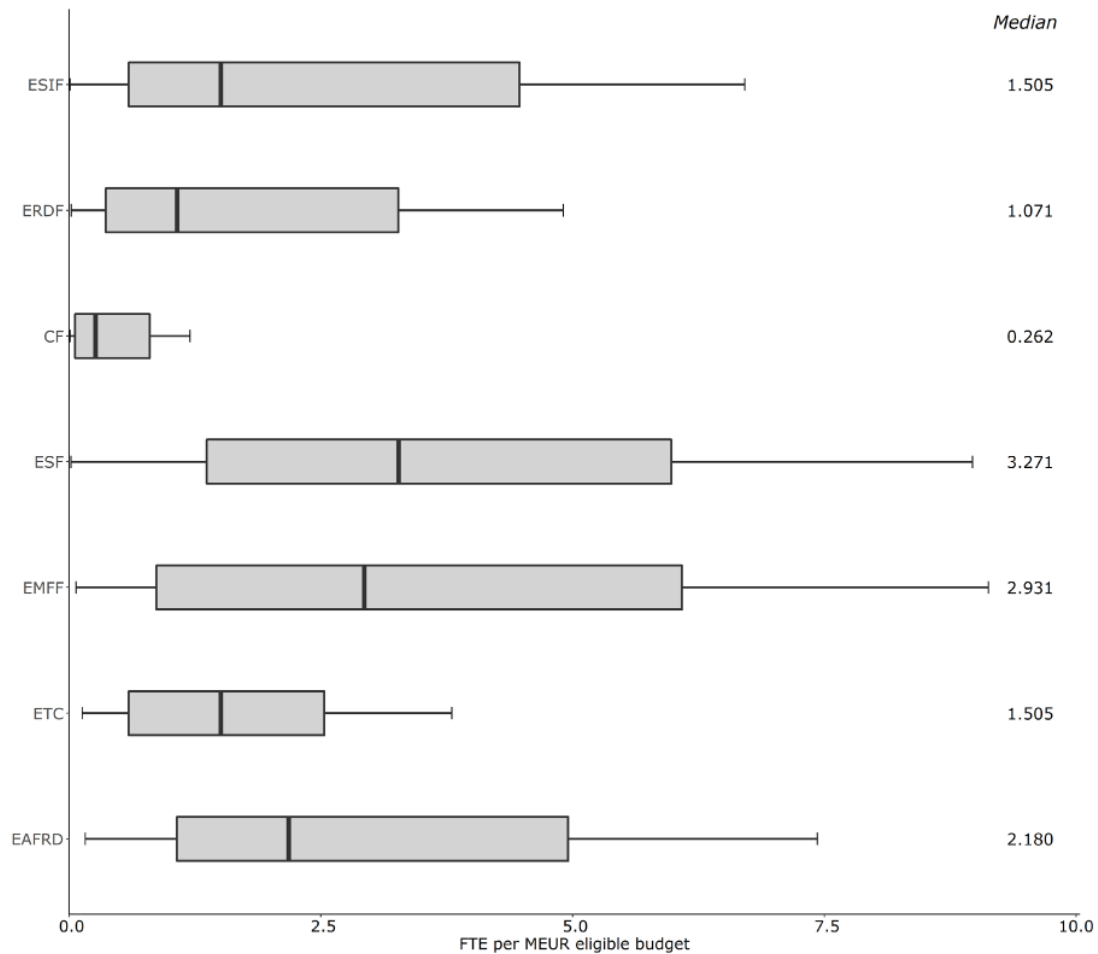
There are also considerable variations when it comes to the share of external costs linked to funding applications. In particular public authorities tend to have rather high external costs, in the case of our sample, about 31% of the total application costs. The assistance by external consultants is less frequent when the applicants are NGOs (here external costs are about 13% of the total application costs), SMEs (7%) and large enterprises (4%).

In general, the application process for financially small and thematically 'easy' projects should be simple and straightforward, so that there is no need for outsourcing – i.e. relying on external support. In particular in cases where NGOs or SMEs applying for small projects outsource application tasks, Managing Authorities might want to check whether their requirements are overly complex and burdensome. Avoiding outsourcing of application tasks may also strengthen applicants' ownership of the project.

### 3.4.2 Administrative burden for project management

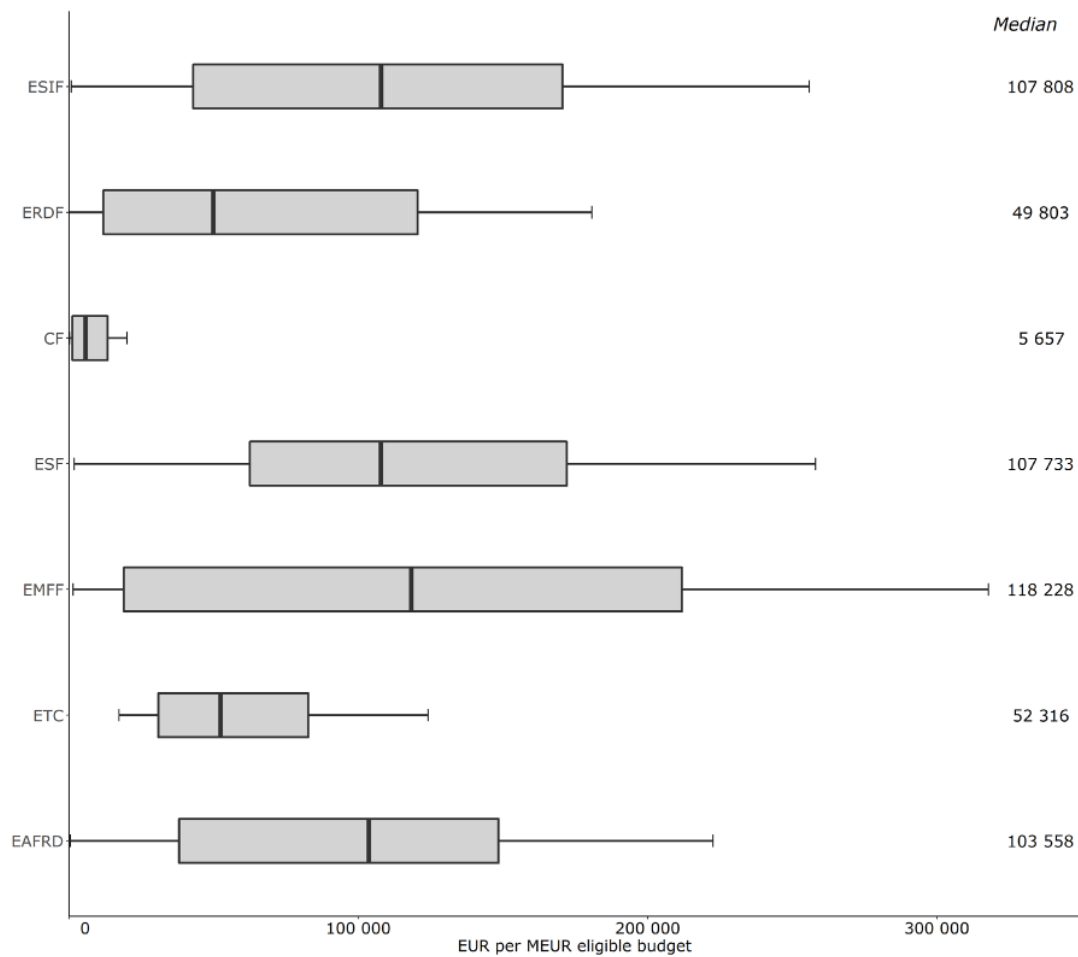
The overall administrative burden for actions which have received funding were about 107 800 EUR or 1.5 FTE per million Euro of eligible project costs. There are considerable differences between funds, following the same general pattern as applications. CF has by far the lowest administrative burden, followed by ERDF and Interreg (ETC). ESF, EMFF and EAFRD have the highest administrative burden (see Figure 3.30 and Figure 3.31).

**Figure 3.30 Project management – administration burden of the sample (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.31 Project management – administration burden of the sample (EUR)**



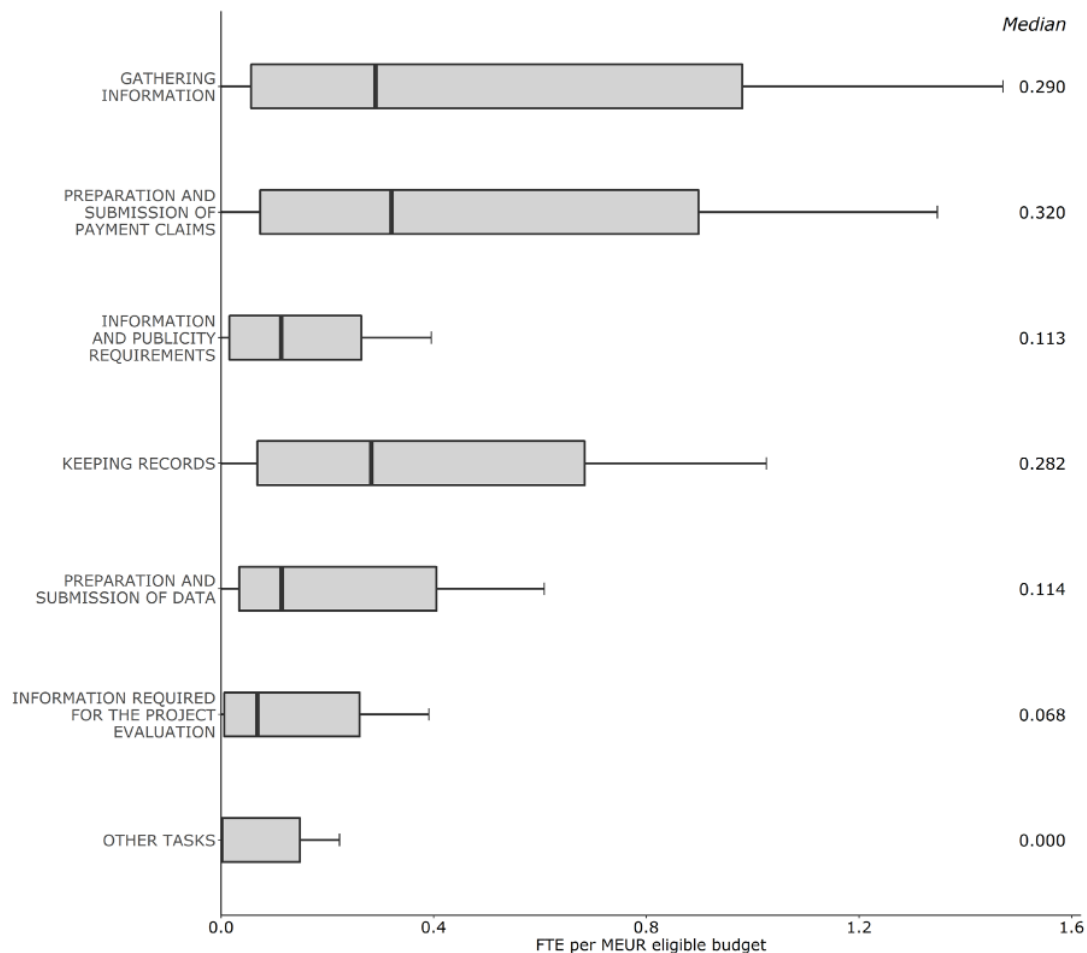
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Considering all ESIF**, the tasks with the highest administrative burden are:

1. **Reporting.** Gathering information on the progress and results of the project (including financial information and indicator data) and submission of that information to the authorities (monitoring and reporting).
2. **Keeping records** (including accounting) and proof of all transactions and actions.
3. **Payment claims.** Preparing and submitting a payment claim, with supporting documents (financial management).

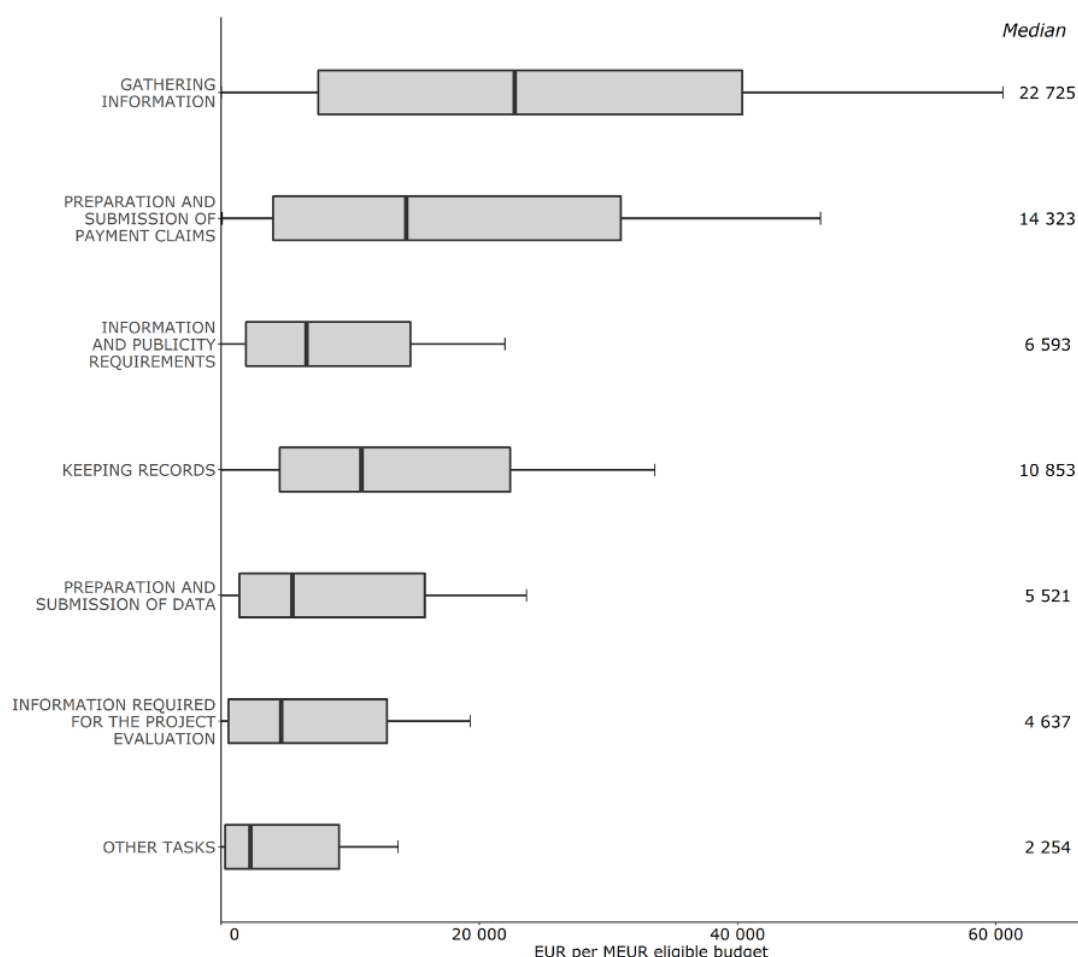
At a more qualitative level, various beneficiaries indicated that they face relatively high burden for reporting due to the level of detail asked for by programme authorities, and they would welcome a stronger focus on SCOs.

**Figure 3.32 ESIF Administrative burden by task (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.33 ESIF Administrative burden by task (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**ERDF** beneficiaries consider reporting (gathering information on the progress and results of the project and submitting that information to the authorities) as the most burdensome task in terms of workload. In monetary terms, the most burdensome tasks relate to preparing and submitting data to the Managing Authority (i.e. payment claims and other information).

**CF** beneficiaries experience reporting (gathering information on the progress and results of the project and submitting that information to the authorities) as the most burdensome task followed by preparing payment claims.

**ESF** beneficiaries consider reporting as most burdensome task, followed by keeping records. In third place comes providing information for evaluations, including participant-related data collection.

**EAFRD** beneficiaries report preparing and submitting payment claims as the most burdensome task, followed by keeping records.

**EMFF** beneficiaries point at preparing payment claims as the most burdensome task. This is followed by keeping records and gathering information.

**Interreg** (ETC) beneficiaries point at gathering information on the progress and results of the project as the most burdensome task. This is followed by keeping records and preparing payment claims.

### 3.4.3 Understanding variations in administrative burden

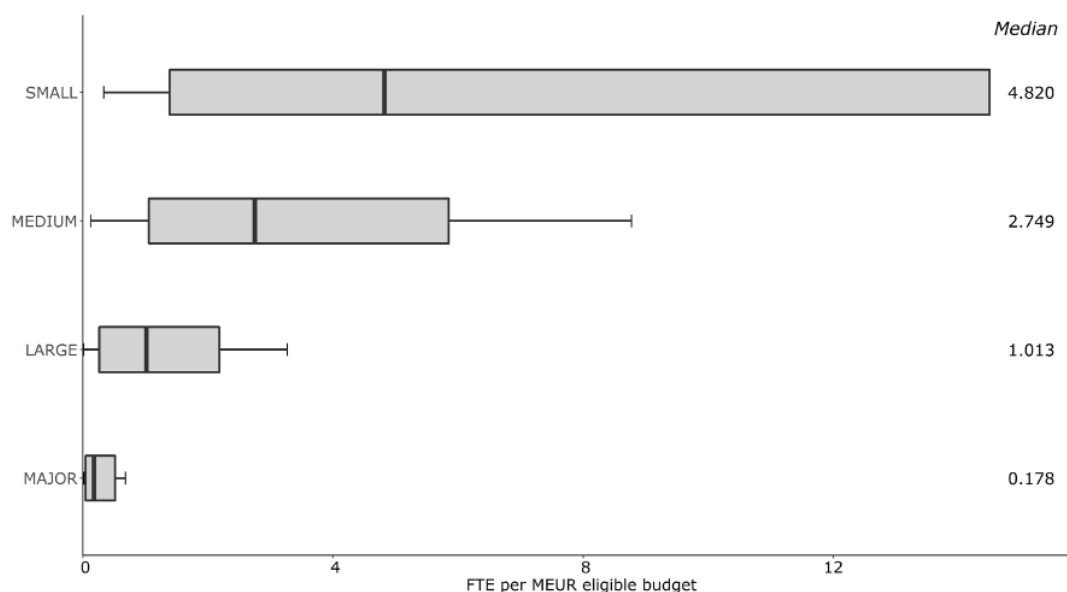
Differences between the actions financed and the types of beneficiaries need to be taken into consideration to provide a better interpretation of the overall administrative workload and burden of ESIF financed actions. In particular, differences in financial volume, thematic focus, experience of beneficiaries and the geographical area covered by the action influence the levels of administrative burden.

#### Administrative burden by an action's financial volume

Every action financed by ESIF requires standard administrative tasks which is why actions with larger financial volumes usually have relatively lower administrative burden (as share of the eligible budget). In addition, many larger actions address investments or large scale activities which more often can make use of SCOs and require less reporting than small scale soft action.

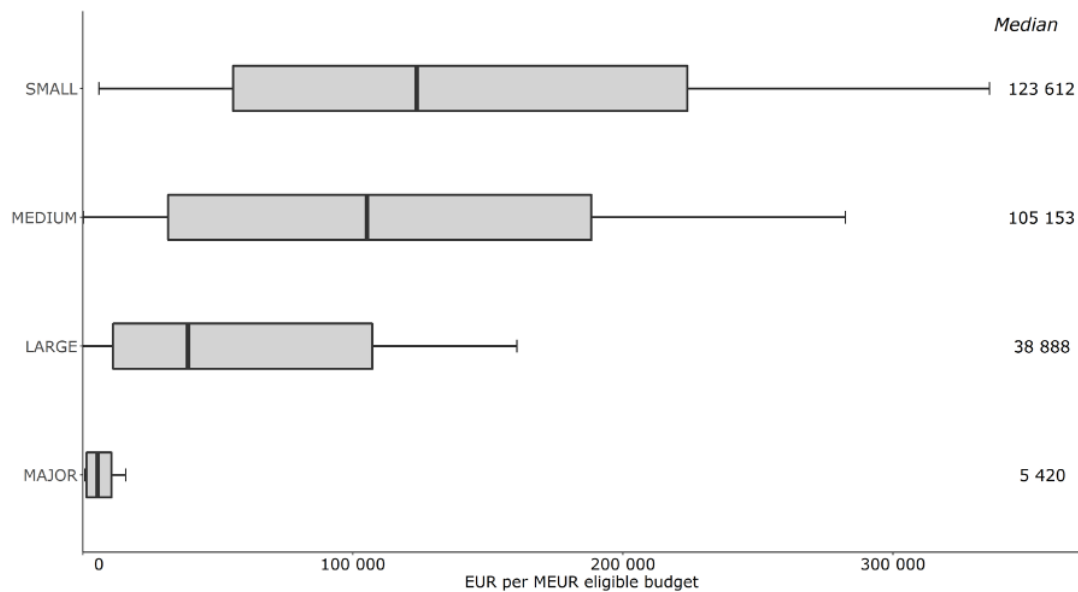
Figure 3.34 and Figure 3.35 show that major projects have by far the lowest share of administrative burden, followed by large projects. The highest levels of administrative burden are clearly for beneficiaries handling small volume actions.

**Figure 3.34 Administrative burden by an action's financial volume (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.35 Administrative burden by an action's financial volume (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Administrative burden by thematic focus

The administrative burden also depends on the complexity and type of activities. As with administrative costs, the more complex an action or smaller the scale, the higher the administrative burden.

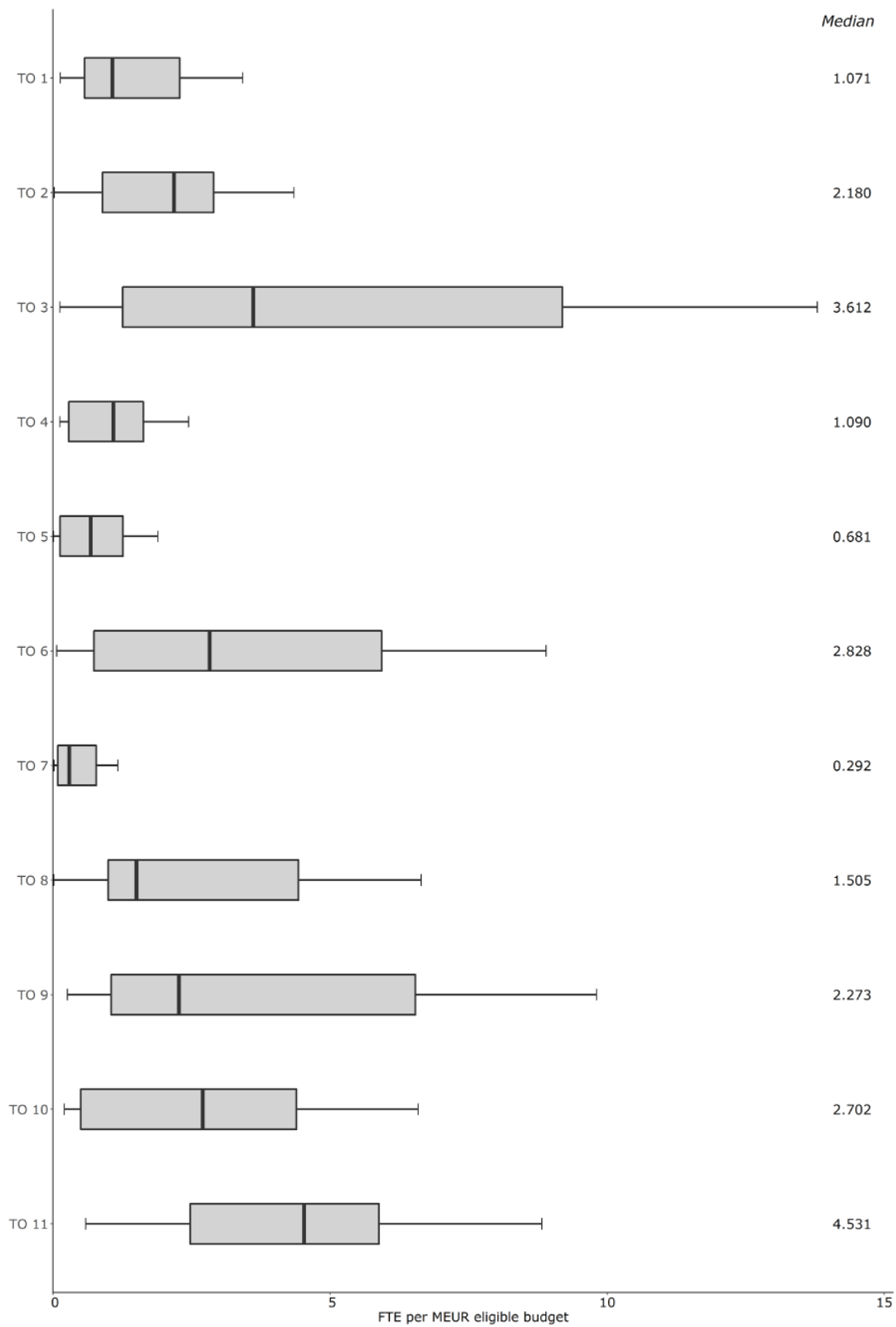
In terms of workload (FTE) the highest burden per million Euro of eligible project funding is for:

- TO 11 Enhancing institutional capacity of public authorities and stakeholders and efficient public administration;
- TO 3 Enhancing the competitiveness of small and medium-sized enterprises (SMEs);
- TO 6 Preserving and protecting the environment and promoting resource efficiency.

In monetary terms (EUR per million Euro of eligible project funding), the highest administrative burden is for:

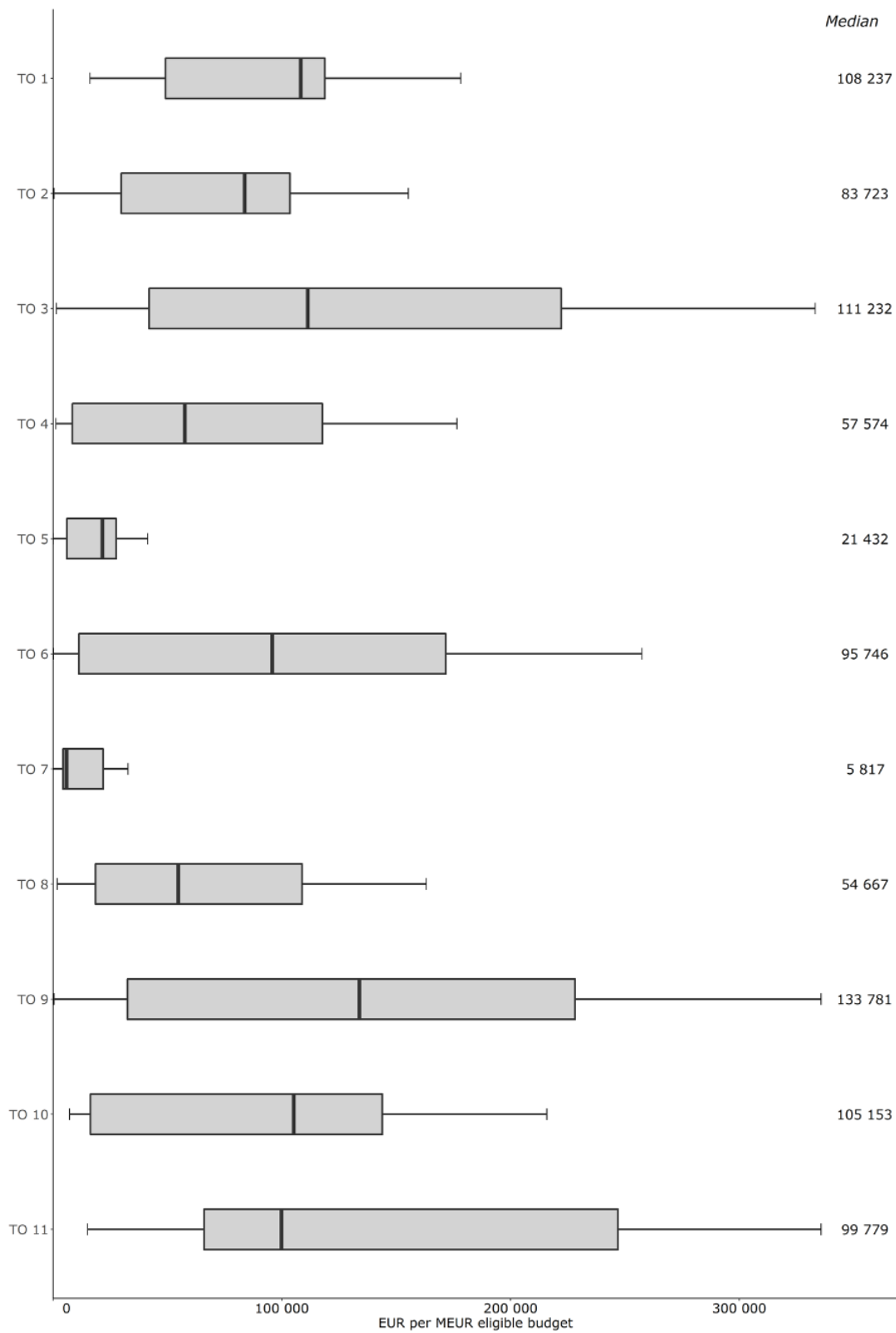
- TO 9 Promoting social inclusion, combating poverty and any discrimination;
- TO 3 Enhancing the competitiveness of small and medium-sized enterprises (SMEs);
- TO 1 Strengthening research, technological development and innovation.

**Figure 3.36 Administrative burden by thematic focus (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.37 Administrative burden by thematic focus (EUR)**



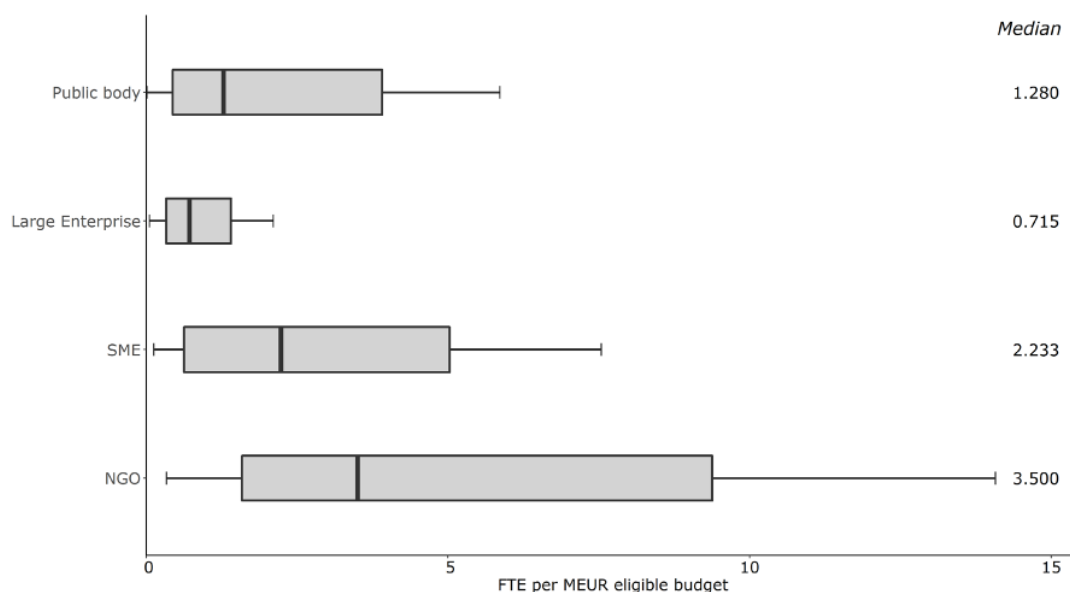
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Administrative burden by type of beneficiary

The administrative burden varies also by the type of beneficiary, as some types of organisations are better equipped to comply with the administrative requirements of ESIF financing. Large enterprises (i.e. enterprises with more than 250 employees) already have detailed accounting and reporting mechanisms as well as dedicated staff. Thus, the administrative requirements related to ESIF financing are not especially new and can be largely handled within existing administrative routines. On the other hand, many NGOs experience ESIF financing as particularly burdensome since the accounting and reporting requirements imply additional administrative procedures. Furthermore, NGOs are often involved in actions with small financial volumes, where the relative administrative burden is high anyway (see below).

Whether a beneficiary has previous experience of ESIF financing or not does not seem to impact on the administrative burden. One reason could be that, due to extensive regulatory changes between each programming period, beneficiaries cannot exploit economies of learning (see Figure 3.40 and Figure 3.41).

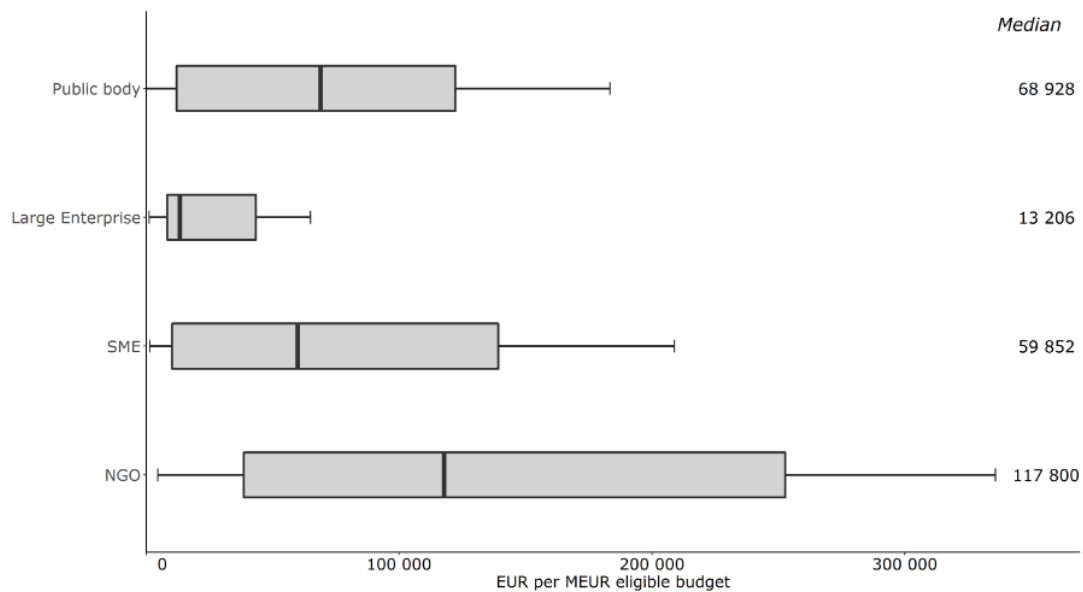
**Figure 3.38 Administrative burden by type of beneficiary (FTE)<sup>12</sup>**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

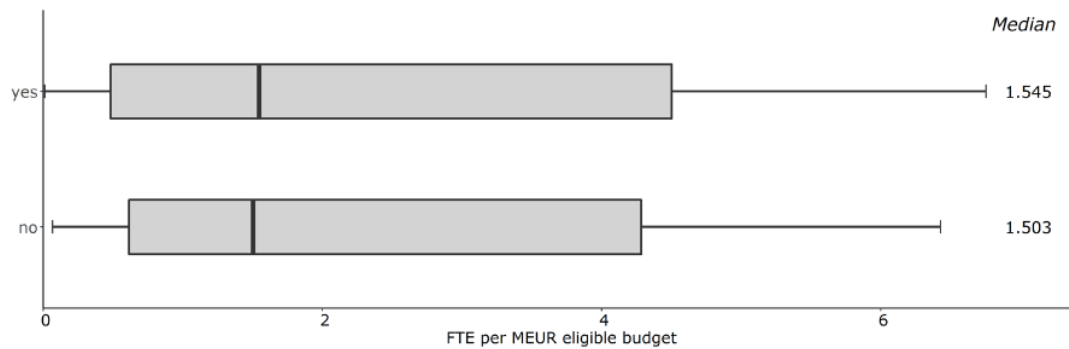
<sup>12</sup> Examples of the cases representing the highest values found in the tail of the NGO category are: a project under TO 11 with a very small financial package and an EMFF project under TO 3. As discussed, projects with small financial packages, EMFF projects, and projects under certain TOs (TO 3 is the second highest in terms of administrative burden, and TO 11 also presents relatively high values), and projects run by NGOs are all associated with relatively higher degrees of administrative burden. The combination of these features can explain these extreme values.

**Figure 3.39 Administrative burden by type of beneficiary (EUR)**



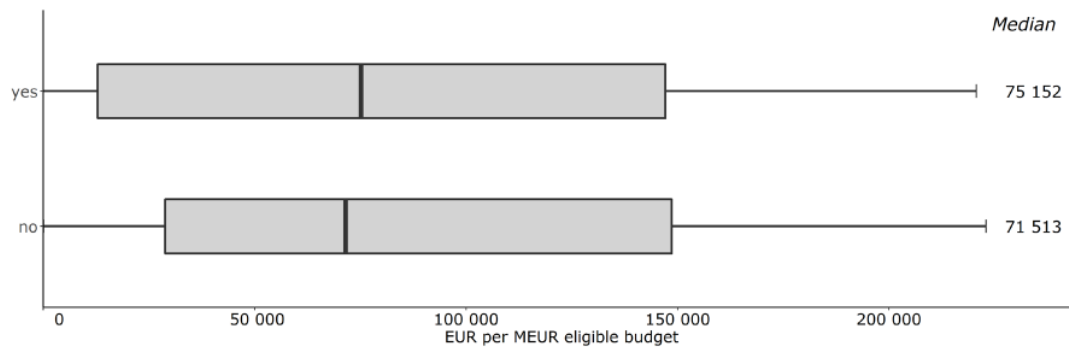
(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.40 Administrative burden by experience of beneficiary (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.41 Administrative burden by experience of beneficiary (EUR)**

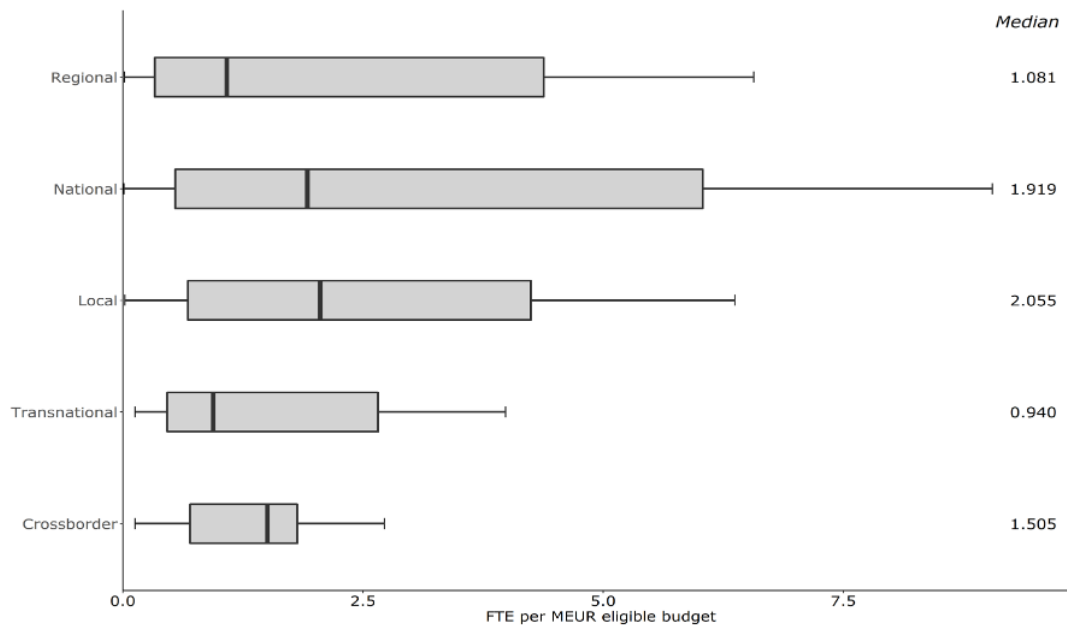


(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Administrative burden by project geography

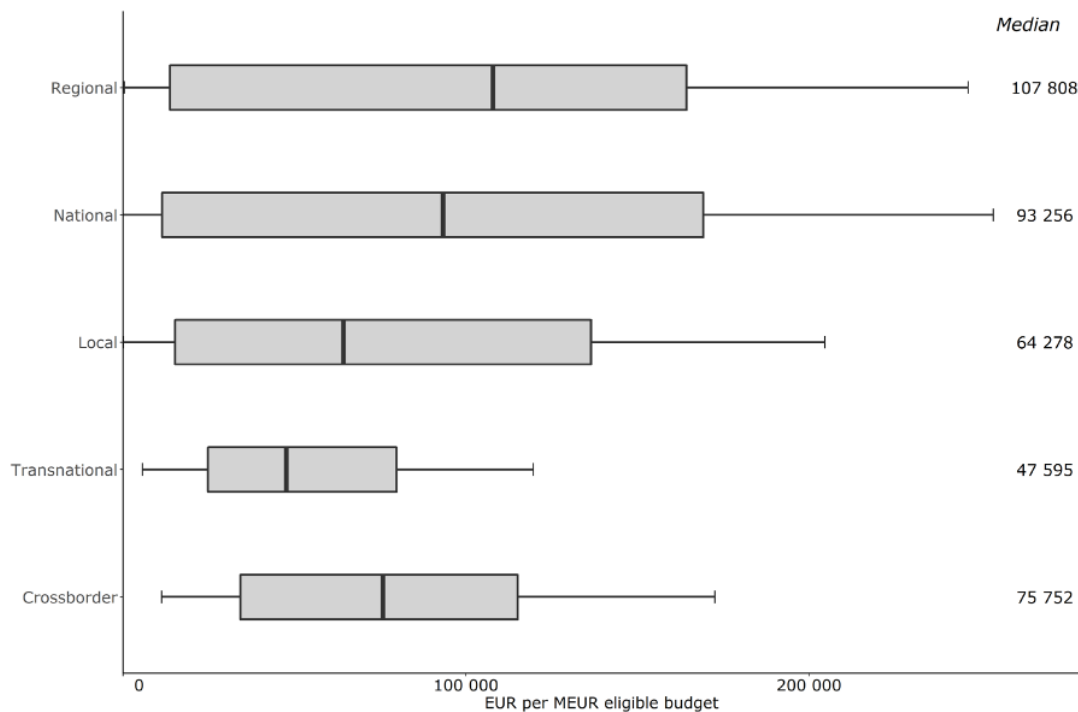
As with administrative costs, the administrative burden is affected by the geography of the funded action. The share of administrative burden falls the larger the geographical area (see Figure 3.43). However, Figure 3.42 shows that regional actions have slightly lower administrative burden workloads than national ones.

**Figure 3.42 Administrative burden by project geography (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

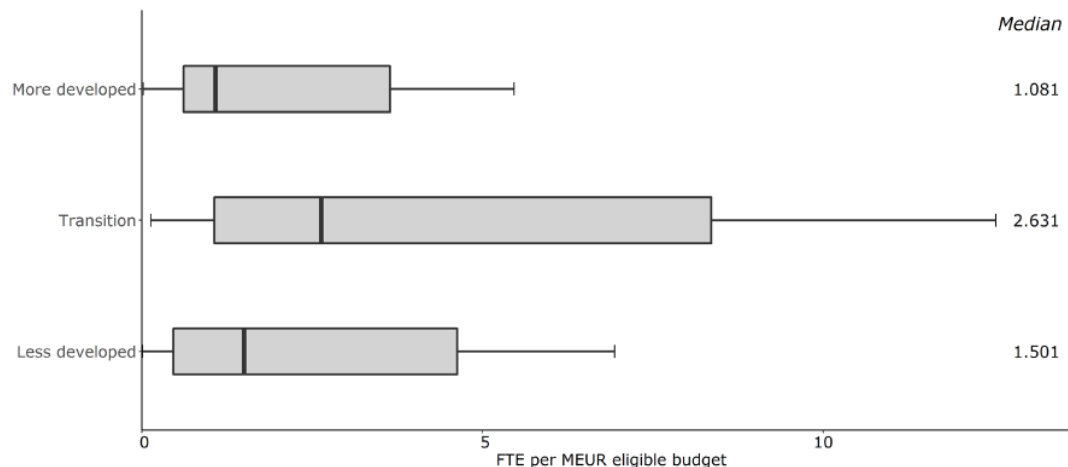
**Figure 3.43 Administrative burden by project geography (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

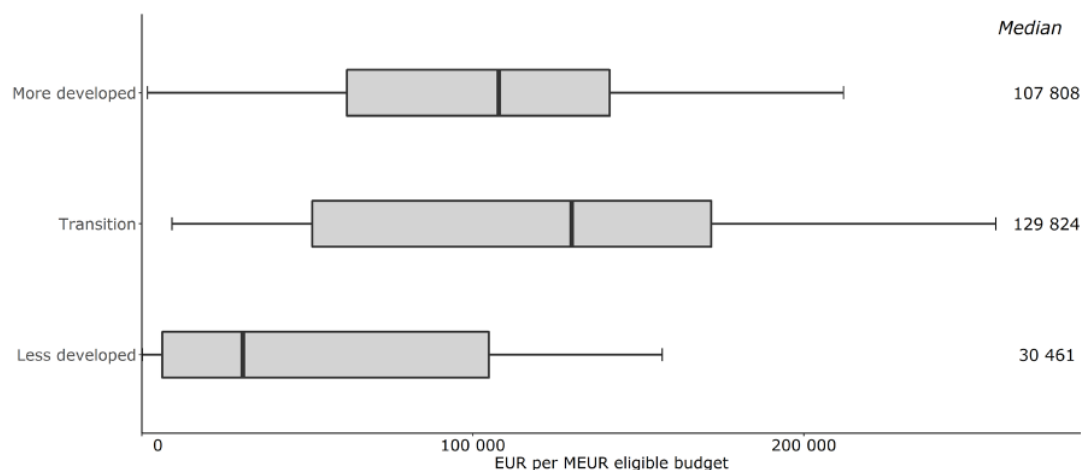
Applying the regional typology used for Cohesion Policy, FTE are generally similar for less developed and more developed regions, but the difference in monetary terms is substantial, with burdens significantly lower for actions in less developed regions (see Figure 3.44 and Figure 3.45). This pattern may be related to differences in salary levels.

**Figure 3.44 Administrative burden by type of region (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.45 Administrative burden by type of region (EUR)**

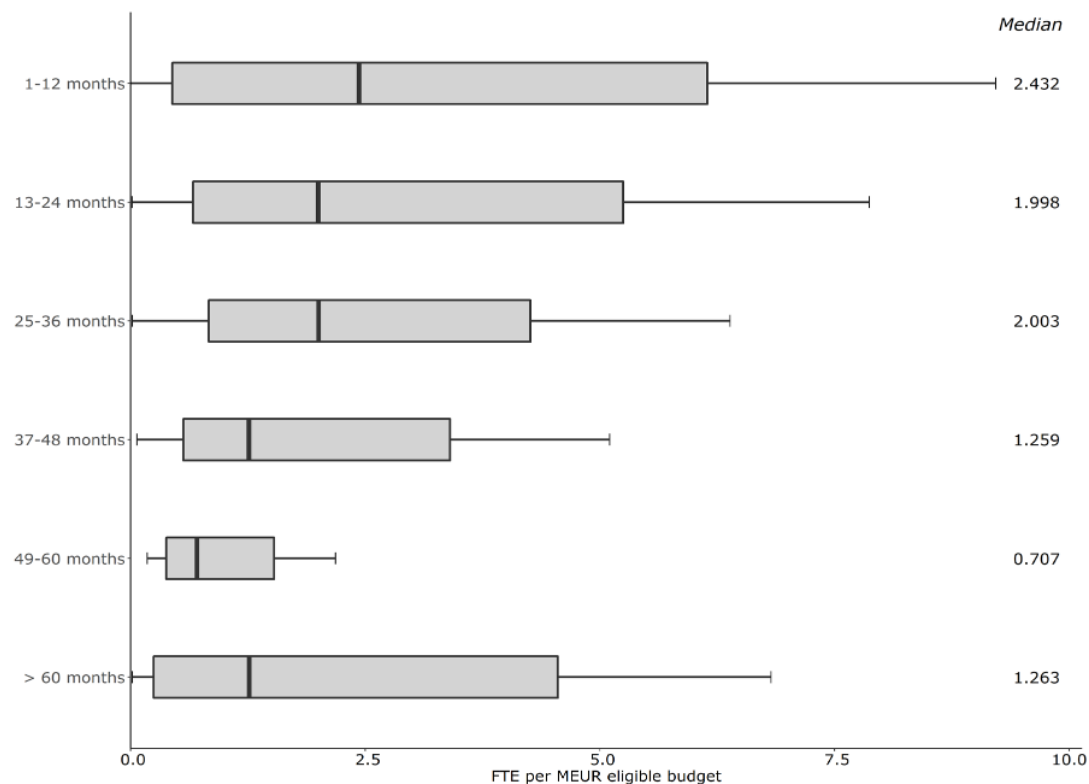


(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Administrative burden by project duration

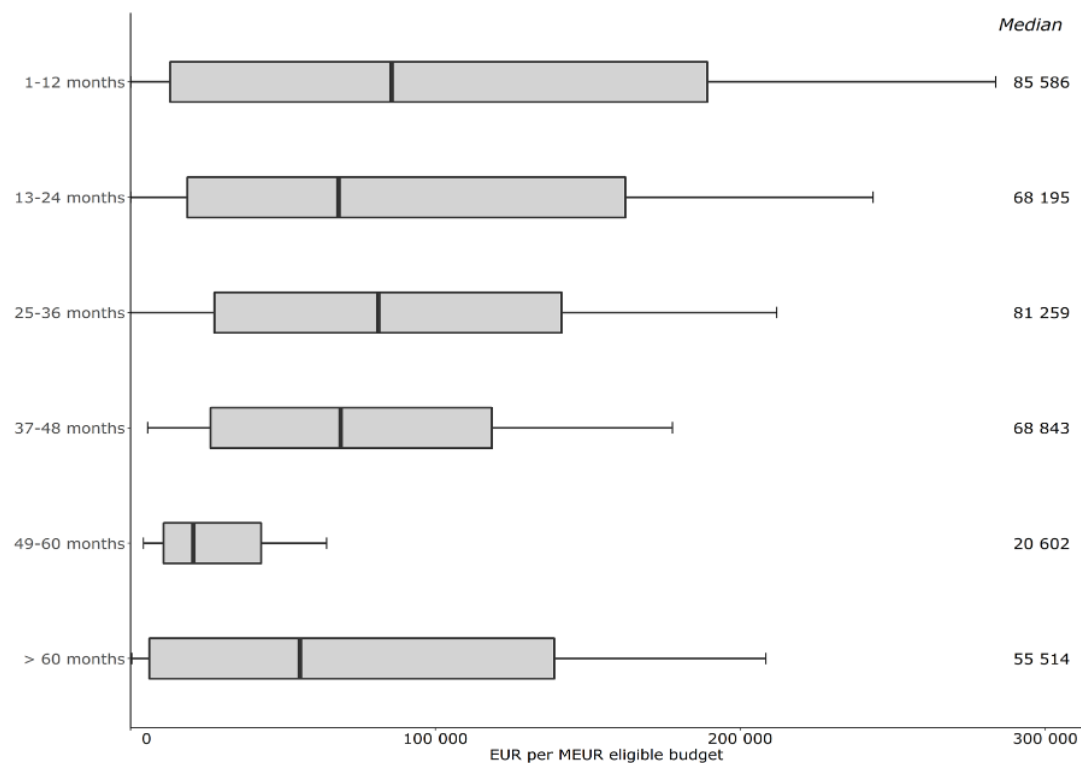
The administrative burden is to a certain degree also related to the duration of a project, i.e. how many months will it take. As a rule of thumb, the longer the duration, the smaller the administrative burden. However, once an activity lasts longer than 60 months, the administrative burden increases again. This effect is likely to be linked to the additional requirements for larger projects.

**Figure 3.46 Administrative burden by project duration (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 3.47 Administrative burden by project duration (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## 4 COMPARING NEW AND OLD BASELINES

The newly established baselines have been compared to previous baselines. A comparison of baselines for administrative costs between the current and previous studies have only been possible for ERDF-CF and ESF. Following the criteria in the methodology (section 2.3) a meaningful comparison between EAFRD and EMFF baselines are not possible due to large differences in methodology, data collection and focus.

This chapter therefore compares baselines on administrative costs collected in the context of the current study:

- for ERDF-CF, with baselines for the 2007-2013 period collected by SWECO in 2010;
- for ESF, with baselines for the 2007-2013 period collected by EPEC/COWI in 2012.

All these studies adopt the same definition of administrative costs. However, the approach towards data collection and data analysis differs slightly this new study.

While the data sample in this study and in SWECO 2010 are comparable (i.e. approximately half the ERDF-CF authorities are involved in the study), the sample in EPEC/COWI 2012 is based on 12 Operational Programmes in seven Member States.

Differences in data analysis include the following.

- ERDF-CF baselines estimated in SWECO in 2010 aggregate administrative costs for ERDF, CF and ETC in a unique set of baselines. To allow comparison, baselines for ERDF, CF and ETC in this study have also been aggregated.
- EPEC/COWI 2012 provides figures on administrative costs for each function as FTE per million EUR of ESF. However, these figures do not include national co-financing. To enable comparisons, all figures have been recalculated based on the total ESF budget, including national co-financing, of the 12 programmes in the 2012 study.
- EPEC/COWI 2012 does not provide figures on the costs per million EUR of ESF (including national co-financing). To allow comparison with this study, the total EUR costs per function in EPEC/COWI 2012 were converted into EUR costs per million EUR of ESF (including national co-financing) by referring to the total ESF budget of the 12 Operational Programmes in the 2012 study.
- Costs related to national coordination are excluded from the comparisons. For SWECO 2010 and EPEC/COWI 2012, the costs for national coordination refer to the costs related to national coordination of ERDF-CF and ESF while in the current study the costs for national coordination cover all ESIF.

For administrative burden, baselines in this study are compared to ERDF-CF baselines collected in 2012, which are consistent to the approach in this new study.

Data on administrative burden provided by EPEC/COWI 2012 are not used due to the limited responses to the beneficiary survey, meaning that ESF baselines for 2007-2013 were based on answers from beneficiaries of only 4 Operational Programmes (against 103 Operational Programmes considered in this study).

For administrative burden, using reference samples to fill data gaps challenges comparability. Baselines on administrative burden have to be calculated based on a sample due the very large number of beneficiaries. While baselines for administrative costs are based on information provided by a large proportion of the administrations involved in implementing ESI funds, information on beneficiaries only covers a small part. This concerns both the current and the previous study on the 2007-2013 period (i.e. SWECO-t33 2012).

## 4.1 Comparison of ERDF-CF administrative costs over time

The relative administrative costs for ERDF, CF and ETC have fallen, as shown in Table 4.1. To make figures comparable this table aggregates administrative costs for ERDF, CF, and ERDF-ETC in the 2014-2020 period. The disaggregated figures are in Table 4.2.

Comparing figures across programming periods shows that the average monetary costs for Managing Authorities went from around 25 000 euros to 18 000 euros. It is however important to note that these averages reflect an extremely diverse situation (as is evident from the average costs for ETC programme MAs).

**Table 4.1 ERDF-CF: Comparison of administrative costs between periods<sup>13</sup>**

	ERDF-CF			
	2007-2013		2014-2020 (current study)	
	FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR
Programme preparation	0.01	€ 950	0.02	€ 990
Managing Authorities	0.35	€ 24 900	0.42	€ 18 350
Certifying Authorities	0.03	€ 1 500	0.04	€ 1 560
Audit Authorities	0.04	€ 2 700	0.05	€ 2 600
Total	0.43	€ 30 050	0.53	€ 23 500

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Table 4.2 ERDF, CF, ERDF-ETC: Administrative costs 2014-2020**

	ERDF		CF		ERDF-ETC	
	2014-2020 (current study)					
	FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR
Programme preparation	0.02	€ 1 000	0.02	€ 800	0.07	€ 2 200
Managing Authorities	0.44	€ 18 100	0.33	€ 14 400	0.56	€ 50 400
Certifying Authorities	0.04	€ 1 200	0.04	€ 2 000	0.11	€ 6 000
Audit Authorities	0.05	€ 2 700	0.04	€ 1 500	0.10	€ 8 100
Total	0.55	€ 23 000	0.43	€ 18 700	0.84	€ 66 700

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

The decrease in monetary costs does not, however, reflect a reduction in workload. This could be due to a general reduction of external costs (for example the use of external consultants or investment in e-cohesion solutions) which could have increased the workload for staff within the administrations.

The following tables focus on the most significant tasks for overall costs. These highlight the variations in the tables above and verify how much the simplifications and changes

<sup>13</sup> In all tables in this section, costs are reported in ratios of Euros spent in administration per million Euro, and are therefore comparable across the two programming periods without the need to adjust for inflation. Both the figures for 2007-2013 and for 2014-2020 are calculated with reference to current prices at the time of the writing of each study.

introduced in the 2014-2020 period have reduced the costs related to tasks that are perceived as the most burdensome by the Managing Authorities.

Table 4.3 compares administrative costs over the two programming periods for:

- information and communication activities;
- selection of operations and information to beneficiaries;
- administrative verifications for each application for reimbursement by beneficiaries;
- monitoring and evaluations during the programming period;
- audit of operations.

**Table 4.3 ERDF-CF: Comparison of administrative costs for selected tasks**

		ERDF-CF			
		2007-2013		2014-2020	
		FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR
MA	Information and communication activities	0.02	€ 1 900	0.02	€ 1 270
MA	Selection of operations and information to beneficiaries	0.05	€ 2 500	0.06	€ 3 160
MA	Administrative verifications for each application for reimbursement by beneficiaries	0.05	€ 2 700	0.04	€ 1 710
MA	Monitoring and evaluations during the programming period	0.04	€ 2 900	0.02	€ 1 020
AA	Audit of operations	0.01	€ 980	0.02	€ 940

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

The overall reduction of Managing Authority ERDF-CF costs (in monetary terms) seems to be mainly related to decreased costs for: (i) monitoring and evaluation; (ii) verifications of the reimbursement claims; (ii) information and communication activities.

In particular, it is interesting to note that more attention on monitoring and evaluation has not led to an increase in administration costs. On the contrary, despite new obligations and tools, overall costs of monitoring and evaluations have decreased. This suggests that tools from the EC (e.g. common indicators, System for Fund Management, guidance on monitoring and evaluation, etc.) were effective in guiding the work of Managing Authorities.

Information and communication activities saw a slight reduction of monetary costs, probably due to lower external costs for information and communication campaigns (i.e. the level of workload is stable over the two programming periods).

On the contrary, more focus on the project results have increased costs related to the selection of operations.

Finally, simplifications introduced in 2014-2020, such as SCOs, seem to have reduced the costs for verifications of payment claims.

## 4.2 Comparison of ESF administrative costs over time

For ESF, overall administrative costs and workload have decreased (see Table 4.4). In particular, as with ERDF, there is a reduction in management costs which seems to indicate a tendency to align with ERDF workload and which can be interpreted as a consequence of greater harmonisation between funds.

The decrease in management costs is however partly compensated by a general increase in the audit and certifying activities. This could be a consequence of the increased focus on results which has also led to more investment in control mechanisms.

**Table 4.4 ESF: Comparison of administrative costs over time**

	ESF			
	2007-2013		2014-2020 (current study)	
	FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR
Programme preparations	0.03	€ 1 110	0.02	€ 1 200
Managing Authorities	0.72	€ 27 800	0.56	€ 22 200
Certifying Authorities	0.01	€ 430	0.04	€ 700
Audit Authorities	0.03	€ 1 180	0.06	€ 3 500
Total	0.79	€ 30 520	0.68	€ 27 600

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Table 4.5 ESF: Comparison of administrative costs for selected tasks**

		ESF			
		2007-2013		2014-2020	
		FTE/MEUR	EUR/MEUR	FTE/MEUR	EUR/MEUR
MA	Information and communication activities	0.21	€ 6 100	0.03	€ 1 400
MA	Selection of operations and information to beneficiaries	0.04	€ 1 800	0.07	€ 2 400
MA	Administrative verifications for each application for reimbursement by beneficiaries	0.07	€ 3 400	0.08	€ 2 400
MA	Monitoring and evaluations during the programming period	0.05	€ 2 200	0.03	€ 1 600
AA	Audit of operations	0.01	€ 460	0.03	€ 1 400

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

As with ERDF-CF, the increased attention given to monitoring and evaluation has not led to an increase in administrative costs. On the contrary, despite new obligations and tools, the overall costs of monitoring and evaluations have decreased. This seems to suggest that also for ESF the tools from the European Commission (e.g. common indicators, SFC, guidance on monitoring and evaluation, etc.) were effective in guiding the work of Managing Authorities.

Similarly, the simplifications introduced in 2014-2020 (in particular the extended use of SCOs under ESF) seem to have reduced the costs of administrative verifications of payment claims.

Benefits at the level of Managing Authority are compensated by the significant increase in costs at Audit Authority level. In particular, costs for auditing operations has tripled, which suggests that some of the control workload has moved from Managing Authorities (see reduction of costs for verifying the payments claims) to Audit Authorities.

### 4.3 Comparing administrative burden for ERDF-CF over time

To establish baselines for administrative burden for ERDF-CF in the 2007-2013 period 132 beneficiaries were interviewed in 2012, with operations referring to 22 Operational Programmes and 10 different countries. Overall administrative burden at the EU level was weighted for each priority as a share of the ERDF/CF contribution. This was then applied to the European distribution of ERDF / CF contribution by priority theme to obtain EU-wide figures. The total burden at EU-level was about 2% of the total ERDF / CF contribution (i.e. estimated at about 5.4 EUR billion). The 2012 study highlights

significant differences at the level of priorities, in particular a significantly lower weighted average burden is noted for transport. During the data collection exercise, experts considered six different tasks:

- monitoring and reporting on progress
- financial management including submitting payment claims
- publicity including labelling
- keeping records (including accounting)
- proof/verification of deliverables and compliance (responding to audit and management controls)
- evaluation.

Within the project administration activities, financial management and monitoring were considered the greatest burden, with about 28% each, while publicity requirements, record keeping, and verification/audits involved a lower workload for the beneficiaries (9 to 14%).

The approach to calculating baselines for 2014-2020 is different from the approach in 2012. In particular, administrative burden at EU level is calculated as a share of the total budget of the projects in the sample, but these values are not applied to the overall EU distribution of ESIF to obtain EU-wide figures. So, the baselines are calculated on the basis of data from beneficiaries interviewed without standardising this sample on the general characteristics of EU level beneficiaries, as agreed with the European Commission. The objective is twofold, to avoid further manipulation of data from the reference sample and to highlight the characteristics and limits of the sample that quantifies the baselines.

Moreover, it is important to note that, although the number of surveyed projects more than doubled since the 2012 study, the size remains very small. Composition of the samples, despite efforts to cover as many different features, TOs and countries as possible, suffers from important gaps, so the results of the two studies are heavily influenced by the different compositions of the two samples. Any comparison would therefore be only indicative.

Keeping these premises in mind, as detailed above, for ERDF, CF and ETC the baselines on administrative burdens for the 2014-2020 period are estimated at approximately 3% (i.e. 30 500 EUR per million of EUR of contribution). However, as illustrated by the table below burdens vary across the three funds with CF having a significantly lower average than ERDF and ETC.

**Table 4.6 ERDF-CF: Administrative burden 2014-2020**

	14-20		07-13
	EUR per MEUR	% of total ESIF	% of total ESIF
ERDF-CF	€ 34 700	3.5%	2.0%
ERDF	€ 49 800	4.9%	
CF	€ 5 700	0.6%	
ETC	€ 52 300	5.2%	

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

All in all, comparisons with baselines for the 2007-2013 period seem to show an increase of administrative burden for beneficiaries (i.e. in 2007-2013 the burden at EU-level was about 2% of the ERDF / CF contribution, in 2014-2014 it is 3.5%).

ERDF administrative burden were about 4.9% of the ERDF contribution. For ETC project partners administration activities lead to average administrative burden of about 5.2%,

while for CF project partners the administrative burden are considerably lower (i.e. 0.6% of the CF contribution).

Monitoring is considered as the greatest burden (25% of the overall burden) while financial management is seen as less burdensome than in the previous programming period (16%).

#### **4.4 Baselines on administrative cost and burden compared**

To conclude, comparison of administrative costs and burden for 2014-2020 from this study to figures for the previous programming period is limited to studies working with comparable definitions and methodologies. Therefore, not all studies could be taken into account for this comparison.

The comparison for ERDF-CF and ESF administrative costs shows an overall reduction in monetary terms, in particular for Managing Authorities. For ERDF-CF the workload (FTE) however increased from the previous to the current programming period. For ESF, the reduction of administrative costs for Managing Authorities is accompanied by a substantial increase in these costs for Certifying Authorities and Audit Authorities.

Administrative burden could only be compared for ERDF-CF though there are some methodological caveats for a fully meaningful comparison. The results show a slight increase in administrative burden from the 2007-13 to the 2014-20 programming period.

## 5 SIMULATIONS FOR ADMINISTRATIVE COSTS AND BURDEN POST 2020

The proposal for a Common Provisions Regulation (CPR)<sup>14</sup> of the 29th of May 2018 contains about 80 simplification measures for Cohesion Policy 2021-2027. Eight of these have been identified by EC representatives as particularly relevant for assessing their impact on administrative costs.

For these eight the newly established baselines have been used to simulate effects for administrative costs and burden. The simulation is based on assessments of the study team, which were discussed in a workshop within the project consortium and with EC representatives on the 12<sup>th</sup> of March 2018, and later confronted with the proposals from the 29<sup>th</sup> of May. These discussions helped to determine the effects on administrative costs and burden.

The simulations presented in this section are to be understood as indications under the assumption that the proposal for a new CPR as it was put forward on the 29<sup>th</sup> of May will be translated into a final regulation without substantial modifications.

In addition a tool has been developed to simulate these effects in monetary and workload terms (see Annex II). The tool allows Commission Services to simulate future changes or proposals on administrative costs and burden, based on the current baselines.

### 5.1 Simulated impact on administrative costs

This section reviews the envisaged regulatory changes individually. For each change, it provides a quick understanding of the change, along with an overview of the tasks directly or indirectly affected and a short rationale of how they are affected. For each regulatory change, there is a table with the expected impacts. Impacts are expressed as decreases or increases in total costs and FTE per million Euro of eligible funding. Moreover, the tables show the percentage change of the impacts compared to the baseline for each fund. Interlinkages and any reinforcing effects between the different changes have not yet been considered.

It is important to note that the ratio between costs and workload is not linear, as every task has a different cost structure (i.e. more external costs, or more internal work). There are two cases in which this is particularly relevant. The first concerns changes which affect certain types of Operational Programmes more than others (e.g. in countries with a particularly low average cost of labour). The second concerns changes where the impacts on tasks with a different cost structure can mean impacts go in opposite directions. This effectively means that workload is transferred from external to internal staff or vice versa, causing a potentially very different impact on total costs and workload.

#### 5.1.1 Simplified programming

**Understanding the change.** Simplified programming will mean a simplified intervention logic (only broad policy objectives and European specific objectives – providing more flexibility for programming); abolishing the performance reserve and ex-ante evaluations, fewer enabling conditions (former ex-ante conditionalities), a flat rate for Technical Assistance, and a shortened Partnership Agreement.

This is accompanied by lighter requirements for programme reviews (see section 5.1.2).

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<sup>14</sup> COM(2018) 375 final

**Understanding the tasks affected.** Administrative tasks affected by this change are:

- **Task N.1 Partnership Agreement:** Shortening the Partnership Agreement will probably imply a minor simplification with less time needed for elaborating the Partnership Agreement. Moreover, additional reduction of workload would derive from the fact that the Partnership Agreement will no longer be amended after each modification to the Operational Programme.  
→ - 10 %
- **Task P.1 Programme preparation:** This is expected to be less work intensive as certain tasks will be abolished. Operational Programmes will require less background analysis and details on the rationale. This holds potential for substantial savings. Moreover, Operational Programmes not requiring a lot of changes from one period to the other, will be more easily drafted. There will be more thematic concentration, with fewer policy objectives, and fewer levels in the structure.  
→ - 25 %
- **Task P.2 Ex-ante evaluation:** Although the ex-ante evaluation will no longer be required, part of this work is unlikely to disappear completely. Some will remain and is likely to be shifted to general programme preparation. Examples are identifying and selecting indicators and corresponding baseline and target values.  
→ - 70 %
- **Task P.4 Setting up management and control system:** Simplification of programming might also include changes in setting up the management and control system. However, they are considered to be minor as more demanding steps for the setting up management and control systems are not affected by the change.  
→ +/- 0 %
- **Task P.5 Designation of authorities:** Simplification of the programming might also include changes concerning the designation of authorities. However, they are considered to be minor.  
→ +/- 0 %
- **Task P.6 Ensuring ex-ante conditionalities:** Simplifications of the ex-ante conditionalities should reduce the workload for this task. Two opposite effects are expected. On the one hand, a reduction in the number of enabling conditions (former ex-ante conditionalities) down to 20 is expected. For those remaining, some reduction in workload is also expected due to learning and better knowledge acquired during the previous programming period. On the other hand, new, lighter, enabling conditions will be introduced. The net effect is still expected to be strong.  
→ - 50 %
- **Tasks M.1 – M.22 All programme management tasks:** The reductions in ex-ante evaluations and enabling conditions are likely to result in more workload for programme management, with the need to produce information that is currently provided during programme preparation. The additional costs for these tasks could offset many of the savings from task P.1, due to the costs and workload of tasks M.1 to M.22.  
→ + 0.5 %

**Estimated impact.** Taken together the change may be from 0.004 and 0.005 FTE less per million Euro of eligible funding compared to the baseline, or 200 to 300 Euro less per million Euro of eligible funding (Table 5.1). The simplification has the highest impact for EMFF authorities in terms of workload as well as in monetary terms.

The intended regulatory change has the least impact on authorities responsible for CF, ERDF and ESF in terms of workload, and the least impact on EAFRD authorities in relative monetary terms.

Differences between the ESI Funds is due to the relatively higher baseline for programme preparation tasks for EMFF authorities. The 2014-2020 regulation was a substantial shift for these authorities compared to the other funds.

The impact on costs in Euro per million Euro of eligible funding is relatively higher than on the workload for the authorities due to relatively high external costs for programming, e.g. external costs for ex-ante evaluations.

National coordination and programme preparation tasks, which would see decreased workload and cost, have a higher cost-to-FTE ratio compared to programme management tasks, due to external costs. Given that part of the workload would shift from programme preparation to programme management, as argued above, this would shift some work from external to internal workload and costs. So, the impact on costs is higher than on FTEs, which, for ERDF, CF and ESF, is close to zero.

**Table 5.1 Simplified programming – estimated impact ranges by ESI Fund<sup>15</sup>**

	ERDF <sup>16</sup>	CF	ESF	EAFRD	EMFF	Total (including National Coord.)
Baseline Workload	0.53	0.40	0.68	2.18	0.93	0.95
FTE per million Euro of eligible funding	-0.002	-0.001 to -0.002	-0.002	-0.008 to -0.012	-0.011 to -0.017	-0.004 To -0.005
% change vs baseline	-0.3% to -0.4%	-0.2% to -0.4%	-0.2% to -0.3%	-0.4% to -0.6%	-1.2% to -1.8%	-0.4% To -0.6%
Baseline Costs	22 600	18 400	27 600	83 100	44 200	40 300
EUR per million Euro of eligible funding	-150 to -200	-100 to -200	-150 to -250	-300 to -500	-100	-200 To -300
% change vs baseline	-0.6% to -0.9%	-0.6% to -1.0%	-0.6% to -0.9%	-0.4% to -0.6%	-0.2% to -0.3%	-0.5% To -0.8%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.2 Light Operational Programmes review

**Understanding the change.** The revision of Operational Programmes will be a relatively light procedure, and Commission formal approval will not be required under some conditions, notably when re-allocation of funding remain below the assigned thresholds. Overall there will be less the cases of reprogramming as many changes will no longer require reprogramming, and there will be only one moment for reprogramming in the programming period. The reprogramming (midterm review) will be mandatory after five years to make use of the allocation for the last two years. This review will not require new complete (ex-ante) evaluations nor modifications of the Partnership

<sup>15</sup> National coordination tasks are only calculated at ESIF level without distinction between funds. Therefore, the effect of a lower cost and workload for task N.1 'Partnership Agreement' is only reflected in the column 'Total' of the table. Fund-specific columns report the impacts of changes to the other tasks, but do not reflect savings from reduced activities for the Partnership Agreement.

<sup>16</sup> The baselines for ERDF in Table 5.1 to Table 5.7 are not comparable to the ERDF baseline in Table 3.1, as the baselines in this chapter combine results for ERDF and ERDF-ETC.

Agreement. In general, this new approach might be comparable to the performance reserve approach in the 2014-20 period, although at larger scale.

**Understanding the tasks affected.** The individual administrative tasks affected by this change are as follows.

- **Task N.1 Partnership Agreement:** This simplification implies also that a revision of the Operational Programme no longer leads to subsequent amendments of the Partnership Agreement.  
➔ - 1 %
- **Task P.1 Programme preparation (amendment):** While this simplification implies a reduction in workload for programme preparation, the mid-term review of the programme document is expected to require an increased workload. A full re-programming would imply almost the same amount of work as the original programming. However, in most cases the review should address only some aspects of the programme document. Moreover, the review will build on existing data and achievements and be an 'incremental' update. These considerations should mitigate the effect of an increase in the number of programming instances, and therefore result in a relatively limited increase in workload and costs.  
➔ + 10 %  
For Programmes experiencing several revisions of the Operational Programme, the change will be more beneficial. Comparing it to current efforts for re-programming – incl. their frequency, the necessity to do so also for smaller changes and the efforts linked to them – for some programmes the effect might even be a reduction of administrative costs, and this reduction may very well balance the additional workload for the mid-term revision.  
➔ +/- 0 %
- **Task P.3 Strategic environmental assessment:** As part of the budget will be allocated in a second instance, this review could trigger the need for additional fulfilments, such as additional strategic environmental assessments. However, this is unpredictable and likely to be modest.  
➔ +/- 0 %
- **Task M.2 Establishing, running and guiding the Monitoring Committee:** As argued for the previous point, introduction of the review is expected to require additional discussions and approvals by the Monitoring Committee. However, this effect is unpredictable and likely to be modest.  
➔ + 1 %
- **Task M.21 Monitoring and evaluation:** As with the previous point, this would also apply for monitoring, with additional work in terms of analysis.  
➔ + 1 %

**Estimated impact.** Taken together, the impact of the change on administrative costs is an increase of circa 0.002 FTE per million Euro of eligible funding, or between 50 and 100 Euros more per million Euro of eligible funding (Table 5.2).

The administrative costs and workload will increase very slightly for all funds, with comparable magnitude.

**Table 5.2 Light Operational Programmes review – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	ERDF	EMFF	Total
<b>Baseline</b>	<b>0.53</b>	<b>0.40</b>	<b>0.68</b>	<b>2.18</b>	<b>0.93</b>	<b>0.95</b>
<b>Workload</b>						
FTE per million Euro of eligible funding	+/-0.0 to +0.001	+/-0.0 to +0.001	+/-0.0 to +0.001	+/-0.0 to +0.005	+/-0.0 to +0.003	+/-0.0 to +0.002
% change vs baseline	+/-0.0% to +0.2%	+/-0.0% to +0.2%	+/-0.0% to +0.2%	+/-0.0% to +0.3%	+/-0.0% to +0.3%	+/-0.0% to +0.2%
<b>Baseline</b>	<b>22 600</b>	<b>18 400</b>	<b>27 600</b>	<b>83 100</b>	<b>44 200</b>	<b>40 300</b>
<b>Costs</b>						
EUR per million Euro of eligible funding	+/-0.0 to +50	+/-0.0 to +50	+/-0.0 to +50	+/-0.0 to +200	+/-0.0 to +50	+/-0.0 to +100
% change vs baseline	+/-0.0% to +0.3%	+/-0.0% to +0.2%	+/-0.0% to +0.3%	+/-0.0% to +0.2%	+/-0.0% to +0.1%	+/-0.0% to +0.2%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.3 Simplified designation of authorities

**Understanding the change.** The initial process of assessing authorities during the designation process will be abolished, and systems largely 'rolled-over' to the next programming period.

**Understanding the tasks affected.** The individual tasks affected by this change are as follows.

- **Task P.5 Designation of authorities:** Even though the current process will be abolished, this does not reduce the workload by 100%. Indeed, it probably means that a substantial share of the administrative procedures can be dropped, while a smaller share will still be needed to exclude some risks.  
➔ - 85 %
- **Task A.1 Audit strategy:** This change also implies a shift of responsibilities and risks from programme preparation to the Audit Authorities at a later stage of the programme cycle. Therefore, definition of the audit strategy may be impacted, as Audit Authorities will have one more element to take into account for auditing the programme.  
➔ + 1 %
- **Task A.2 System audit:** The impact on this task could vary from case to case, as Audit Authorities are free to decide what to audit. So, they may choose to have more in-depth audits where the procedure for designating authorities has not been done. However, even today, the Audit Authority does not generally review the designation if the track record of the authority is good, so little change is to be expected. It is possible, however, that Audit Authorities, at least initially, may continue with established rules and procedures, and this may cause the total number of audits to increase slightly, given the reduced information available.  
Overall, this change is expected to lead to a reduction of administrative costs. On the other hand, such benefits could also be offset by gold-plating practises, which have been witnessed during previous transition periods.

- - 5% (Although considering inertia in implementation processes the reduction might be considerably lower.)

**Estimated impact.** Taken together, the impact of the change on administrative costs is a decrease of 0.002 to 0.003 FTE per million Euro of eligible funding, or 50 to 100 Euros per million Euro of eligible funding (Table 5.3).

**Table 5.3 Simplified designation of authorities – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
<b>Baseline Workload</b>	0.53	0.40	0.68	2.18	0.93	0.95
FTE per million Euro of eligible funding	-0.001 to -0.003	-0.001 to -0.002	-0.002 to -0.004	-0.001 to -0.002	-0.005 to -0.01	-0.002 to -0.003
% change vs baseline	-0.2% to -0.5%	-0.2% to -0.5%	-0.3% to -0.6%	-0.1%	-0.6% to -1.1%	-0.2% to -0.4%
<b>Baseline Costs</b>	22 600	18 400	27 600	83 100	44 200	40 300
EUR per million Euro of eligible funding	-50 to -100	-50	-50 to -150	-50	-50 to -100	-50 to -100
% change vs baseline	-0.1% to -0.4%	-0.1% to -0.3%	-0.1% to -0.5%	-0.1%	-0.1% to -0.2%	-0.1% to -0.3%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

The intended regulatory change has a slightly larger relative impact on administrative workload for EMFF and a modest impact on the other funds.

#### 5.1.4 No specific rules for revenue generating projects

**Understanding the change.** The specific CPR requirements for revenue generating projects will be dropped. This concerns e.g. Art. 65(8) during the implementation, and Art. 61 after the completion of a revenue generating project. However, State aid requirements serving a different purpose would still apply.

**Understanding the tasks affected.** The individual administrative tasks affected by this change comprise the following.

- **Task M.12 Selection of operations and information of beneficiaries:** Abolishing specific rules for revenue generating projects may potentially also impact the selection of operations and information of beneficiaries, as checks for specific rules will not be needed anymore. The impact of this is however estimated to be negligible as this check is a minor sub-task of task M.12 and as probably some checks and information still will be necessary to ensure compliance with State aid regulations.  
→ - 1 %
- **Task M.13 Ensuring an adequate audit trail and verifications:** A slight reduction in workload for ensuring the audit trail and verifications is to be expected, given that some work is currently linked to additional requirements for revenue generating projects.  
→ - 1 %
- **Task M.14 Verification for reimbursement of beneficiaries:** Abolishing specific rules for revenue generating projects may potentially also impact on verifications for

reimbursement of beneficiaries, as checks for specific rules will not be needed anymore. The impact of this is however estimated to be negligible as this check is a minor sub-task of M.14 and as some work will probably still be necessary to ensure compliance with State aid regulations. Seen across all ESIF programmes, the change will lead to a modest reduction of administrative workload. However, for programmes with many revenue generating projects the reduction will be significant.

→ - 1 %

- **Task M.22 Assessment & monitoring of revenue generating operations:** Even though formal requirements concerning revenue generating projects will be dropped in the CPR, programmes will still have to monitor and report on revenue generating projects under State aid procedures. This probably implies that a fair share of the administrative procedures can be dropped but not completely.

→ - 90 %

- **Task C.2 Certification of expenditure:** Fewer rules will also result in a lower workload for certification, given that revenue generating projects represent a small share of the total projects the reduction is minor.

→ - 1 %

- **Task C.3 Ensuring that adequate information from the Managing Authority was received:** Decreased data and information requirements will ease the workload on communications between the Managing Authority and the Certification Authority or Paying Agency for EAFRD.

→ - 1 %

- **Tasks A.1 to A.5 All audit tasks:** For the reasons discussed above, less stringent rules and data requirements will decrease the amount of information that could be audited, with a noticeable decrease in the overall activity of Managing Authorities, as such issues have proved to be the source of important complexity and legal uncertainty.

→ - 1 %

**Estimated impact.** Taken together the impact of the change on administrative costs may be a decrease of 0.006 to 0.009 FTE per million Euro of eligible funding, or a 200 to 300 Euros less per million Euro of eligible funding (Table 5.4).

The impact of the intended regulatory change is generally modest overall, but highest for CF and ERDF and in particular under the new policy objective 2 and least for EAFRD. The change is not applicable to EMFF, for which no impact is envisaged.

**Table 5.4 No specific rules for revenue generating projects – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
<b>Baseline Workload</b>	0.53	0.40	0.68	2.18	0.93	0.95
FTE per million Euro of eligible funding	-0.006 to -0.009	-0.005 to -0.008	-0.005 to -0.007	-0.007 to -0.010	n/a	-0.006 to -0.009
% change vs baseline	-1.1% to -1.7%	-1.2% to -1.8%	-0.7% to -1.1%	-0.3% to -0.5%	n/a	-0.6% to -0.9%
<b>Baseline Costs</b>	22 600	18 400	27 600	83 100	44 200	40 300
EUR per million Euro of eligible funding	-200 to -300	-150 to -200	-200 to -250	-250 to -400	n/a	-200 to -300
% change	-0.9%	-0.7%	-0.6%	-0.3%		-0.5%

vs baseline	to -1.3%	to -1.1%	to -1.0%	to -0.5%	n/a	to -0.8%
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(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.5 No specific rules for major projects

**Understanding the change.** The specific CPR requirements for major projects will be dropped. This concerns e.g. Art. 100-103 of the CPR.

**Understanding the tasks affected.** The individual administrative tasks affected by this change comprise the following.

- **Task M.12 Selection of operations and information of beneficiaries:** Abolishing rules for major projects affects also the selection of operations and information of beneficiaries, as checks for specific rules will not be needed anymore. Seen across all ESIF programmes, the impact of this is however estimated to be negligible as this check is a minor sub-task of task M.12. However, for programmes with many major projects the reduction will be significant.  
→ - 1 %
- **Task M.13 Ensuring an adequate audit trail and verifications:** A slight reduction in workload for ensuring the audit trail and verifications is to be expected, given that some work is currently linked to additional requirements for major projects.  
→ - 1 %
- **Task M.17 Management of major projects:** All requirements linked to the management of major projects will be abolished, so task M.17 would disappear.  
→ - 100 %

**Estimated impact.** Taken together the impact of the change on administrative costs may be a decrease of 0.005 to 0.006 FTE per million Euro of eligible funding, or 100 to 150 Euros less per million Euro of eligible funding (Table 5.5)

The impact of the intended regulatory change is generally modest, but highest for ERDF and EMFF and least for CF and ESF. The change is not applicable to EAFRD, for which no impact is envisaged.

**Table 5.5 No specific rules for major projects – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
<b>Baseline Workload</b>	0.53	0.40	0.68	2.18	0.93	0.95
<b>FTE per million Euro of eligible funding</b>	-0.007 to -0.009	-0.007 to -0.009	-0.005 to -0.007	n/a	-0.003 to -0.004	-0.005 to -0.006
<b>% change vs baseline</b>	-1.3% to -1.7%	-2.0% to -2.5%	-0.8% to -1.0%	n/a	-0.4% to -0.5%	-0.5% to -0.6%
<b>Baseline Costs</b>	22 600	18 400	27 600	83 100	44 200	40 300
<b>EUR per million Euro of eligible funding</b>	-150 To -200	-150	-150	n/a	-150 to -200	-100 to -150
<b>% change vs baseline</b>	-0.6% to	-0.7% to	-0.5% to	n/a	-0.3% to	-0.3%



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.6 Reduced number of verifications

**Understanding the change.** The change will reduce first level controls (management and verifications), as the approach shifts to a risk-based verification of payments. This might also imply a transfer of 'risks' from Managing Authorities to Audit Authorities. At the same time, second level controls (audits) will focus more on proportionate controls. Certification functions will be abolished and replaced by an accounting function, ruling out the possibility to perform duplicate controls.

**Understanding the tasks affected.** The individual administrative tasks affected by this change are as follows.

- **Task M.7 Correction of irregularities:** Effective application of the risk-based approach would be as efficient, if not more, than systematic first level verifications and, most of the irregularities should then still be spotted and therefore the impact on this task is probably negligible.  
→ +/- 0 %
- **Task M.13 Ensuring an adequate audit trail and verifications:** Fewer controls will impact the work related to ensuring an adequate audit trail and verifications. However, it will probably change the work but not necessarily the workload.  
→ +/- 0 %
- **Task M.14 Verifications for reimbursements of beneficiaries:** Moving to risk based first-level control should help reduce the verifications for reimbursements. However, some tasks will still to be needed. Gold-plating practices could also be feared, and some programmes might not make fully use of this simplification to safeguard themselves. Furthermore, the risk assessment will also require slight additional work.  
→ - 30 %
- **Task M.15 On the spot verifications:** As part of the management verifications, on-the-spot verifications will also decrease. However, these could become more labour-intensive due to the greater focus on risk-based assessments. Overall, this effect is unpredictable, as it also might bring risks for more gold-plating.  
→ +/- 0 % (in the best of all cases it might lead to a reduction of up to 10 %)
- **Task C.1 Payment applications:** Fewer elements of payment applications will have to be verified, resulting in a decreased workload.  
→ - 5 %
- **Task C.2 Certification of expenditure:** The certification function will be abolished and will be replaced by an accounting function that will not duplicate controls in the future. These two measures should result in a decrease in workload.  
→ - 15 %
- **Task C.6 Accounting of amounts recoverable or withdrawn:** Fewer elements will be involved in accounting for amounts recoverable or withdrawn, resulting in a decreased workload.  
→ - 10 %
- **Tasks A.1 to A.5 All audit tasks:** Fewer verifications may be interpreted by some authorities as the source of greater risks, as audits would rely on fewer previous controls. It cannot be excluded, therefore, that some may engage in more in-depth audits as passive gold-plating. The certification function will no longer need to be audited; however, the new accounting function will. The net effect is expected to result in slightly less work for audit tasks.  
Overall, this change is expected to lead to a reduction of administrative costs. On the other hand, such benefits could also be offset by gold-plating practises, which have been witnessed during previous transition periods.

- - 5 % (Although considering inertia in implementation processes the reduction might be considerably lower.)

**Estimated impact.** Taken together the impact of the change on administrative costs may range between 0.029 and 0.05 FTE less per million Euro of eligible funding or between 1 100 and 2 000 Euros per million Euro of eligible funding (Table 5.6). This impact could be higher in case the workload for on the spot verifications is substantially reduced as a consequence.

The intended regulatory change has a considerable impact on all funds, due to the relevance of task M.14 (verifications of reimbursements of beneficiaries). Given the particular weight of this task for EAFRD, this is the most heavily impacted fund, both in workload as well as in monetary terms. The impact on other funds is roughly similar, around -2%/-4% for both workload and costs.

**Table 5.6 Reduced number of verifications – estimated impact by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
<b>Baseline</b>						
<b>Workload</b>	0.53	0.40	0.68	2.18	0.93	0.95
FTE per million Euro of eligible funding	-0.012 to -0.024	-0.008 to -0.016	-0.017 to -0.032	-0.084 to -0.13	-0.020 to -0.039	-0.029 to -0.05
% change vs baseline	-2.1% to -4.2%	-1.8% to -3.8%	-2.5% to -4.7%	-3.9% to -6.1%	-2.1% to -4.2%	-3.0% to -5.2%
<b>Baseline</b>						
<b>Costs</b>	22 600	18 400	27 600	83 100	44 200	40 300
EUR per million Euro of eligible funding	-350 to -850	-250 to -550	-500 to -1100	-3.500 to -5.500	-750 to -1.900	-1 100 to -2 000
% change vs baseline	-1.5% to -3.5%	-1.3% to -2.9%	-1.8% to -4.0%	-4.2% to -6.7%	-1.7% to -4.2%	-2.8% to -5.0%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.7 Simplified reporting

**Understanding the change.** Reporting on the programmes to the European Commission will change. Annual implementation reports will be cancelled, and also the regular progress reporting and reporting on financial engineering will be dropped. However, annual review meetings focusing on the qualitative aspects of the programme implementation will be retained. For quantitative reporting the E-Cohesion system will be further developed into an Open Data Platform, and include more frequent (e.g. six times per year) transmissions of the most up-to-date data on financial performance and output indicators. This will be accompanied by a longer list of common output and direct results indicators.

**Understanding the tasks affected.** The individual administrative tasks affected by this change are as follows.

- **Task P.4 Setting up management and control system:** To enable more frequent transmission of financial and output information, changes in management and control systems will be necessary. This will probably increase the workload for this task.  
→ + 5 %

- **Task M.2 Establishing, running and guiding the Monitoring Committee:** More frequent interactions with the European Commission (transmitting data) may also require the Monitoring Committee to be constantly updated with information on programme implementation.  
→ - 2 %
- **Task M.3 Ensuring a system for collecting, recording, and storing data:** The requirements for this will not change. The stability of the regulatory framework is supposed to particularly benefit Managing Authorities who have already invested in effective E-Cohesion systems.  
→ - 1 %
- **Task M.19 Annual implementation reports:** Abolishing the annual implementation reports, regular progress reporting and reporting on financial engineering implies a considerable reduction in workload for this task. However, annual review meetings may need to be better prepared, hence triggering slightly more workload (preparation, follow-up). Therefore, the expected reduction in workload for this task is limited.  
→ - 10 %
- **Task M.20 Preparing and transmitting data to the European Commission:** Increased frequency for transmitting financial and output data to the Commission may result in a slightly increased workload for this task, although it should build on existing electronic collection systems. A lot of the work should be covered by the existing E-Cohesion system so the actual increase is expected to be limited.  
→ + 10 %
- **Task M.21 Monitoring and evaluation:** More frequent data transmission may marginally impact the workload for monitoring. Taking into account that reductions in reporting (also in relation to financial instruments) will benefit from e-cohesion, the increase due to more frequent reporting is partly offset.  
→ + 5 %

**Estimated impact.** Taken together, the impact of the change on administrative costs risks to be an additional administrative workload of 0.002 to 0.005 FTE per million Euro of eligible funding, or additional costs of 100 to 300 Euros per million Euro of eligible funding (Table 5.7).

The risk of an increase in administrative workload and costs is similar across all funds.

**Table 5.7 Simplified reporting – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	Total
<b>Baseline</b>						
<b>Workload</b>	0.53	0.40	0.68	2.18	0.93	0.95
FTE per million Euro of eligible funding	+0.001 to +0.002	+0.001 to +0.002	+0.001 to +0.003	+0.004 to +0.012	+0.001	+0.002 to +0.005
% change vs baseline	+0.2% to +0.4%	+0.2% to +0.5%	+0.2% to +0.5%	+0.2% to +0.6%	+0.1% to +0.2%	+0.2% to +0.5%
<b>Baseline</b>						
<b>Costs</b>	22 600	18 400	27 600	83 100	44 200	40 300
EUR per million Euro of eligible funding	+50 to +150	+50	+100 to +250	+250 to +600	+50 to +150	+100 to +300
% change vs baseline	+0.3% to +0.7%	+0.1% to +0.4%	+0.3% to +0.9%	+0.3% to +0.7%	+0.1% to +0.3%	+0.3% to +0.7%

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### 5.1.8 Extended scope of SCOs

This envisaged an increased uptake of an existing simplification measure, with the obligation to use SCOs for operations below 200 000 Euros. However, this would be additionally encouraged by simplifying rules and calculation methods, providing more off-the-shelf options and making them compulsory for small amounts. Therefore, we suggest reviewing the results of the DG REGIO (2017) study 'Use of new provisions on simplification during the early implementation phase of ESIF'.

As discussed in the 2017 study (see above), the increased use of SCOs has a considerable potential to reduce administrative costs. As illustrated in the table below, in 2014-2020 uptake of SCOs varies across the funds, while the reduction of administrative costs is in general estimated between -1% and -2%.

**Table 5.8 Share of ESIF covered by SCOs and reduction of administrative costs (2014-2020)**

	ERDF-CF	ESF	EAFRD	EMFF
% of ESIF covered by SCOs	4%	33%	2%	2%
Reduction of admin costs	-1.2% to -1.8%	-1.3% to -1.9%	-1.1% to -1.6%	-0.5% to -1.4%

(Sources: results of the survey 'Use and intended use of simplified cost options in ERDF, CF, ESF, EAFRD' & DG REGIO (2017) study 'Use of new provisions on simplification during the early implementation phase of ESIF'. Data on the uptake for EMFF is not available but is assumed to be the same as for EAFRD).

The more SCOs are used, the less authorities will have to work on verification and control of the real costs. More precisely, an increased use of SCOs is expected to impact the following tasks.

- **Task P.1 Programme preparation:** Increased use of SCOs will most likely already be addressed in the programme preparation. However, the impact on the workload for that task is estimated to be negligible.
- **Task P.4 Setting up management and control system:** Increased use of SCOs will most likely already be addressed when setting up the management and control system. In particular, preparing a programme specific SCOs (i.e. Art. 67(5)(a) CPR) and control would imply a minor increase in the workload related to this task.
- **Task M.7 Correction of irregularities:** The use of SCOs will result in an important reduction of irregularities to be corrected as the focus shifts to application of the SCOs instead of detailed checks on expenditures.
- **Task M.12 Selection of operations and information of beneficiaries:** The use of SCOs might also imply a reduced workload for the selection of operations and information of beneficiaries. However, to a large extent the use of SCOs will merely imply a change of this work and only a small reduction in workload.
- **Task M.13 Ensuring an adequate audit trail and verifications:** The use of SCOs changes the work related to verifications and audits, with a substantial reduction and accordingly also for developing and ensuring an adequate audit trail.
- **Task M.14 Verifications for reimbursement of beneficiaries:** The use of SCOs has the highest impact on verifications for reimbursement of beneficiaries, which is one of the most work intensive tasks for programmes. By using data from the recent study on the use of SCOs (EC 2018)<sup>17</sup> we confirm that the costs for verifying

<sup>17</sup> Using data from this latter study on the use of SCOs, we compared the costs declared by the programmes using SCOs to baselines in this study.

reimbursement of beneficiaries is generally substantially lower when SCOs are used (i.e. the median costs for verifying payment claims is lower for programmes using SCOs).

- **Task M.20 Preparation and transmission of financial data to the European Commission:** A higher uptake of SCOs implies changes in preparing and transmitting financial data to the European Commission. However, to a large degree this might only be a change of routing and just a negligible change in the actual workload.
- **Task C.2 Certification of expenditure:** The use of SCOs has a considerable impact on the certification of expenditure. Depending on the degree of SCO uptake, this can imply a substantial reduction.
- **Task C.5 Maintenance of records of expenditure declared:** Fewer records of expenditures declared need to be kept with a higher uptake of SCOs. However, the impact on the workload for this task overall is expected to be negligible.
- **Task A.3 Audit of operations:** The use of SCOs has a direct impact on audit as the character of audits will shift. Depending on the degree of uptake of SCOs, this can imply a substantial revision.

In concrete, the impact will depend on the share of ESIF budget covered by SCOs.

Based on the current level of uptake we can assume two scenarios: the first ('realistic scenario') assumes that the European Commission's effort to increase the use of SCOs (e.g. more technical support, more off-the-shelf SCOs, more legal certainty) will lead to double the current level of ESIF budget covered by SCOs; the second scenario ('ambitious scenario') assumes that the European Commission's effort will lead to the maximum budget covered by SCOs for all ESIF.

### Realistic scenario

Under this scenario we assume:

- 1) that the uptake of SCOs will double the current level of ESIF budget covered by SCOs;
- 2) that doubling the ESIF budget covered by SCOs will lead to a reduction of costs similar to the reduction estimated for the 2014-2020 period.

**Estimated impact.** Based on these assumptions, the table below presents the estimated impact deriving from a 'realistic' increase uptake of SCOs.

**Table 5.9 SCO 'realistic scenario' – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	
Current level of budget share potentially covered by SCOs	4%	4%	33%	2%	2%	
'Realistic' level of budget share potentially covered by SCOs	8%	8%	66%	4%	4%	
Workload						Total
FTE	-0.007	-0.005	-0.009	-0.024	-0.005	-0.011
(total values)	to	to	to	to	to	to
	-0.011	-0.008	-0.013	-0.034	-0.013	-0.016
Costs						
MEUR	-310	-225	-360	-900	-220	-440
(total values)	to	to	to	to	to	to
	-460	-340	-530	-1300	-620	-650

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

### Ambitious scenario

Under this scenario we assume that the European Commission's efforts lead to the maximum potential budget share covered by SCOs for all ESIF. More precisely we assume that:

- for ERDF and CF respectively 50% and 40% of budget is covered by SCOs;
- for ESF, 100% of budget is covered, by extending the use of delegated acts (i.e. Art. 14.1 ESF) which could cover fully publicly procured operations;
- for EAFRD and EMFF, that the maximum potential increase is 50% and 30% of the budget respectively, due to operations for which eligible expenditure is not calculated on real costs but is predefined compensation (i.e. IACS measures for EAFRD); and
- the impact of SCOs in reducing administrative costs will be proportional to the share of budget covered by SCOs, using the impacts estimated for the 2014-2020 period as a reference, i.e. +4% of ERDF-CF budget covered by SCOs leads to a reduction from -1.8% to 1.2% of costs similar to the reduction estimated for the 2014-2020 period.

Notably, the use of SCOs should be optimised for the budget share applicable to each type of SCOs. For instance, flat rates cover only a part of the budget for an operation (e.g. up to 20% of eligible direct staff costs under Article 19 of ETC Regulation) while lump sums and Standard Scales of Unit Costs (SSUC) can cover the entire operation budget. Following these assumptions, using SSUC and lump sums to cover all operation costs leads to the largest reduction of administrative costs.

**Table 5.10 SCO 'ambitious scenario' – estimated impact ranges by ESI Fund**

	ERDF	CF	ESF	EAFRD	EMFF	
Current level of budget share potentially covered by SCOs	4%	4%	33%	2%	2%	
Maximum level of budget share potentially covered by SCOs	50%	40%	100%	50%	30%	
Workload						Total
FTE	-0.066	-0.046	-0.013	-0.568	-0.065	-0.170
(total values)	to	to	to	to	to	To
	-0.096	-0.069	-0.018	-0.827	-0.183	-0.251
Costs						
MEUR	-2 780	-2 020	-5 10	-21 700	-3 090	-6 690
(total values)	to	to	to	to	to	To
	-4 200	-3 030	-7 50	-31 500	-8 660	-9 850

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

## 5.2 Simulated impact on administrative burden

Not all the proposed changes impact administrative burden. This section discusses possible impacts on administrative burden for tasks directly relevant for beneficiaries.

The main steps concerning administrative burden identified in this study are as follows.

- **Application process.** Preparing and submitting the funding application, etc.
- **Monitoring and Reporting.** Gathering information on project progress and results (including financial information and indicator data) and submission of that information to the authorities (monitoring and reporting).

- **Financial management and payment claims.** Preparing and submitting a payment claim, with supporting documents (financial management).
- **Information and publicity.** Fulfilling information and publicity requirements including labelling with required logos.
- **Keeping records** (including accounts) and proof of all transactions and actions.
- **Financial controls.** Preparing and submitting data and documentation required for control purposes (proving/verifying deliverables and compliance/audit).
- **Evaluations.** Preparing and providing information required for evaluation purposes. (ESF: including participant-related data collection).
- **Other administrative tasks.**

When assessing possible impacts of the changes on administrative burden, the main question is which of the above steps are affected by each change.

### 5.2.1 No specific rules for revenue generating projects

No specific rules for revenue generating projects will only affect a minor share of all projects, i.e. only those that are revenue generating. However, for beneficiaries running revenue generating projects this change will bring a substantial reduction of their administrative burden, in particular under the policy objective 2. For these projects most of the tasks will become less burdensome.

- **Application process.** Already in the application process this change implies a reduction of information to be submitted. Given the small share of revenue generating projects the impact would however be minor.
- **Monitoring and Reporting.** As monitoring and reporting will only cover the standard aspects and not also the CPR requirements for revenue generating projects, the impact will be minor.
- **Financial management and payment claims.** The financial management and payment claims will only cover the standard set of aspects and not the CPR requirements for revenue generating projects, so the impact will be minor.
- **Evaluations.** There will be no specific evaluations on revenue generating projects, but given the small share of revenue generating projects the impact would be minor.

Although the change implies a reduced administrative burden, State aid rules continue to apply.

### 5.2.2 No specific rules for major projects

No specific rules for major projects will only affect a minor share of all projects, i.e. only those that are major. However, for beneficiaries running major projects this change will bring a substantial reduction of their administrative burden, especially during the application stage. For these projects most of the tasks will become less burdensome.

- **Application process.** Already in the application process this change implies a substantial reduction of information to be submitted, noticeably through the cancellation of the obligation to carry out heavy cost benefit analysis. Given the small share of major projects the impact would however be minor.
- **Monitoring and Reporting.** As monitoring and reporting will only cover the standard aspects and not also the CPR requirements for major projects, the impact will be minor.
- **Financial management and payment claims.** The financial management and payment claims will only cover the standard set of aspects and not the CPR requirements for major projects, so the impact will be minor.
- **Evaluations.** There will be no specific evaluations on major projects, but given the small share of major projects the impact would be minor.

### 5.2.3 Reduced number of verifications

Fewer verifications and a focus on more risk-based and proportionate controls will ease the administrative burden for beneficiaries not covered by the controls to the same extent as today.

For projects the following will become less burdensome.

- **Monitoring and Reporting.** Depending on how the change is implemented it might imply a slight decrease in the burden related to financial reporting.
- **Financial management and payment claims.** Preparing and submitting a payment claim with supporting documents should not be affected, however reduced controls might imply that some parts become easier.
- **Financial controls.** Preparing and submitting data and documentation required for control purposes should be the part of the administrative burden reduced most substantially through this change.

### 5.2.4 Simplified reporting

The simplification of reporting might be a double-edged sword for beneficiaries. It could imply a reduction in reporting requirements, but increased reporting frequencies and increased numbers of indicators could result in additional administrative duties for beneficiaries.

For the projects the following will become less burdensome.

- **Application process.** Some indicator and target setting currently covered in the application process might be affected. Since fewer indicators are expected slightly less administrative burden may be expected.
- **Monitoring and Reporting.** Gathering information on the progress and results of the project and submitting that information to the authorities will be affected. The amount of data that needs to be collected and reported might be less, but the frequency of reporting increases, resulting in a negligible impact.
- **Evaluations.** Indirectly the changed reporting requirements might also affect the amount and depth of evaluations which will impact the beneficiaries approached for information.

### 5.2.5 Extended scope of SCOs

Extending the scope of SCOs could substantially reduce administrative burden for beneficiaries.

For projects the following will become less burdensome for all issues covered by SCOs.

- **Monitoring and Reporting.** In particular reporting on financial information and data will become less burdensome.
- **Financial management and payment claims.** Most importantly the financial management and payment claims will become less burdensome.
- **Keeping records.** Also keeping records should become easier.
- **Financial controls.** Financial controls will become less burdensome.

In general terms, for beneficiaries, SCOs offer key advantages as they enable more efficient financial management of operations, and contribute to speeding up the implementation and reimbursement of the Funds.

### 5.2.6 Estimated impact on administrative burden

Taken together the intended regulatory changes generally have a positive impact on the administrative burden, so it decreases for beneficiaries. Table 5.11 illustrates the outcomes based on expert judgement. In particular, the reduced number of controls and increased use of SCOs are expected to reduce administrative burden.

**Table 5.11 Estimated impact on administrative burden**

	Application process	Monitoring and reporting	Financial management and payment claims	Keeping records	Financial controls	Evaluations
No specific rules for revenue generating projects	↘	↘	↘	=	=	↘
No specific rules for major projects	↘	↘	↘	=	=	↘
Reduced number of verifications	=	↘	↘	=	↓	=
Simplified reporting	↘	=	=	=	=	↗
Extending the scope of SCOs	=	↓	↓	↘	↘	=

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

- ↓ large reduction of administrative burden
- ↘ minor reduction of administrative burden
- = negligible effect on administrative burden
- ↗ minor increase of administrative burden
- ↑ large increase of administrative burden

### 5.3 Overview of impact of regulatory changes

Taken together the eight proposed simplifications add up to a total reduction of administrative cost by approx. 6% in monetary terms and approx. 7% in terms of workload. These are however conservative estimations, which take into account possible passive gold-plating reactions from the concerned authorities. The figure can be slightly higher in case the reduced number of verifications has a more substantial impact on reducing administrative costs for on the spot verifications.

Given that the eight changes presented in this study only cover a part of the 80 simplification measures included in the proposal for a new CPR, the total reduction of administrative costs and burden will be higher than the figures provided in this study. For example, the elimination of the performance reserve, single audit arrangements and more proportionate approaches to audits will trigger further important reductions of administrative costs and burden.

As for the eight simplification measures studied, the proposed changes affect administrative costs to varying degrees. The highest potential for reducing administrative costs comes with an enormous increase in the uptake of SCOs driven by an extension in their scope. At the extreme, this could see a reduction of administrative costs by up to 26% – although this is currently unrealistic.

Keeping to more conservative estimations, an increased uptake of SCOs could see administrative costs fall by 1 to 2%. An increased use of SCOs in the realistic scenario is more likely to result in reduced administrative burden.

**Table 5.12 Estimated impact ranges of changes by ESI Fund**

	Administrative costs				Administrative burden
	FTE (per MEUR)	FTE (% change)	EUR (per MEUR)	EUR (% change)	
Simplified programming	-0.004 to -0.005	-0.4% to -0.6%	-200 to -200	-0.5% to -0.8%	=
Light Operational Programmes review	+/-0.0 to +0.002	+/-0.0% to +0.2%	+/-0.0 to +100	+/-0.0% to +0.2%	=
Simplified designation of authorities	-0.002 to -0.003	-0.2% to -0.4%	-50 to -100	-0.1% to -0.3%	=
No specific rules for revenue generating projects	-0.006 to -0.009	-0.6% to -0.9%	-200 to -300	-0.5% to -0.8%	↓
No specific rules for major projects	-0.005 to -0.006	-0.5% to -0.6%	-100 to -150	-0.3%	↓
Reduced number of verifications	-0.029 to -0.05	-3% to -5.2%	-1100 to -2000	-2.8% to -5.0%	↓
Simplified reporting	+0.002 to +0.005	+0.2% to +0.5%	+100 to +300	+0.3% to +0.7%	=
Extended scope of SCOs - realistic	-0.011 to -0.016	-1.1% to -1.7%	-440 to -650	-1.1% to -1.6%	↓
Extended scope of SCOs - ambitious	-0.17 to -0.251	-17.7% to -26.1%	-6690 to -9850	-16.7% to -24.6%	↓

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

- ↓ large reduction of administrative burden
- ↓ minor reduction of administrative burden
- = negligible effect on administrative burden
- ↑ minor increase of administrative burden
- ↑ large increase of administrative burden

A fall in administrative costs of up to 2% is roughly in line with the expected impact of all other changes, except for a reduction in the number of verifications. Simpler programming, changes in the designation of authorities, and the elimination of rules for revenue generating projects would cause a reduction of up to approximately 1% in costs and workload each. On the other hand, the light Operational Programme review and simplified reporting, as well as the cancellation of specific provisions for major projects, would cause very small increases in costs and workload.

The only change with a potential to significantly decrease administration is rigorous implementation of fewer verifications, which could reduce administrative costs by 3 to 5%.

The impact of each of the proposed changes is summarised in the Table 5.12.

These figures illustrate an initial expert judgement on the possible impacts of individual changes on administrative costs post 2020. If all changes are implemented, the total impact could be slightly higher than the sum of the individual impacts as the changes

also impact on each other. Percentage changes are calculated as a decrease or increase with respect to the baseline.<sup>18</sup>

## 5.4 Expected variations of administrative costs by future Policy Objectives

The proposal for the CPR for the 2021-2027 period provides for the replacement of current Thematic Objectives with five Policy Objectives. A first indicative estimation of administrative costs for the five Policy Objectives presented in the regulatory proposal for 2021-27, suggests considerable variations in administrative costs between them.

The analysis of variations of administrative costs per Thematic Objective (see chapter 3.3.4) allows for some conclusions on what level of administrative costs to expect for which Policy Objectives. This is based on following assumptions:

- Policy Objective 1 (A smarter Europe – innovative and smart economic transformation) is similar to Thematic Objectives 1 and 3;
- Policy Objective 2 (A greener, low-carbon Europe) resembles Thematic Objectives 4, 5 and 6;
- Policy Objective 3 (A more connected Europe – mobility and regional ICT connectivity) is comparable to Thematic Objectives 2 and 7;
- Policy Objective 4 (A more social Europe – implementing the European Pillar of Social Rights) is comparable to Thematic Objectives 8, 9 and 10;
- Policy Objective 5 (Europe closer to citizens – sustainable and integrated development of urban, rural and coastal areas through local initiatives) is comparable to Thematic Objectives 4, 6 and 9, i.e. the Thematic Objectives with the highest shares of Territorial and Urban Strategies<sup>19</sup>. Given the thematically broad nature of this Policy Objective, it will cover operations linked to other Thematic Objectives in the current programming period.

Following this simple approach to estimating expected administrative costs for future Policy Objectives, Policy Objective 3 is expected to have the lowest administrative costs. Whereas Policy Objectives 2 can be expected to have the highest administrative costs, about more than 2 times as high as Policy Objective 3. Policy Objectives 1 and 5 are expected to have administrative costs levels in the neighbourhood of Policy Objective 2.

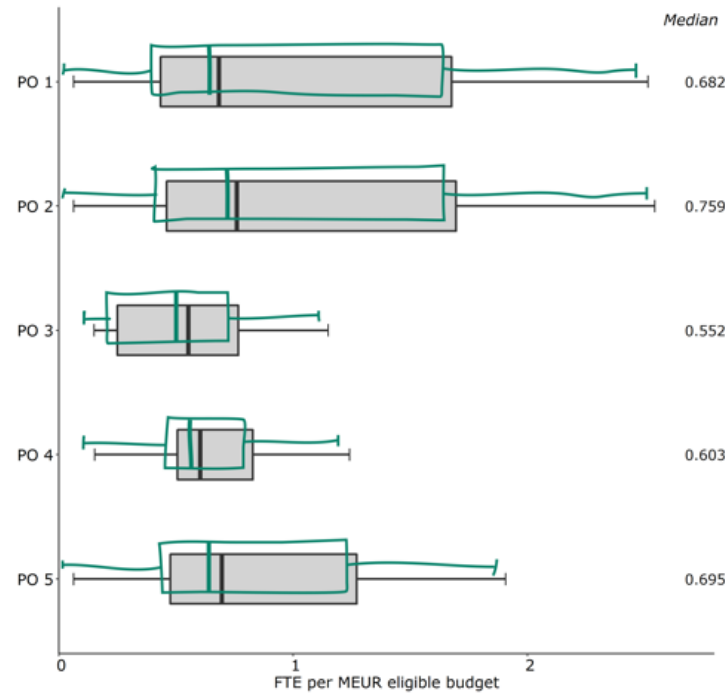
The below figures show the expected administrative costs by Policy Objective both in monetary values as well as in person years. The underlying figure is based on the administrative cost of the 2014-2020 period, while the figure sketched on top includes also the results of possible reductions of simplifications and overall reductions deriving from budgetary changes (see section 5.3).

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<sup>18</sup> The baseline in this simulation was a cost of 40,000 EUR per million Euro of eligible funding, and a workload of 0.96 FTE per million Euro of eligible funding

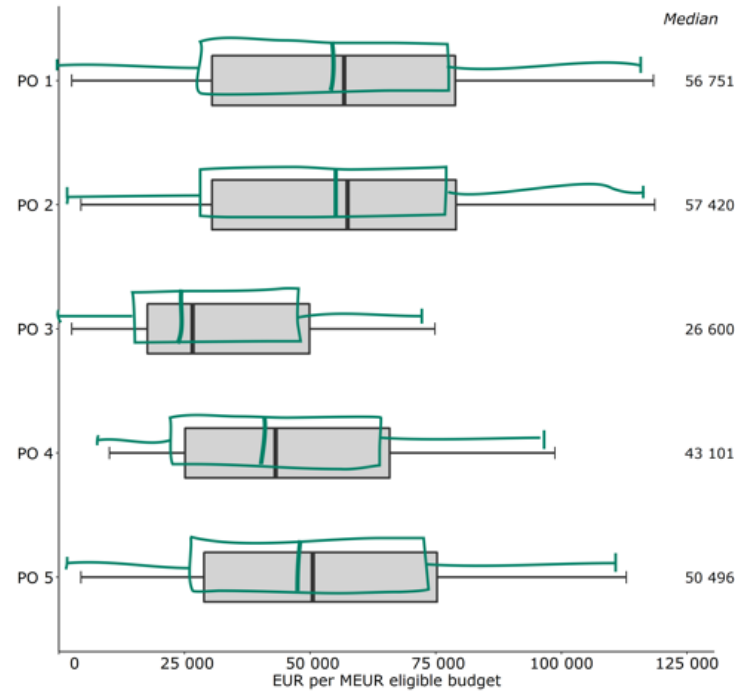
<sup>19</sup> See <http://urban.jrc.ec.europa.eu/strat-board/#/what>

**Figure 5.1 Expected administrative costs by Policy Objectives (FTE)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

**Figure 5.2 Expected administrative costs by Policy Objectives (EUR)**



(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

Following the proposal for the CPR, the emphasis given to different Policy Objectives will vary between less developed regions, transition regions and more developed regions. As shown in chapter 3.3.3 administrative costs vary between these types of regions. Translating these differences to the new expected administrative costs per Policy Objective, shows considerable variations:

- **Policy Objective 1:** Including the expected reductions from simplifications (see hand drawn box plots), the median administrative costs for Policy Objective 1 will vary between 40 000 EUR per million Euro of eligible budget in less developed regions and 56 000 EUR in more developed regions. The corresponding figures for person years are 0.47 FTE per million Euro of eligible budget in more developed regions and 0.88 FTE in less developed regions.
- **Policy Objective 2:** The expected variations of median administrative costs are far more considerable than for Policy Objective 1. They range from 18 000 EUR per million Euro of eligible budget in less developed regions and 67 000 EUR in more developed regions. As for person years, the variations range between 0.53 FTE per million Euro of eligible budget in less developed regions and 1.02 FTE in transition regions.
- **Policy Objective 3:** The expected variations of median administrative costs range from 15 000 EUR per million Euro of eligible budget in less developed regions and 30 000 EUR in more developed regions. As for person years, the variations range between 0.14 FTE per million Euro of eligible budget in transition regions and 0.44 FTE in more developed regions<sup>20</sup>.
- **Policy Objective 4:** In monetary terms, the median administrative costs vary between 33 000 EUR per million Euro of eligible budget in less developed regions and 42 000 EUR in more developed regions. The corresponding figures for person years are 0.54 FTE per million Euro of eligible budget in more developed regions and 0.59 FTE in less developed regions.
- **Policy Objective 5:** The median administrative cost of Objective 5 are expected to vary between 22 000 EUR per million Euro of eligible budget in less developed regions and 58 000 EUR in more developed regions. Then it comes the person years, the median is expected to vary between 0.54 FTE per million Euro of eligible budget in transition regions and 0.61 FTE in less developed regions<sup>21</sup>.

## 5.5 Expected overall administrative costs for 2021-2027

Taken together the analysis of the simplification measures as well as the estimations on expected administrative costs per future Policy Objective – including the fact that large parts of the funds will be concentrated to Policy Objectives 1 and 2 – and their variation across different types of regions<sup>22</sup>, following picture of the expected future administrative costs emerges: Considering only ERDF, CF, ESF and EMFF, the total administrative costs for the 2021-2027 period are expected to be about EUR 12.7 billion and 235 000 FTE compared to EUR 12.8 billion and 280 000 FTE in the 2014-2020 period<sup>23</sup>. While the simplification efforts undertaken do not fully show in the reduction in monetary terms, they are clearly visible in terms of person years. As pointed out

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<sup>20</sup> Mixed programmes tend to have higher figures than that.

<sup>21</sup> Mixed programmes tend to have higher figures than that.

<sup>22</sup> Based on the assumption that less developed regions use 60% of the budget for Policy Objectives 1 and 2, transition regions about 65% and more developed regions about 85%. Whereas the remaining budget is shared more or less equally among the three other Policy Objectives.

<sup>23</sup> Calculated on eligible budget estimated based on the current level of co-financing on Commission data (at 2018 prices).

previously, given the differences in staff costs across the EU, person year figures are much more reliable indications of administrative costs.

Considering that this study only addressed 8 of 80 simplification measures presented in the CPR, the overall reduction will be higher than the figures presented here.

**Table 5.13 Expected administrative costs today and tomorrow**

	ESIF	Cohesion Policy + EMFF	
	2014-2020	2014-2020	2021-2027
Total eligible budget (EU and national financing)	€ 646 billion	€ 493 billion	€ 519 billion
Total administrative costs in EUR	€ 25.9 billion	€ 12.8 billion	€ 12.7 billion
Average administrative costs in monetary terms	4.0 %	2.6 %	2.4 %
Total administrative costs in FTE	610 000	280 000	235 000
Average administrative costs in FTE in relation to total eligible budget	0.95	0.56	0.45

(Source: own elaboration based on 2018 database for ESIF administrative costs and burden)

All the figures on changing administrative costs come with caveats.

Firstly, although administrative costs are expected to fall overall, this does not imply that costs are lower for every authority. As can be seen from the discussion about the tasks affected (see chapters 2 and 3), administrative costs fall for some authorities but may rise in parallel for others.

Secondly, every regulatory change – even a simplification – comes at a cost for adjustments and meets inertia. This implies that changes are often implemented with a time delay. This also means that simplifications are most effective, if they address tasks which are particularly costly or labour intensive.

Thirdly, the need for regulatory clarity, stability and legal certainty, highlighted in previous studies on ESIF administrative costs, also apply to the changes reviewed in this document:

- Fewer and clearer rules, reducing the complexity of the regulatory system.
- More stable rules over time, also from one funding period to the next.
- Reduce uncertainty among programmes, with training and guidance.

Fourthly, administrative costs and burden are not only shaped by the CPR but also affected by implementation practices and possible additional regulations at the level of Member States and programmes. As the CPR aims at higher legal certainty reducing the need for precautionary measures or over-interpretations – which often are the reason for

gold-plating – it also lays the ground for matching the reductions of administrative costs and burden with reductions in gold-plating.

Last but not least, existing regulations have generally emerged for a reason and changes might come with a trade-off. This particularly concerns the quality of results achieved through ESIF as well as the transparency and accountability of spending.

- **Trade-off of simplification and results.** The selection of operations is the task with the highest administrative costs. So, simplifications of this task are expected to be particularly effective in reducing administrative costs. At the same time, this task is also decisive in ensuring that the best projects and investments are funded to achieve programmes and fund objectives. To offset the risk of reduced project quality, new enabling conditions should contribute to an improvement in the quality of projects, together with the reduction of co-financing rates, prompting more project ownership. Nonetheless, reducing the workload of this task may impact the achievements of the funding.
- **Trade-off of simplification and controls.** Taken together, the various administrative tasks for controls generate the highest administrative costs. So, simplifications reducing the administrative costs and workload related to controls are expected to be very effective. At the same time, the controls (however enervating they are) ensure accountability and transparency for spending taxpayers' money, which sets its own standard. To offset the risk of reduced accountability and transparency, fewer, better targeted and risk-based controls are introduced, which are expected to be more effective than systemic, often formalistic ones. Nonetheless, reducing the workload of this task may impact the level of accountability and transparency that ESIF stands for at present.

## 6 Conclusions

This report presents new baselines for administrative costs and burden for ESIF 2014-2020. For the first time a comprehensive study across the five ESI Funds has enabled better comparison between all ESI Funds. The new baselines for administrative costs and burden required extensive data collection from programme authorities and project lead partners, a new database with administrative cost and burden information, filling data gaps, comparing the new baselines with those from previous studies, and simulations for administrative costs and burdens in the next programming period, post 2020.

Overall, the newly established baselines are robust and can be used by Commission Services to simulate the impact of regulatory changes on ESIF administrative costs and burden. The newly established baselines for ESIF administrative costs and burden prove reasonable when compared with previous baselines. Proper comparison of baselines from all studies on administrative costs and burden is challenging due to different study objectives and scope, but a sound comparison with ERDF, CF and ESF was possible. Furthermore, comparison with data from DG AGRI shows that the newly established baselines in this study are comparable to their recent studies as well.

In addition, plausibility checks were performed in Member States and with programme authorities to verify the data. Feedback was generally positive and the established baselines seem to represent the perceived administrative costs and burden. Feedback and comments were used to recalculate the baselines and make them more robust.

### Administrative costs

**4% spent on administrating and managing ESIF.** Overall, the new baseline for administrative costs for ESIF is 40 300 Euros per million Euros of eligible funding, and an overall workload for authorities of 0.95 fulltime equivalents (FTEs) per million Euros of eligible funding. This means that 4% of the total eligible costs for ESIF is spent on administrative tasks by programme authorities. The workload for programme authorities is estimated at over 610 000 FTE accumulated over the full programming period.<sup>24</sup> These figures are average figures and figures for individual programme vary greatly for a number of good reasons as discussed further down.

These figures on administrative costs provide information on the workload and money used to administer the funds. As shown above there are various reasons why not all programmes can have the same level of administrative costs. To judge whether administrative costs are well spent and of appropriate size, they should be compared with programme achievements. For ESIF this has not been done so far. Therefore, we strongly advise against using administrative cost information out of context, to compare programmes or Member States or even draw conclusions on performance or efficiency.

**For good reasons administrative costs vary between ESI Funds,** programmes and functions. Comparing administrative costs across the five ESI Funds shows some differences. EAFRD programmes have the highest administrative costs at 83 000 Euros and 2.18 FTEs, per million Euros of eligible funding. ERDF, CF, and ESF have the lowest administrative costs of 18 000 - 27 000 Euros and 0.55 - 0.68 FTEs, per million Euros of eligible funding.

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<sup>24</sup> Focusing on person years (FTEs) is in most cases more sensible than looking at administrative costs in monetary terms. This is mainly due to the huge variation in staff costs and price levels across Europe. On average administrative costs are some 0.96 FTE per million EUR of eligible funding (taking into account EU funding and national co-funding). Including private co-funding would reduce the figure.

Differentiating administrative costs by function illustrates the highest costs and workload for Managing Authorities, of 21 700 Euros and 0.56 FTEs per million Euros of eligible funding. For programme preparation, Certifying Authorities, Audit Authorities, and EAFRD Certification Bodies costs range from 800 Euros and 0.02 FTEs to 8 100 Euros and 0.10 FTEs per million Euros of eligible funding. EAFRD Paying Agencies are an exception, at 52 200 Euros and 1.18 FTEs per million Euros of eligible funding. Lastly, national coordination activities are estimated at 820 Euros and 0.01 FTEs per million Euros of eligible funding.

Differences in administrative costs by function may be explained by the tasks performed by the different functions. ERDF, CF, ESF and EMFF Managing Authorities as well as EAFRD Paying Agencies perform mostly project related tasks, dealing with the selection of operations and exchanges with beneficiaries.

At ESIF level, the most costly single tasks in monetary terms are 'verifications for reimbursement of beneficiaries', followed by 'selection of operations and information of beneficiaries', 'ensuring an adequate audit trail and verifications', 'information and communication' and 'on the spot verifications'.

There are substantial variations of administrative costs between programmes as well as between funds. These variations can be explained by several factors. The most important factors are the following:

- **The financial size of a programme.** As many tasks are not related to the size of a programme, financially smaller programmes tend to be relatively costlier.
- **The number of beneficiaries and time span of the individual operations.** These two dimensions matter, as more beneficiaries and shorter operations imply more administrative workload. This is not directly linked to the financial volume of the programme but rather to the type of operations funded.
- **The thematic focus of a programme.** The thematic objectives have a considerable impact on administrative costs, as some objectives are more work intensive than others. The highest administrative costs are for TO 11 (Enhancing institutional capacity of public authorities and stakeholders and efficient public administration), TO 5 (Promoting climate change adaptation, risk prevention and management) and TO 3 (Enhancing the competitiveness of SMEs).

Variations in administrative costs are strongly influenced by the three aspects outlined above. Accordingly, proportionality – both in terms of financial volume and thematic focus of a programme – needs to be a key element of any assessment or discussion about administrative costs.

## Administrative burden

**The administrative burden differs largely by type of beneficiary.** The limited sample analysis for this study shows, that complying with administrative requirements stemming from the CPR by project partners account for 107 800 Euros and 1.5 FTEs per million Euros of eligible project cost based on the sample projects. In other words, 11% of total project costs are spent on administrative tasks. In addition, project partners have to invest resources when making an application. The administrative burden for the application phase is estimated at 19 900 Euros and 0.5 FTEs per million Euros of eligible project cost.

During project implementation, monitoring and reporting, followed by keeping records, and preparation and submission of payment claims require the highest administrative burden and workload for project partners.

Establishing the baseline for administrative burden illustrates large variations in burden and workload. Larger projects have relatively lower administrative burden. These projects benefit from economies of scale since some of the fixed costs and administrative workload are spread over a larger total budget. Hence CF projects have the lowest and ESF projects the highest administrative burden.

Due to the very small size of the sample in relation to the overall population of ESIF beneficiaries, the conclusions on administrative burden are to be considered indicative. More extensive data collection should be carried out in order to obtain more significant results.

## **Administrative costs and burden compared to previous periods**

**ESIF administrative costs have decreased since the 2007-13 programming period.** The new baselines have enabled estimations of the scope of administrative costs for ESIF 2014-2020 compared to the 2007-2013 programming period. For ERDF-CF administrative costs have decreased in the 2014-2020 period. The decrease is in particular notable for Managing Authorities, whereas there are more administrative costs for programme preparation and by Certification Authorities. Comparing individual administrative tasks more precisely for programme authorities with generally high costs and workload shows a mixed picture. The administrative costs and workload for information and communication, administrative verifications of each application for reimbursement by beneficiaries, as well as monitoring and evaluations during the programming period have decreased. On the other hand, selection of operations and information to beneficiaries have become more expensive and require more workload. Auditing operations shows a mix picture as the administrative costs have fallen slightly in 2014-2020, but require slightly more workload.

Similar conclusions can be drawn from comparing administrative costs for ESF between 2007-2013 and 2014-2020. Overall administrative costs have decreased, most notably for Managing Authorities, whereas Audit Authorities have seen an increase.

For EAFRD and EMFF, assessing the scope of administrative costs by comparing the baselines between previous and the current programming periods was not possible. The methods and scope of the previous and current studies are too diverse.

**Administrative burden in the sample has increased.** This is for ERDF-CF, the only fund for which previous data was available. The reliability of this finding is low, given the small sample size.

## **Expectations post 2020**

**Extending the scope of SCOs should decrease administrative costs even further.** The study also assessed the applicability of the new baselines for the future. They were used to assess the impact of eight regulatory changes on administrative costs and burden post 2020. Conservative estimations show that the eight simplification measures studied may add up to a reduction of administrative costs by 6% in monetary terms and 7% in terms of workload. The figure can be slightly higher in case the reduced number of verifications has a more substantial impact on reducing administrative costs for on the spot verifications. Considering that the eight changes presented in this study only cover a part of the 80 simplification measures included in the proposal for a new CPR, the overall reduction will be higher than the figures presented here.

The most considerable decreases in administrative costs can be expected by reducing the number of verifications and by considerably increasing the use of SCOs. On the contrary, midterm reviews and simplified reporting may increase administrative costs and workload.

Of the proposed changes, the increased use of SCOs, discarding specific rules for revenue generating projects and reducing the number of verifications are the most beneficial for projects, leading to less administrative burden and workload for beneficiaries.

**Expect variation of administrative costs for future ESIF Policy Objectives.** A first indicative estimation of administrative costs for the five Policy Objectives presented in the regulatory proposal for 2021-27, suggests considerable variations in administrative costs between them. Policy Objective 3 (A more connected Europe - mobility and

regional ICT connectivity) is expected to have the lowest administrative costs. Whereas Policy Objective 2 (A greener, low-carbon Europe) can be expected to have the highest administrative costs, about more than 2 times as high as Policy Objective 3. Policy Objectives 1 (A smarter Europe - innovative and smart economic transformation) and 5 (Europe closer to citizens – sustainable and integrated development of urban, rural and coastal areas through local initiatives) are expected to have administrative costs levels in the neighbourhood of Policy Objective 2.

## To conclude

The main results of the study are the establishment of new baselines for all five ESI Funds with a single approach and methodology. Comparisons with previous baselines as well as the simulation of changes in administration cautions care when putting these figures into political contexts.

- **Actual figures lower than perceived costs and burden.** Complaints about excessive administrative costs and burden are widely shared in the ESIF community. However, this report shows that administrative costs average about 4% and administrative burden about 11%. These figures, in light of the comparison presented above, can be considered as reasonable (see also SWECO 2010). Still, there are considerable variations.
- **Good reasons for variations.** The variations in administrative costs and burden are largely linked to the type of operations supported and the financial volume of the operations and programmes.
- **Most costly are financial controls and selection of operations.** The study analysed administrative costs for 42 individual tasks specified in the CPR. Grouping these tasks thematically shows that some 45% of administrative costs concern financial management, controls and audits. Although these tasks are often considered critically as the most burdensome, they ensure transparent and sound spending of taxpayers' money. The two tasks with the highest administrative costs are 'verifications for reimbursement of beneficiaries', followed by 'selection of operations and information of beneficiaries'. While the first is related to financial controls, the second is decisive for quality of the outcomes and results of a programme, i.e. ensuring that the best possible operations are selected and funded.
- **Further reductions possible.** The proposed regulations for ESIF post 2020 suggest there is scope for modest further reductions of administrative costs. A tentative assessment of the impact of proposed changes in the regulations for ESIF post 2020 reveals some possibilities for slightly reduced administrative costs in future. Modest estimates suggest that administrative costs could be reduced by about 7%. For administrative burden reductions are also possible. All this depends largely on the final uptake of SCOs and the final implementation of simplifications for financial verifications.
- **Change is costly.** Complying with regulatory requirements demands learning and finding ways to implement (new) requirements in established systems. Indeed in many cases changes – including simplifications – meet a strong inertia. This implies that changes are often implemented with a considerable time delay and in the short run the simple fact of change risks to create additional administrative costs and burden. This also means that simplifications are most effective, if they address tasks which are particularly costly or labour intensive.
- **Gold-plating.** In the shared management system, the reduction of administrative costs and burden does not depend solely on the CPR. It is also affected by implementation practices and possible additional regulations at the level of Member States and programmes. As the CPR aims at higher legal certainty reducing the need for precautionary measures or over-interpretations – which often are the reason for gold-plating – it also lays the ground for matching the reductions of administrative costs and burden with reductions in gold-plating.
- **Trade-off between administrative costs and money well spent.** Discussing administrative costs and burden implies considering the trade-off between: (a)

ensuring accountability and the best use of taxpayer's money; and (b) making the necessary procedures as simple and lean as possible for all involved. The established baselines for administrative costs and burden reflect current costs and workload to ensure transparency of EU-funding spending, while at the same time ensuring and highlighting relevant and measurable outputs and results from EU investments. Also in comparison to other policy fields the administrative costs seem reasonable. A comparison made in 2010 (SWECO 2010) shows that the EBRD has a comparable level of administrative costs to EU Cohesion Policy, while other examples have up to two or three times higher administrative costs than EU Cohesion Policy. Although these figures cannot be used for a direct comparison of numbers, they clearly indicate that EU Cohesion Policy does not involve particularly high administrative costs.

- **Proportionality is important.** There are considerable variations of administrative costs and burden related to the financial volume of programme and operations and their thematic focus. Therefore, proportionality – both in terms of financial volume and thematic focus – should be an important feature in any discussion about administrative costs and burden.
- **Administrative costs are not a performance indicator.** Administrative costs solely provide information on how much workload or money is used to administer the funds. As shown above there are various reasons why not all programmes can have the same level of administrative costs. To judge whether administrative costs are well spent and of appropriate size, administrative costs should be compared to programme achievements. For ESIF this has not been done so far. Therefore, we strongly advise against using administrative cost information – out of context – to compare programmes or Member States or even draw conclusions on performance or efficiency.

In short, using the newly established baselines requires consideration of the transparency and accountability of the spending. The new baselines presented in this report and detailed in the accompanying database and simulation tool enable the costs and workload of ESIF administrative tasks to be simulated, along with changes to these resulting from regulatory framework changes.

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## New assessment of ESIF administrative costs and burden

### ANNEXES

## Annex I – List of tasks per function

### List of tasks per function (excluding EAFRD)

	TASKS	FUNDS (reference in regulations)		BODIES (allocation to specific surveys)					
	Task name	ERDF/CF & ESF	EMFF	National coordination	Programme preparation	Managing Authority	Certifying Authority	Audit Authority	
N.1	Elaboration of partnership agreement	CPR, Part II - Art. 14-17		X					
N.2	Progress report	CPR, Part II - Art. 52		X					
P.1	Preparation of programmes	CPR, Part II - Art. 26 – 31, EMFF Art 17-22			X				
P.2	Ex ante evaluation	CPR, Part II - Art. 55, EMFF Art 115-116			X				
P2.1	Strategic Environmental Assessment (when applicable)	CPR, Part II - Art. 55(4)							
P.3	Setting up of management and control system	CPR, Part II - Art. 72			X				
P.4	Designation of authorities	CPR, Part IV - Art. 123,124, EAFRD Reg. - Art. 65			X				
P.5	Ensuring ex ante conditionalities	CPR, Part II - Art.19							
	<b>General management tasks</b>					X			
M.1	Information and communication	CPR, Part III - Art. 115	EMFF Reg. - Art. 119			X			
M.2	Establishing, running and guiding the work of the monitoring committee	CPR, Part IV - Art. 125(2a), CPR, Part II - Art. 47	CPR, Part IV - Art. 125(2a), CPR, Part II - Art. 47, EMFF Art 112-113			X			
M.3	Ensuring a system for collecting, recording and storing data. (ESF: including participants-related data)	CPR Art. 72 (d), Art. 112(3), Art. 125(2a, 2d, 2e, 4d, 8), Art. 140	CPR Art. 72 (d), Art. 112(3), Art. 125(2a, 2d, 2e, 4d, 8), Art. 140			X			
M.3.1	Set up and use of a system for the electronic exchange of information with beneficiaries (e-cohesion)	CPR, Part IV - Art. 122 (3), Art. 140	Optional for EMFF: CPR, Part IV - Art. 122 (3)			X			
M.4	Ensuring equality between men & women and non-discrimination	CPR, Part II - Art. 7	CPR, Part II - Art. 7			X			
	<b>Financial management tasks</b>					X			
M.5	Ensuring adequate separation of functions and systems for reporting and monitoring where the responsible authority entrusts execution of tasks to another body	CPR, Part II - Art. 72(a, b, e, h), Part IV - Art. 122(2), Art. 125(1)	CPR, Part II - Art. 72(a, b, e, h), Part IV - Art. 122(2), Art. 125(1)			X			
M.6	Correction of irregularities	CPR, Part II - Art. 72(h)	CPR, Part II - Art. 72(h)			X			
M.7	Effective and proportionate anti-fraud measures	CPR Part II - Art. 72(h), Part IV - Art. 122(2), Art. 125(4c)	CPR Part II - Art. 72(h), Part IV - Art. 122(2), Art. 125(4c)						
M.8	Management of financial instruments(*)	CPR, Part II - Art. 37-46	CPR, Part II - Art. 37-46			X			
M.9	Integrated territorial investment(*)	CPR, Part II - Art. 36	n.a.			X			
M.10	Community-led local development & LEADER(*)	CPR, Part II - Art. 34-35	CPR, Part II - Art. 34-35, EMFF Reg. Art. 63			X			

	<b>Project related tasks</b>					<b>X</b>		
M.11	Selection of operations and information to beneficiaries	CPR, Part IV - Art. 125(3), Art. 72(c)	CPR, Part IV - Art. 125(3), Art. 72(c)			X		
M.12	Ensuring an adequate audit trail and adequate management verifications	CPR Art. 72 (c, g, h), Art. 122(3), Art. 125 (4a, 4b 4d, 5, 6, 8), Art. 140	CPR Art. 72 (c, g, h), Art. 122(3), Art. 125 (4a, 4b 4d, 5, 6, 8), Art. 140			X		
M.12.1	Administrative verifications for each application for reimbursement by beneficiaries	CPR, Part IV - Art. 125 (4a, 5a)	CPR, Part IV - Art. 125 (4a, 5a)					
M.12.2	On-the-spot verifications	CPR, Part IV - Art. 125 (4a, 5b, 6)	CPR, Part IV - Art. 125 (4a-c, 5b, 6)			X		
M.13	Drawing up the management declaration and annual summary of final audit reports and of controls carried out	CPR, Part IV - Art. 125(4e)	CPR, Part IV - Art. 125(4e)			X		
M.14	Management of major projects(*)	CPR, Part III - Art. 100-103	n.a.			X		
M.15	Management of global grants(*)	CPR, Part IV - Art. 123(7)	CPR, Part IV - Art. 123(7)			X		
	<b>Reporting, monitoring and evaluation tasks</b>					<b>X</b>		
M.16	Annual implementation reports	CPR, Part IV - Art. 125(2b)	EMFF Art 114			X		
M.17	Preparation and transmission of financial data to the EC, including payment forecasts (in the case of EMFF two different tasks are considered : (1) transmission of financial data; (2) annual provision of cumulative data on operation)	CPR, Part III - Art. 112	EMFF Reg. - Art. 97(1)(a) and 98			X		
M.18	Monitoring and evaluations during the programming period (ESF: including participant-related data collection)	CPR, Part II Art 56, 57 Part III - Art. 114	EMFF Reg. - Art. 117			X		
M.20	Assessment and monitoring of operations generating net revenue after completion(*)	CPR, Part II - Art. 61	CPR, Part II - Art. 61			X		
C.1	Draw up and submit payment application to the Commission	CPR, Part IV - Art. 126 (a)	CPR, Part IV - Art. 126 (a)				X	
C.2	Certification of expenditure entered in the accounts	CPR, Part IV - Art.126 (c)	CPR, Part IV - Art.126 (c)				X	
C.3	Ensuring that adequate information was received from the MA	CPR, Part IV - Art. 126(e)	CPR, Part IV - Art. 126(e)				X	
C.4	Taking account of the results of all audits	CPR, Part IV - Art. 126(f)	CPR, Part IV - Art. 126(f)				X	
C.5	Maintenance of records of expenditure declared to the Commission	CPR, Part IV - Art. 126(g)	CPR, Part IV - Art. 126(g)				X	
C.6	Accounting of amounts recoverable or withdrawn following cancellations	CPR, Part IV - Art. 126(h)	CPR, Part IV - Art. 126(h)				X	
A.1	Preparation, submission and updating of the audit strategy	CPR, Part IV - Art. 127(4)	CPR, Part IV - Art. 127(4)					X
A.2	System audits	CPR, Part IV - Art. 127(1)	CPR, Part IV - Art. 127(1)					X
A.3	Audit of operations	CPR, Part IV - Art. 127(1)	CPR, Part IV - Art. 127(1)					X
A.4	Audit of accounts	CPR, Part IV - Art. 127(1)	CPR, Part IV - Art. 127(1)					X
A.5	Preparation and submission of the annual control report	CPR, Part IV - Art. 127(5)	CPR, Part IV - Art. 127(5)					X

**List of tasks per function (EAFRD)**

	<b>EAFRD</b>		<b>BODIES</b> (allocation to specific surveys)				
	<b>Task name</b>	<b>Reference in regulation</b>	National coordination	Programme preparation	Managing Authority	Paying Agency	Certification Body
N.1	Elaboration of partnership agreement	CPR, Part II - Art. 14-17	X				
N.2	Progress report	CPR, Part II - Art. 52	X				
P.1	Preparation of programmes	CPR, Part II - Art. 26 – 31		X			
P.2	Ex ante evaluation	CPR, Part II - Art. 55		X			
P2.1	Strategic Environmental Assessment (when applicable)	CPR, Part II - Art. 55(4)		X			
P.3	Designation of authorities	EAFRD, Art 65, HZR, Art 7		X			
P.4	Ensuring ex ante conditionalities	CPR, Part II - Art.19		X			
	<b>General management tasks</b>				X		
E-MA.1	Information and communication	EAFRD Reg. - Art. 66(1) and Impl. Reg. 808/2014 - Annex 3			X		
E-MA.2	Establishing, running and guiding the work of the monitoring committee	EAFRD Reg. - Art. 74, CPR, Part II - Art. 47			X		
E-MA.3	Ensuring a system for collecting, recording and storing data, including the provision of data by beneficiaries	EAFRD Reg. - Art. 66(1)(a) and 70			X		
E-MA.4	Ensuring equality between men & women and non-discrimination	CPR, Part II - Art. 7			X		
	<b>Financial management tasks</b>				X		
E-MA.5	Ensuring adequate separation of functions and systems for reporting and monitoring where the responsible authority entrusts execution of tasks to another body	CPR, Part II - Art. 72(a, b, e, h)			X		
E-MA.8	Management of financial instruments(*)	CPR, Part II - Art. 37-46			X		
E-MA.9	Integrated territorial investment(*)	n.a.			X		
E-MA.10	Community-led local development & LEADER(*)	CPR, Part II - Art. 34-35, EAFRD Reg. - Art. 42-44			X		
	<b>Project related tasks</b>				X		
E-MA.11	Selection of operations and information to beneficiaries	EAFRD Reg. - Art. 49, CPR, Part II - Art. 34(3)			X		
	<b>Reporting, monitoring and evaluation tasks</b>				X		
E-MA.16	Annual implementation reports	EAFRD Reg. - Art. 75			X		
E-MA.18	Monitoring and evaluations during the programming period	EAFRD Reg. - Art. 66(1)(b), 76-79, Reg.1306/2014 – Art. 110			X		
E-MA.20	Assessment and monitoring of operations generating net revenue after completion(*)	CPR, Part II - Art. 61			X		

E-PA.1	Setting up of management and control system in programme preparation phase (only consider additional workload for this task, in case pre-existing Pillar 1 management and control systems are used)	HZR, Art. 58.2					X	
E-PA.2	Draw up and submit payment application to the Commission	CAP Impl. Reg. 908/2014 Art. 22(1)					X	
E-PA.3	Ensuring that adequate information was received from the MA	HZR, Art. 9, Art. 6					X	
E-PA.4	Preparation and transmission of financial data to the EC, including payment forecasts	HZR, Art 102.1.c					X	
E-PA.5	Ensuring an adequate audit trail and adequate management verifications	HZR, Art 49, Art. 58					X	
E-PA.5.1	Administrative verifications for each application for reimbursement by beneficiaries	HZR, Art 59.1					X	
E-PA.5.2	On-the-spot verifications	HZR, Art 59.1					X	
E-PA.6	Effective and proportionate anti-fraud measures	HZR, Art 58,1,b					X	
E-PA.7	Correction of irregularities	HZR, Art 58.1.c					X	
E-PA.8	Drawing up the management declaration and annual summary of final audit reports and of controls carried out	HZR, Art. 7(3b, 3c)					X	
E-PA.9	Taking account of the results of all audits	HZR, Art. 7, Art. 9					X	
E-PA.10	Maintenance of records of expenditure declared to the Commission	HZR, Art 48-49					X	
E-PA.11	Accounting of amounts recoverable or withdrawn following cancellations	HZR, Art 7.3.a					X	
E-CB.1	Certification of expenditure entered in the accounts	HZR, Art 9						X
E-CB.2	Preparation, submission and updating of the audit strategy	HZR, Art 9						X
E-CB.3	System audits	HZR, Art 9						X
E-CB.4	Audit of operations	HZR, Art 9						X
E-CB.5	Audit of accounts	HZR, Art 9						X
E-CB.6	Preparation and submission of the annual control report	HZR, Art 7.3.c						X

## Annex II - Excel file with draft database

The Excel file annexed to this report provides an overview of the analysis findings.

The file includes two worksheets, one presenting the findings for administrative costs (Authorities sheet), while the second includes data about administrative burden (Beneficiaries sheet).

**The sheet 'Authorities'** has five fields:

- total costs,
- external costs,
- full-time equivalents (FTEs),
- total costs per million Euros (OP amount), and
- full-time equivalents per million Euro (OP amount).

These are aggregated in three levels in the columns: Overall, By Authority, and By Task. The rows include details for each combination of Country/Fund, totals by country, and the aggregation at EU level (by Fund and in total). In this worksheet, no aggregations are performed across Funds or across authorities responsible for different tasks. So, the funds are presented at the most disaggregated level as EAFRD, CF, EMFF, ERDF, ERDF & CF, ERDF & CF & ESF, ERDF & ESF, ERDF-ETC, ESF and ESIF (only for National Coordination). This means the data does not match with those for funds that have been aggregated in the report (ERDF, CF, and ESF). Likewise, authorities are presented separately for non-EAFRD and for EAFRD in the section 'By authority'. In the section 'By task', Managing Authority and Programme Preparation are combined for EAFRD and non-EAFRD funds, while Paying Agencies and Certification Bodies are kept separate from Certifying and Audit Authorities. This minimises confusion about task attribution, while allowing for quick comparisons between Funds.

The data refer to monetary costs and workload reported by respondents to the sample, and expanded to ESIF authorities overall, as described in chapter 2. Possible comparisons and cross-analyses of this data are in chapter 3.3. Other cross-comparisons, including comparisons between Member States, are not within the scope of this study. The data are not intended to be a performance indicator that can be compared across countries due to two main factors.

- Country contexts are extremely diverse with qualitative aspects which are not easy to assess, including levels of economic activity and development, organisational and administrative cultures, and availability of skilled staff.
- Comparison between countries needs to consider the different salary levels of administrators involved. This would imply weighting not only for the level of prices or purchasing power in each country, but also for the different proportion of staff types, and their specific costs in each country.

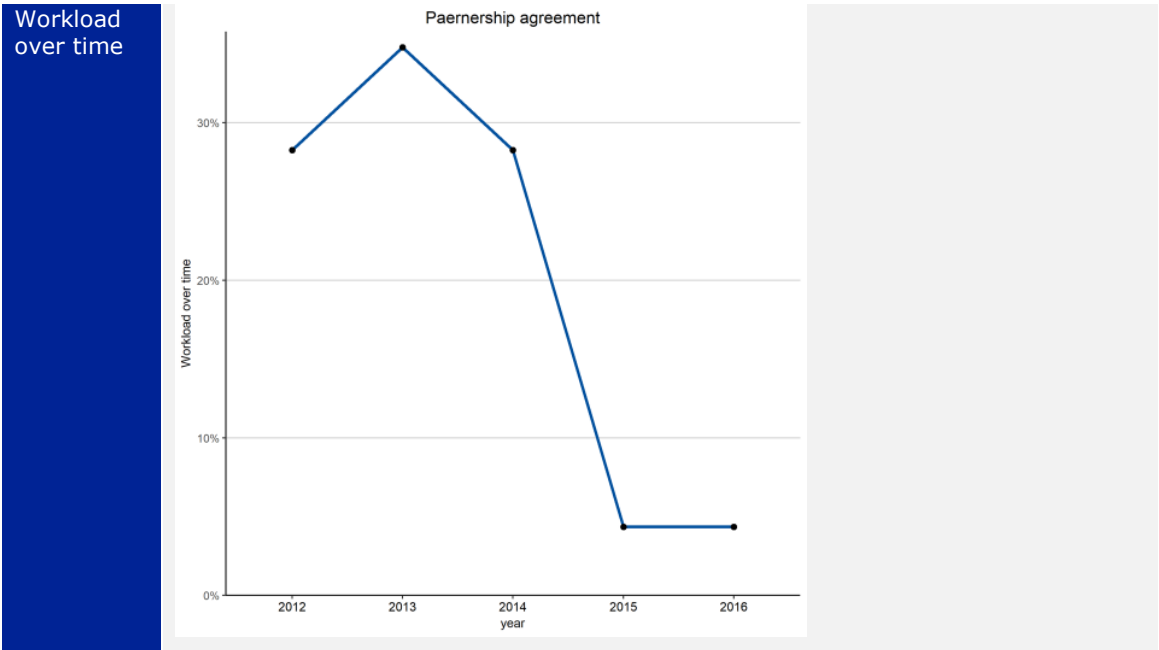
**The sheet 'Beneficiaries'** presents the data underlying the summary tables shown under sections 3.4.1 and 3.4.2 of the report. It is the full set of usable responses from beneficiaries. The database includes information about the fund, Member State, and total amount of investment for each project. It includes data regarding the workload for applications (in terms of FTE and monetary value), and for management of the programme management tasks described in section 3.4.

## Annex III - Factsheets of administrative costs per task

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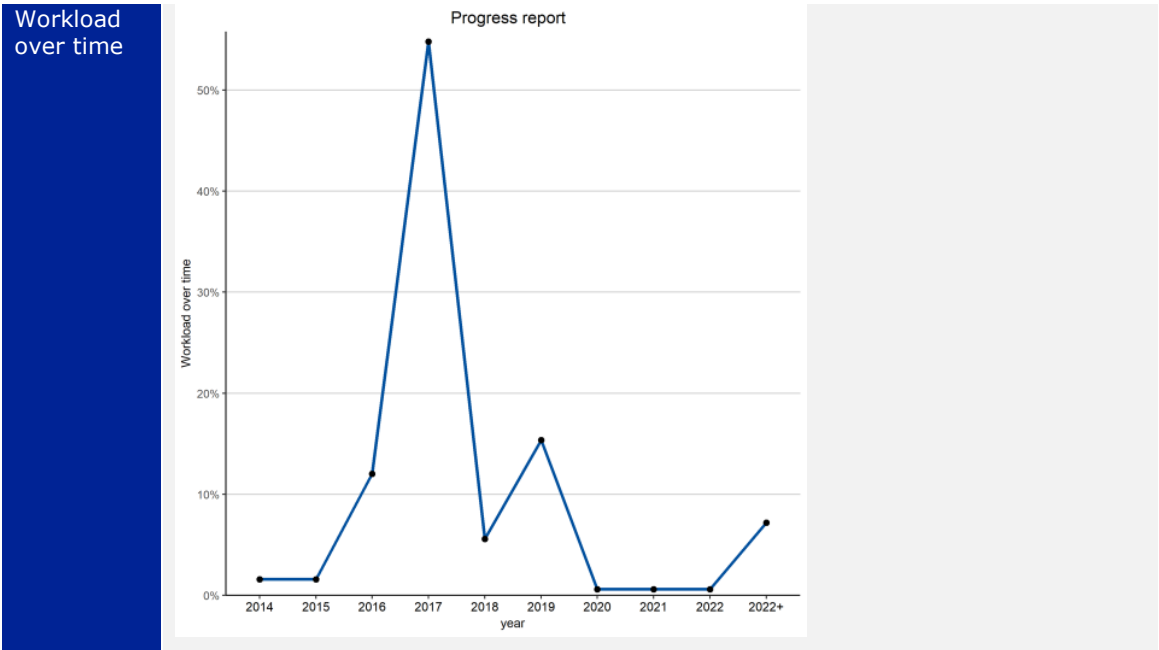
## A.1 Task N.1 – Partnership Agreement

Task description	Partnership Agreement National policy level <ul style="list-style-type: none"> <li>CPR, Part II - Art. 14-17</li> </ul>
ESIF workload (approx.)	2 500 FTE
Share of total workload	0.4%
ESIF costs (approx.)	€ 204 200 000
Share of total costs	0.8%
ESIF external costs	€ 11 210 000
Workload in person years per million EUR of total eligible budget	<p>Partnership Agreement</p> <p>Median: 0.004</p>
Costs in EUR per million EUR of total eligible budget	<p>Partnership Agreement</p> <p>Median: 341</p>

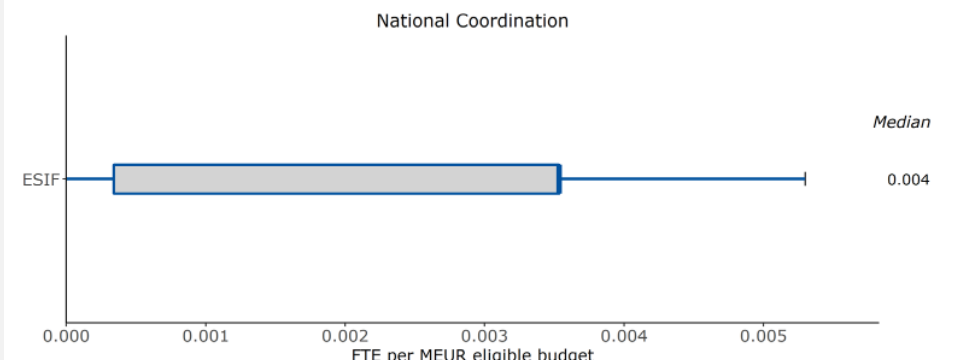
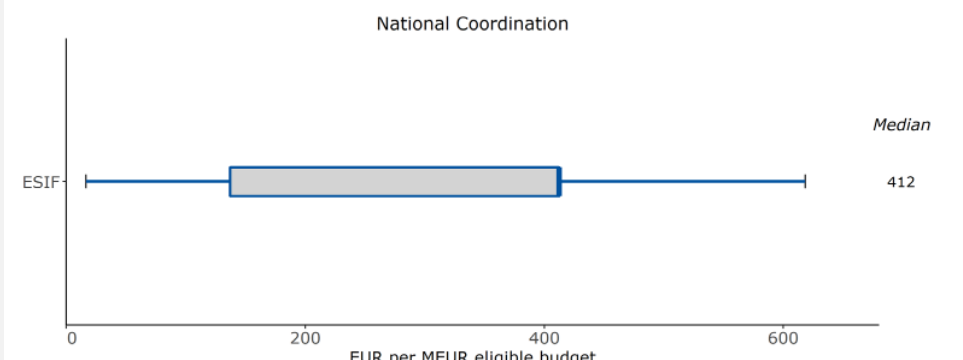


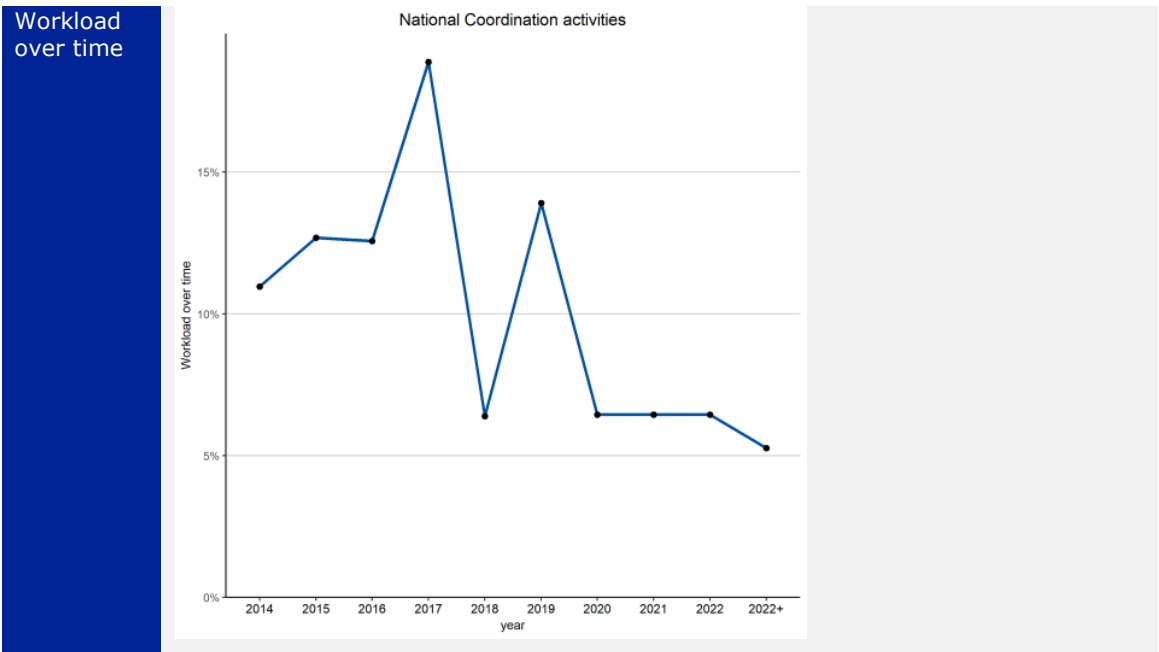
## A.2 Task N.2 – Progress report

Task description	Progress report National policy level <ul style="list-style-type: none"> <li>CPR, Part II - Art. 52</li> </ul>
ESIF workload (approx.)	1 300 FTE
Share of total workload	0.2%
ESIF costs (approx.)	€ 116 100 000
Share of total costs	0.4%
ESIF external costs	€ 1 430 000
Workload in person years per million EUR of total eligible budget	<p>Progress report</p> <p>Median</p> <p>0.001</p> <p>FTE per MEUR eligible budget</p>
Costs in EUR per million EUR of total eligible budget	<p>Progress report</p> <p>Median</p> <p>217</p> <p>EUR per MEUR eligible budget</p>



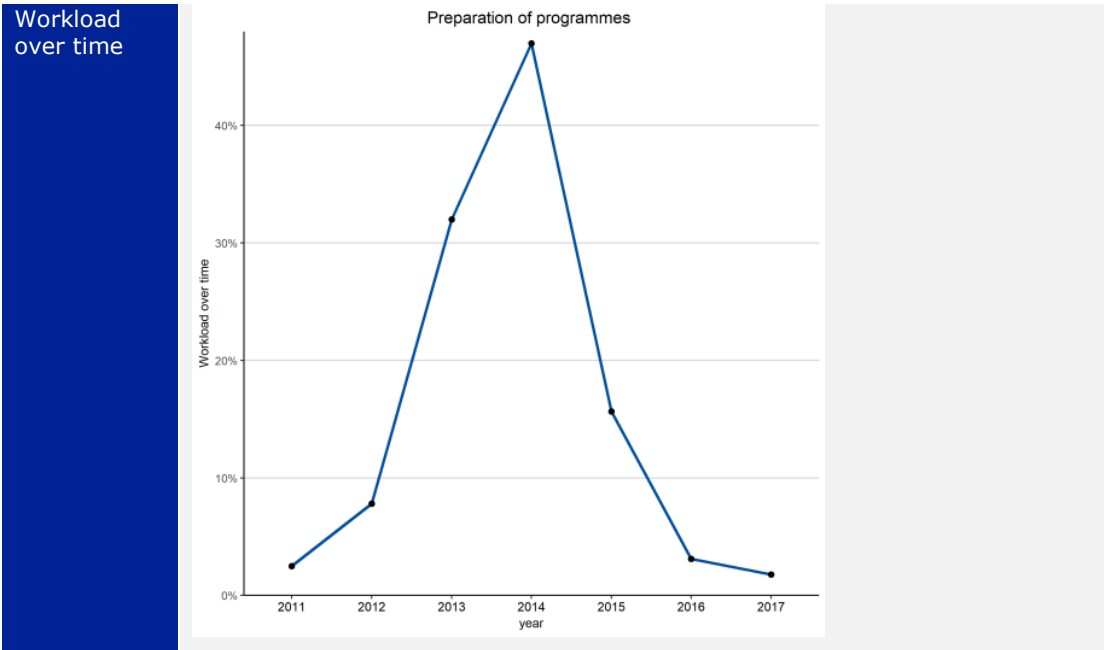
### A.3 Task N.3 – National coordination

Task description	National Coordination National policy level • non-regulated task
ESIF workload (approx.)	2 500 FTE
Share of total workload	0.4%
ESIF costs (approx.)	€ 204 500 000
Share of total costs	0.8%
ESIF external costs	€ 36 680 000
Workload in person years per million EUR of total eligible budget	<p>National Coordination</p>  <p>Median: 0.004</p>
Costs in EUR per million EUR of total eligible budget	<p>National Coordination</p>  <p>Median: 412</p>

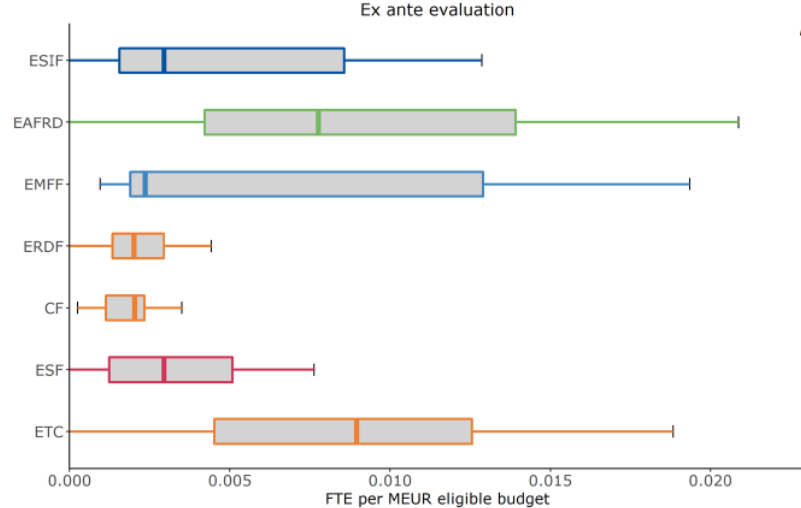
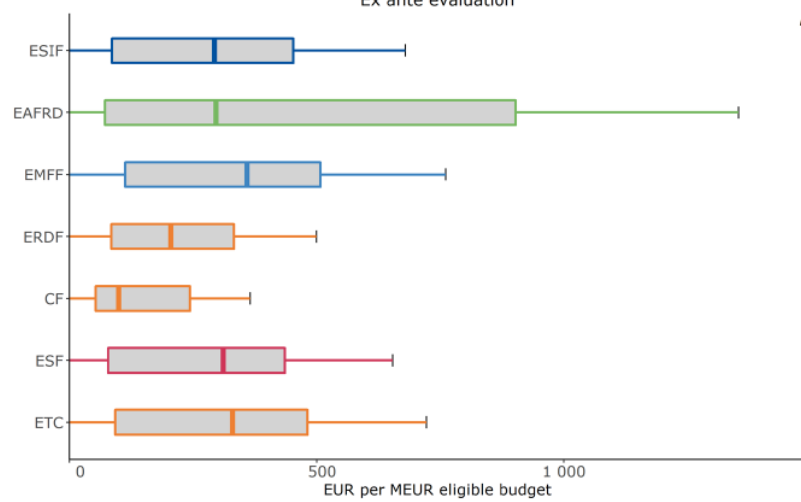


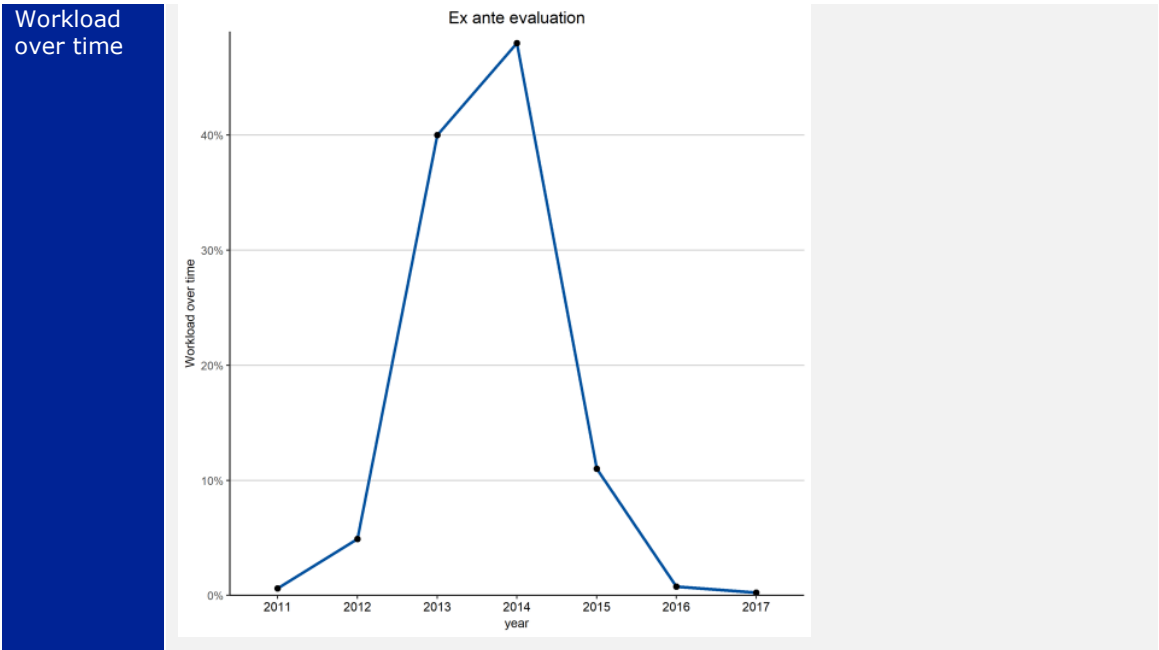
#### A.4 Task P.1 – Programme preparation

Task description	Preparation of programmes Programme Preparation <ul style="list-style-type: none"> <li>• CPR, Part II - Art. 26 – 31</li> <li>• EMFF Art 17-22</li> </ul>																
ESIF workload (approx.)	8 500 FTE																
Share of total workload	1.4%																
ESIF costs (approx.)	€ 379 700 000																
Share of total costs	1.5%																
ESIF external costs	€ 82 500 000																
Workload in person years per million EUR of total eligible budget	<p>Preparation of programmes</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.013</td> </tr> <tr> <td>EAFRD</td> <td>0.022</td> </tr> <tr> <td>EMFF</td> <td>0.013</td> </tr> <tr> <td>ERDF</td> <td>0.008</td> </tr> <tr> <td>CF</td> <td>0.006</td> </tr> <tr> <td>ESF</td> <td>0.008</td> </tr> <tr> <td>ETC</td> <td>0.020</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Programme	Median	ESIF	0.013	EAFRD	0.022	EMFF	0.013	ERDF	0.008	CF	0.006	ESF	0.008	ETC	0.020
Programme	Median																
ESIF	0.013																
EAFRD	0.022																
EMFF	0.013																
ERDF	0.008																
CF	0.006																
ESF	0.008																
ETC	0.020																
Costs in EUR per million EUR of total eligible budget	<p>Preparation of programmes</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>527</td> </tr> <tr> <td>EAFRD</td> <td>1 898</td> </tr> <tr> <td>EMFF</td> <td>122</td> </tr> <tr> <td>ERDF</td> <td>402</td> </tr> <tr> <td>CF</td> <td>336</td> </tr> <tr> <td>ESF</td> <td>545</td> </tr> <tr> <td>ETC</td> <td>1 041</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Programme	Median	ESIF	527	EAFRD	1 898	EMFF	122	ERDF	402	CF	336	ESF	545	ETC	1 041
Programme	Median																
ESIF	527																
EAFRD	1 898																
EMFF	122																
ERDF	402																
CF	336																
ESF	545																
ETC	1 041																



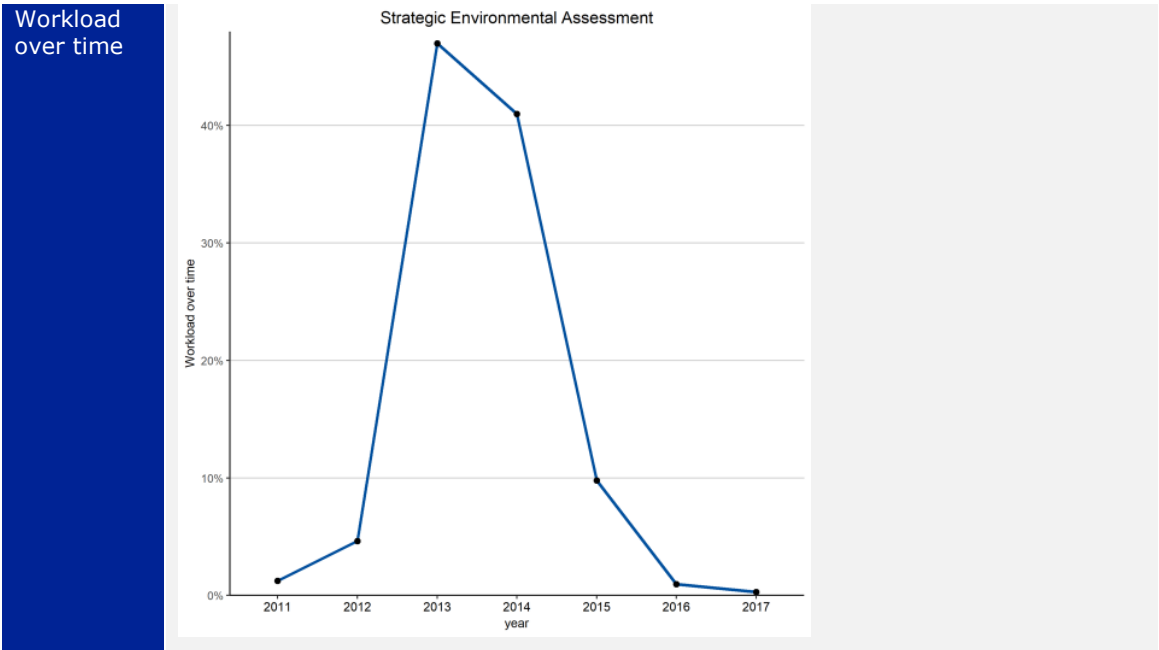
## A.5 Task P.2 – Ex-ante evaluation

Task description	Ex ante evaluation Programme Preparation <ul style="list-style-type: none"><li>CPR, Part II - Art. 55</li><li>EMFF Art 115-116</li></ul>																		
ESIF workload (approx.)	2 000 FTE																		
Share of total workload	0.3%																		
ESIF costs (approx.)	€ 123 300 000																		
Share of total costs	0.5%																		
ESIF external costs	€ 59 900 000																		
Workload in person years per million EUR of total eligible budget	<div>Ex ante evaluation</div>  <table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.003</td></tr><tr><td>EAFRD</td><td>0.008</td></tr><tr><td>EMFF</td><td>0.002</td></tr><tr><td>ERDF</td><td>0.002</td></tr><tr><td>CF</td><td>0.002</td></tr><tr><td>ESF</td><td>0.003</td></tr><tr><td>ETC</td><td>0.009</td></tr></tbody></table>				Median	ESIF	0.003	EAFRD	0.008	EMFF	0.002	ERDF	0.002	CF	0.002	ESF	0.003	ETC	0.009
	Median																		
ESIF	0.003																		
EAFRD	0.008																		
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ERDF	0.002																		
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ETC	0.009																		
Costs in EUR per million EUR of total eligible budget	<div>Ex ante evaluation</div>  <table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>293</td></tr><tr><td>EAFRD</td><td>296</td></tr><tr><td>EMFF</td><td>358</td></tr><tr><td>ERDF</td><td>205</td></tr><tr><td>CF</td><td>99</td></tr><tr><td>ESF</td><td>311</td></tr><tr><td>ETC</td><td>330</td></tr></tbody></table>				Median	ESIF	293	EAFRD	296	EMFF	358	ERDF	205	CF	99	ESF	311	ETC	330
	Median																		
ESIF	293																		
EAFRD	296																		
EMFF	358																		
ERDF	205																		
CF	99																		
ESF	311																		
ETC	330																		

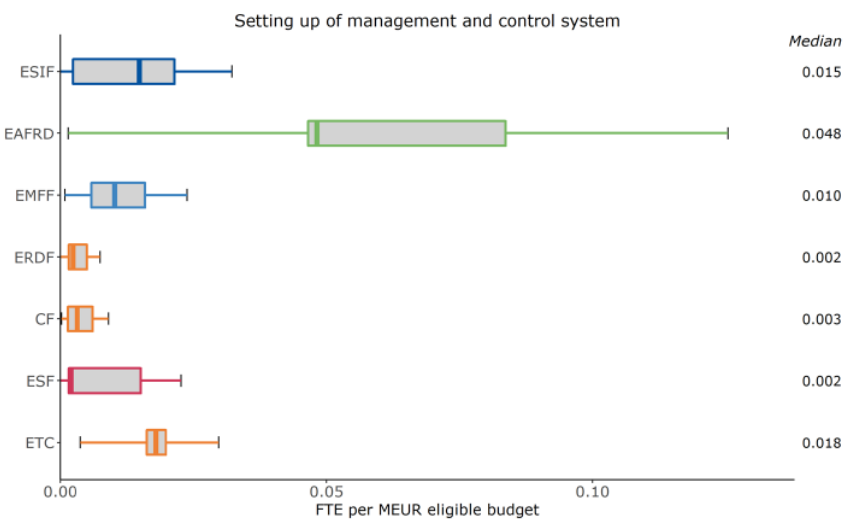
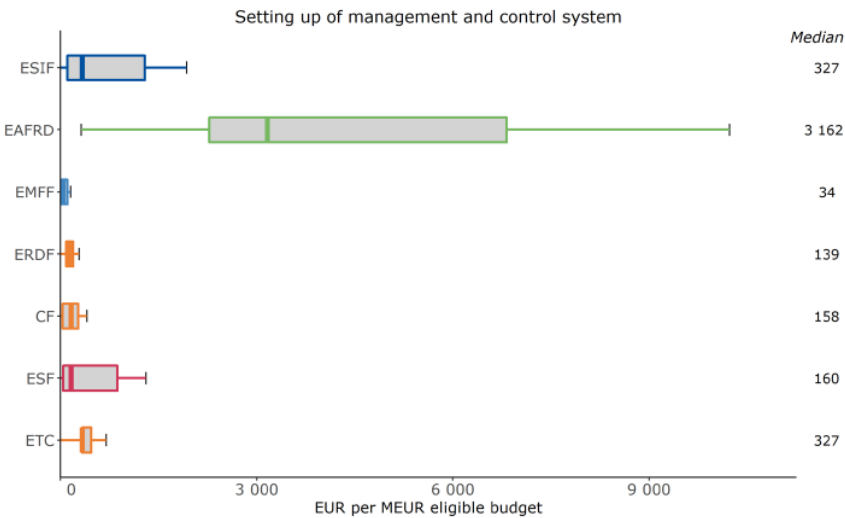


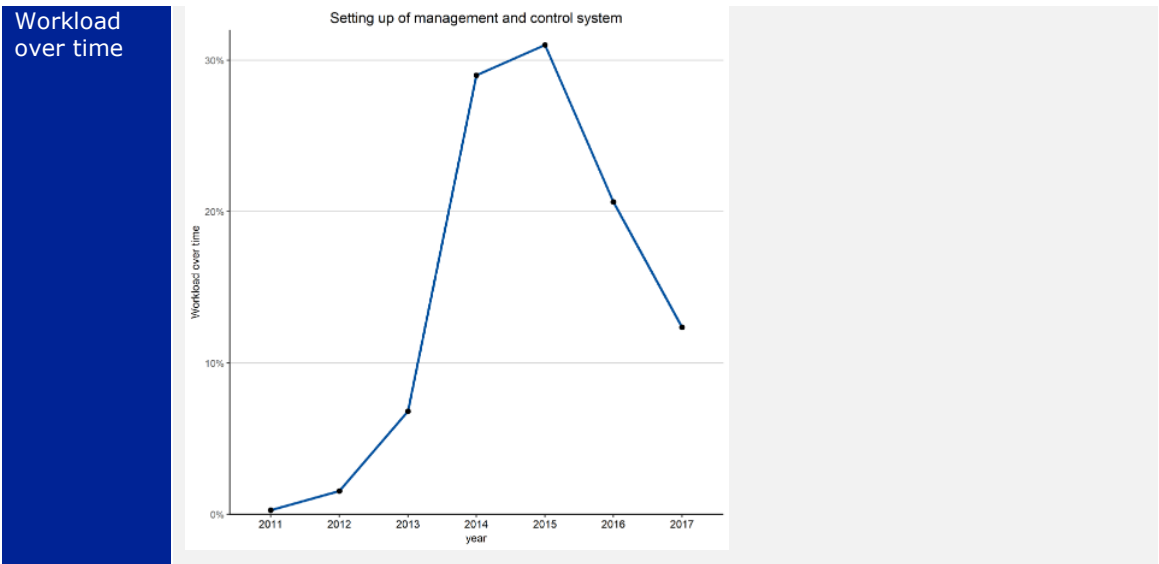
## A.6 Task P.3 – Strategic Environmental Assessment

Task description	Strategic Environmental Assessment Programme Preparation <ul style="list-style-type: none"><li>CPR, Part II - Art. 55(4)</li></ul>																		
ESIF workload (approx.)	1 500 FTE																		
Share of total workload	0.3%																		
ESIF costs (approx.)	€ 55 400 000																		
Share of total costs	0.2%																		
ESIF external costs	€ 16 200 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Strategic Environmental Assessment</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.001</td></tr><tr><td>EAFRD</td><td>0.008</td></tr><tr><td>EMFF</td><td>0.002</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.001</td></tr><tr><td>ESF</td><td>0.001</td></tr><tr><td>ETC</td><td>0.006</td></tr></tbody></table></div>			Fund	Median	ESIF	0.001	EAFRD	0.008	EMFF	0.002	ERDF	0.001	CF	0.001	ESF	0.001	ETC	0.006
Fund	Median																		
ESIF	0.001																		
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EMFF	0.002																		
ERDF	0.001																		
CF	0.001																		
ESF	0.001																		
ETC	0.006																		
Costs in EUR per million EUR of total eligible budget	<div><div>Strategic Environmental Assessment</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>40</td></tr><tr><td>EAFRD</td><td>268</td></tr><tr><td>EMFF</td><td>80</td></tr><tr><td>ERDF</td><td>42</td></tr><tr><td>CF</td><td>41</td></tr><tr><td>ESF</td><td>21</td></tr><tr><td>ETC</td><td>133</td></tr></tbody></table></div>			Fund	Median	ESIF	40	EAFRD	268	EMFF	80	ERDF	42	CF	41	ESF	21	ETC	133
Fund	Median																		
ESIF	40																		
EAFRD	268																		
EMFF	80																		
ERDF	42																		
CF	41																		
ESF	21																		
ETC	133																		

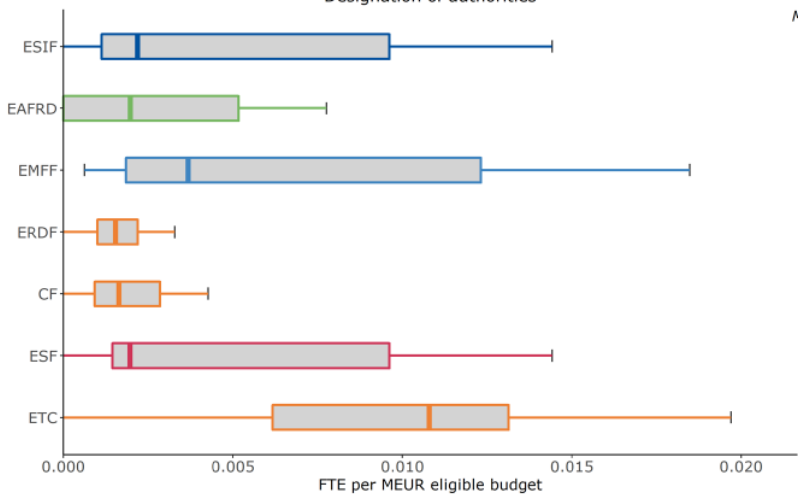
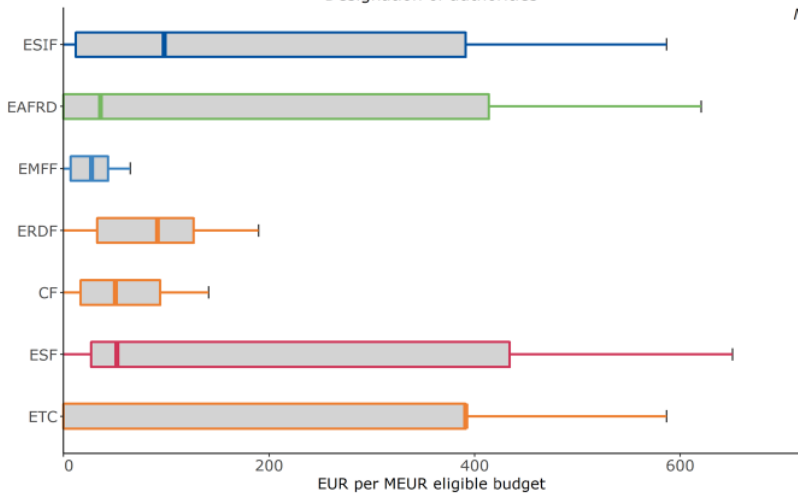


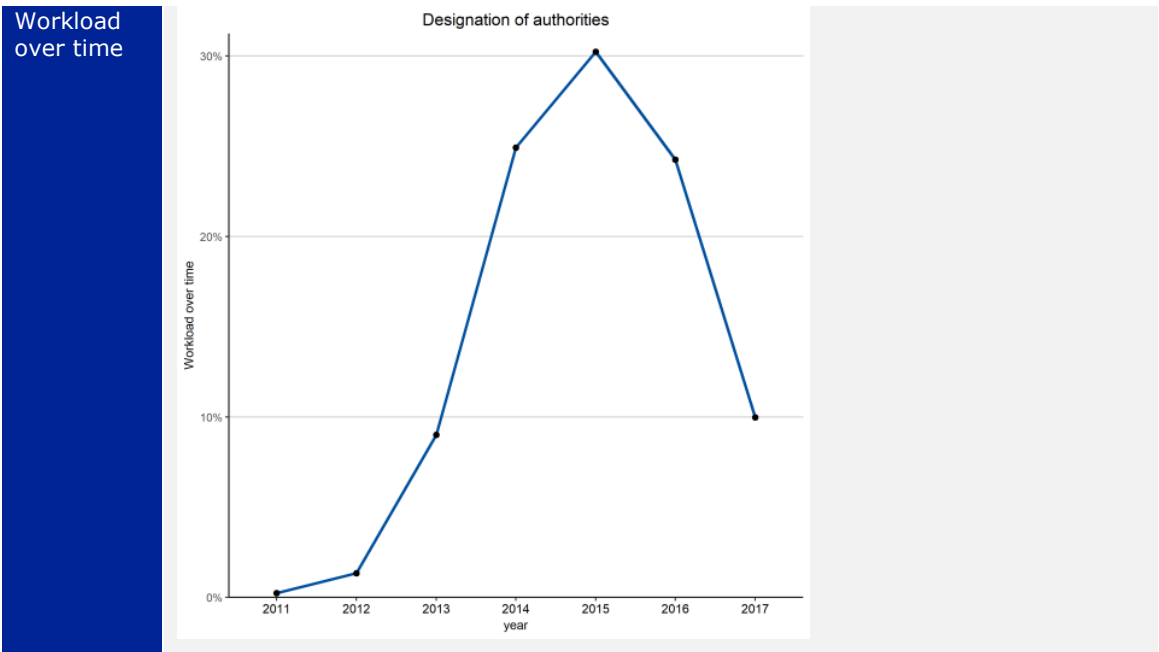
## A.7 Task P.4 – Setting up management and control system

Task description	Setting up management and control system Programme Preparation. For EAFRD the task is under the responsibility of the Paying Agency. <ul style="list-style-type: none"><li>CPR, Part II - Art. 72</li><li>EAFRD HZR 58.2</li></ul>																		
ESIF workload (approx.)	13 700 FTE																		
Share of total workload	2.2%																		
ESIF costs (approx.)	€ 667 500 000																		
Share of total costs	2.6%																		
ESIF external costs	€ 22 900 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Setting up of management and control system</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.015</td></tr><tr><td>EAFRD</td><td>0.048</td></tr><tr><td>EMFF</td><td>0.010</td></tr><tr><td>ERDF</td><td>0.002</td></tr><tr><td>CF</td><td>0.003</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.018</td></tr></tbody></table></div>			ESIF	Median	ESIF	0.015	EAFRD	0.048	EMFF	0.010	ERDF	0.002	CF	0.003	ESF	0.002	ETC	0.018
ESIF	Median																		
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ETC	0.018																		
Costs in EUR per million EUR of total eligible budget	<div><div>Setting up of management and control system</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>327</td></tr><tr><td>EAFRD</td><td>3 162</td></tr><tr><td>EMFF</td><td>34</td></tr><tr><td>ERDF</td><td>139</td></tr><tr><td>CF</td><td>158</td></tr><tr><td>ESF</td><td>160</td></tr><tr><td>ETC</td><td>327</td></tr></tbody></table></div>			ESIF	Median	ESIF	327	EAFRD	3 162	EMFF	34	ERDF	139	CF	158	ESF	160	ETC	327
ESIF	Median																		
ESIF	327																		
EAFRD	3 162																		
EMFF	34																		
ERDF	139																		
CF	158																		
ESF	160																		
ETC	327																		



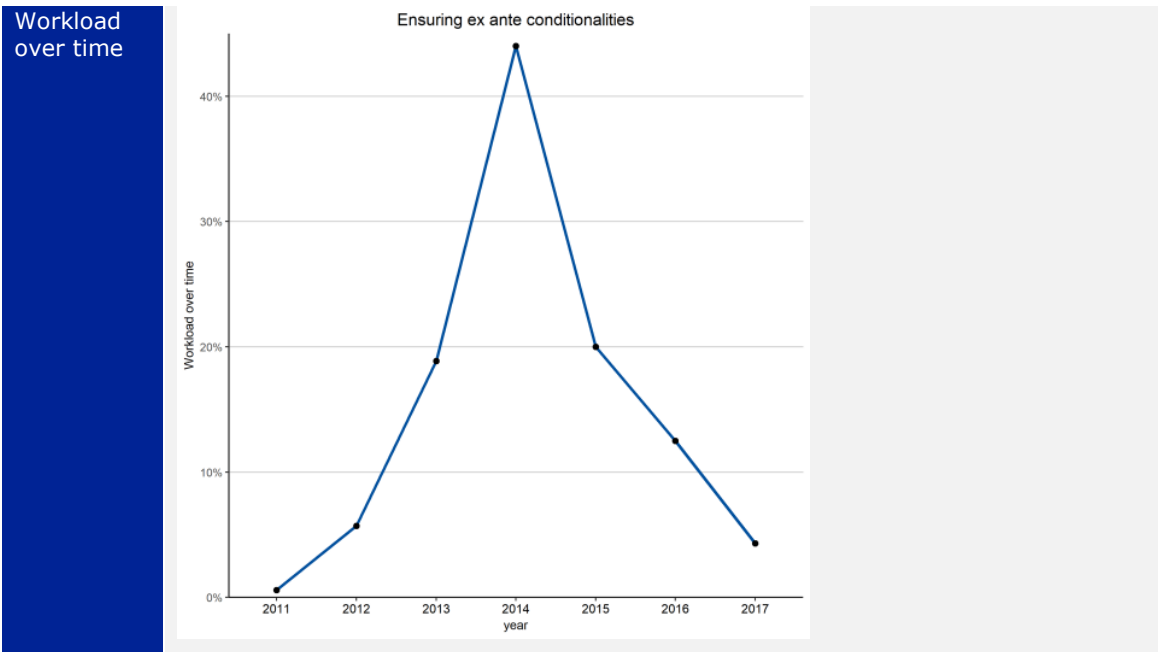
## A.8 Task P.5 – Designation of authorities

Task description	Designation of authorities Programme Preparation <ul style="list-style-type: none"><li>• CPR, Part IV - Art. 123, 124,</li><li>• EAFRD Reg. - Art. 65, HZR, Art 7</li></ul>																		
ESIF workload (approx.)	1 900 FTE																		
Share of total workload	0.3%																		
ESIF costs (approx.)	€ 57 900 000																		
Share of total costs	0.2%																		
ESIF external costs	€ 6 300 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Designation of authorities</div><table><thead><tr><th>Fund</th><th>Median (FTE per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>0.002</td></tr><tr><td>EAFRD</td><td>0.002</td></tr><tr><td>EMFF</td><td>0.004</td></tr><tr><td>ERDF</td><td>0.002</td></tr><tr><td>CF</td><td>0.002</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.011</td></tr></tbody></table></div>			Fund	Median (FTE per MEUR eligible budget)	ESIF	0.002	EAFRD	0.002	EMFF	0.004	ERDF	0.002	CF	0.002	ESF	0.002	ETC	0.011
Fund	Median (FTE per MEUR eligible budget)																		
ESIF	0.002																		
EAFRD	0.002																		
EMFF	0.004																		
ERDF	0.002																		
CF	0.002																		
ESF	0.002																		
ETC	0.011																		
Costs in EUR per million EUR of total eligible budget	<div><div>Designation of authorities</div><table><thead><tr><th>Fund</th><th>Median (EUR per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>98</td></tr><tr><td>EAFRD</td><td>36</td></tr><tr><td>EMFF</td><td>27</td></tr><tr><td>ERDF</td><td>91</td></tr><tr><td>CF</td><td>50</td></tr><tr><td>ESF</td><td>52</td></tr><tr><td>ETC</td><td>391</td></tr></tbody></table></div>			Fund	Median (EUR per MEUR eligible budget)	ESIF	98	EAFRD	36	EMFF	27	ERDF	91	CF	50	ESF	52	ETC	391
Fund	Median (EUR per MEUR eligible budget)																		
ESIF	98																		
EAFRD	36																		
EMFF	27																		
ERDF	91																		
CF	50																		
ESF	52																		
ETC	391																		



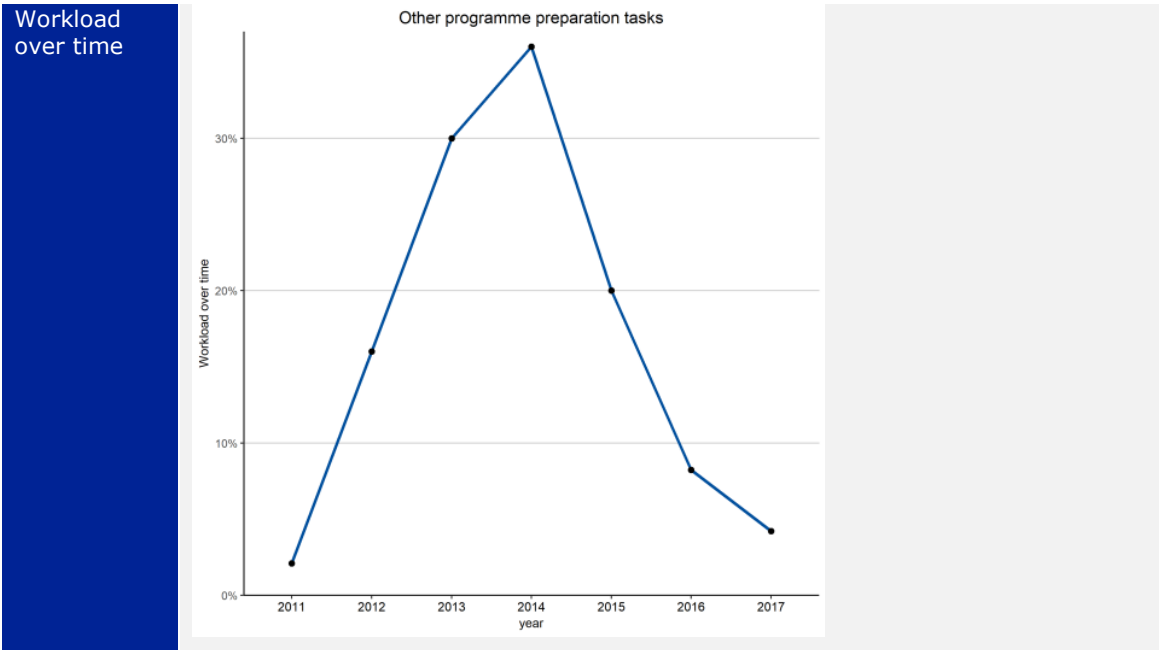
## A.9 Task P.6 – Ensuring ex-ante conditionalities

Task description	Ensuring ex ante conditionalities Programme Preparation <ul style="list-style-type: none"><li>CPR, Part II - Art.19</li></ul>																		
ESIF workload (approx.)	1 800 FTE																		
Share of total workload	0.3%																		
ESIF costs (approx.)	€ 81 300 000																		
Share of total costs	0.3%																		
ESIF external costs	€ 10 600 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Ensuring ex ante conditionalities</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.002</td></tr><tr><td>EAFRD</td><td>0.007</td></tr><tr><td>EMFF</td><td>0.002</td></tr><tr><td>ERDF</td><td>0.002</td></tr><tr><td>CF</td><td>0.002</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.001</td></tr></tbody></table></div>			Fund	Median	ESIF	0.002	EAFRD	0.007	EMFF	0.002	ERDF	0.002	CF	0.002	ESF	0.002	ETC	0.001
Fund	Median																		
ESIF	0.002																		
EAFRD	0.007																		
EMFF	0.002																		
ERDF	0.002																		
CF	0.002																		
ESF	0.002																		
ETC	0.001																		
Costs in EUR per million EUR of total eligible budget	<div><div>Ensuring ex ante conditionalities</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>93</td></tr><tr><td>EAFRD</td><td>50</td></tr><tr><td>EMFF</td><td>27</td></tr><tr><td>ERDF</td><td>112</td></tr><tr><td>CF</td><td>66</td></tr><tr><td>ESF</td><td>161</td></tr><tr><td>ETC</td><td>0</td></tr></tbody></table></div>			Fund	Median	ESIF	93	EAFRD	50	EMFF	27	ERDF	112	CF	66	ESF	161	ETC	0
Fund	Median																		
ESIF	93																		
EAFRD	50																		
EMFF	27																		
ERDF	112																		
CF	66																		
ESF	161																		
ETC	0																		



### A.10 Task P.x – Other programme preparation tasks

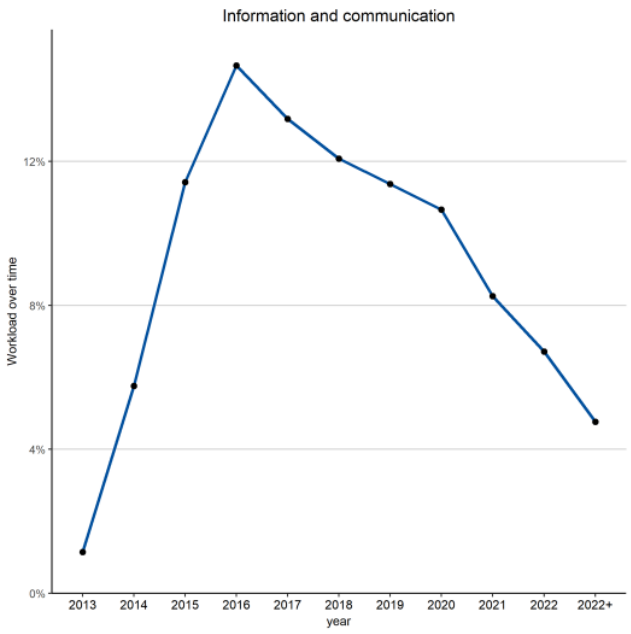
Task description	Other programme preparation tasks Programme Preparation <ul style="list-style-type: none"><li>non-regulated task</li></ul>																		
ESIF workload (approx.)	1 100 FTE																		
Share of total workload	0.2%																		
ESIF costs (approx.)	€ 39 800 000																		
Share of total costs	0.2%																		
ESIF external costs	€ 6 500 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Other programme preparation tasks</div><table><thead><tr><th>Programme</th><th>Median (FTE per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>0.000</td></tr><tr><td>EAFRD</td><td>0.000</td></tr><tr><td>EMFF</td><td>0.000</td></tr><tr><td>ERDF</td><td>0.000</td></tr><tr><td>CF</td><td>0.000</td></tr><tr><td>ESF</td><td>0.000</td></tr><tr><td>ETC</td><td>0.001</td></tr></tbody></table></div>			Programme	Median (FTE per MEUR eligible budget)	ESIF	0.000	EAFRD	0.000	EMFF	0.000	ERDF	0.000	CF	0.000	ESF	0.000	ETC	0.001
Programme	Median (FTE per MEUR eligible budget)																		
ESIF	0.000																		
EAFRD	0.000																		
EMFF	0.000																		
ERDF	0.000																		
CF	0.000																		
ESF	0.000																		
ETC	0.001																		
Costs in EUR per million EUR of total eligible budget	<div><div>Other programme preparation tasks</div><table><thead><tr><th>Programme</th><th>Median (EUR per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>7</td></tr><tr><td>EAFRD</td><td>0</td></tr><tr><td>EMFF</td><td>0</td></tr><tr><td>ERDF</td><td>10</td></tr><tr><td>CF</td><td>13</td></tr><tr><td>ESF</td><td>61</td></tr><tr><td>ETC</td><td>0</td></tr></tbody></table></div>			Programme	Median (EUR per MEUR eligible budget)	ESIF	7	EAFRD	0	EMFF	0	ERDF	10	CF	13	ESF	61	ETC	0
Programme	Median (EUR per MEUR eligible budget)																		
ESIF	7																		
EAFRD	0																		
EMFF	0																		
ERDF	10																		
CF	13																		
ESF	61																		
ETC	0																		



### A.11 Task M.1 – Information and communication

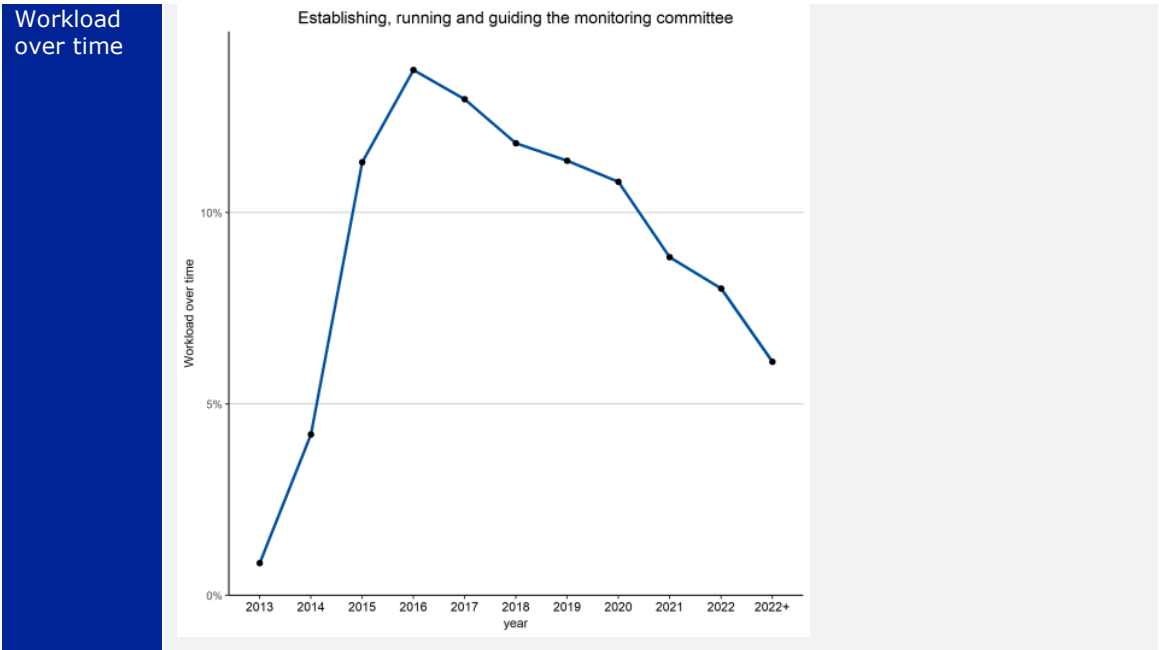
Task description	Information and communication Programme Management <ul style="list-style-type: none"><li>• CPR, Part III - Art. 115</li><li>• EAFRD Reg. - Art. 66(1) and Impl. Reg. 808/2014 - Annex 3</li><li>• EMFF Reg. - Art. 119</li></ul>																		
ESIF workload (approx.)	22 800 FTE																		
Share of total workload	3.7%																		
ESIF costs (approx.)	€ 1 078 300 000																		
Share of total costs	4.2%																		
ESIF external costs	€ 341 700 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Information and communication</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.032</td></tr><tr><td>EAFRD</td><td>0.067</td></tr><tr><td>EMFF</td><td>0.020</td></tr><tr><td>ERDF</td><td>0.022</td></tr><tr><td>CF</td><td>0.013</td></tr><tr><td>ESF</td><td>0.024</td></tr><tr><td>ETC</td><td>0.040</td></tr></tbody></table></div>			ESIF	Median	ESIF	0.032	EAFRD	0.067	EMFF	0.020	ERDF	0.022	CF	0.013	ESF	0.024	ETC	0.040
ESIF	Median																		
ESIF	0.032																		
EAFRD	0.067																		
EMFF	0.020																		
ERDF	0.022																		
CF	0.013																		
ESF	0.024																		
ETC	0.040																		
Costs in EUR per million EUR of total eligible budget	<div><div>Information and communication</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>2 031</td></tr><tr><td>EAFRD</td><td>1 969</td></tr><tr><td>EMFF</td><td>1 694</td></tr><tr><td>ERDF</td><td>1 655</td></tr><tr><td>CF</td><td>819</td></tr><tr><td>ESF</td><td>1 668</td></tr><tr><td>ETC</td><td>6 179</td></tr></tbody></table></div>			ESIF	Median	ESIF	2 031	EAFRD	1 969	EMFF	1 694	ERDF	1 655	CF	819	ESF	1 668	ETC	6 179
ESIF	Median																		
ESIF	2 031																		
EAFRD	1 969																		
EMFF	1 694																		
ERDF	1 655																		
CF	819																		
ESF	1 668																		
ETC	6 179																		

Workload over time



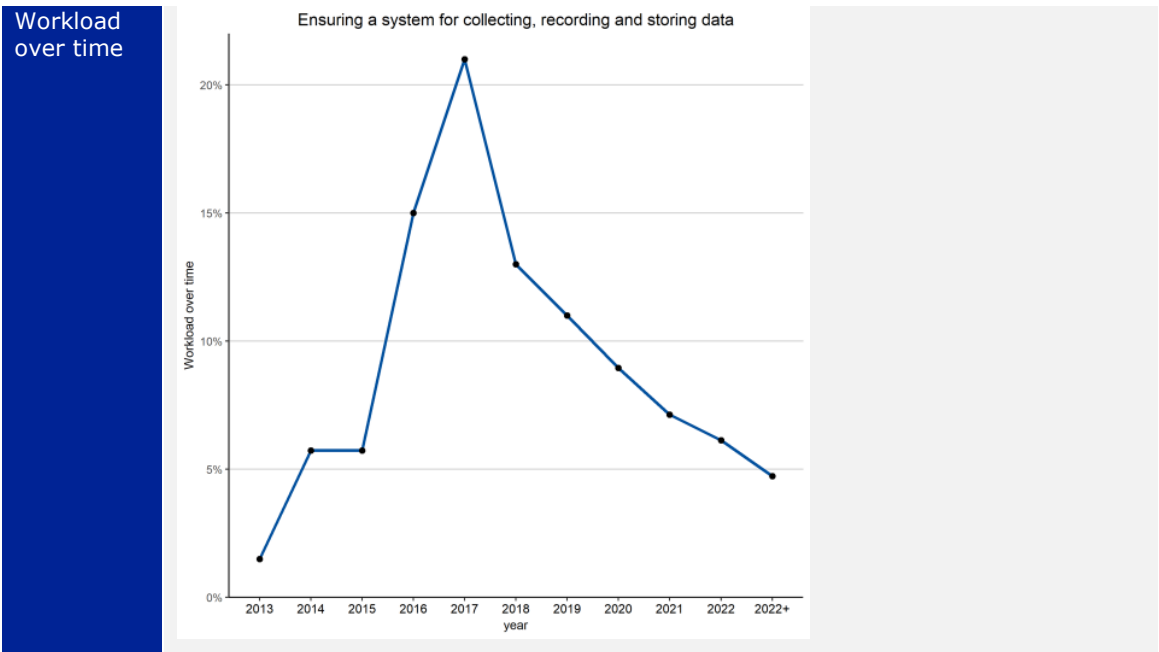
## A.12 Task M.2 – Establishing, running and guiding the Monitoring Committee

Task description	Establishing, running and guiding the monitoring committee Programme Management <ul style="list-style-type: none"><li>• CPR, Part IV - Art. 125(2a)</li><li>• CPR, Part II - Art. 47</li><li>• EAFRD Reg. - Art. 74</li><li>• EMFF Art 112-113</li></ul>																		
ESIF workload (approx.)	12 600 FTE																		
Share of total workload	2.1%																		
ESIF costs (approx.)	€ 448 100 000																		
Share of total costs	1.7%																		
ESIF external costs	€ 77 900 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Establishing, running and guiding the monitoring committee</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.014</td></tr><tr><td>EAFRD</td><td>0.034</td></tr><tr><td>EMFF</td><td>0.013</td></tr><tr><td>ERDF</td><td>0.012</td></tr><tr><td>CF</td><td>0.012</td></tr><tr><td>ESF</td><td>0.010</td></tr><tr><td>ETC</td><td>0.025</td></tr></tbody></table></div>			ESIF	Median	ESIF	0.014	EAFRD	0.034	EMFF	0.013	ERDF	0.012	CF	0.012	ESF	0.010	ETC	0.025
ESIF	Median																		
ESIF	0.014																		
EAFRD	0.034																		
EMFF	0.013																		
ERDF	0.012																		
CF	0.012																		
ESF	0.010																		
ETC	0.025																		
Costs in EUR per million EUR of total eligible budget	<div><div>Establishing, running and guiding the monitoring committee</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>884</td></tr><tr><td>EAFRD</td><td>901</td></tr><tr><td>EMFF</td><td>812</td></tr><tr><td>ERDF</td><td>565</td></tr><tr><td>CF</td><td>519</td></tr><tr><td>ESF</td><td>548</td></tr><tr><td>ETC</td><td>2 974</td></tr></tbody></table></div>			ESIF	Median	ESIF	884	EAFRD	901	EMFF	812	ERDF	565	CF	519	ESF	548	ETC	2 974
ESIF	Median																		
ESIF	884																		
EAFRD	901																		
EMFF	812																		
ERDF	565																		
CF	519																		
ESF	548																		
ETC	2 974																		

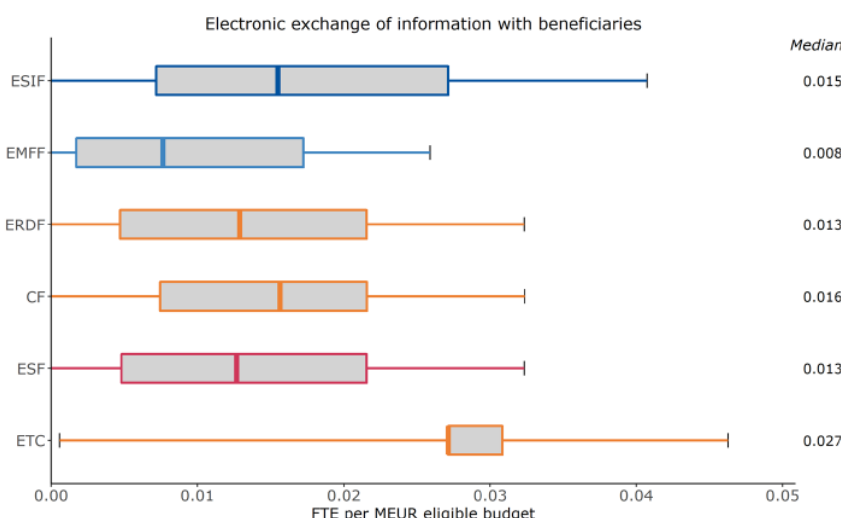
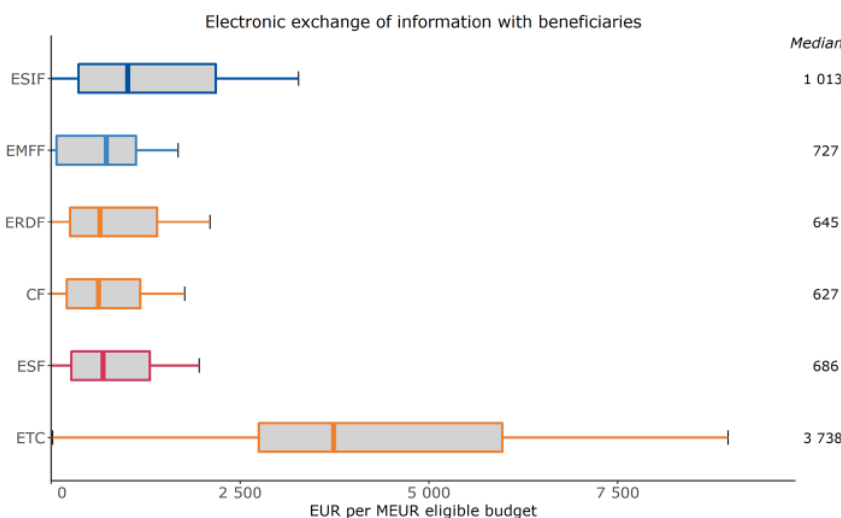


### A.13 Task M.3 – Ensuring a system for collecting, recording and storing data

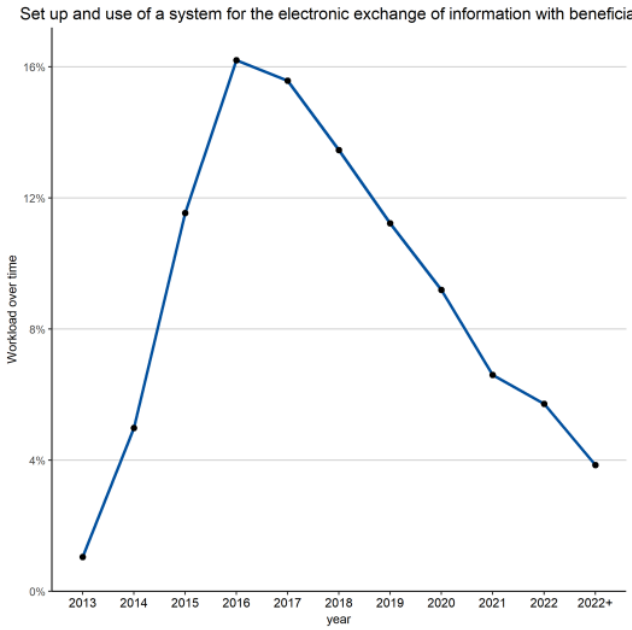
Task description	Ensuring a system for collecting, recording and storing data Programme Management <ul style="list-style-type: none"> <li>CPR Art. 72 (d), Art. 112(3), Art. 125(2a, 2d, 2e, 4d, 8), Art. 140</li> <li>EAFRD Reg. - Art. 66(1)(a) and 70</li> </ul>																
ESIF workload (approx.)	26 000 FTE																
Share of total workload	4.2%																
ESIF costs (approx.)	€ 901 600 000																
Share of total costs	3.5%																
ESIF external costs	€ 113 600 000																
Workload in person years per million EUR of total eligible budget	<p>Ensuring a system for collecting, recording and storing data</p> <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median (FTE per MEUR eligible budget)</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.027</td> </tr> <tr> <td>EAFRD</td> <td>0.071</td> </tr> <tr> <td>EMFF</td> <td>0.032</td> </tr> <tr> <td>ERDF</td> <td>0.022</td> </tr> <tr> <td>CF</td> <td>0.017</td> </tr> <tr> <td>ESF</td> <td>0.029</td> </tr> <tr> <td>ETC</td> <td>0.021</td> </tr> </tbody> </table>	ESIF	Median (FTE per MEUR eligible budget)	ESIF	0.027	EAFRD	0.071	EMFF	0.032	ERDF	0.022	CF	0.017	ESF	0.029	ETC	0.021
ESIF	Median (FTE per MEUR eligible budget)																
ESIF	0.027																
EAFRD	0.071																
EMFF	0.032																
ERDF	0.022																
CF	0.017																
ESF	0.029																
ETC	0.021																
Costs in EUR per million EUR of total eligible budget	<p>Ensuring a system for collecting, recording and storing data</p> <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median (EUR per MEUR eligible budget)</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>1 777</td> </tr> <tr> <td>EAFRD</td> <td>2 881</td> </tr> <tr> <td>EMFF</td> <td>2 288</td> </tr> <tr> <td>ERDF</td> <td>1 031</td> </tr> <tr> <td>CF</td> <td>698</td> </tr> <tr> <td>ESF</td> <td>1 298</td> </tr> <tr> <td>ETC</td> <td>2 592</td> </tr> </tbody> </table>	ESIF	Median (EUR per MEUR eligible budget)	ESIF	1 777	EAFRD	2 881	EMFF	2 288	ERDF	1 031	CF	698	ESF	1 298	ETC	2 592
ESIF	Median (EUR per MEUR eligible budget)																
ESIF	1 777																
EAFRD	2 881																
EMFF	2 288																
ERDF	1 031																
CF	698																
ESF	1 298																
ETC	2 592																



#### A.14 Task M.4 – System for electronic exchange with beneficiaries

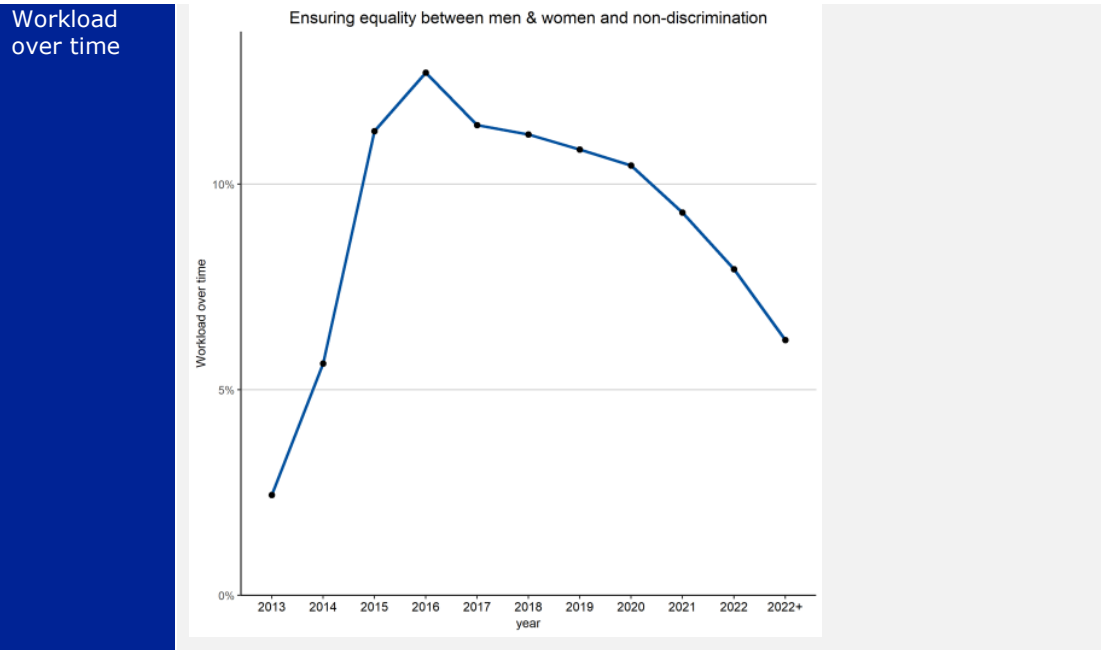
Task description	<p>Set up and use of a system for the electronic exchange of information with beneficiaries</p> <p>Programme Management</p> <ul style="list-style-type: none"> <li>• CPR, Part IV - Art. 122 (3), Art. 140</li> <li>• not relevant for EAFRD and optional for EMFF</li> </ul>														
ESIF workload (approx.)	8 400 FTE														
Share of total workload	1.4%														
ESIF costs (approx.)	€ 355 500 000														
Share of total costs	1.4%														
ESIF external costs	€ 60 800 000														
Workload in person years per million EUR of total eligible budget	<p>Electronic exchange of information with beneficiaries</p>  <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.015</td> </tr> <tr> <td>EMFF</td> <td>0.008</td> </tr> <tr> <td>ERDF</td> <td>0.013</td> </tr> <tr> <td>CF</td> <td>0.016</td> </tr> <tr> <td>ESF</td> <td>0.013</td> </tr> <tr> <td>ETC</td> <td>0.027</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.015	EMFF	0.008	ERDF	0.013	CF	0.016	ESF	0.013	ETC	0.027
Fund	Median														
ESIF	0.015														
EMFF	0.008														
ERDF	0.013														
CF	0.016														
ESF	0.013														
ETC	0.027														
Costs in EUR per million EUR of total eligible budget	<p>Electronic exchange of information with beneficiaries</p>  <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>1 013</td> </tr> <tr> <td>EMFF</td> <td>727</td> </tr> <tr> <td>ERDF</td> <td>645</td> </tr> <tr> <td>CF</td> <td>627</td> </tr> <tr> <td>ESF</td> <td>686</td> </tr> <tr> <td>ETC</td> <td>3 738</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	1 013	EMFF	727	ERDF	645	CF	627	ESF	686	ETC	3 738
Fund	Median														
ESIF	1 013														
EMFF	727														
ERDF	645														
CF	627														
ESF	686														
ETC	3 738														

Workload  
over time



### A.15 Task M.5 – Ensuring equality and non-discrimination

Task description	Ensuring equality between men & women and non-discrimination Programme Management • CPR, Part II - Art. 7																
ESIF workload (approx.)	4 600 FTE																
Share of total workload	0.7%																
ESIF costs (approx.)	€ 133 000 000																
Share of total costs	0.5%																
ESIF external costs	€ 9 200 000																
Workload in person years per million EUR of total eligible budget	<p>Ensuring equality between men &amp; women and non-discrimination</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.005</td> </tr> <tr> <td>EAFRD</td> <td>0.009</td> </tr> <tr> <td>EMFF</td> <td>0.005</td> </tr> <tr> <td>ERDF</td> <td>0.004</td> </tr> <tr> <td>CF</td> <td>0.002</td> </tr> <tr> <td>ESF</td> <td>0.005</td> </tr> <tr> <td>ETC</td> <td>0.005</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Programme	Median	ESIF	0.005	EAFRD	0.009	EMFF	0.005	ERDF	0.004	CF	0.002	ESF	0.005	ETC	0.005
Programme	Median																
ESIF	0.005																
EAFRD	0.009																
EMFF	0.005																
ERDF	0.004																
CF	0.002																
ESF	0.005																
ETC	0.005																
Costs in EUR per million EUR of total eligible budget	<p>Ensuring equality between men &amp; women and non-discrimination</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>263</td> </tr> <tr> <td>EAFRD</td> <td>225</td> </tr> <tr> <td>EMFF</td> <td>280</td> </tr> <tr> <td>ERDF</td> <td>170</td> </tr> <tr> <td>CF</td> <td>113</td> </tr> <tr> <td>ESF</td> <td>218</td> </tr> <tr> <td>ETC</td> <td>425</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Programme	Median	ESIF	263	EAFRD	225	EMFF	280	ERDF	170	CF	113	ESF	218	ETC	425
Programme	Median																
ESIF	263																
EAFRD	225																
EMFF	280																
ERDF	170																
CF	113																
ESF	218																
ETC	425																



## A.16 Task M.xa – Other general management tasks

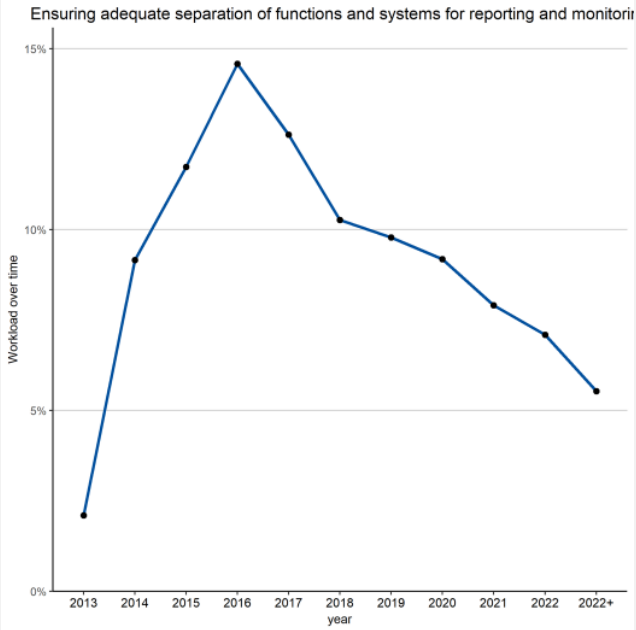
Task description	Other project general management tasks Programme Management • non-regulated task																
ESIF workload (approx.)	10 700 FTE																
Share of total workload	1.7%																
ESIF costs (approx.)	€ 336 600 000																
Share of total costs	1.3%																
ESIF external costs	€ 67 200 000																
Workload in person years per million EUR of total eligible budget	<p>Other project general management tasks</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.003</td> </tr> <tr> <td>EAFRD</td> <td>0.006</td> </tr> <tr> <td>EMFF</td> <td>0.004</td> </tr> <tr> <td>ERDF</td> <td>0.001</td> </tr> <tr> <td>CF</td> <td>0.002</td> </tr> <tr> <td>ESF</td> <td>0.003</td> </tr> <tr> <td>ETC</td> <td>0.004</td> </tr> </tbody> </table>	Programme	Median	ESIF	0.003	EAFRD	0.006	EMFF	0.004	ERDF	0.001	CF	0.002	ESF	0.003	ETC	0.004
Programme	Median																
ESIF	0.003																
EAFRD	0.006																
EMFF	0.004																
ERDF	0.001																
CF	0.002																
ESF	0.003																
ETC	0.004																
Costs in EUR per million EUR of total eligible budget	<p>Other project general management tasks</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>229</td> </tr> <tr> <td>EAFRD</td> <td>682</td> </tr> <tr> <td>EMFF</td> <td>454</td> </tr> <tr> <td>ERDF</td> <td>163</td> </tr> <tr> <td>CF</td> <td>163</td> </tr> <tr> <td>ESF</td> <td>159</td> </tr> <tr> <td>ETC</td> <td>576</td> </tr> </tbody> </table>	Programme	Median	ESIF	229	EAFRD	682	EMFF	454	ERDF	163	CF	163	ESF	159	ETC	576
Programme	Median																
ESIF	229																
EAFRD	682																
EMFF	454																
ERDF	163																
CF	163																
ESF	159																
ETC	576																



### A.17 Task M.6 – Ensuring adequate separation of functions

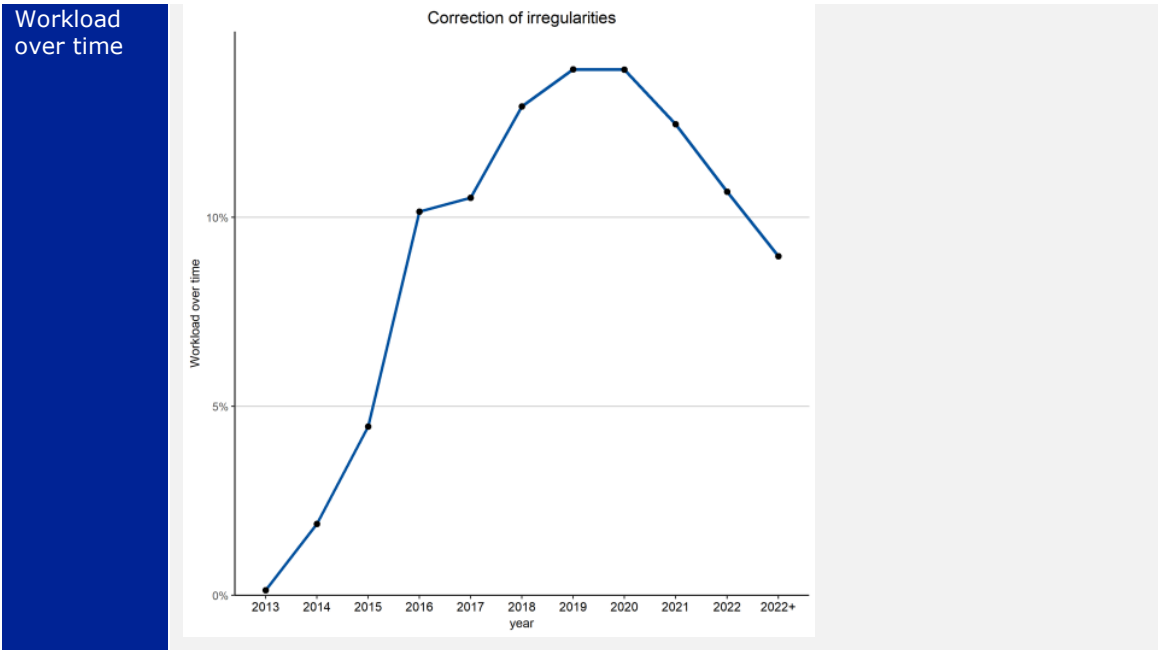
Task description	Ensuring adequate separation of functions and systems for reporting and monitoring Programme Management <ul style="list-style-type: none"> <li>CPR, Part II - Art. 72(a, b, e, h), Part IV - Art. 122(2), Art. 125(1)</li> </ul>																
ESIF workload (approx.)	21 500 FTE																
Share of total workload	3.5%																
ESIF costs (approx.)	€ 539 200 000																
Share of total costs	2.1%																
ESIF external costs	€ 66 800 000																
Workload in person years per million EUR of total eligible budget	<p>Separation of functions and systems for reporting and monitoring</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.012</td> </tr> <tr> <td>EAFRD</td> <td>0.030</td> </tr> <tr> <td>EMFF</td> <td>0.014</td> </tr> <tr> <td>ERDF</td> <td>0.008</td> </tr> <tr> <td>CF</td> <td>0.012</td> </tr> <tr> <td>ESF</td> <td>0.008</td> </tr> <tr> <td>ETC</td> <td>0.014</td> </tr> </tbody> </table>	Fund	Median	ESIF	0.012	EAFRD	0.030	EMFF	0.014	ERDF	0.008	CF	0.012	ESF	0.008	ETC	0.014
Fund	Median																
ESIF	0.012																
EAFRD	0.030																
EMFF	0.014																
ERDF	0.008																
CF	0.012																
ESF	0.008																
ETC	0.014																
Costs in EUR per million EUR of total eligible budget	<p>Separation of functions and systems for reporting and monitoring</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>616</td> </tr> <tr> <td>EAFRD</td> <td>671</td> </tr> <tr> <td>EMFF</td> <td>858</td> </tr> <tr> <td>ERDF</td> <td>451</td> </tr> <tr> <td>CF</td> <td>429</td> </tr> <tr> <td>ESF</td> <td>324</td> </tr> <tr> <td>ETC</td> <td>1 542</td> </tr> </tbody> </table>	Fund	Median	ESIF	616	EAFRD	671	EMFF	858	ERDF	451	CF	429	ESF	324	ETC	1 542
Fund	Median																
ESIF	616																
EAFRD	671																
EMFF	858																
ERDF	451																
CF	429																
ESF	324																
ETC	1 542																

Workload  
over time

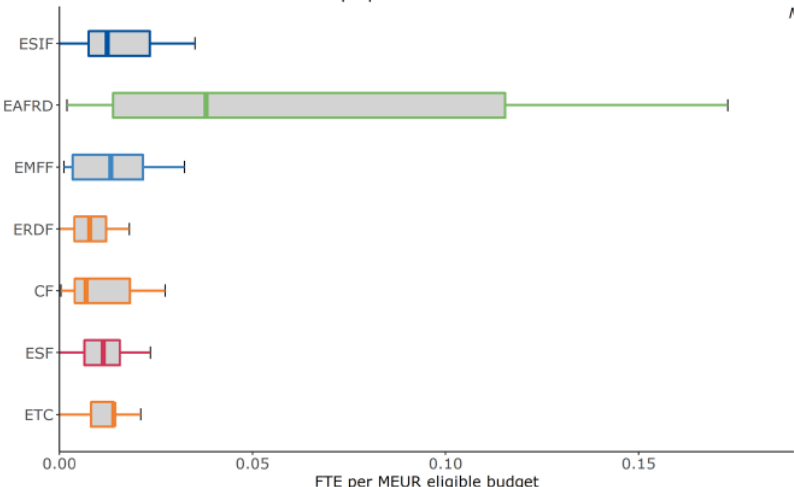
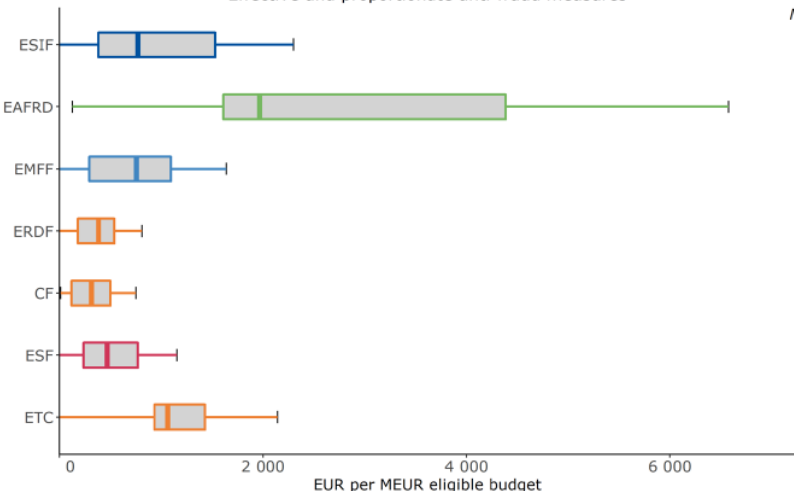


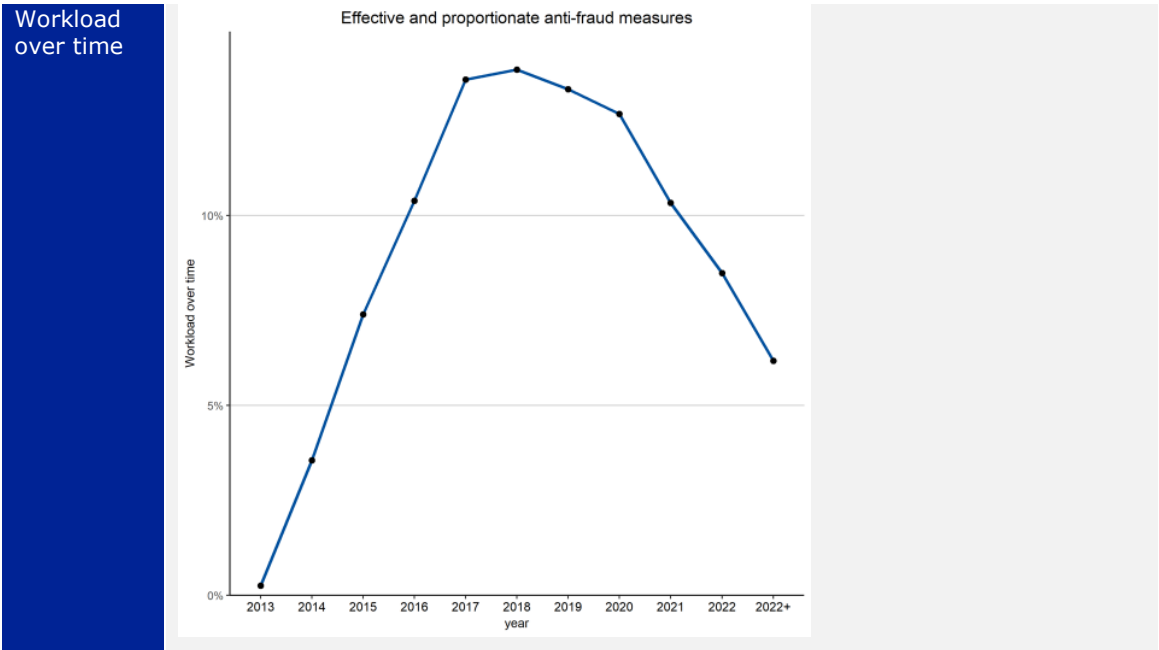
### A.18 Task M.7 – Correction of irregularities

Task description	<p>Correction of irregularities</p> <p>Programme Management. For EAFRD the task is under the responsibility of the Paying Agency.</p> <ul style="list-style-type: none"> <li>• CPR, Part II - Art. 72(h)</li> <li>• EAFRD HZR, Art 58.1.c</li> </ul>																
ESIF workload (approx.)	13 000 FTE																
Share of total workload	2.1%																
ESIF costs (approx.)	€ 495 000 000																
Share of total costs	1.9%																
ESIF external costs	€ 39 400 000																
Workload in person years per million EUR of total eligible budget	<p>Correction of irregularities</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.016</td> </tr> <tr> <td>EAFRD</td> <td>0.030</td> </tr> <tr> <td>EMFF</td> <td>0.008</td> </tr> <tr> <td>ERDF</td> <td>0.011</td> </tr> <tr> <td>CF</td> <td>0.012</td> </tr> <tr> <td>ESF</td> <td>0.014</td> </tr> <tr> <td>ETC</td> <td>0.020</td> </tr> </tbody> </table>	Programme	Median	ESIF	0.016	EAFRD	0.030	EMFF	0.008	ERDF	0.011	CF	0.012	ESF	0.014	ETC	0.020
Programme	Median																
ESIF	0.016																
EAFRD	0.030																
EMFF	0.008																
ERDF	0.011																
CF	0.012																
ESF	0.014																
ETC	0.020																
Costs in EUR per million EUR of total eligible budget	<p>Correction of irregularities</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>918</td> </tr> <tr> <td>EAFRD</td> <td>1 965</td> </tr> <tr> <td>EMFF</td> <td>466</td> </tr> <tr> <td>ERDF</td> <td>525</td> </tr> <tr> <td>CF</td> <td>497</td> </tr> <tr> <td>ESF</td> <td>489</td> </tr> <tr> <td>ETC</td> <td>2 003</td> </tr> </tbody> </table>	Programme	Median	ESIF	918	EAFRD	1 965	EMFF	466	ERDF	525	CF	497	ESF	489	ETC	2 003
Programme	Median																
ESIF	918																
EAFRD	1 965																
EMFF	466																
ERDF	525																
CF	497																
ESF	489																
ETC	2 003																



### A.19 Task M.8 – Effective and proportionate anti-fraud measures

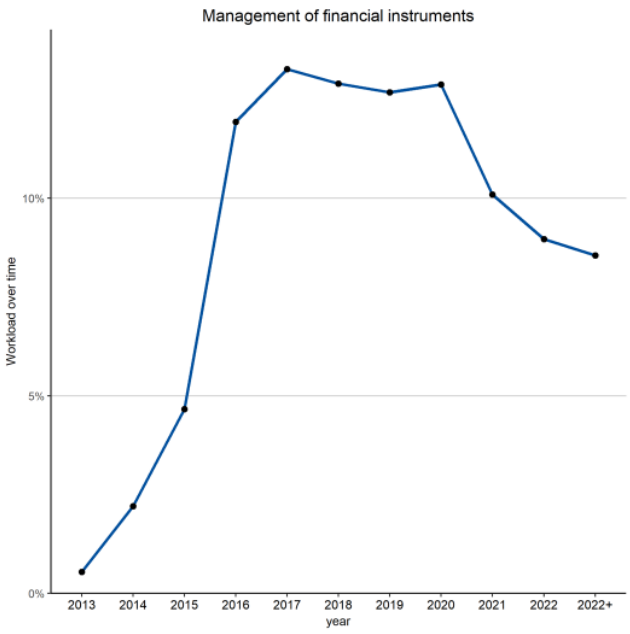
Task description	Effective and proportionate anti-fraud measures Programme Management. For EAFRD the task is under the responsibility of the Paying Agency. <ul style="list-style-type: none"><li>• CPR Part II - Art. 72(h), Part IV - Art. 122(2), Art. 125(4c)</li><li>• EAFRD HZR, Art 58.1.b</li></ul>																	
ESIF workload (approx.)	10 400 FTE																	
Share of total workload	1.7%																	
ESIF costs (approx.)	€ 427 700 000																	
Share of total costs	1.6%																	
ESIF external costs	€ 37 200 000																	
Workload in person years per million EUR of total eligible budget	<div><div>Effective and proportionate anti-fraud measures</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.012</td></tr><tr><td>EAFRD</td><td>0.038</td></tr><tr><td>EMFF</td><td>0.013</td></tr><tr><td>ERDF</td><td>0.008</td></tr><tr><td>CF</td><td>0.007</td></tr><tr><td>ESF</td><td>0.011</td></tr><tr><td>ETC</td><td>0.014</td></tr></tbody></table></div>			Median	ESIF	0.012	EAFRD	0.038	EMFF	0.013	ERDF	0.008	CF	0.007	ESF	0.011	ETC	0.014
	Median																	
ESIF	0.012																	
EAFRD	0.038																	
EMFF	0.013																	
ERDF	0.008																	
CF	0.007																	
ESF	0.011																	
ETC	0.014																	
Costs in EUR per million EUR of total eligible budget	<div><div>Effective and proportionate anti-fraud measures</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>769</td></tr><tr><td>EAFRD</td><td>1 965</td></tr><tr><td>EMFF</td><td>754</td></tr><tr><td>ERDF</td><td>382</td></tr><tr><td>CF</td><td>312</td></tr><tr><td>ESF</td><td>468</td></tr><tr><td>ETC</td><td>1 064</td></tr></tbody></table></div>			Median	ESIF	769	EAFRD	1 965	EMFF	754	ERDF	382	CF	312	ESF	468	ETC	1 064
	Median																	
ESIF	769																	
EAFRD	1 965																	
EMFF	754																	
ERDF	382																	
CF	312																	
ESF	468																	
ETC	1 064																	



## A.20 Task M.9 – Management of financial instruments

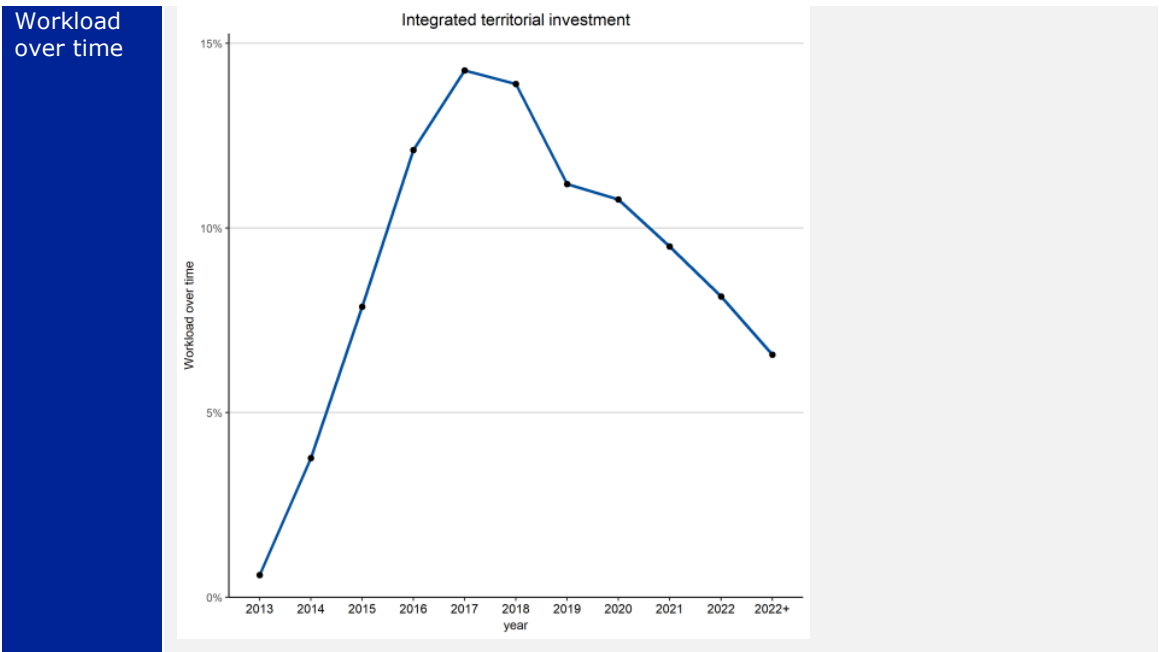
Task description	Management of financial instruments Programme Management • CPR, Part II - Art. 37-46																
ESIF workload (approx.)	8 400 FTE																
Share of total workload	1.4%																
ESIF costs (approx.)	€ 215 900 000																
Share of total costs	0.8%																
ESIF external costs	€ 15 500 000																
Workload in person years per million EUR of total eligible budget	<p>Management of financial instruments</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.002</td> </tr> <tr> <td>EAFRD</td> <td>0.002</td> </tr> <tr> <td>EMFF</td> <td>0.000</td> </tr> <tr> <td>ERDF</td> <td>0.005</td> </tr> <tr> <td>CF</td> <td>0.003</td> </tr> <tr> <td>ESF</td> <td>0.004</td> </tr> <tr> <td>ETC</td> <td>0.000</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.002	EAFRD	0.002	EMFF	0.000	ERDF	0.005	CF	0.003	ESF	0.004	ETC	0.000
Fund	Median																
ESIF	0.002																
EAFRD	0.002																
EMFF	0.000																
ERDF	0.005																
CF	0.003																
ESF	0.004																
ETC	0.000																
Costs in EUR per million EUR of total eligible budget	<p>Management of financial instruments</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>97</td> </tr> <tr> <td>EAFRD</td> <td>42</td> </tr> <tr> <td>EMFF</td> <td>0</td> </tr> <tr> <td>ERDF</td> <td>283</td> </tr> <tr> <td>CF</td> <td>199</td> </tr> <tr> <td>ESF</td> <td>199</td> </tr> <tr> <td>ETC</td> <td>0</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	97	EAFRD	42	EMFF	0	ERDF	283	CF	199	ESF	199	ETC	0
Fund	Median																
ESIF	97																
EAFRD	42																
EMFF	0																
ERDF	283																
CF	199																
ESF	199																
ETC	0																

Workload  
over time

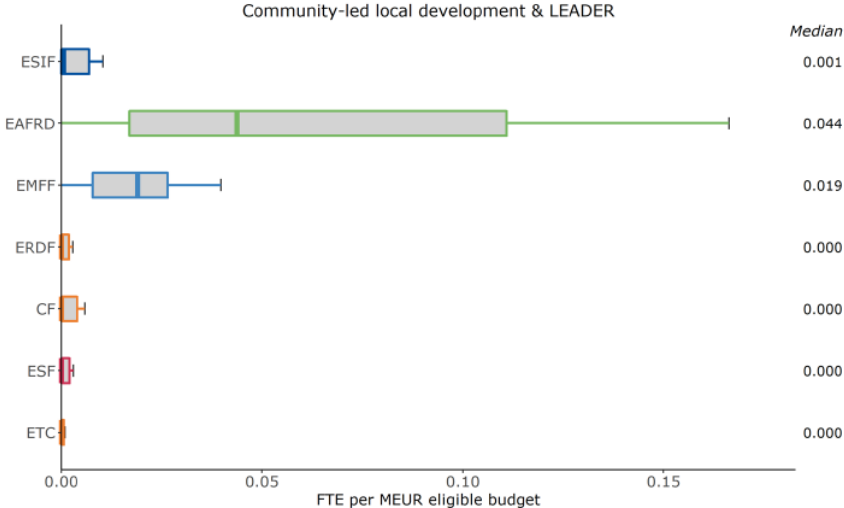
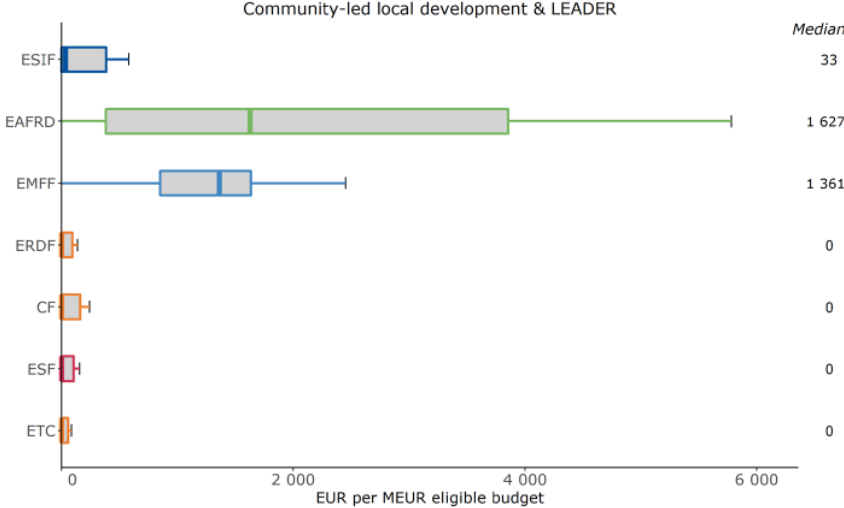


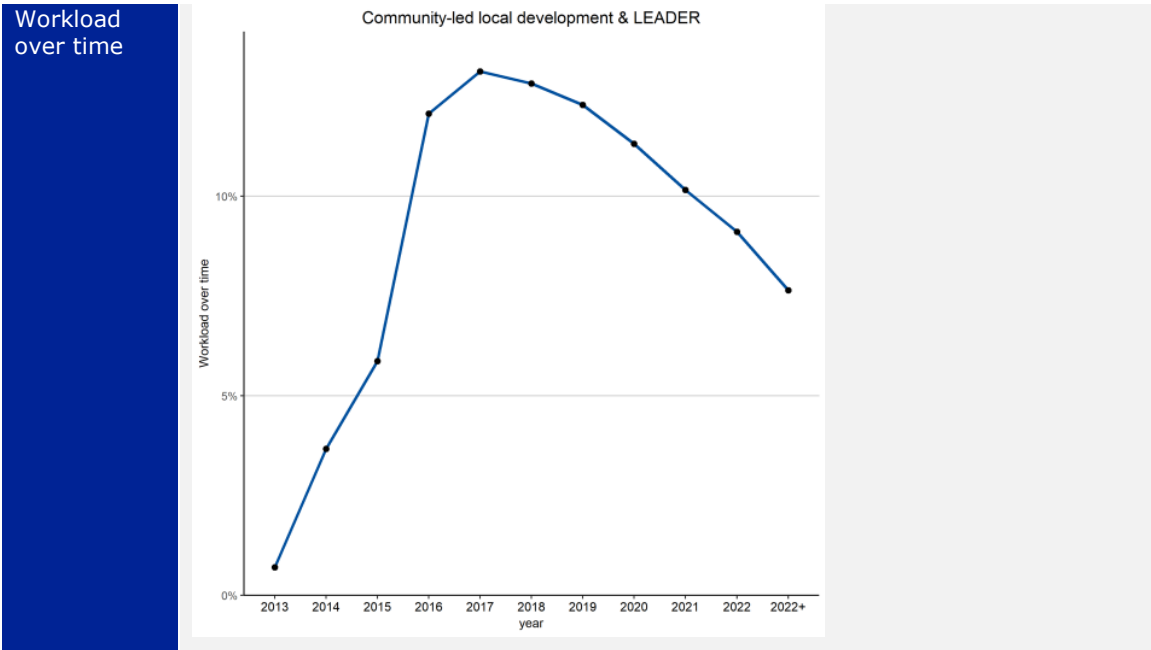
### A.21 Task M.10 – Management of integrated territorial investments

Task description	Management of integrated territorial investment Programme Management • CPR, Part II - Art. 36																
ESIF workload (approx.)	3 700 FTE																
Share of total workload	0.6%																
ESIF costs (approx.)	€ 118 400 000																
Share of total costs	0.5%																
ESIF external costs	€ 4 500 000																
Workload in person years per million EUR of total eligible budget	<p>Integrated territorial investment</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.000</td> </tr> <tr> <td>EAFRD</td> <td>0.000</td> </tr> <tr> <td>EMFF</td> <td>0.000</td> </tr> <tr> <td>ERDF</td> <td>0.001</td> </tr> <tr> <td>CF</td> <td>0.001</td> </tr> <tr> <td>ESF</td> <td>0.002</td> </tr> <tr> <td>ETC</td> <td>0.000</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.000	EAFRD	0.000	EMFF	0.000	ERDF	0.001	CF	0.001	ESF	0.002	ETC	0.000
Fund	Median																
ESIF	0.000																
EAFRD	0.000																
EMFF	0.000																
ERDF	0.001																
CF	0.001																
ESF	0.002																
ETC	0.000																
Costs in EUR per million EUR of total eligible budget	<p>Integrated territorial investment</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0</td> </tr> <tr> <td>EAFRD</td> <td>0</td> </tr> <tr> <td>EMFF</td> <td>43</td> </tr> <tr> <td>ERDF</td> <td>100</td> </tr> <tr> <td>CF</td> <td>29</td> </tr> <tr> <td>ESF</td> <td>137</td> </tr> <tr> <td>ETC</td> <td>0</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	0	EAFRD	0	EMFF	43	ERDF	100	CF	29	ESF	137	ETC	0
Fund	Median																
ESIF	0																
EAFRD	0																
EMFF	43																
ERDF	100																
CF	29																
ESF	137																
ETC	0																



## A.22 Task M.11 – Management of CLLD and LEADER

Task description	Community-led local development & LEADER Programme Management <ul style="list-style-type: none"> <li>CPR, Part II - Art. 34-35</li> <li>EAFRD Reg. Art. 42-44</li> <li>EMFF Reg. Art. 63</li> </ul>																
ESIF workload (approx.)	13 100 FTE																
Share of total workload	2.1%																
ESIF costs (approx.)	€ 373 200 000																
Share of total costs	1.4%																
ESIF external costs	€ 38 400 000																
Workload in person years per million EUR of total eligible budget	<p>Community-led local development &amp; LEADER</p>  <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.001</td> </tr> <tr> <td>EAFRD</td> <td>0.044</td> </tr> <tr> <td>EMFF</td> <td>0.019</td> </tr> <tr> <td>ERDF</td> <td>0.000</td> </tr> <tr> <td>CF</td> <td>0.000</td> </tr> <tr> <td>ESF</td> <td>0.000</td> </tr> <tr> <td>ETC</td> <td>0.000</td> </tr> </tbody> </table>	ESIF	Median	ESIF	0.001	EAFRD	0.044	EMFF	0.019	ERDF	0.000	CF	0.000	ESF	0.000	ETC	0.000
ESIF	Median																
ESIF	0.001																
EAFRD	0.044																
EMFF	0.019																
ERDF	0.000																
CF	0.000																
ESF	0.000																
ETC	0.000																
Costs in EUR per million EUR of total eligible budget	<p>Community-led local development &amp; LEADER</p>  <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>33</td> </tr> <tr> <td>EAFRD</td> <td>1 627</td> </tr> <tr> <td>EMFF</td> <td>1 361</td> </tr> <tr> <td>ERDF</td> <td>0</td> </tr> <tr> <td>CF</td> <td>0</td> </tr> <tr> <td>ESF</td> <td>0</td> </tr> <tr> <td>ETC</td> <td>0</td> </tr> </tbody> </table>	ESIF	Median	ESIF	33	EAFRD	1 627	EMFF	1 361	ERDF	0	CF	0	ESF	0	ETC	0
ESIF	Median																
ESIF	33																
EAFRD	1 627																
EMFF	1 361																
ERDF	0																
CF	0																
ESF	0																
ETC	0																



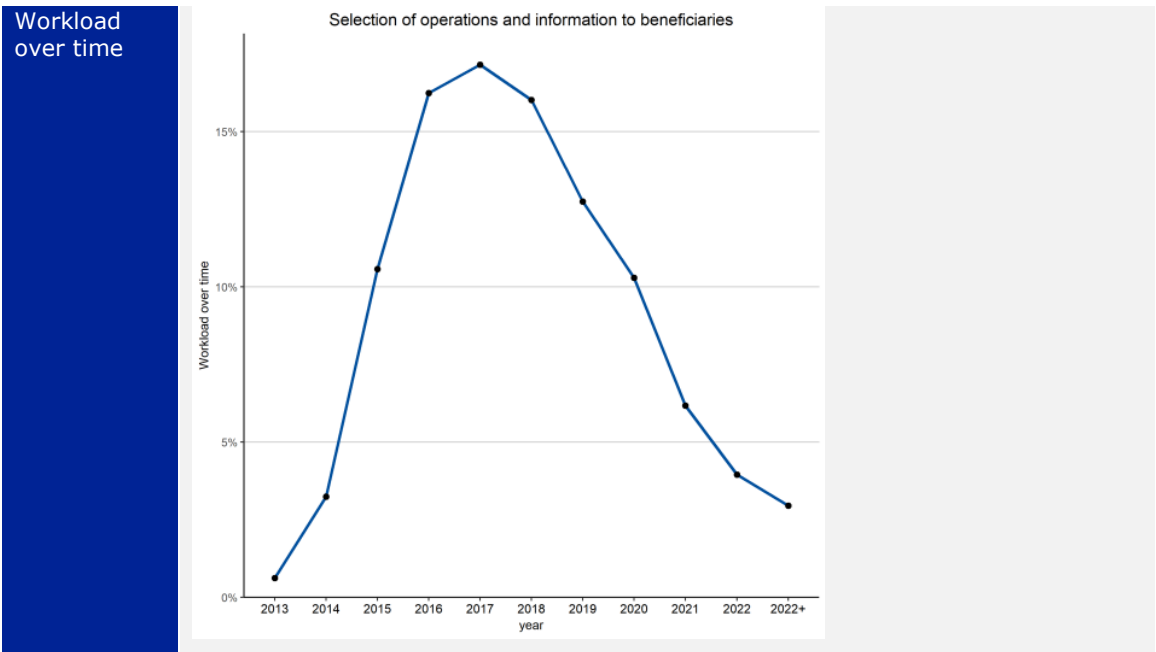
### A.23 Task M.xb – Other financial management tasks

Task description	Other project financial management tasks Programme Management <ul style="list-style-type: none"><li>non-regulated tasks</li></ul>																		
ESIF workload (approx.)	6 500 FTE																		
Share of total workload	1.1%																		
ESIF costs (approx.)	€ 204 200 000																		
Share of total costs	0.8%																		
ESIF external costs	€ 21 500 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Other project financial management tasks</div><table><thead><tr><th>Fund</th><th>Median (FTE per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>0.002</td></tr><tr><td>EAFRD</td><td>0.002</td></tr><tr><td>EMFF</td><td>0.002</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.000</td></tr><tr><td>ESF</td><td>0.000</td></tr><tr><td>ETC</td><td>0.003</td></tr></tbody></table></div>			Fund	Median (FTE per MEUR eligible budget)	ESIF	0.002	EAFRD	0.002	EMFF	0.002	ERDF	0.001	CF	0.000	ESF	0.000	ETC	0.003
Fund	Median (FTE per MEUR eligible budget)																		
ESIF	0.002																		
EAFRD	0.002																		
EMFF	0.002																		
ERDF	0.001																		
CF	0.000																		
ESF	0.000																		
ETC	0.003																		
Costs in EUR per million EUR of total eligible budget	<div><div>Other project financial management tasks</div><table><thead><tr><th>Fund</th><th>Median (EUR per MEUR eligible budget)</th></tr></thead><tbody><tr><td>ESIF</td><td>95</td></tr><tr><td>EAFRD</td><td>105</td></tr><tr><td>EMFF</td><td>261</td></tr><tr><td>ERDF</td><td>83</td></tr><tr><td>CF</td><td>36</td></tr><tr><td>ESF</td><td>40</td></tr><tr><td>ETC</td><td>284</td></tr></tbody></table></div>			Fund	Median (EUR per MEUR eligible budget)	ESIF	95	EAFRD	105	EMFF	261	ERDF	83	CF	36	ESF	40	ETC	284
Fund	Median (EUR per MEUR eligible budget)																		
ESIF	95																		
EAFRD	105																		
EMFF	261																		
ERDF	83																		
CF	36																		
ESF	40																		
ETC	284																		

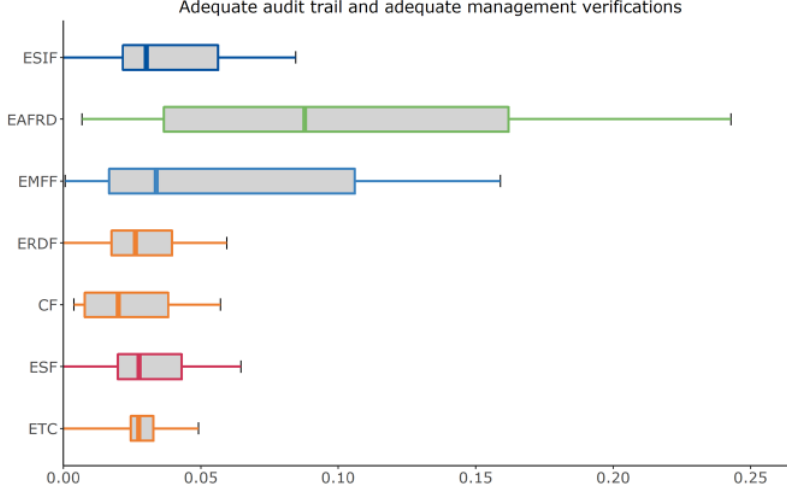
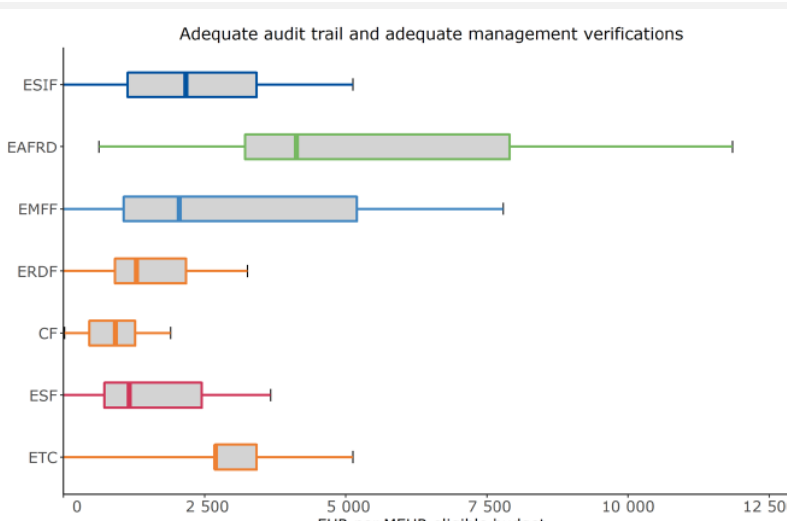


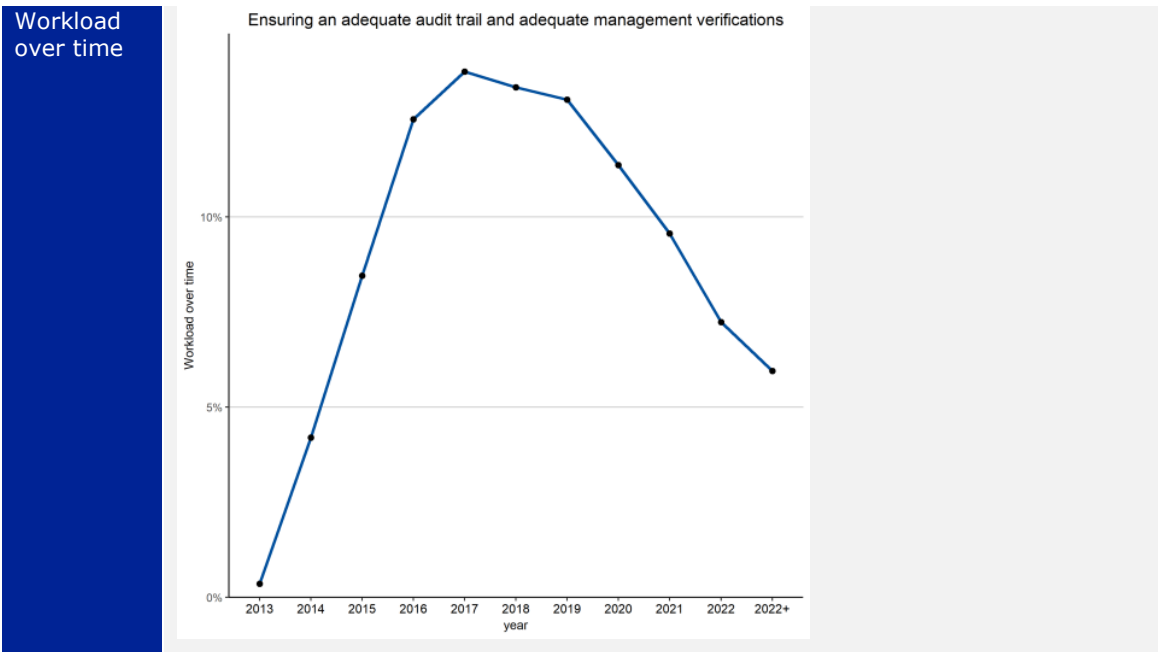
## A.24 Task M.12 – Selection of operations and information of beneficiaries

Task description	Selection of operations and information to beneficiaries Programme Management <ul style="list-style-type: none"><li>• CPR, Part II - Art. 34(3)</li><li>• CPR, Part IV - Art. 125(3), Art. 72(c)</li><li>• EAFRD Reg. Art. 49</li></ul>																		
ESIF workload (approx.)	57 900 FTE																		
Share of total workload	9.5%																		
ESIF costs (approx.)	€ 1 956 500 000																		
Share of total costs	7.5%																		
ESIF external costs	€ 118 800 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Selection of operations and information to beneficiaries</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.051</td></tr><tr><td>EAFRD</td><td>0.203</td></tr><tr><td>EMFF</td><td>0.067</td></tr><tr><td>ERDF</td><td>0.047</td></tr><tr><td>CF</td><td>0.024</td></tr><tr><td>ESF</td><td>0.049</td></tr><tr><td>ETC</td><td>0.051</td></tr></tbody></table></div>				Median	ESIF	0.051	EAFRD	0.203	EMFF	0.067	ERDF	0.047	CF	0.024	ESF	0.049	ETC	0.051
	Median																		
ESIF	0.051																		
EAFRD	0.203																		
EMFF	0.067																		
ERDF	0.047																		
CF	0.024																		
ESF	0.049																		
ETC	0.051																		
Costs in EUR per million EUR of total eligible budget	<div><div>Selection of operations and information to beneficiaries</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>3 044</td></tr><tr><td>EAFRD</td><td>5 622</td></tr><tr><td>EMFF</td><td>3 993</td></tr><tr><td>ERDF</td><td>2 376</td></tr><tr><td>CF</td><td>1 001</td></tr><tr><td>ESF</td><td>2 616</td></tr><tr><td>ETC</td><td>5 474</td></tr></tbody></table></div>				Median	ESIF	3 044	EAFRD	5 622	EMFF	3 993	ERDF	2 376	CF	1 001	ESF	2 616	ETC	5 474
	Median																		
ESIF	3 044																		
EAFRD	5 622																		
EMFF	3 993																		
ERDF	2 376																		
CF	1 001																		
ESF	2 616																		
ETC	5 474																		

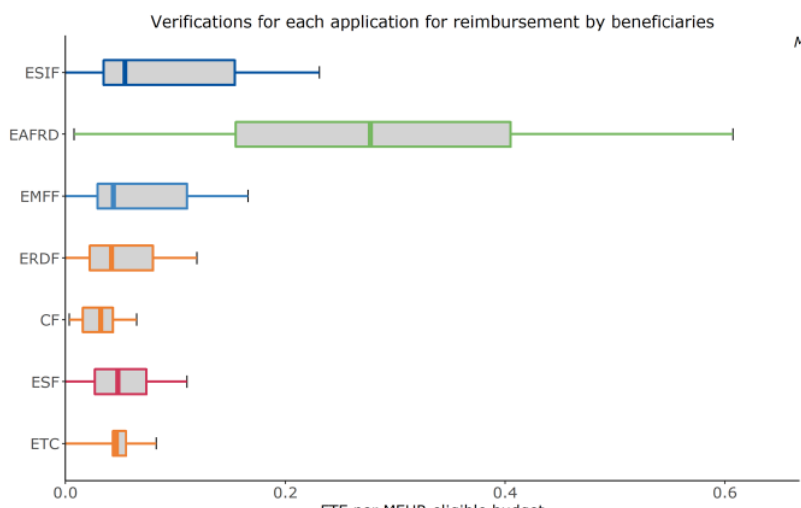
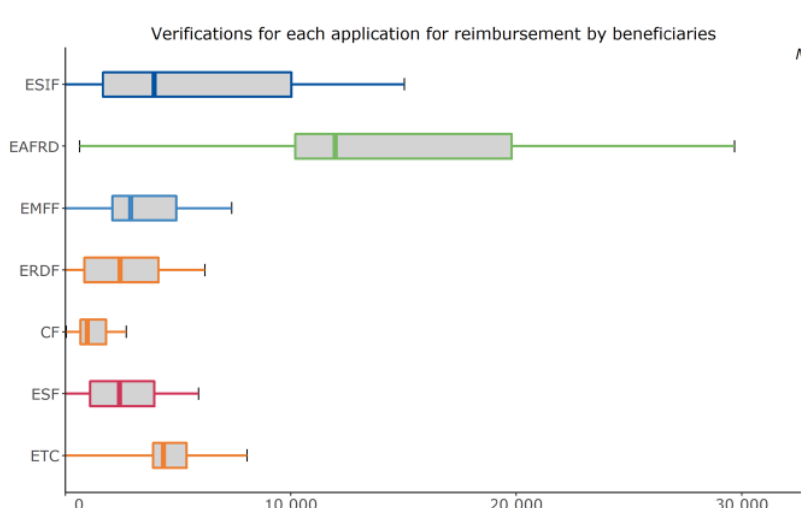


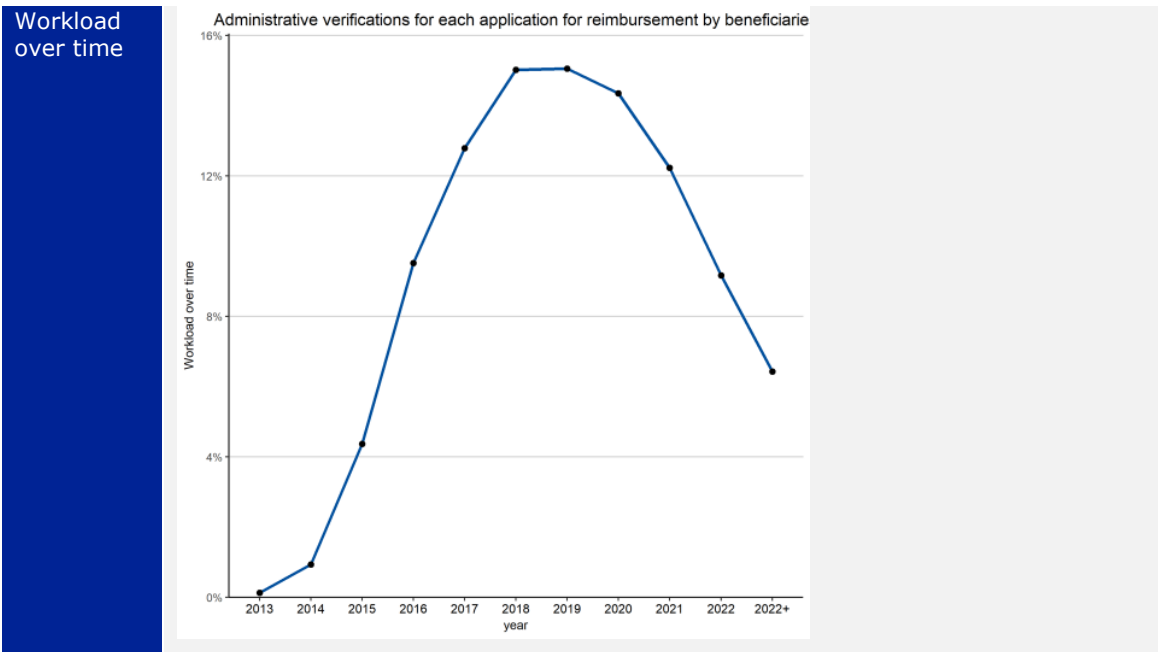
### A.25 Task M.13 – Ensuring an adequate audit trail and verifications

Task description	Ensuring an adequate audit trail and adequate management verifications Programme Management. For EAFRD the task is under the responsibility of the Paying Agency. <ul style="list-style-type: none"><li>CPR Art. 72 (c, g, h), Art. 122(3), Art. 125 (4a, 4b 4d, 5, 6, 8), Art. 140</li><li>EAFRD HZR, Art 49, Art. 58</li></ul>																		
ESIF workload (approx.)	28 500 FTE																		
Share of total workload	4.7%																		
ESIF costs (approx.)	€ 1 132 800 000																		
Share of total costs	4.4%																		
ESIF external costs	€ 69 400 000																		
Workload in person years per million EUR of total eligible budget	<div><div><div>Adequate audit trail and adequate management verifications</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.030</td></tr><tr><td>EAFRD</td><td>0.088</td></tr><tr><td>EMFF</td><td>0.034</td></tr><tr><td>ERDF</td><td>0.026</td></tr><tr><td>CF</td><td>0.020</td></tr><tr><td>ESF</td><td>0.028</td></tr><tr><td>ETC</td><td>0.027</td></tr></tbody></table><div>FTE per MEUR eligible budget</div></div></div>			ESIF	Median	ESIF	0.030	EAFRD	0.088	EMFF	0.034	ERDF	0.026	CF	0.020	ESF	0.028	ETC	0.027
ESIF	Median																		
ESIF	0.030																		
EAFRD	0.088																		
EMFF	0.034																		
ERDF	0.026																		
CF	0.020																		
ESF	0.028																		
ETC	0.027																		
Costs in EUR per million EUR of total eligible budget	<div><div><div>Adequate audit trail and adequate management verifications</div><table><thead><tr><th>ESIF</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>2 166</td></tr><tr><td>EAFRD</td><td>4 123</td></tr><tr><td>EMFF</td><td>2 049</td></tr><tr><td>ERDF</td><td>1 287</td></tr><tr><td>CF</td><td>917</td></tr><tr><td>ESF</td><td>1 162</td></tr><tr><td>ETC</td><td>2 692</td></tr></tbody></table><div>EUR per MEUR eligible budget</div></div></div>			ESIF	Median	ESIF	2 166	EAFRD	4 123	EMFF	2 049	ERDF	1 287	CF	917	ESF	1 162	ETC	2 692
ESIF	Median																		
ESIF	2 166																		
EAFRD	4 123																		
EMFF	2 049																		
ERDF	1 287																		
CF	917																		
ESF	1 162																		
ETC	2 692																		



## A.26 Task M.14 – Verifications for reimbursements of beneficiaries

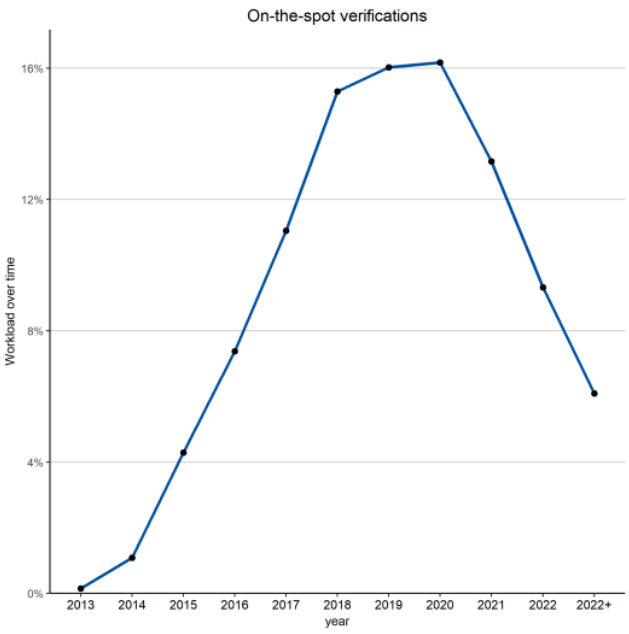
Task description	Administrative verifications for each application for reimbursement by beneficiaries Programme Management. For EAFRD the task is under the responsibility of the Paying Agency. <ul style="list-style-type: none"><li>CPR, Part IV - Art. 125 (4a, 5a)</li><li>EAFRD HZR, Art 59.1</li></ul>																		
ESIF workload (approx.)	75 200 FTE																		
Share of total workload	12.3%																		
ESIF costs (approx.)	€ 2 993 200 000																		
Share of total costs	11.5%																		
ESIF external costs	€ 78 100 000																		
Workload in person years per million EUR of total eligible budget	<div>Verifications for each application for reimbursement by beneficiaries</div>  <table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.054</td></tr><tr><td>EAFRD</td><td>0.277</td></tr><tr><td>EMFF</td><td>0.043</td></tr><tr><td>ERDF</td><td>0.042</td></tr><tr><td>CF</td><td>0.032</td></tr><tr><td>ESF</td><td>0.048</td></tr><tr><td>ETC</td><td>0.046</td></tr></tbody></table> <p>FTE per MEUR eligible budget</p>			Fund	Median	ESIF	0.054	EAFRD	0.277	EMFF	0.043	ERDF	0.042	CF	0.032	ESF	0.048	ETC	0.046
Fund	Median																		
ESIF	0.054																		
EAFRD	0.277																		
EMFF	0.043																		
ERDF	0.042																		
CF	0.032																		
ESF	0.048																		
ETC	0.046																		
Costs in EUR per million EUR of total eligible budget	<div>Verifications for each application for reimbursement by beneficiaries</div>  <table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>3 919</td></tr><tr><td>EAFRD</td><td>11 967</td></tr><tr><td>EMFF</td><td>2 881</td></tr><tr><td>ERDF</td><td>2 415</td></tr><tr><td>CF</td><td>957</td></tr><tr><td>ESF</td><td>2 391</td></tr><tr><td>ETC</td><td>4 350</td></tr></tbody></table> <p>EUR per MEUR eligible budget</p>			Fund	Median	ESIF	3 919	EAFRD	11 967	EMFF	2 881	ERDF	2 415	CF	957	ESF	2 391	ETC	4 350
Fund	Median																		
ESIF	3 919																		
EAFRD	11 967																		
EMFF	2 881																		
ERDF	2 415																		
CF	957																		
ESF	2 391																		
ETC	4 350																		



## A.27 Task M.15 – On the spot verifications

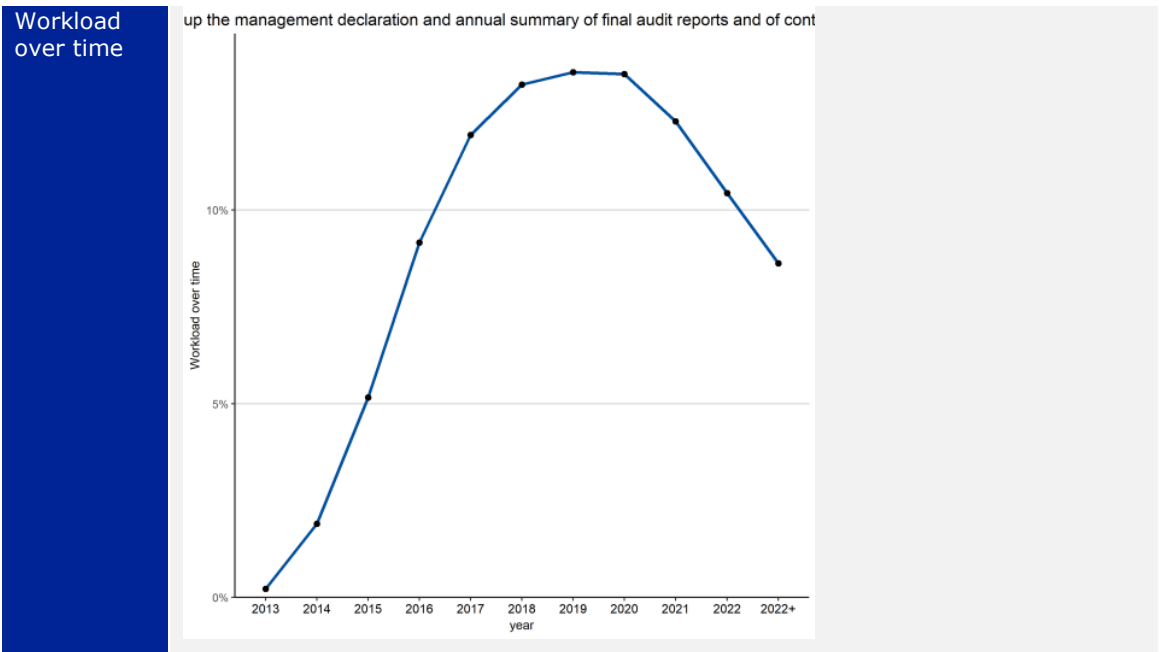
Task description	<p>On the spot verifications Programme Management. For EAFRD the task is under the responsibility of the Paying Agency.</p> <ul style="list-style-type: none"> <li>• CPR, Part IV - Art. 125 (4a, 5b, 6)</li> <li>• EAFRD HZR, Art 59.1</li> </ul>																
ESIF workload (approx.)	43 500 FTE																
Share of total workload	7.1%																
ESIF costs (approx.)	€ 1 646 400 000																
Share of total costs	6.3%																
ESIF external costs	€ 96 200 000																
Workload in person years per million EUR of total eligible budget	<p>On-the-spot verifications</p> <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.029</td> </tr> <tr> <td>EAFRD</td> <td>0.124</td> </tr> <tr> <td>EMFF</td> <td>0.034</td> </tr> <tr> <td>ERDF</td> <td>0.021</td> </tr> <tr> <td>CF</td> <td>0.016</td> </tr> <tr> <td>ESF</td> <td>0.030</td> </tr> <tr> <td>ETC</td> <td>0.016</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	ESIF	Median	ESIF	0.029	EAFRD	0.124	EMFF	0.034	ERDF	0.021	CF	0.016	ESF	0.030	ETC	0.016
ESIF	Median																
ESIF	0.029																
EAFRD	0.124																
EMFF	0.034																
ERDF	0.021																
CF	0.016																
ESF	0.030																
ETC	0.016																
Costs in EUR per million EUR of total eligible budget	<p>On-the-spot verifications</p> <table border="1"> <thead> <tr> <th>ESIF</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>1 824</td> </tr> <tr> <td>EAFRD</td> <td>8 421</td> </tr> <tr> <td>EMFF</td> <td>2 413</td> </tr> <tr> <td>ERDF</td> <td>999</td> </tr> <tr> <td>CF</td> <td>759</td> </tr> <tr> <td>ESF</td> <td>1 320</td> </tr> <tr> <td>ETC</td> <td>1 530</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	ESIF	Median	ESIF	1 824	EAFRD	8 421	EMFF	2 413	ERDF	999	CF	759	ESF	1 320	ETC	1 530
ESIF	Median																
ESIF	1 824																
EAFRD	8 421																
EMFF	2 413																
ERDF	999																
CF	759																
ESF	1 320																
ETC	1 530																

Workload over time



## A.28 Task M.16 – Management declarations and annual summaries

Task description	<p>Drawing up the management declaration and annual summary of final audit reports and of controls carried out Programme Management. For EAFRD the task is under the responsibility of the Paying Agency.</p> <ul style="list-style-type: none"> <li>• CPR, Part IV - Art. 125(4e)</li> <li>• EAFRD HZR, Art. 7(3b, 3c)</li> </ul>																
ESIF workload (approx.)	11 400 FTE																
Share of total workload	1.9%																
ESIF costs (approx.)	€ 458 800 000																
Share of total costs	1.8%																
ESIF external costs	€ 10 900 000																
Workload in person years per million EUR of total eligible budget	<p>Declaration and annual summary of final audit reports and of controls</p> <table border="1"> <thead> <tr> <th>Program</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.013</td> </tr> <tr> <td>EAFRD</td> <td>0.033</td> </tr> <tr> <td>EMFF</td> <td>0.006</td> </tr> <tr> <td>ERDF</td> <td>0.008</td> </tr> <tr> <td>CF</td> <td>0.008</td> </tr> <tr> <td>ESF</td> <td>0.012</td> </tr> <tr> <td>ETC</td> <td>0.013</td> </tr> </tbody> </table>	Program	Median	ESIF	0.013	EAFRD	0.033	EMFF	0.006	ERDF	0.008	CF	0.008	ESF	0.012	ETC	0.013
Program	Median																
ESIF	0.013																
EAFRD	0.033																
EMFF	0.006																
ERDF	0.008																
CF	0.008																
ESF	0.012																
ETC	0.013																
Costs in EUR per million EUR of total eligible budget	<p>Declaration and annual summary of final audit reports and of controls</p> <table border="1"> <thead> <tr> <th>Program</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>886</td> </tr> <tr> <td>EAFRD</td> <td>2 246</td> </tr> <tr> <td>EMFF</td> <td>532</td> </tr> <tr> <td>ERDF</td> <td>408</td> </tr> <tr> <td>CF</td> <td>338</td> </tr> <tr> <td>ESF</td> <td>387</td> </tr> <tr> <td>ETC</td> <td>1 307</td> </tr> </tbody> </table>	Program	Median	ESIF	886	EAFRD	2 246	EMFF	532	ERDF	408	CF	338	ESF	387	ETC	1 307
Program	Median																
ESIF	886																
EAFRD	2 246																
EMFF	532																
ERDF	408																
CF	338																
ESF	387																
ETC	1 307																



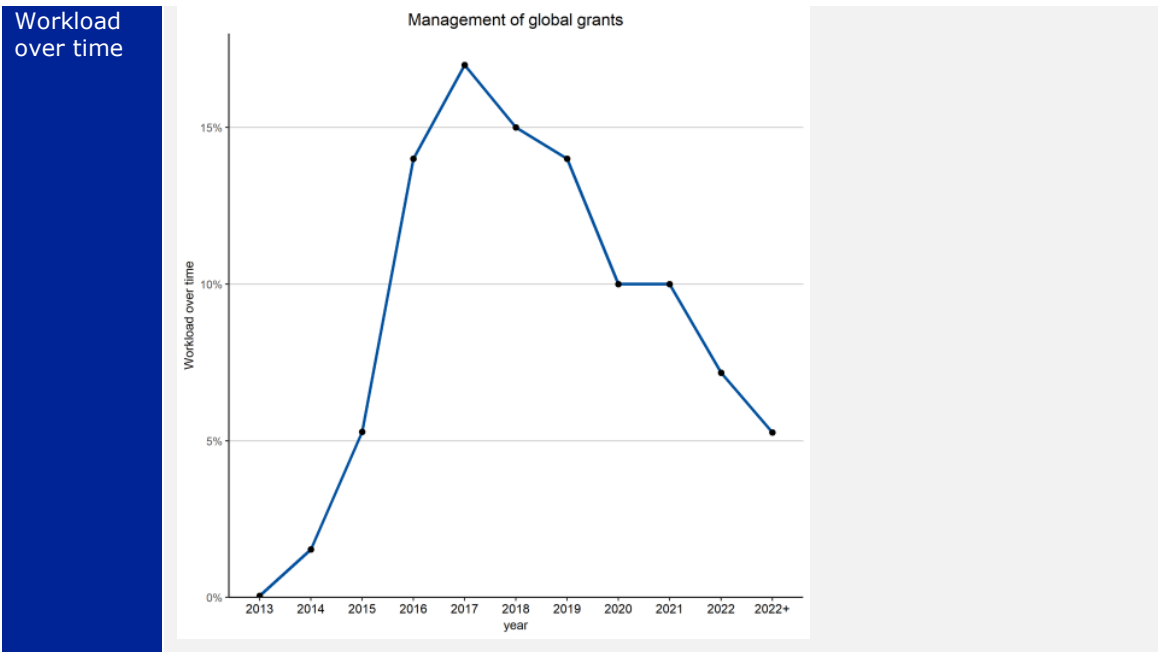
## A.29 Task M.17 – Management of major projects

Task description	Management of major projects Programme Management <ul style="list-style-type: none"> <li>• CPR, Part III - Art. 100-103</li> <li>• Not relevant for EAFRD</li> </ul>												
ESIF workload (approx.)	3 300 FTE												
Share of total workload	0.5%												
ESIF costs (approx.)	€ 68 500 000												
Share of total costs	0.3%												
ESIF external costs	€ 1 900 000												
Workload in person years per million EUR of total eligible budget	<div> <div> <p>Management of major projects</p> <table border="1"> <thead> <tr> <th>Funding Source</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.000</td> </tr> <tr> <td>EMFF</td> <td>0.001</td> </tr> <tr> <td>ERDF</td> <td>0.001</td> </tr> <tr> <td>CF</td> <td>0.008</td> </tr> <tr> <td>ETC</td> <td>0.000</td> </tr> </tbody> </table> </div> </div>	Funding Source	Median	ESIF	0.000	EMFF	0.001	ERDF	0.001	CF	0.008	ETC	0.000
Funding Source	Median												
ESIF	0.000												
EMFF	0.001												
ERDF	0.001												
CF	0.008												
ETC	0.000												
Costs in EUR per million EUR of total eligible budget	<div> <div> <p>Management of major projects</p> <table border="1"> <thead> <tr> <th>Funding Source</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0</td> </tr> <tr> <td>EMFF</td> <td>80</td> </tr> <tr> <td>ERDF</td> <td>51</td> </tr> <tr> <td>CF</td> <td>278</td> </tr> <tr> <td>ETC</td> <td>0</td> </tr> </tbody> </table> </div> </div>	Funding Source	Median	ESIF	0	EMFF	80	ERDF	51	CF	278	ETC	0
Funding Source	Median												
ESIF	0												
EMFF	80												
ERDF	51												
CF	278												
ETC	0												



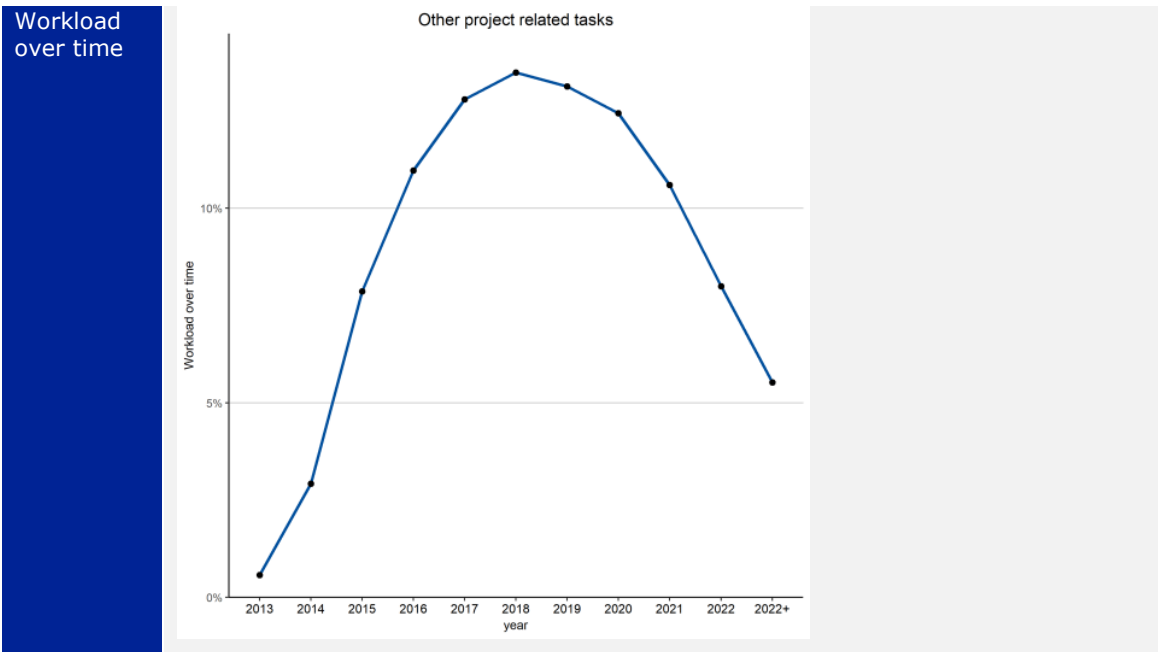
### A.30 Task M.18 – Management of global grants

Task description	Management of global grants Programme Management <ul style="list-style-type: none"><li>CPR, Part IV - Art. 123(7)</li><li>Not relevant for EAFRD</li></ul>														
ESIF workload (approx.)	900 FTE														
Share of total workload	0.1%														
ESIF costs (approx.)	€ 36 000 000														
Share of total costs	0.1%														
ESIF external costs	€ 2 400 000														
Workload in person years per million EUR of total eligible budget	<div><div>Management of global grants</div><table><tr><th>Programme</th><th>Median</th></tr><tr><td>ESIF</td><td>0.000</td></tr><tr><td>EMFF</td><td>0.002</td></tr><tr><td>ERDF</td><td>0.000</td></tr><tr><td>CF</td><td>0.000</td></tr><tr><td>ETC</td><td>0.000</td></tr></table></div>			Programme	Median	ESIF	0.000	EMFF	0.002	ERDF	0.000	CF	0.000	ETC	0.000
Programme	Median														
ESIF	0.000														
EMFF	0.002														
ERDF	0.000														
CF	0.000														
ETC	0.000														
Costs in EUR per million EUR of total eligible budget	<div><div>Management of global grants</div><table><tr><th>Programme</th><th>Median</th></tr><tr><td>ESIF</td><td>0</td></tr><tr><td>EMFF</td><td>214</td></tr><tr><td>ERDF</td><td>0</td></tr><tr><td>CF</td><td>0</td></tr><tr><td>ETC</td><td>0</td></tr></table></div>			Programme	Median	ESIF	0	EMFF	214	ERDF	0	CF	0	ETC	0
Programme	Median														
ESIF	0														
EMFF	214														
ERDF	0														
CF	0														
ETC	0														



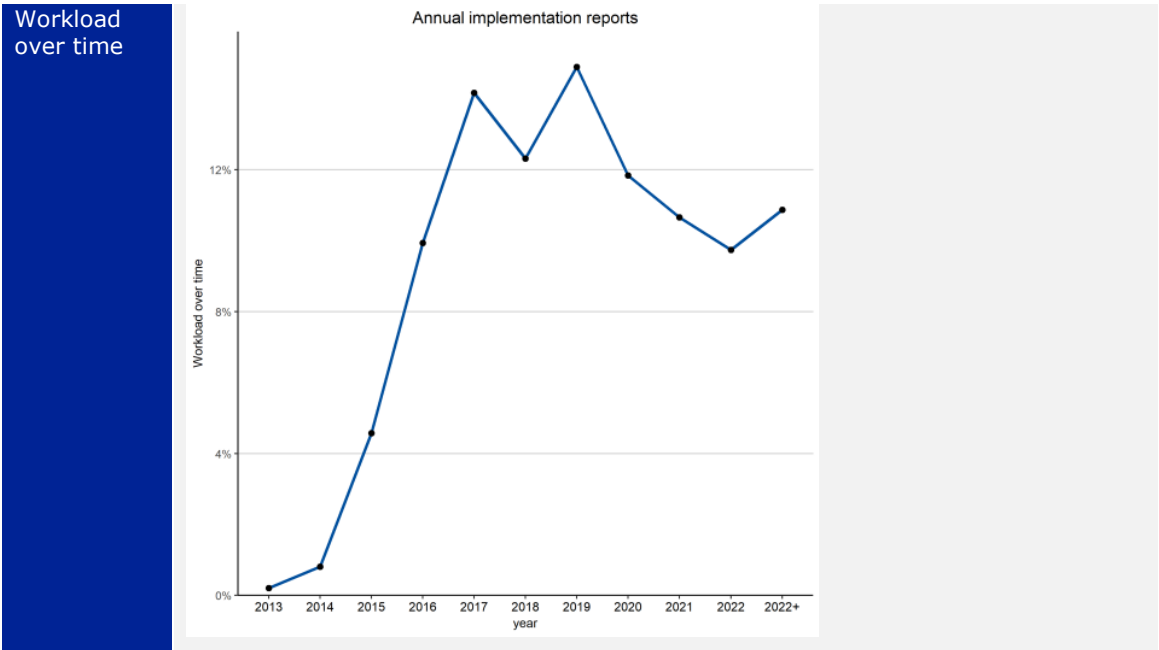
### A.31 Task M.xc – Other project related tasks

Task description	Other project related tasks Programme Management <ul style="list-style-type: none"><li>non-regulated task</li></ul>																		
ESIF workload (approx.)	7 800 FTE																		
Share of total workload	1.3%																		
ESIF costs (approx.)	€ 244 000 000																		
Share of total costs	0.9%																		
ESIF external costs	€ 29 100 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Other project related tasks</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.002</td></tr><tr><td>EAFRD</td><td>0.000</td></tr><tr><td>EMFF</td><td>0.000</td></tr><tr><td>ERDF</td><td>0.000</td></tr><tr><td>CF</td><td>0.002</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.015</td></tr></tbody></table><p>FTE per MEUR eligible budget</p></div>			Fund	Median	ESIF	0.002	EAFRD	0.000	EMFF	0.000	ERDF	0.000	CF	0.002	ESF	0.002	ETC	0.015
Fund	Median																		
ESIF	0.002																		
EAFRD	0.000																		
EMFF	0.000																		
ERDF	0.000																		
CF	0.002																		
ESF	0.002																		
ETC	0.015																		
Costs in EUR per million EUR of total eligible budget	<div><div>Other project related tasks</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>93</td></tr><tr><td>EAFRD</td><td>14</td></tr><tr><td>EMFF</td><td>8</td></tr><tr><td>ERDF</td><td>36</td></tr><tr><td>CF</td><td>71</td></tr><tr><td>ESF</td><td>98</td></tr><tr><td>ETC</td><td>1 420</td></tr></tbody></table><p>EUR per MEUR eligible budget</p></div>			Fund	Median	ESIF	93	EAFRD	14	EMFF	8	ERDF	36	CF	71	ESF	98	ETC	1 420
Fund	Median																		
ESIF	93																		
EAFRD	14																		
EMFF	8																		
ERDF	36																		
CF	71																		
ESF	98																		
ETC	1 420																		

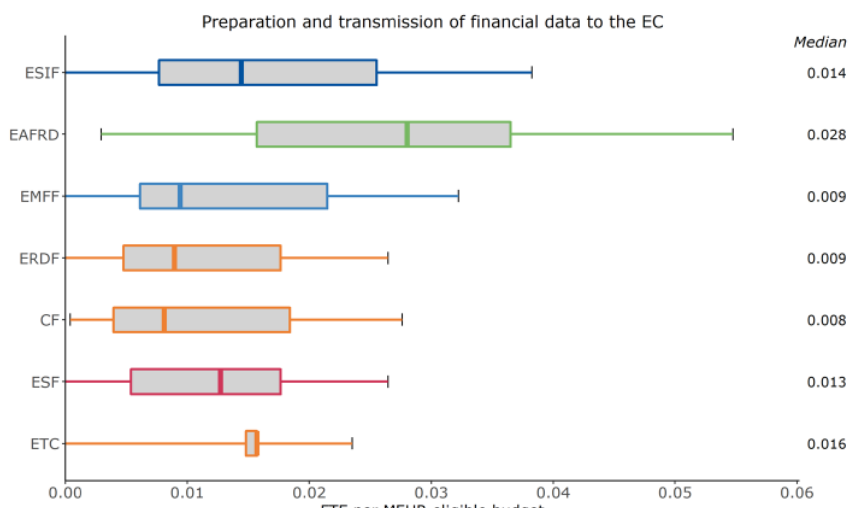
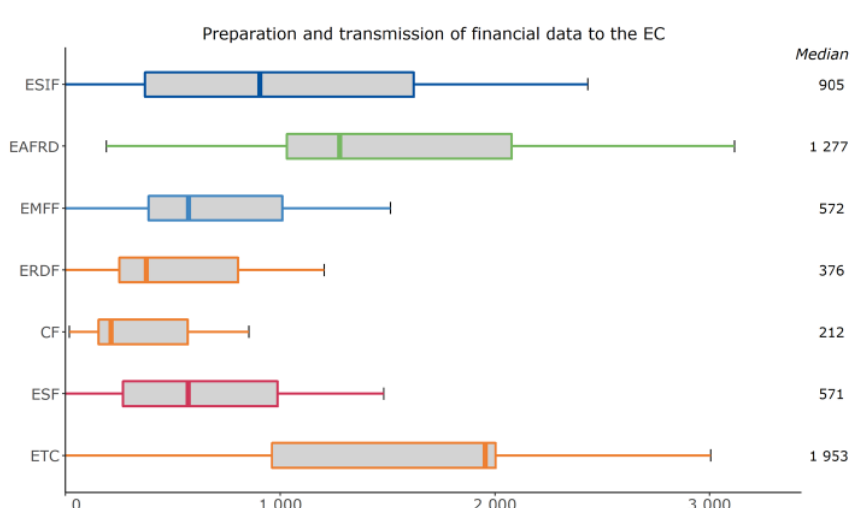


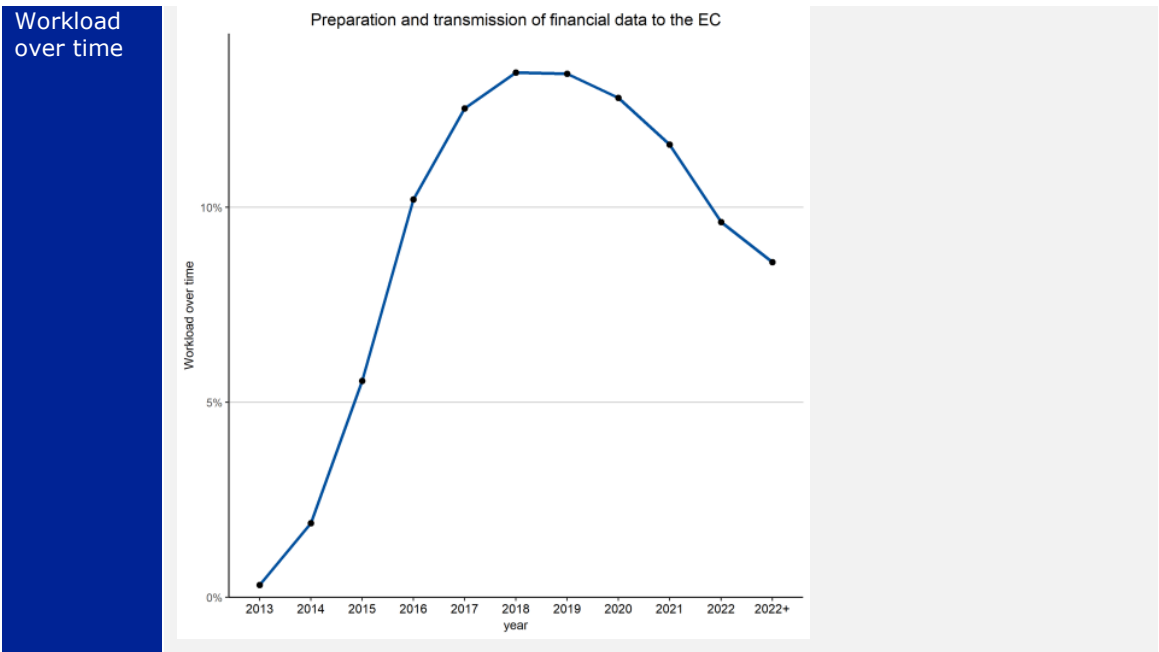
### A.32 Task M.19 – Annual implementation reports

Task description	Annual implementation reports Programme Management <ul style="list-style-type: none"> <li>• CPR, Part IV - Art. 125(2b)</li> <li>• EMFF Art. 114</li> <li>• EAFRD Reg. Art. 75</li> </ul>																
ESIF workload (approx.)	22 300 FTE																
Share of total workload	3.6%																
ESIF costs (approx.)	€ 721 900 000																
Share of total costs	2.8%																
ESIF external costs	€ 77 200 000																
Workload in person years per million EUR of total eligible budget	<p>Annual implementation reports</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.019</td> </tr> <tr> <td>EAFRD</td> <td>0.052</td> </tr> <tr> <td>EMFF</td> <td>0.015</td> </tr> <tr> <td>ERDF</td> <td>0.014</td> </tr> <tr> <td>CF</td> <td>0.012</td> </tr> <tr> <td>ESF</td> <td>0.016</td> </tr> <tr> <td>ETC</td> <td>0.019</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Programme	Median	ESIF	0.019	EAFRD	0.052	EMFF	0.015	ERDF	0.014	CF	0.012	ESF	0.016	ETC	0.019
Programme	Median																
ESIF	0.019																
EAFRD	0.052																
EMFF	0.015																
ERDF	0.014																
CF	0.012																
ESF	0.016																
ETC	0.019																
Costs in EUR per million EUR of total eligible budget	<p>Annual implementation reports</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>1 306</td> </tr> <tr> <td>EAFRD</td> <td>2 206</td> </tr> <tr> <td>EMFF</td> <td>938</td> </tr> <tr> <td>ERDF</td> <td>634</td> </tr> <tr> <td>CF</td> <td>474</td> </tr> <tr> <td>ESF</td> <td>701</td> </tr> <tr> <td>ETC</td> <td>1 573</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Programme	Median	ESIF	1 306	EAFRD	2 206	EMFF	938	ERDF	634	CF	474	ESF	701	ETC	1 573
Programme	Median																
ESIF	1 306																
EAFRD	2 206																
EMFF	938																
ERDF	634																
CF	474																
ESF	701																
ETC	1 573																



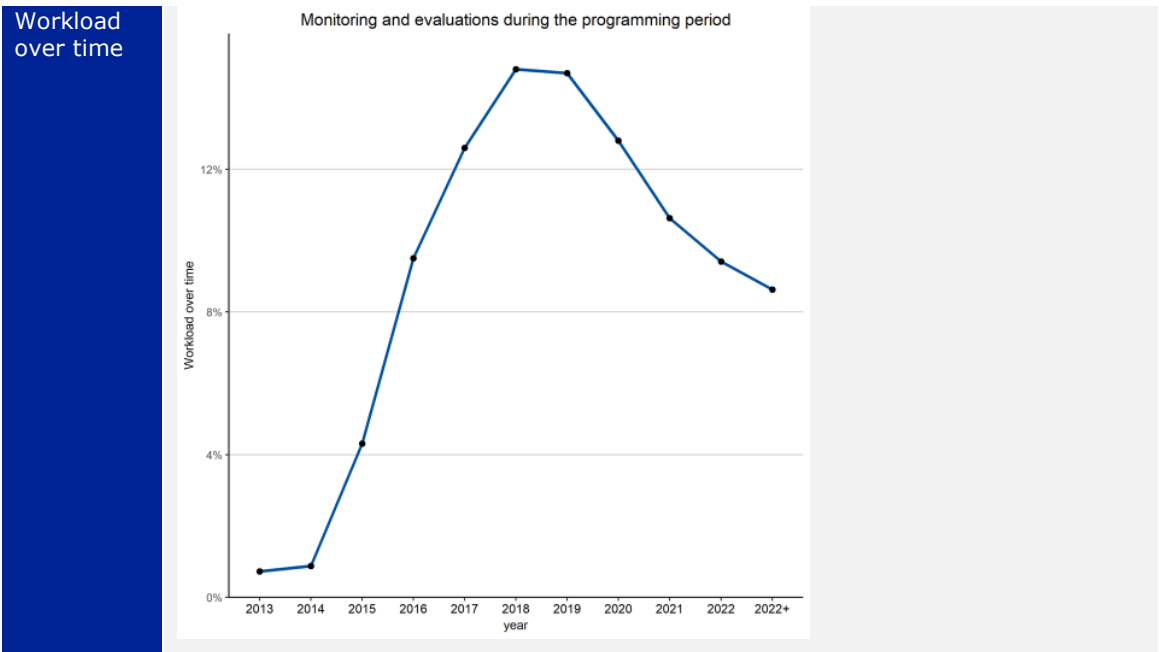
### A.33 Task M.20 – Preparation and transmission of financial data to the EC

Task description	Preparation and transmission of financial data to the EC Programme Management. For EAFRD the task is under the responsibility of the Paying Agency. <ul style="list-style-type: none"><li>• CPR, Part III - Art. 112</li><li>• HZR, Art 102.1.c</li><li>• EMFF Reg. - Art. 97(1)(a) and 98</li></ul>																		
ESIF workload (approx.)	10 500 FTE																		
Share of total workload	1.7%																		
ESIF costs (approx.)	€ 416 900 000																		
Share of total costs	1.6%																		
ESIF external costs	€ 41 000 000																		
Workload in person years per million EUR of total eligible budget	<div><p>Preparation and transmission of financial data to the EC</p><table><thead><tr><th>Fund</th><th>Median (person years per million EUR)</th></tr></thead><tbody><tr><td>ESIF</td><td>0.014</td></tr><tr><td>EAFRD</td><td>0.028</td></tr><tr><td>EMFF</td><td>0.009</td></tr><tr><td>ERDF</td><td>0.009</td></tr><tr><td>CF</td><td>0.008</td></tr><tr><td>ESF</td><td>0.013</td></tr><tr><td>ETC</td><td>0.016</td></tr></tbody></table></div>			Fund	Median (person years per million EUR)	ESIF	0.014	EAFRD	0.028	EMFF	0.009	ERDF	0.009	CF	0.008	ESF	0.013	ETC	0.016
Fund	Median (person years per million EUR)																		
ESIF	0.014																		
EAFRD	0.028																		
EMFF	0.009																		
ERDF	0.009																		
CF	0.008																		
ESF	0.013																		
ETC	0.016																		
Costs in EUR per million EUR of total eligible budget	<div><p>Preparation and transmission of financial data to the EC</p><table><thead><tr><th>Fund</th><th>Median (EUR per million EUR)</th></tr></thead><tbody><tr><td>ESIF</td><td>905</td></tr><tr><td>EAFRD</td><td>1 277</td></tr><tr><td>EMFF</td><td>572</td></tr><tr><td>ERDF</td><td>376</td></tr><tr><td>CF</td><td>212</td></tr><tr><td>ESF</td><td>571</td></tr><tr><td>ETC</td><td>1 953</td></tr></tbody></table></div>			Fund	Median (EUR per million EUR)	ESIF	905	EAFRD	1 277	EMFF	572	ERDF	376	CF	212	ESF	571	ETC	1 953
Fund	Median (EUR per million EUR)																		
ESIF	905																		
EAFRD	1 277																		
EMFF	572																		
ERDF	376																		
CF	212																		
ESF	571																		
ETC	1 953																		



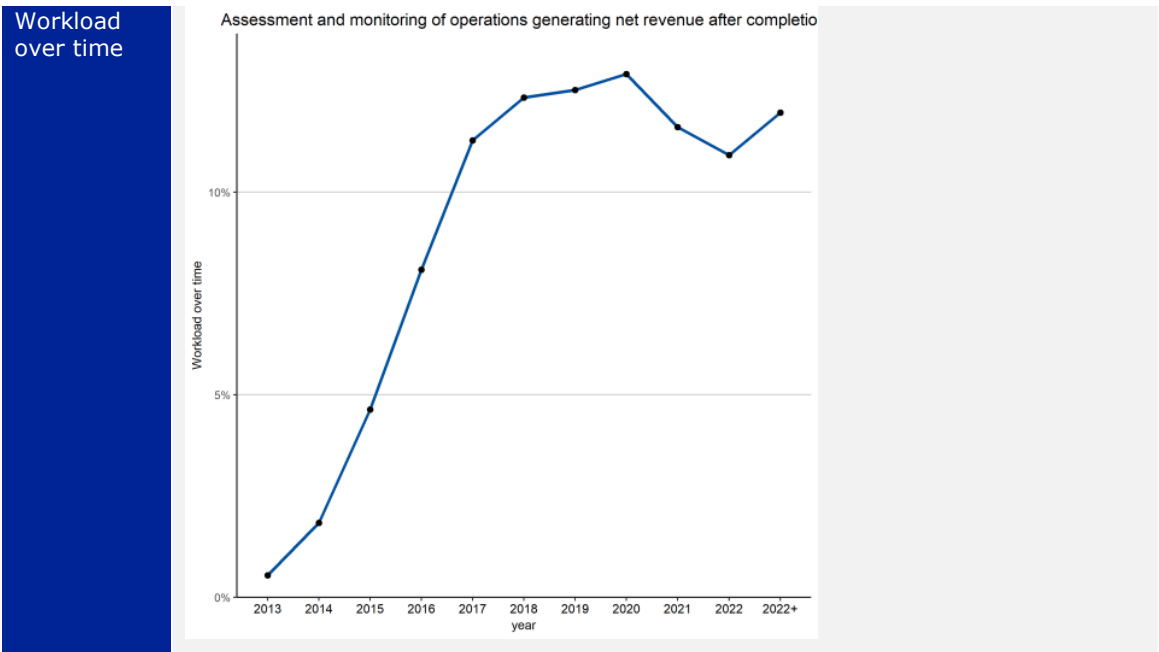
### A.34 Task M.21 – Monitoring and evaluation

Task description	Monitoring and evaluations during the programming period Programme Management <ul style="list-style-type: none"> <li>• CPR, Part II - Art 56, 57 Part III - Art. 114</li> <li>• EAFRD Reg. Art. 66(1)(b), 76-79, Reg.1306/2014 – Art. 110</li> <li>• EMFF Reg. Art. 117</li> </ul>																
ESIF workload (approx.)	24 600 FTE																
Share of total workload	4.0%																
ESIF costs (approx.)	€ 1 093 700 000																
Share of total costs	4.2%																
ESIF external costs	€ 354 300 000																
Workload in person years per million EUR of total eligible budget	<p>Monitoring and evaluations during the programming period</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.022</td> </tr> <tr> <td>EAFRD</td> <td>0.049</td> </tr> <tr> <td>EMFF</td> <td>0.011</td> </tr> <tr> <td>ERDF</td> <td>0.016</td> </tr> <tr> <td>CF</td> <td>0.011</td> </tr> <tr> <td>ESF</td> <td>0.022</td> </tr> <tr> <td>ETC</td> <td>0.023</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.022	EAFRD	0.049	EMFF	0.011	ERDF	0.016	CF	0.011	ESF	0.022	ETC	0.023
Fund	Median																
ESIF	0.022																
EAFRD	0.049																
EMFF	0.011																
ERDF	0.016																
CF	0.011																
ESF	0.022																
ETC	0.023																
Costs in EUR per million EUR of total eligible budget	<p>Monitoring and evaluations during the programming period</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>1 781</td> </tr> <tr> <td>EAFRD</td> <td>2 305</td> </tr> <tr> <td>EMFF</td> <td>803</td> </tr> <tr> <td>ERDF</td> <td>1 072</td> </tr> <tr> <td>CF</td> <td>556</td> </tr> <tr> <td>ESF</td> <td>1 412</td> </tr> <tr> <td>ETC</td> <td>2 527</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	1 781	EAFRD	2 305	EMFF	803	ERDF	1 072	CF	556	ESF	1 412	ETC	2 527
Fund	Median																
ESIF	1 781																
EAFRD	2 305																
EMFF	803																
ERDF	1 072																
CF	556																
ESF	1 412																
ETC	2 527																



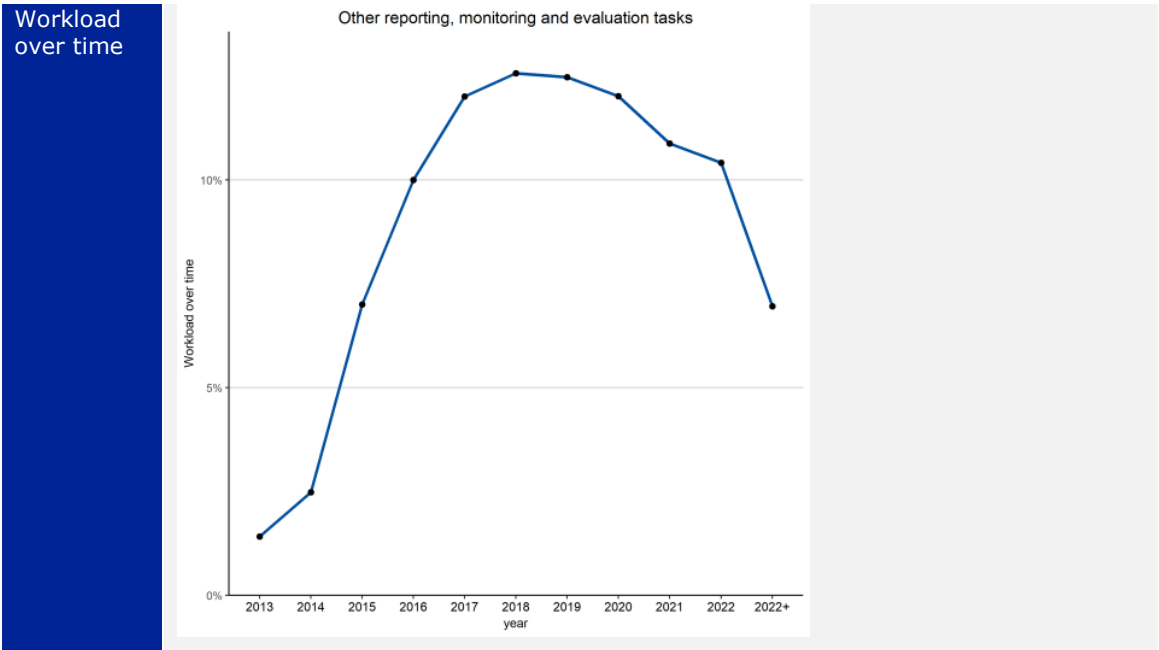
### A.35 Task M.22 – Assessment and monitoring of revenue generating operations

Task description	Assessment and monitoring of operations generating net revenue after completion Programme Management • CPR, Part II - Art. 61																
ESIF workload (approx.)	3 200 FTE																
Share of total workload	0.5%																
ESIF costs (approx.)	€ 106 600 000																
Share of total costs	0.4%																
ESIF external costs	€ 6 100 000																
Workload in person years per million EUR of total eligible budget	<p>Assessment and monitoring of operations generating net revenue</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.002</td> </tr> <tr> <td>EAFRD</td> <td>0.000</td> </tr> <tr> <td>EMFF</td> <td>0.001</td> </tr> <tr> <td>ERDF</td> <td>0.003</td> </tr> <tr> <td>CF</td> <td>0.002</td> </tr> <tr> <td>ESF</td> <td>0.002</td> </tr> <tr> <td>ETC</td> <td>0.004</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.002	EAFRD	0.000	EMFF	0.001	ERDF	0.003	CF	0.002	ESF	0.002	ETC	0.004
Fund	Median																
ESIF	0.002																
EAFRD	0.000																
EMFF	0.001																
ERDF	0.003																
CF	0.002																
ESF	0.002																
ETC	0.004																
Costs in EUR per million EUR of total eligible budget	<p>Assessment and monitoring of operations generating net revenue</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>88</td> </tr> <tr> <td>EAFRD</td> <td>0</td> </tr> <tr> <td>EMFF</td> <td>48</td> </tr> <tr> <td>ERDF</td> <td>154</td> </tr> <tr> <td>CF</td> <td>70</td> </tr> <tr> <td>ESF</td> <td>73</td> </tr> <tr> <td>ETC</td> <td>488</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	88	EAFRD	0	EMFF	48	ERDF	154	CF	70	ESF	73	ETC	488
Fund	Median																
ESIF	88																
EAFRD	0																
EMFF	48																
ERDF	154																
CF	70																
ESF	73																
ETC	488																



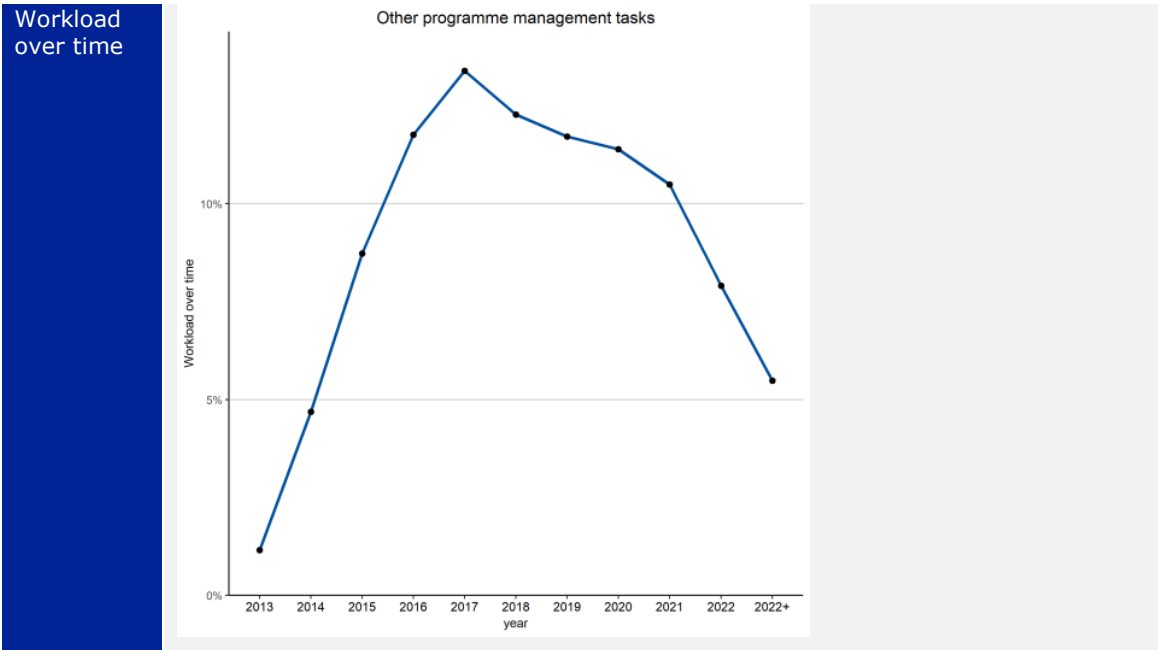
### A.36 Task M.xd – Other reporting, monitoring and evaluation tasks

Task description	Other reporting, monitoring and evaluation tasks Programme Management • non-regulated task																
ESIF workload (approx.)	6 400 FTE																
Share of total workload	1.0%																
ESIF costs (approx.)	€ 179 600 000																
Share of total costs	0.7%																
ESIF external costs	€ 22 200 000																
Workload in person years per million EUR of total eligible budget	<p>Other reporting, monitoring and evaluation tasks</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.004</td> </tr> <tr> <td>EAFRD</td> <td>0.001</td> </tr> <tr> <td>EMFF</td> <td>0.003</td> </tr> <tr> <td>ERDF</td> <td>0.002</td> </tr> <tr> <td>CF</td> <td>0.001</td> </tr> <tr> <td>ESF</td> <td>0.003</td> </tr> <tr> <td>ETC</td> <td>0.005</td> </tr> </tbody> </table>	Fund	Median	ESIF	0.004	EAFRD	0.001	EMFF	0.003	ERDF	0.002	CF	0.001	ESF	0.003	ETC	0.005
Fund	Median																
ESIF	0.004																
EAFRD	0.001																
EMFF	0.003																
ERDF	0.002																
CF	0.001																
ESF	0.003																
ETC	0.005																
Costs in EUR per million EUR of total eligible budget	<p>Other reporting, monitoring and evaluation tasks</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>163</td> </tr> <tr> <td>EAFRD</td> <td>84</td> </tr> <tr> <td>EMFF</td> <td>261</td> </tr> <tr> <td>ERDF</td> <td>109</td> </tr> <tr> <td>CF</td> <td>129</td> </tr> <tr> <td>ESF</td> <td>196</td> </tr> <tr> <td>ETC</td> <td>432</td> </tr> </tbody> </table>	Fund	Median	ESIF	163	EAFRD	84	EMFF	261	ERDF	109	CF	129	ESF	196	ETC	432
Fund	Median																
ESIF	163																
EAFRD	84																
EMFF	261																
ERDF	109																
CF	129																
ESF	196																
ETC	432																



### A.37 Task M.xx – Other programme management tasks

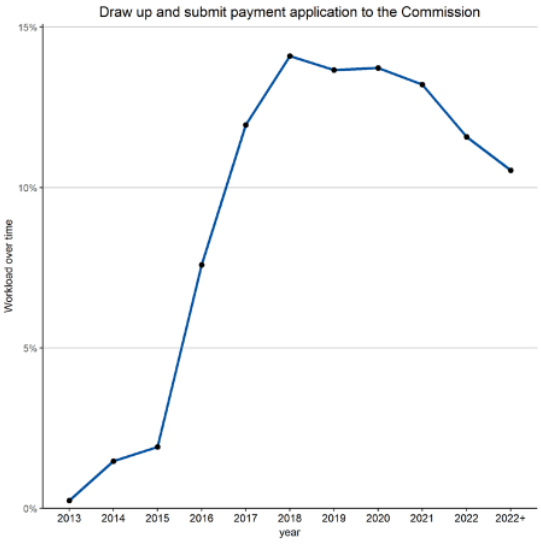
Task description	Other programme management tasks Programme Management • non-regulated task																
ESIF workload (approx.)	9 500 FTE																
Share of total workload	1.6%																
ESIF costs (approx.)	€ 1 800 600 000																
Share of total costs	6.9%																
ESIF external costs	€ 1 573 800 000																
Workload in person years per million EUR of total eligible budget	<p>Other programme management tasks</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.000</td> </tr> <tr> <td>EAFRD</td> <td>0.001</td> </tr> <tr> <td>EMFF</td> <td>0.000</td> </tr> <tr> <td>ERDF</td> <td>0.000</td> </tr> <tr> <td>CF</td> <td>0.000</td> </tr> <tr> <td>ESF</td> <td>0.000</td> </tr> <tr> <td>ETC</td> <td>0.003</td> </tr> </tbody> </table>	Programme	Median	ESIF	0.000	EAFRD	0.001	EMFF	0.000	ERDF	0.000	CF	0.000	ESF	0.000	ETC	0.003
Programme	Median																
ESIF	0.000																
EAFRD	0.001																
EMFF	0.000																
ERDF	0.000																
CF	0.000																
ESF	0.000																
ETC	0.003																
Costs in EUR per million EUR of total eligible budget	<p>Other programme management tasks</p> <table border="1"> <thead> <tr> <th>Programme</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>184</td> </tr> <tr> <td>EAFRD</td> <td>240</td> </tr> <tr> <td>EMFF</td> <td>133</td> </tr> <tr> <td>ERDF</td> <td>53</td> </tr> <tr> <td>CF</td> <td>126</td> </tr> <tr> <td>ESF</td> <td>120</td> </tr> <tr> <td>ETC</td> <td>293</td> </tr> </tbody> </table>	Programme	Median	ESIF	184	EAFRD	240	EMFF	133	ERDF	53	CF	126	ESF	120	ETC	293
Programme	Median																
ESIF	184																
EAFRD	240																
EMFF	133																
ERDF	53																
CF	126																
ESF	120																
ETC	293																



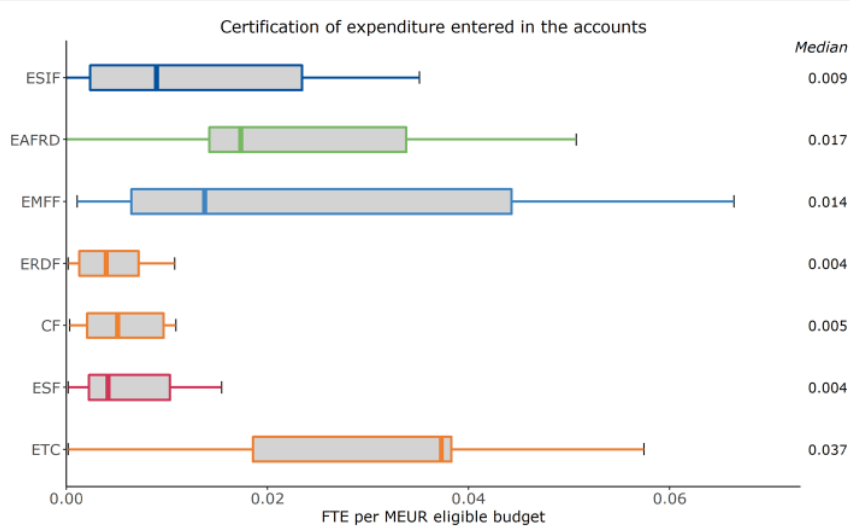
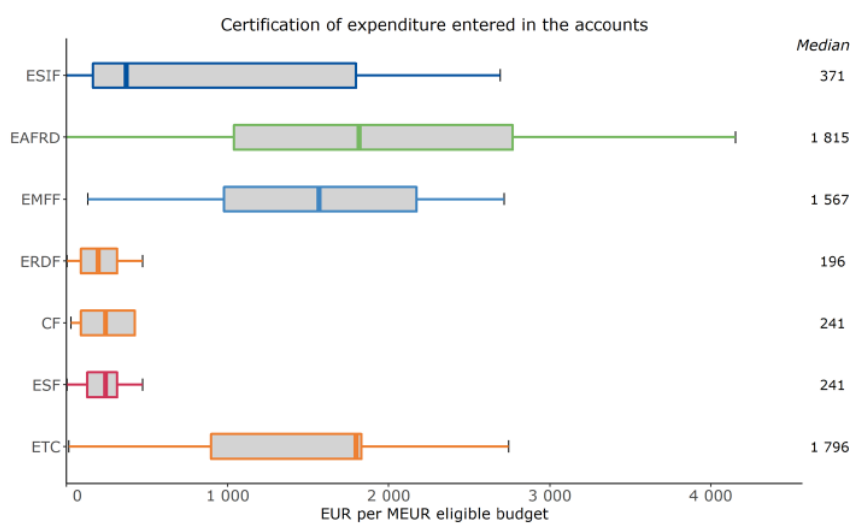
### A.38 Task C.1 – Payment applications

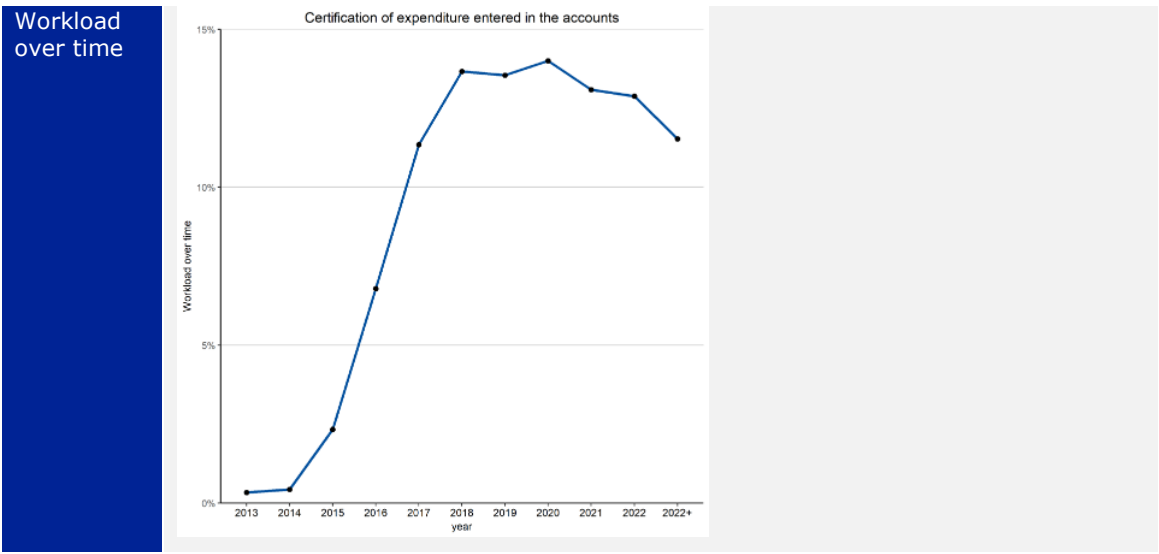
Task description	<p>Draw up and submit payment application to the Commission Programme Certification</p> <ul style="list-style-type: none"> <li>• CPR, Part IV - Art. 126 (a)</li> <li>• EAFRD CAP Impl. Reg. 908/2014 Art. 22(1)</li> </ul>																
ESIF workload (approx.)	12 800 FTE																
Share of total workload	2.1%																
ESIF costs (approx.)	€ 585 400 000																
Share of total costs	2.3%																
ESIF external costs	€ 22 100 000																
Workload in person years per million EUR of total eligible budget	<p>Draw up and submit payment application to the Commission</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.007</td> </tr> <tr> <td>EAFRD</td> <td>0.080</td> </tr> <tr> <td>EMFF</td> <td>0.006</td> </tr> <tr> <td>ERDF</td> <td>0.001</td> </tr> <tr> <td>CF</td> <td>0.004</td> </tr> <tr> <td>ESF</td> <td>0.004</td> </tr> <tr> <td>ETC</td> <td>0.029</td> </tr> </tbody> </table>	Fund	Median	ESIF	0.007	EAFRD	0.080	EMFF	0.006	ERDF	0.001	CF	0.004	ESF	0.004	ETC	0.029
Fund	Median																
ESIF	0.007																
EAFRD	0.080																
EMFF	0.006																
ERDF	0.001																
CF	0.004																
ESF	0.004																
ETC	0.029																
Costs in EUR per million EUR of total eligible budget	<p>Draw up and submit payment application to the Commission</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>434</td> </tr> <tr> <td>EAFRD</td> <td>4 225</td> </tr> <tr> <td>EMFF</td> <td>1 172</td> </tr> <tr> <td>ERDF</td> <td>123</td> </tr> <tr> <td>CF</td> <td>191</td> </tr> <tr> <td>ESF</td> <td>154</td> </tr> <tr> <td>ETC</td> <td>1 122</td> </tr> </tbody> </table>	Fund	Median	ESIF	434	EAFRD	4 225	EMFF	1 172	ERDF	123	CF	191	ESF	154	ETC	1 122
Fund	Median																
ESIF	434																
EAFRD	4 225																
EMFF	1 172																
ERDF	123																
CF	191																
ESF	154																
ETC	1 122																

Workload  
over time

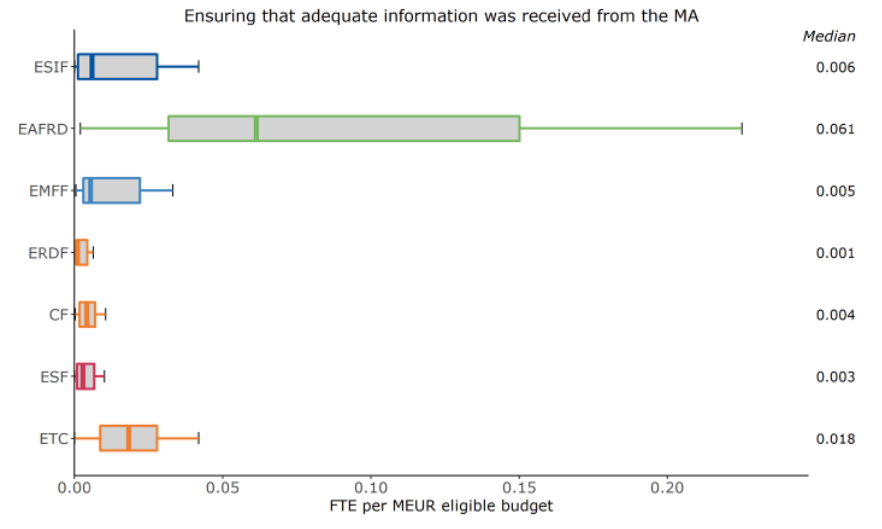
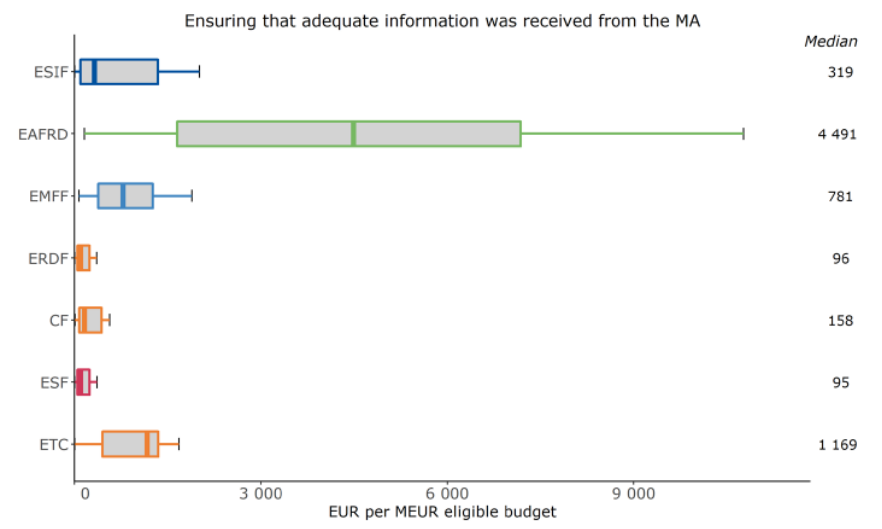


### A.39 Task C.2 – Certification of expenditure

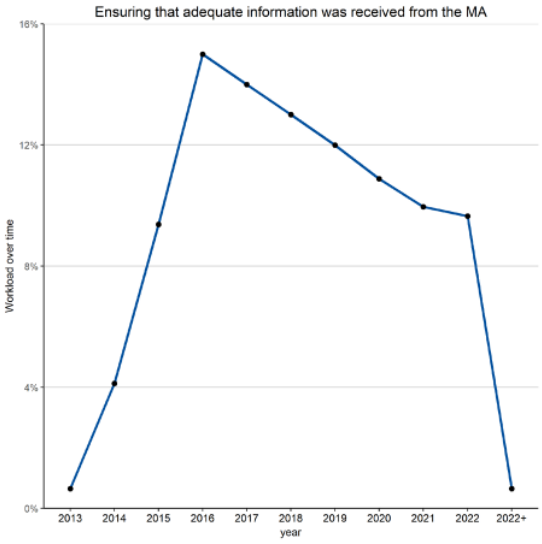
Task description	Certification of expenditure entered in the accounts Programme Certification <ul style="list-style-type: none"><li>CPR, Part IV - Art.126 (c)</li><li>EAFRD HZR Art.9</li></ul>																	
ESIF workload (approx.)	5 700 FTE																	
Share of total workload	0.9%																	
ESIF costs (approx.)	€ 284 000 000																	
Share of total costs	1.1%																	
ESIF external costs	€ 20 400 000																	
Workload in person years per million EUR of total eligible budget	<div><div>Certification of expenditure entered in the accounts</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.009</td></tr><tr><td>EAFRD</td><td>0.017</td></tr><tr><td>EMFF</td><td>0.014</td></tr><tr><td>ERDF</td><td>0.004</td></tr><tr><td>CF</td><td>0.005</td></tr><tr><td>ESF</td><td>0.004</td></tr><tr><td>ETC</td><td>0.037</td></tr></tbody></table></div>			Median	ESIF	0.009	EAFRD	0.017	EMFF	0.014	ERDF	0.004	CF	0.005	ESF	0.004	ETC	0.037
	Median																	
ESIF	0.009																	
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ESF	0.004																	
ETC	0.037																	
Costs in EUR per million EUR of total eligible budget	<div><div>Certification of expenditure entered in the accounts</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>371</td></tr><tr><td>EAFRD</td><td>1 815</td></tr><tr><td>EMFF</td><td>1 567</td></tr><tr><td>ERDF</td><td>196</td></tr><tr><td>CF</td><td>241</td></tr><tr><td>ESF</td><td>241</td></tr><tr><td>ETC</td><td>1 796</td></tr></tbody></table></div>			Median	ESIF	371	EAFRD	1 815	EMFF	1 567	ERDF	196	CF	241	ESF	241	ETC	1 796
	Median																	
ESIF	371																	
EAFRD	1 815																	
EMFF	1 567																	
ERDF	196																	
CF	241																	
ESF	241																	
ETC	1 796																	



#### A.40 Task C.3 – Ensuring that adequate information from MA was received

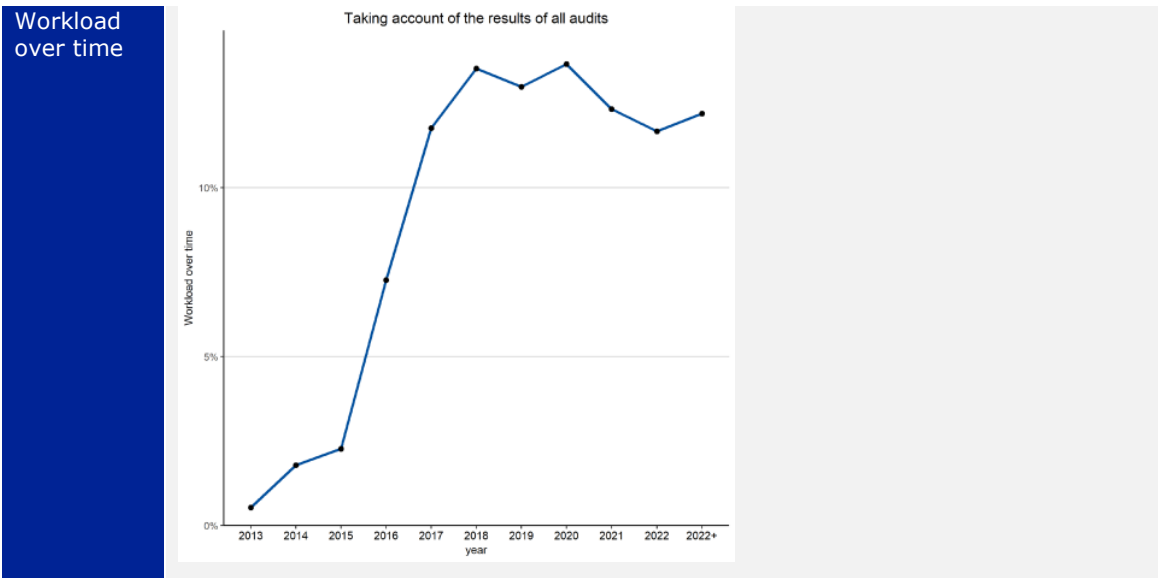
Task description	Ensuring that adequate information was received from the MA Programme Certification <ul style="list-style-type: none"><li>CPR, Part IV - Art. 126(e)</li><li>EAFRD HZR, Art. 9, Art. 6</li></ul>																		
ESIF workload (approx.)	11 500 FTE																		
Share of total workload	1.9%																		
ESIF costs (approx.)	€ 469 500 000																		
Share of total costs	1.8%																		
ESIF external costs	€ 7 000 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Ensuring that adequate information was received from the MA</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.006</td></tr><tr><td>EAFRD</td><td>0.061</td></tr><tr><td>EMFF</td><td>0.005</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.004</td></tr><tr><td>ESF</td><td>0.003</td></tr><tr><td>ETC</td><td>0.018</td></tr></tbody></table><p>FTE per MEUR eligible budget</p></div>				Median	ESIF	0.006	EAFRD	0.061	EMFF	0.005	ERDF	0.001	CF	0.004	ESF	0.003	ETC	0.018
	Median																		
ESIF	0.006																		
EAFRD	0.061																		
EMFF	0.005																		
ERDF	0.001																		
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ESF	0.003																		
ETC	0.018																		
Costs in EUR per million EUR of total eligible budget	<div><div>Ensuring that adequate information was received from the MA</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>319</td></tr><tr><td>EAFRD</td><td>4 491</td></tr><tr><td>EMFF</td><td>781</td></tr><tr><td>ERDF</td><td>96</td></tr><tr><td>CF</td><td>158</td></tr><tr><td>ESF</td><td>95</td></tr><tr><td>ETC</td><td>1 169</td></tr></tbody></table><p>EUR per MEUR eligible budget</p></div>				Median	ESIF	319	EAFRD	4 491	EMFF	781	ERDF	96	CF	158	ESF	95	ETC	1 169
	Median																		
ESIF	319																		
EAFRD	4 491																		
EMFF	781																		
ERDF	96																		
CF	158																		
ESF	95																		
ETC	1 169																		

Workload  
over time

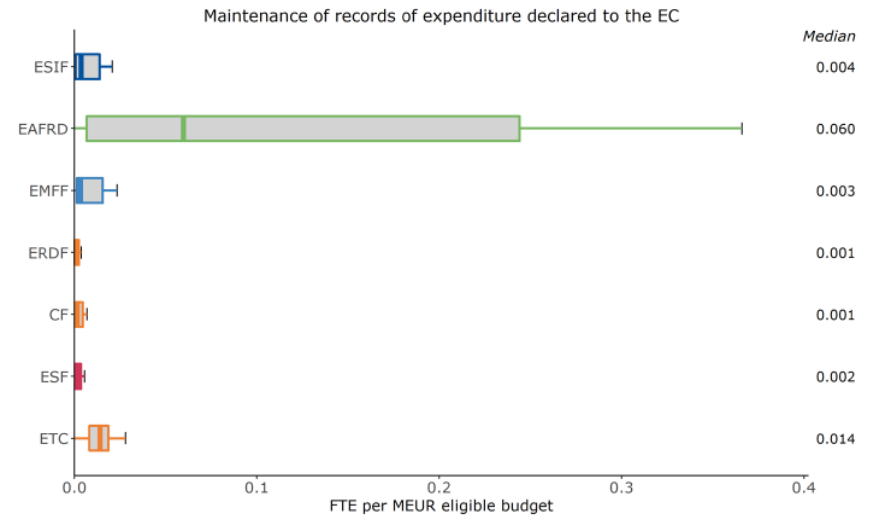
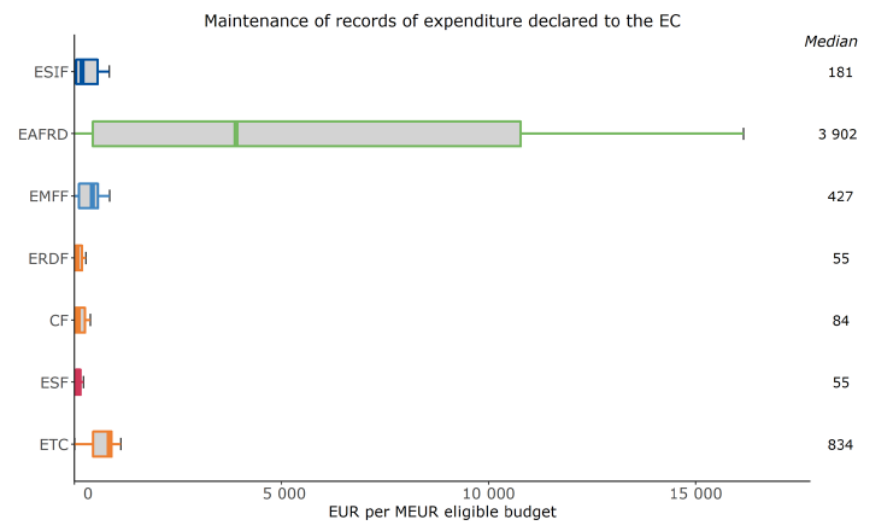


#### A.41 Task C.4 – Taking account of audit results

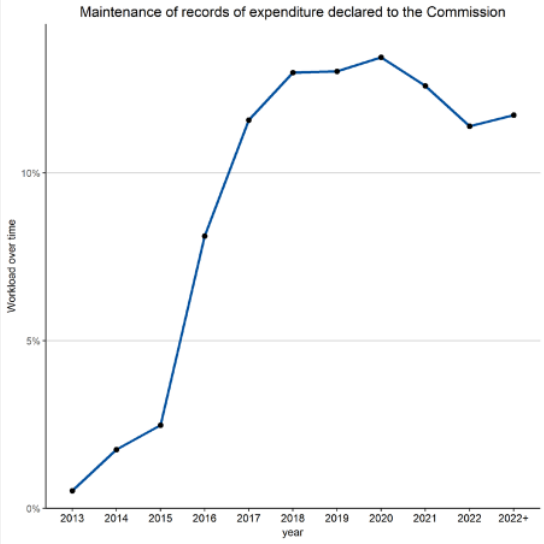
Task description	Taking account of the results of all audits Programme Certification <ul style="list-style-type: none"><li>CPR, Part IV - Art. 126(f)</li><li>EAFRD HZR, Art. 7, Art. 9</li></ul>																		
ESIF workload (approx.)	9 900 FTE																		
Share of total workload	1.6%																		
ESIF costs (approx.)	€ 478 300 000																		
Share of total costs	1.8%																		
ESIF external costs	€ 8 300 000																		
Workload in person years per million EUR of total eligible budget	<div><div><div>Taking account of the results of all audits</div><table><tr><th>Fund</th><th>Median</th></tr><tr><td>ESIF</td><td>0.005</td></tr><tr><td>EAFRD</td><td>0.059</td></tr><tr><td>EMFF</td><td>0.005</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.003</td></tr><tr><td>ESF</td><td>0.003</td></tr><tr><td>ETC</td><td>0.017</td></tr></table></div></div>			Fund	Median	ESIF	0.005	EAFRD	0.059	EMFF	0.005	ERDF	0.001	CF	0.003	ESF	0.003	ETC	0.017
Fund	Median																		
ESIF	0.005																		
EAFRD	0.059																		
EMFF	0.005																		
ERDF	0.001																		
CF	0.003																		
ESF	0.003																		
ETC	0.017																		
Costs in EUR per million EUR of total eligible budget	<div><div><div>Taking account of the results of all audits</div><table><tr><th>Fund</th><th>Median</th></tr><tr><td>ESIF</td><td>260</td></tr><tr><td>EAFRD</td><td>2 667</td></tr><tr><td>EMFF</td><td>547</td></tr><tr><td>ERDF</td><td>71</td></tr><tr><td>CF</td><td>125</td></tr><tr><td>ESF</td><td>66</td></tr><tr><td>ETC</td><td>828</td></tr></table></div></div>			Fund	Median	ESIF	260	EAFRD	2 667	EMFF	547	ERDF	71	CF	125	ESF	66	ETC	828
Fund	Median																		
ESIF	260																		
EAFRD	2 667																		
EMFF	547																		
ERDF	71																		
CF	125																		
ESF	66																		
ETC	828																		



#### A.42 Task C.5 – Maintenance of records of expenditure declared

Task description	Maintenance of records of expenditure declared to the Commission Programme Certification <ul style="list-style-type: none"><li>CPR, Part IV - Art. 126(g)</li><li>EAFRD HZR, Art 48-49</li></ul>																
ESIF workload (approx.)	8 700 FTE																
Share of total workload	1.4%																
ESIF costs (approx.)	€ 389 500 000																
Share of total costs	1.5%																
ESIF external costs	€ 6 900 000																
Workload in person years per million EUR of total eligible budget	<div><div><div>Maintenance of records of expenditure declared to the EC</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.004</td></tr><tr><td>EAFRD</td><td>0.060</td></tr><tr><td>EMFF</td><td>0.003</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.001</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.014</td></tr></tbody></table><div>FTE per MEUR eligible budget</div></div></div>		Median	ESIF	0.004	EAFRD	0.060	EMFF	0.003	ERDF	0.001	CF	0.001	ESF	0.002	ETC	0.014
	Median																
ESIF	0.004																
EAFRD	0.060																
EMFF	0.003																
ERDF	0.001																
CF	0.001																
ESF	0.002																
ETC	0.014																
Costs in EUR per million EUR of total eligible budget	<div><div><div>Maintenance of records of expenditure declared to the EC</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>181</td></tr><tr><td>EAFRD</td><td>3 902</td></tr><tr><td>EMFF</td><td>427</td></tr><tr><td>ERDF</td><td>55</td></tr><tr><td>CF</td><td>84</td></tr><tr><td>ESF</td><td>55</td></tr><tr><td>ETC</td><td>834</td></tr></tbody></table><div>EUR per MEUR eligible budget</div></div></div>		Median	ESIF	181	EAFRD	3 902	EMFF	427	ERDF	55	CF	84	ESF	55	ETC	834
	Median																
ESIF	181																
EAFRD	3 902																
EMFF	427																
ERDF	55																
CF	84																
ESF	55																
ETC	834																

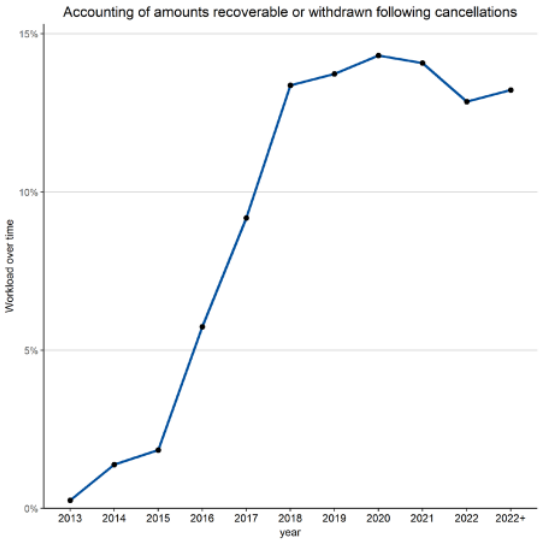
Workload  
over time



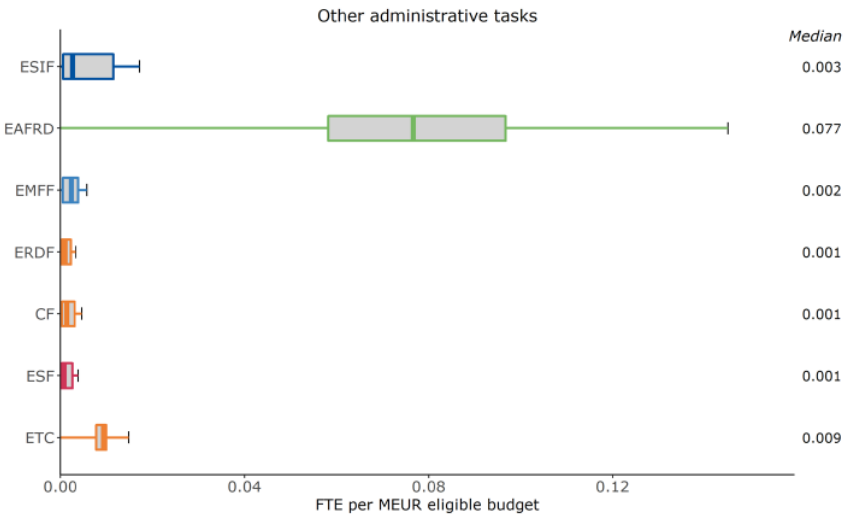
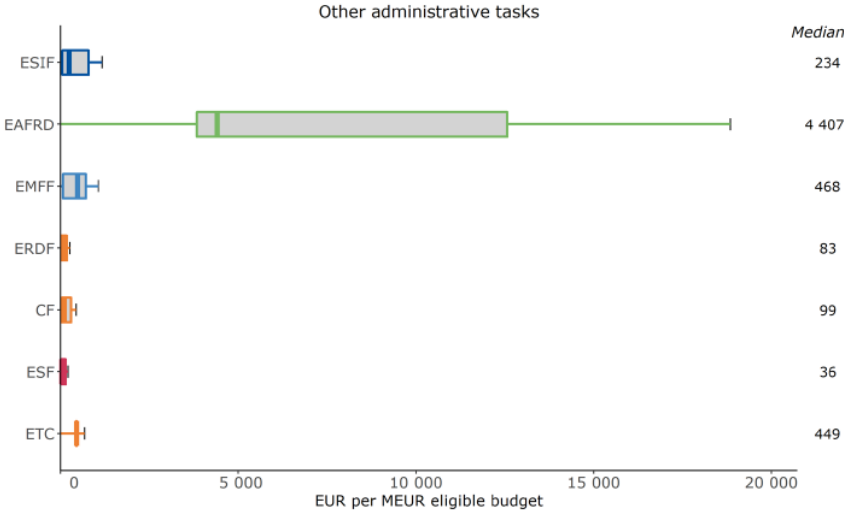
### A.43 Task C.6 – Accounting for amounts recoverable or withdrawn

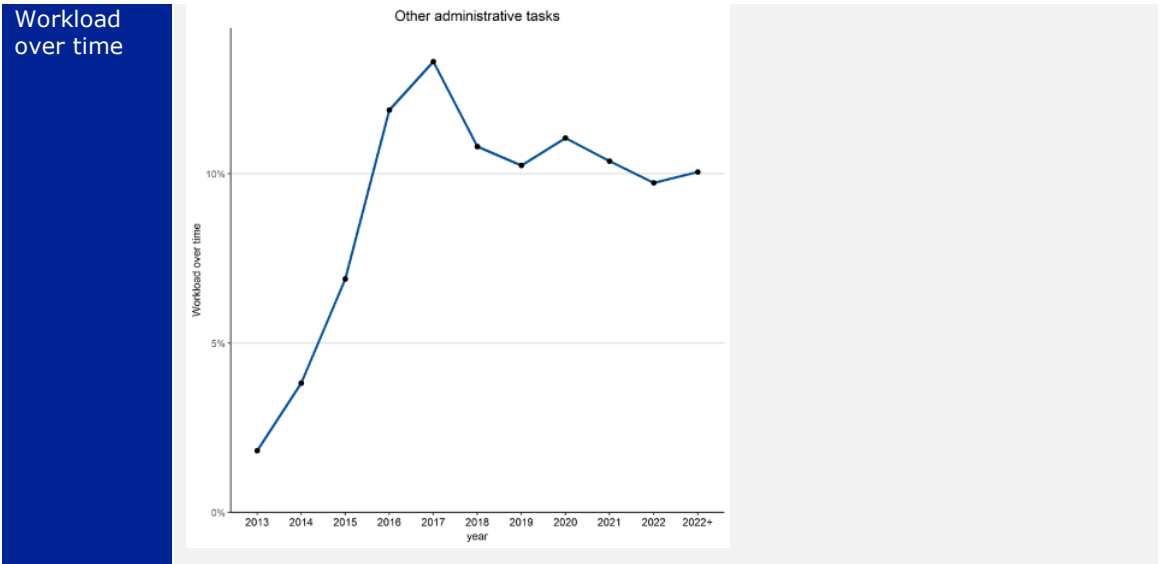
Task description	Accounting for amounts recoverable or withdrawn following cancellations Programme Certification <ul style="list-style-type: none"><li>CPR, Part IV - Art. 126(h)</li><li>EAFRD HZR, Art 7.3.a</li></ul>																		
ESIF workload (approx.)	9 500 FTE																		
Share of total workload	1.6%																		
ESIF costs (approx.)	€ 430 900 000																		
Share of total costs	1.7%																		
ESIF external costs	€ 6 200 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Accounting of amounts recoverable or withdrawn</div><table><tr><th>Fund</th><th>Median</th></tr><tr><td>ESIF</td><td>0.004</td></tr><tr><td>EAFRD</td><td>0.055</td></tr><tr><td>EMFF</td><td>0.004</td></tr><tr><td>ERDF</td><td>0.001</td></tr><tr><td>CF</td><td>0.002</td></tr><tr><td>ESF</td><td>0.002</td></tr><tr><td>ETC</td><td>0.018</td></tr></table></div>			Fund	Median	ESIF	0.004	EAFRD	0.055	EMFF	0.004	ERDF	0.001	CF	0.002	ESF	0.002	ETC	0.018
Fund	Median																		
ESIF	0.004																		
EAFRD	0.055																		
EMFF	0.004																		
ERDF	0.001																		
CF	0.002																		
ESF	0.002																		
ETC	0.018																		
Costs in EUR per million EUR of total eligible budget	<div><div>Accounting of amounts recoverable or withdrawn</div><table><tr><th>Fund</th><th>Median</th></tr><tr><td>ESIF</td><td>237</td></tr><tr><td>EAFRD</td><td>3 930</td></tr><tr><td>EMFF</td><td>385</td></tr><tr><td>ERDF</td><td>68</td></tr><tr><td>CF</td><td>83</td></tr><tr><td>ESF</td><td>57</td></tr><tr><td>ETC</td><td>664</td></tr></table></div>			Fund	Median	ESIF	237	EAFRD	3 930	EMFF	385	ERDF	68	CF	83	ESF	57	ETC	664
Fund	Median																		
ESIF	237																		
EAFRD	3 930																		
EMFF	385																		
ERDF	68																		
CF	83																		
ESF	57																		
ETC	664																		

Workload  
over time

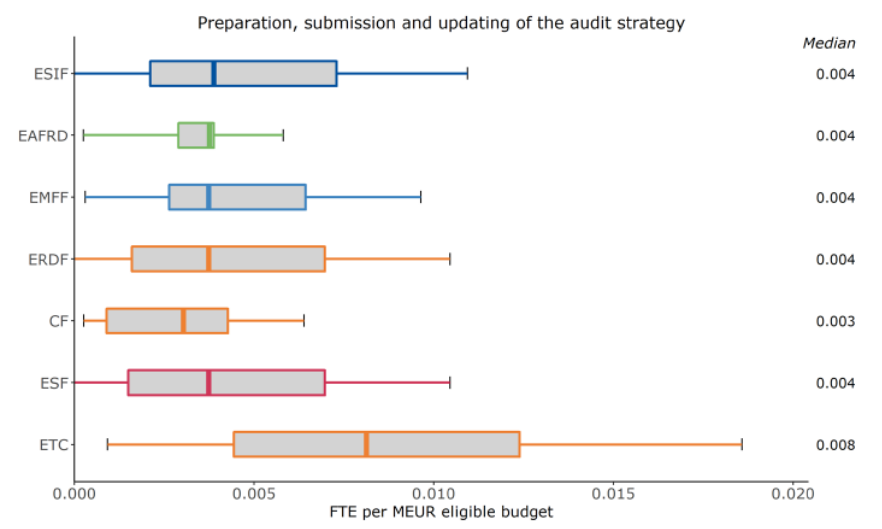
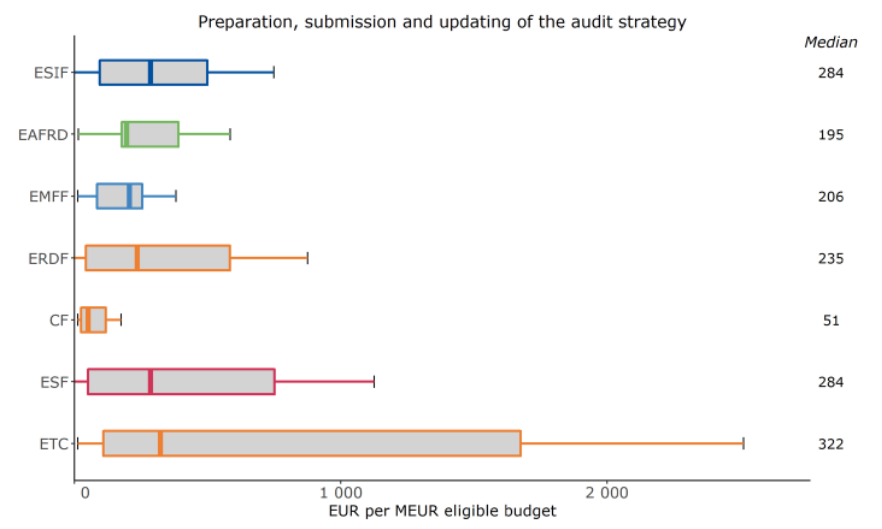


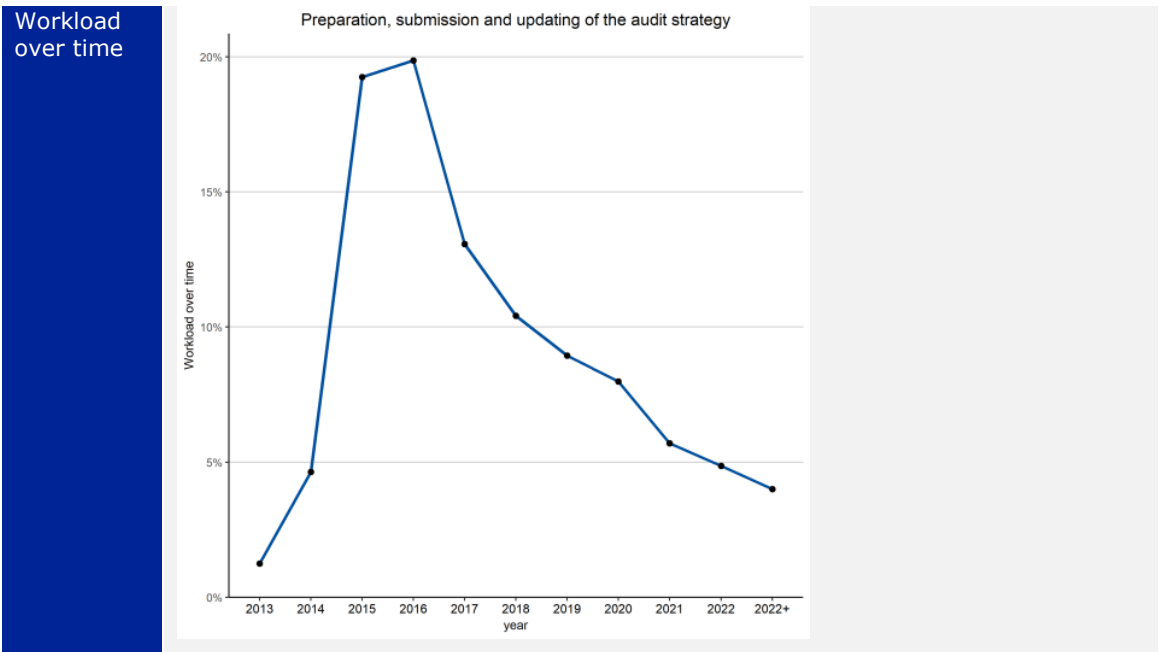
#### A.44 Task C.x – Other certification tasks

Task description	Other administrative tasks Programme Certification • non-regulated task																
ESIF workload (approx.)	19 200 FTE																
Share of total workload	3.1%																
ESIF costs (approx.)	€ 985 100 000																
Share of total costs	3.8%																
ESIF external costs	€ 0																
Workload in person years per million EUR of total eligible budget	<p>Other administrative tasks</p>  <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.003</td> </tr> <tr> <td>EAFRD</td> <td>0.077</td> </tr> <tr> <td>EMFF</td> <td>0.002</td> </tr> <tr> <td>ERDF</td> <td>0.001</td> </tr> <tr> <td>CF</td> <td>0.001</td> </tr> <tr> <td>ESF</td> <td>0.001</td> </tr> <tr> <td>ETC</td> <td>0.009</td> </tr> </tbody> </table> <p>FTE per MEUR eligible budget</p>	Fund	Median	ESIF	0.003	EAFRD	0.077	EMFF	0.002	ERDF	0.001	CF	0.001	ESF	0.001	ETC	0.009
Fund	Median																
ESIF	0.003																
EAFRD	0.077																
EMFF	0.002																
ERDF	0.001																
CF	0.001																
ESF	0.001																
ETC	0.009																
Costs in EUR per million EUR of total eligible budget	<p>Other administrative tasks</p>  <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>234</td> </tr> <tr> <td>EAFRD</td> <td>4 407</td> </tr> <tr> <td>EMFF</td> <td>468</td> </tr> <tr> <td>ERDF</td> <td>83</td> </tr> <tr> <td>CF</td> <td>99</td> </tr> <tr> <td>ESF</td> <td>36</td> </tr> <tr> <td>ETC</td> <td>449</td> </tr> </tbody> </table> <p>EUR per MEUR eligible budget</p>	Fund	Median	ESIF	234	EAFRD	4 407	EMFF	468	ERDF	83	CF	99	ESF	36	ETC	449
Fund	Median																
ESIF	234																
EAFRD	4 407																
EMFF	468																
ERDF	83																
CF	99																
ESF	36																
ETC	449																



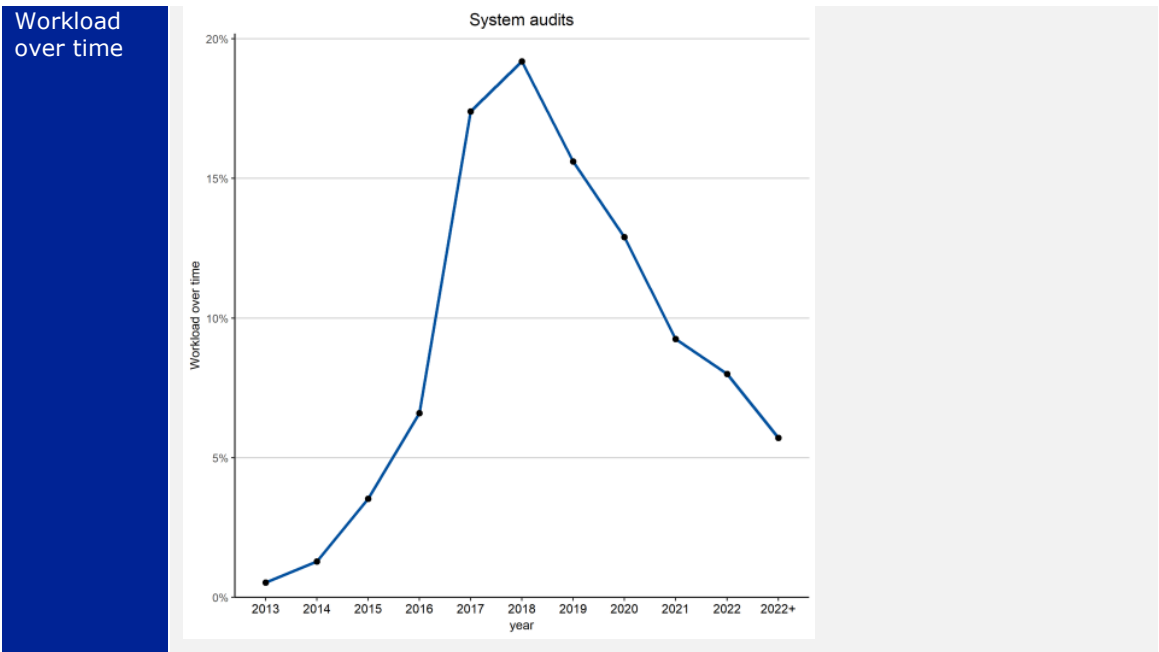
#### A.45 Task A.1 – Audit strategy

Task description	Preparation, submission and updating of the audit strategy Audit <ul style="list-style-type: none"><li>CPR, Part IV - Art. 127(4)</li><li>EAFRD HZR, Art 9</li></ul>																	
ESIF workload (approx.)	2 100 FTE																	
Share of total workload	0.3%																	
ESIF costs (approx.)	€ 125 000 000																	
Share of total costs	0.5%																	
ESIF external costs	€ 18 500 000																	
Workload in person years per million EUR of total eligible budget	<div><div>Preparation, submission and updating of the audit strategy</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.004</td></tr><tr><td>EAFRD</td><td>0.004</td></tr><tr><td>EMFF</td><td>0.004</td></tr><tr><td>ERDF</td><td>0.004</td></tr><tr><td>CF</td><td>0.003</td></tr><tr><td>ESF</td><td>0.004</td></tr><tr><td>ETC</td><td>0.008</td></tr></tbody></table></div>			Median	ESIF	0.004	EAFRD	0.004	EMFF	0.004	ERDF	0.004	CF	0.003	ESF	0.004	ETC	0.008
	Median																	
ESIF	0.004																	
EAFRD	0.004																	
EMFF	0.004																	
ERDF	0.004																	
CF	0.003																	
ESF	0.004																	
ETC	0.008																	
Costs in EUR per million EUR of total eligible budget	<div><div>Preparation, submission and updating of the audit strategy</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>284</td></tr><tr><td>EAFRD</td><td>195</td></tr><tr><td>EMFF</td><td>206</td></tr><tr><td>ERDF</td><td>235</td></tr><tr><td>CF</td><td>51</td></tr><tr><td>ESF</td><td>284</td></tr><tr><td>ETC</td><td>322</td></tr></tbody></table></div>			Median	ESIF	284	EAFRD	195	EMFF	206	ERDF	235	CF	51	ESF	284	ETC	322
	Median																	
ESIF	284																	
EAFRD	195																	
EMFF	206																	
ERDF	235																	
CF	51																	
ESF	284																	
ETC	322																	



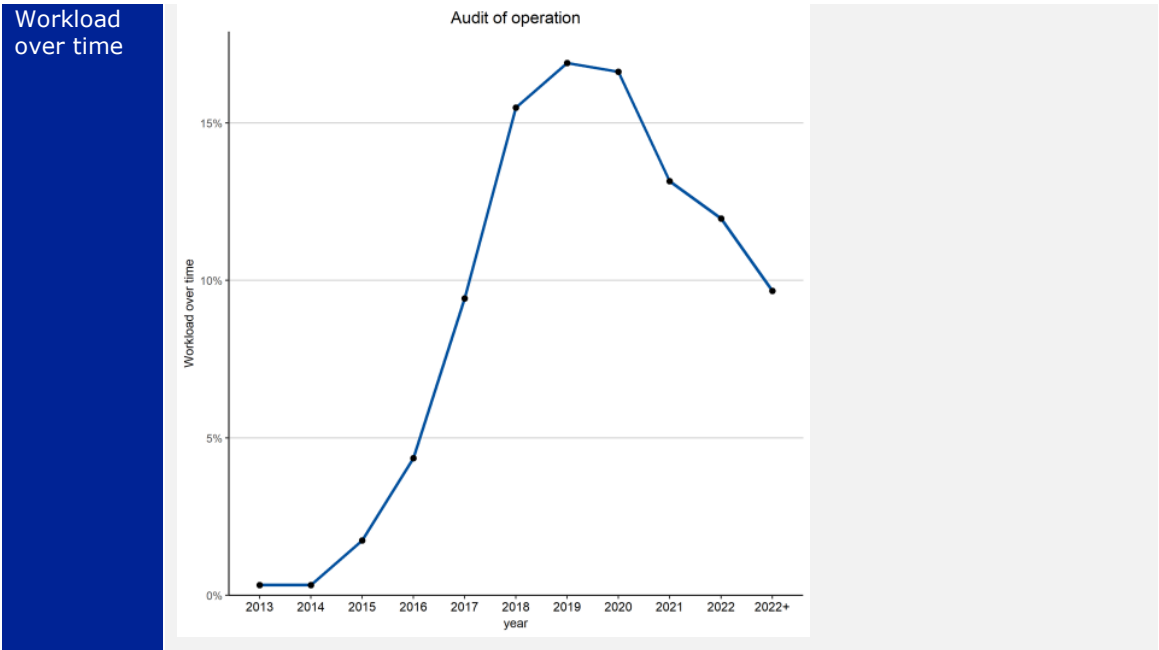
## A.46 Task A.2 – System audits

Task description	<p>System audits</p> <p>Audit</p> <ul style="list-style-type: none"> <li>CPR, Part IV - Art. 127(1)</li> <li>EAFRD HZR, Art 9</li> </ul>																
ESIF workload (approx.)	7 900 FTE																
Share of total workload	1.3%																
ESIF costs (approx.)	€ 451 100 000																
Share of total costs	1.7%																
ESIF external costs	€ 103 300 000																
Workload in person years per million EUR of total eligible budget	<p>System audits</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>0.013</td> </tr> <tr> <td>EAFRD</td> <td>0.006</td> </tr> <tr> <td>EMFF</td> <td>0.004</td> </tr> <tr> <td>ERDF</td> <td>0.014</td> </tr> <tr> <td>CF</td> <td>0.012</td> </tr> <tr> <td>ESF</td> <td>0.014</td> </tr> <tr> <td>ETC</td> <td>0.025</td> </tr> </tbody> </table>	Fund	Median	ESIF	0.013	EAFRD	0.006	EMFF	0.004	ERDF	0.014	CF	0.012	ESF	0.014	ETC	0.025
Fund	Median																
ESIF	0.013																
EAFRD	0.006																
EMFF	0.004																
ERDF	0.014																
CF	0.012																
ESF	0.014																
ETC	0.025																
Costs in EUR per million EUR of total eligible budget	<p>System audits</p> <table border="1"> <thead> <tr> <th>Fund</th> <th>Median</th> </tr> </thead> <tbody> <tr> <td>ESIF</td> <td>813</td> </tr> <tr> <td>EAFRD</td> <td>567</td> </tr> <tr> <td>EMFF</td> <td>206</td> </tr> <tr> <td>ERDF</td> <td>794</td> </tr> <tr> <td>CF</td> <td>300</td> </tr> <tr> <td>ESF</td> <td>794</td> </tr> <tr> <td>ETC</td> <td>1 021</td> </tr> </tbody> </table>	Fund	Median	ESIF	813	EAFRD	567	EMFF	206	ERDF	794	CF	300	ESF	794	ETC	1 021
Fund	Median																
ESIF	813																
EAFRD	567																
EMFF	206																
ERDF	794																
CF	300																
ESF	794																
ETC	1 021																

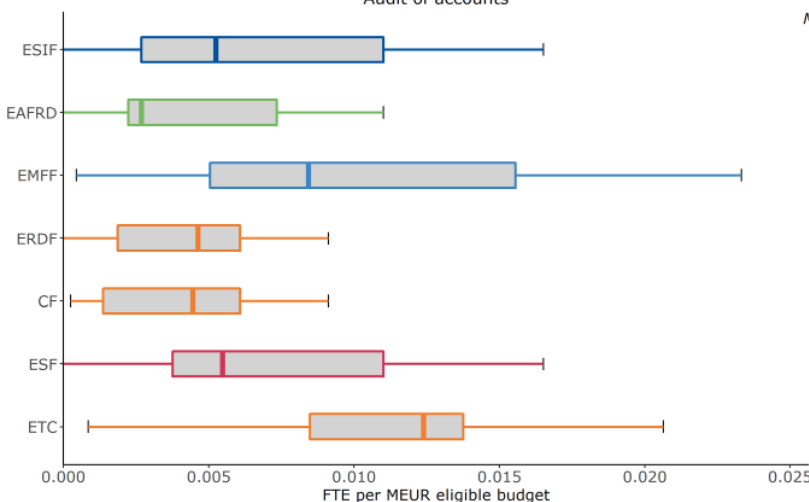
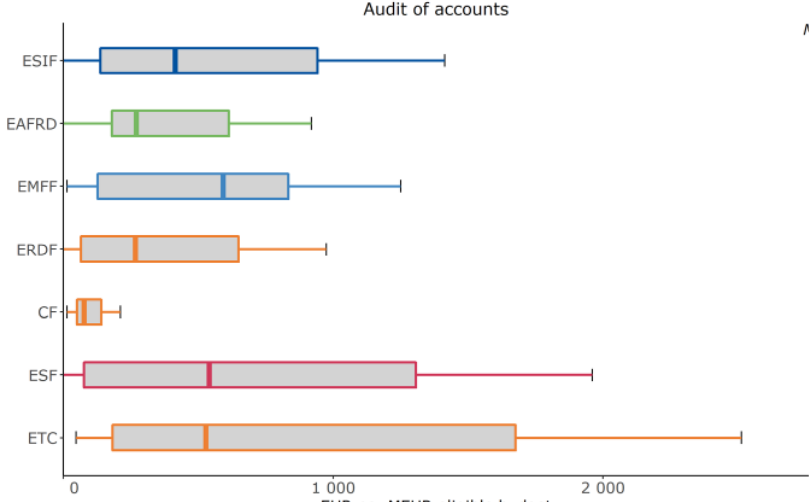


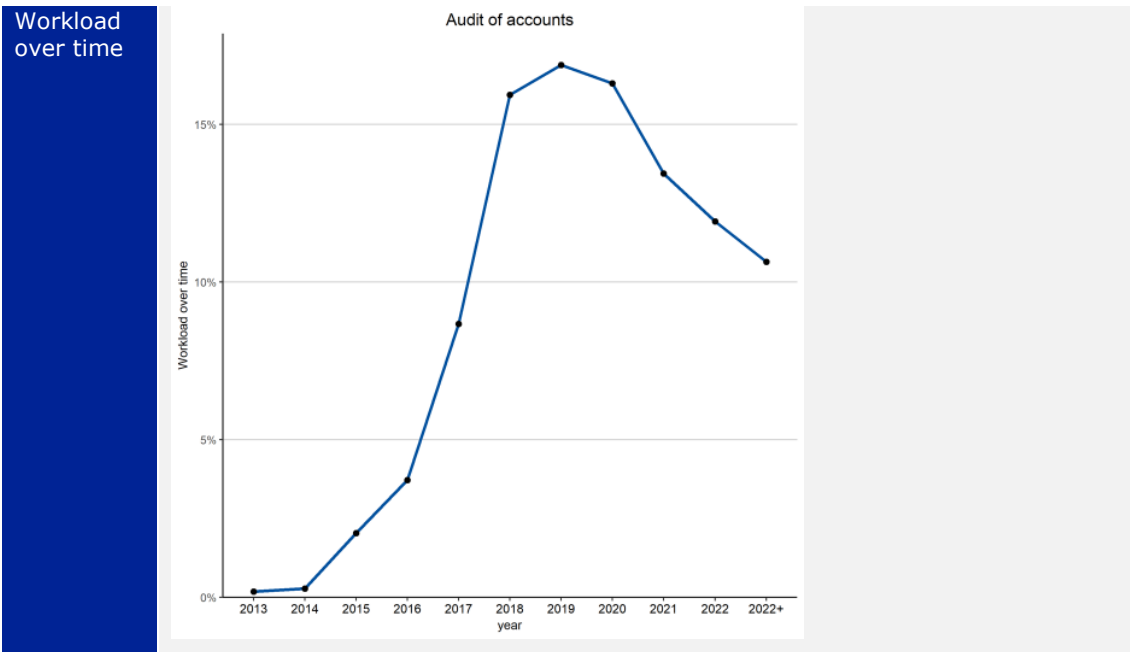
### A.47 Task A.3 – Audit of operations

Task description	Audit of operations Audit <ul style="list-style-type: none"><li>CPR, Part IV - Art. 127(1)</li><li>EAFRD HZR, Art 9</li></ul>																		
ESIF workload (approx.)	12 700 FTE																		
Share of total workload	2.1%																		
ESIF costs (approx.)	€ 742 300 000																		
Share of total costs	2.9%																		
ESIF external costs	€ 176 100 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Audit of operation</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.019</td></tr><tr><td>EAFRD</td><td>0.007</td></tr><tr><td>EMFF</td><td>0.035</td></tr><tr><td>ERDF</td><td>0.019</td></tr><tr><td>CF</td><td>0.018</td></tr><tr><td>ESF</td><td>0.027</td></tr><tr><td>ETC</td><td>0.036</td></tr></tbody></table><p>FTE per MEUR eligible budget</p></div>				Median	ESIF	0.019	EAFRD	0.007	EMFF	0.035	ERDF	0.019	CF	0.018	ESF	0.027	ETC	0.036
	Median																		
ESIF	0.019																		
EAFRD	0.007																		
EMFF	0.035																		
ERDF	0.019																		
CF	0.018																		
ESF	0.027																		
ETC	0.036																		
Costs in EUR per million EUR of total eligible budget	<div><div>Audit of operation</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>1 383</td></tr><tr><td>EAFRD</td><td>746</td></tr><tr><td>EMFF</td><td>1 965</td></tr><tr><td>ERDF</td><td>1 383</td></tr><tr><td>CF</td><td>533</td></tr><tr><td>ESF</td><td>1 452</td></tr><tr><td>ETC</td><td>2 053</td></tr></tbody></table><p>EUR per MEUR eligible budget</p></div>				Median	ESIF	1 383	EAFRD	746	EMFF	1 965	ERDF	1 383	CF	533	ESF	1 452	ETC	2 053
	Median																		
ESIF	1 383																		
EAFRD	746																		
EMFF	1 965																		
ERDF	1 383																		
CF	533																		
ESF	1 452																		
ETC	2 053																		

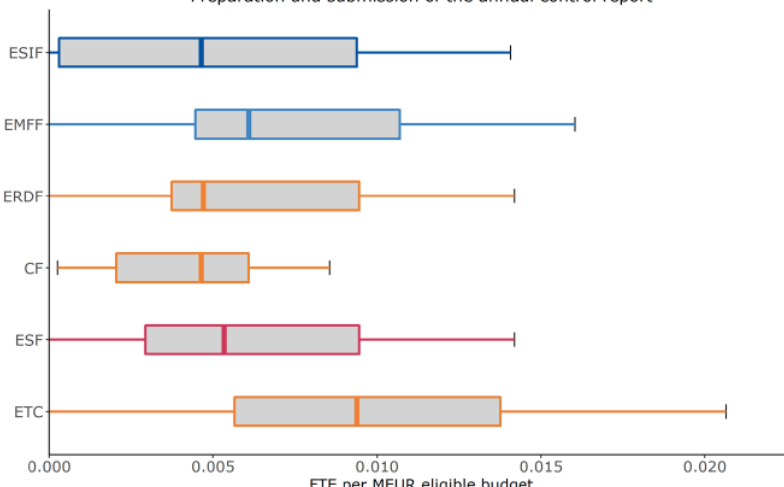
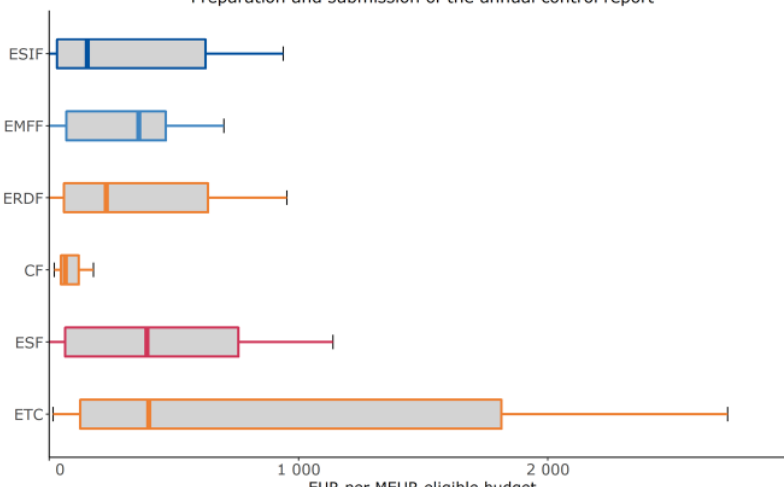


#### A.48 Task A.4 – Audit of accounts

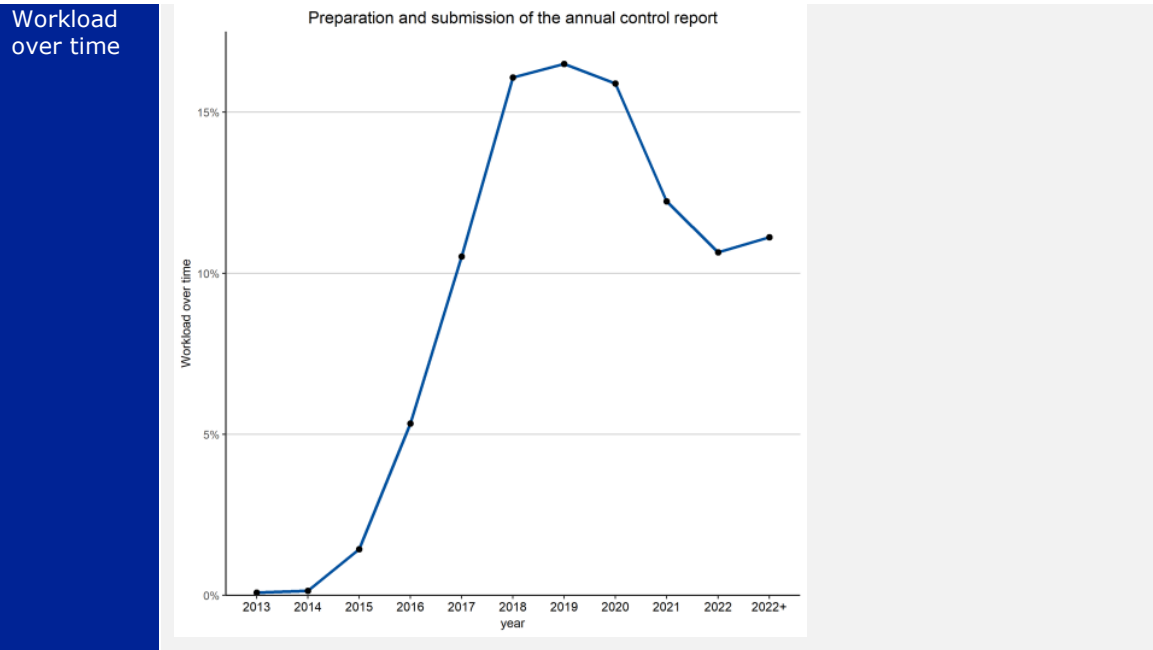
Task description	Audit of accounts Audit <ul style="list-style-type: none"><li>CPR, Part IV - Art. 127(1)</li><li>EAFRD HZR, Art 9</li></ul>																		
ESIF workload (approx.)	3 100 FTE																		
Share of total workload	0.5%																		
ESIF costs (approx.)	€ 170 700 000																		
Share of total costs	0.7%																		
ESIF external costs	€ 32 600 000																		
Workload in person years per million EUR of total eligible budget	<div><div><div>Audit of accounts</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.005</td></tr><tr><td>EAFRD</td><td>0.003</td></tr><tr><td>EMFF</td><td>0.008</td></tr><tr><td>ERDF</td><td>0.005</td></tr><tr><td>CF</td><td>0.004</td></tr><tr><td>ESF</td><td>0.005</td></tr><tr><td>ETC</td><td>0.012</td></tr></tbody></table></div></div>				Median	ESIF	0.005	EAFRD	0.003	EMFF	0.008	ERDF	0.005	CF	0.004	ESF	0.005	ETC	0.012
	Median																		
ESIF	0.005																		
EAFRD	0.003																		
EMFF	0.008																		
ERDF	0.005																		
CF	0.004																		
ESF	0.005																		
ETC	0.012																		
Costs in EUR per million EUR of total eligible budget	<div><div><div>Audit of accounts</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>414</td></tr><tr><td>EAFRD</td><td>270</td></tr><tr><td>EMFF</td><td>591</td></tr><tr><td>ERDF</td><td>267</td></tr><tr><td>CF</td><td>76</td></tr><tr><td>ESF</td><td>540</td></tr><tr><td>ETC</td><td>528</td></tr></tbody></table></div></div>				Median	ESIF	414	EAFRD	270	EMFF	591	ERDF	267	CF	76	ESF	540	ETC	528
	Median																		
ESIF	414																		
EAFRD	270																		
EMFF	591																		
ERDF	267																		
CF	76																		
ESF	540																		
ETC	528																		



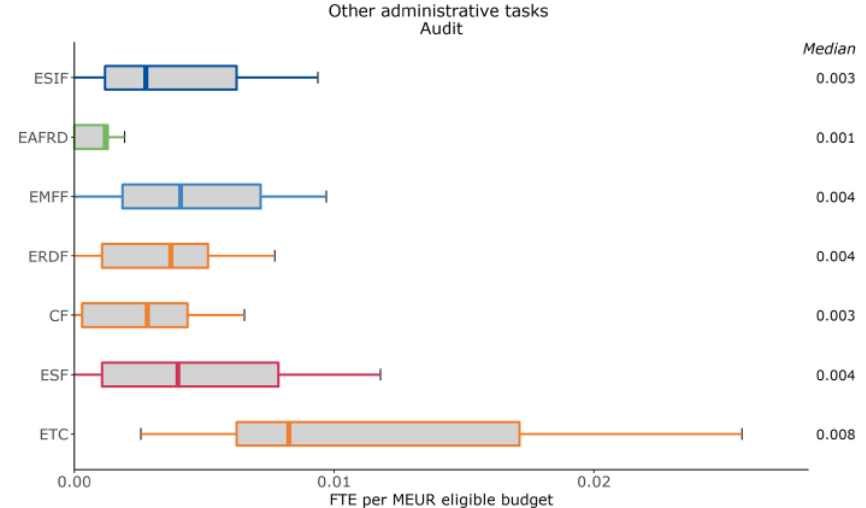
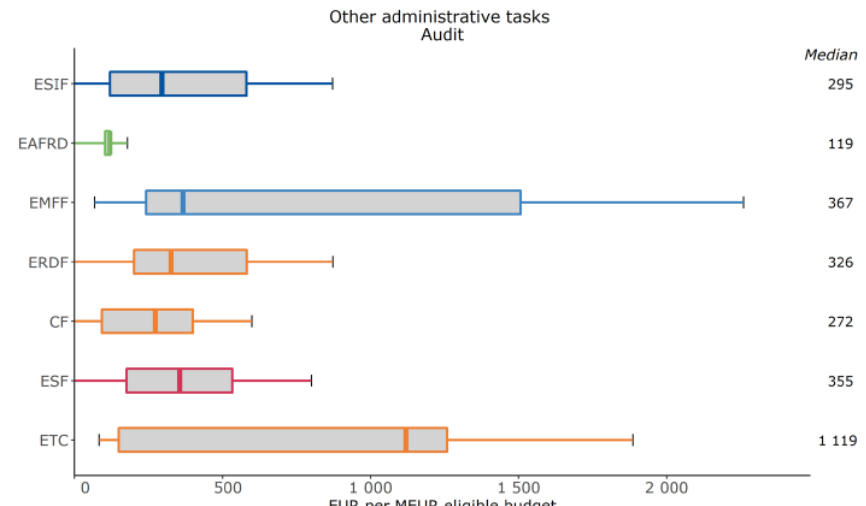
#### A.49 Task A.5 – Annual control report

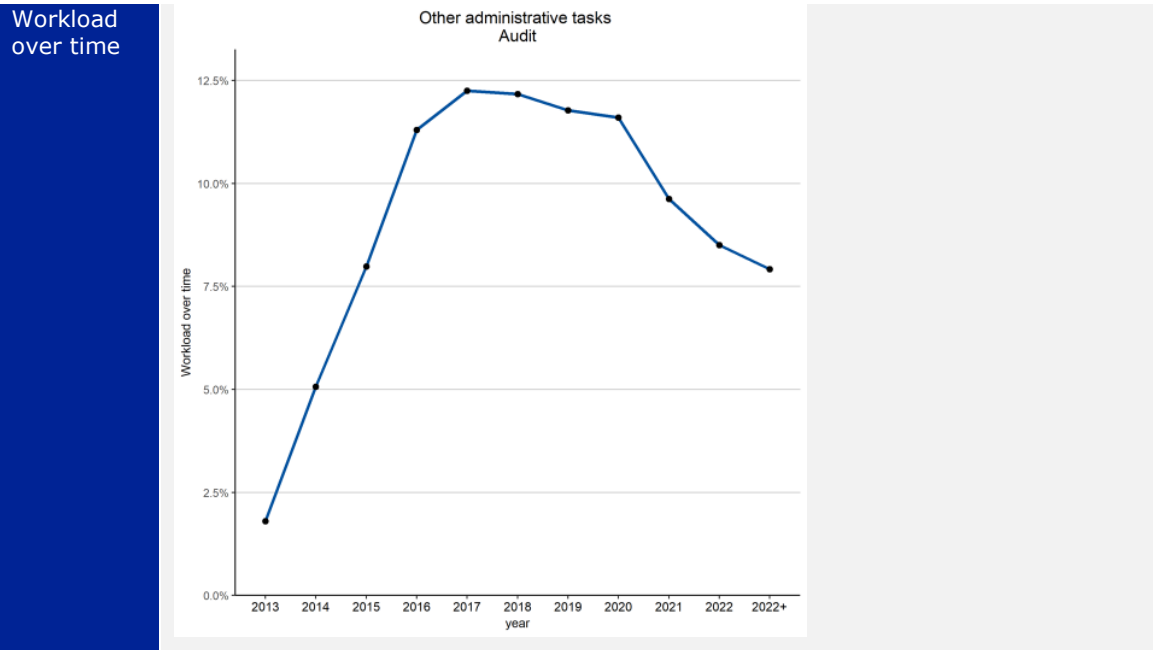
Task description	Preparation and submission of the annual control report - Audit <sup>25</sup> <ul style="list-style-type: none"><li>• CPR, Part IV - Art. 127(5)</li><li>• HZR, Art 7.3.c</li></ul>																
ESIF workload (approx.)	2 600 FTE																
Share of total workload	0.4%																
ESIF costs (approx.)	€ 141 700 000																
Share of total costs	0.5%																
ESIF external costs	€ 31 700 000																
Workload in person years per million EUR of total eligible budget	<div><div>Preparation and submission of the annual control report</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.005</td></tr><tr><td>EMFF</td><td>0.006</td></tr><tr><td>ERDF</td><td>0.005</td></tr><tr><td>CF</td><td>0.005</td></tr><tr><td>ESF</td><td>0.005</td></tr><tr><td>ETC</td><td>0.009</td></tr></tbody></table></div>			Fund	Median	ESIF	0.005	EMFF	0.006	ERDF	0.005	CF	0.005	ESF	0.005	ETC	0.009
Fund	Median																
ESIF	0.005																
EMFF	0.006																
ERDF	0.005																
CF	0.005																
ESF	0.005																
ETC	0.009																
Costs in EUR per million EUR of total eligible budget	<div><div>Preparation and submission of the annual control report</div><table><thead><tr><th>Fund</th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>152</td></tr><tr><td>EMFF</td><td>359</td></tr><tr><td>ERDF</td><td>229</td></tr><tr><td>CF</td><td>63</td></tr><tr><td>ESF</td><td>391</td></tr><tr><td>ETC</td><td>397</td></tr></tbody></table></div>			Fund	Median	ESIF	152	EMFF	359	ERDF	229	CF	63	ESF	391	ETC	397
Fund	Median																
ESIF	152																
EMFF	359																
ERDF	229																
CF	63																
ESF	391																
ETC	397																

<sup>25</sup> For EAFRD, this task is covered under Task M.16 of the Managing Authority (Management declarations and annual summaries)



### A.50 Task A.x – Other audit tasks

Task description	Other administrative tasks Audit <ul style="list-style-type: none"><li>non-regulated task</li></ul>																		
ESIF workload (approx.)	2 800 FTE																		
Share of total workload	0.5%																		
ESIF costs (approx.)	€ 251 600 000																		
Share of total costs	1.0%																		
ESIF external costs	€ 160 000 000																		
Workload in person years per million EUR of total eligible budget	<div><div>Other administrative tasks Audit</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>0.003</td></tr><tr><td>EAFRD</td><td>0.001</td></tr><tr><td>EMFF</td><td>0.004</td></tr><tr><td>ERDF</td><td>0.004</td></tr><tr><td>CF</td><td>0.003</td></tr><tr><td>ESF</td><td>0.004</td></tr><tr><td>ETC</td><td>0.008</td></tr></tbody></table><div>FTE per MEUR eligible budget</div></div>				Median	ESIF	0.003	EAFRD	0.001	EMFF	0.004	ERDF	0.004	CF	0.003	ESF	0.004	ETC	0.008
	Median																		
ESIF	0.003																		
EAFRD	0.001																		
EMFF	0.004																		
ERDF	0.004																		
CF	0.003																		
ESF	0.004																		
ETC	0.008																		
Costs in EUR per million EUR of total eligible budget	<div><div>Other administrative tasks Audit</div><table><thead><tr><th></th><th>Median</th></tr></thead><tbody><tr><td>ESIF</td><td>295</td></tr><tr><td>EAFRD</td><td>119</td></tr><tr><td>EMFF</td><td>367</td></tr><tr><td>ERDF</td><td>326</td></tr><tr><td>CF</td><td>272</td></tr><tr><td>ESF</td><td>355</td></tr><tr><td>ETC</td><td>1 119</td></tr></tbody></table><div>EUR per MEUR eligible budget</div></div>				Median	ESIF	295	EAFRD	119	EMFF	367	ERDF	326	CF	272	ESF	355	ETC	1 119
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