



Action Plan revision Discussion paper - Comments by Slovenia

1) ACTION PLAN AS A "ROLLING DOCUMENT"

In the document "*Revision of the EUSAIR Action Plan – Position of Slovenia*" it is stated that within the EUSAIR more focus should be given to the preparedness policy and foresight in policymaking. According to that, we agree with the proposal that EUSAIR actions on the level of each pillar/topic (as defined on page 7 of the Discussion paper) should be evaluated on a regular basis to see their progress and relevance. Nevertheless, in order to get effective evaluation, a pre-defined monitoring should be agreed and established through the new Facility Point project. Slovenia is not in favour of developing a complex quantitative indicators (like ESIF indicators) for monitoring purposes. We believe that qualitative monitoring on the progress would be more appropriate and sufficient for the strategy.

Even though we believe that the EUSAIR Action plan should be a "dynamic" and "up-to-date" document, we have to consider that the EUSAIR Action Plan is not a working document of the EUSAIR governance, but is a working document from the European Commission services¹. This means that the document cannot be changed over minor deviations or adjustments every year.

Having this in mind, we would propose to keep the EUSAIR Action Plan on a more general basis. In order to define in detail the actions, activities and expected results, we would propose to introduce specific Action plans on the level of each Pillar (as is a practice within the EUSALP). That working documents could then be endorsed by the Governing Board and could be changed or adjusted upon constant monitoring by a simpler procedure.

We also agree with the proposal that EUSAIR webpage should be further developed by integrating the planned and implemented actions (in line with the EUSAIR Action Plan or even EUSAIR Pillar Action Plan) on the level of each pillar/topic. That could also become a "story telling" tool of the strategy.

2) EUSAIR ACTION PLAN STRUCTURE

In continuation, Slovenia would like to stress overall considerations, related to the structure and detail of the EUSAIR Action Plan document.

- **STRATEGY vs. PROGRAMME**

"A strategy is a plan of action designed to achieve a long-term or overall aim."² EU macro-regional strategies are political frameworks that address common challenges and opportunities on the specific geographical area.

¹ Referring to the EUSDR Action plan of 6.4.2020 where it is written, "The Staff Working document is not endorsed by the EC and is only a document from the EC services".

² Source: Oxford English Dictionary



Because of that reason we believe that we should not follow the intervention logic (presented at page 6 of the Discussion paper) that applies for the cohesion or other programmes that are determined by the specific timeframe (programming period), pre-defined financial resources and rules that are determined by the specific legislation.

This does not mean that the EUSAIR Action Plan should not be ambitious. It should be, but to the extent that it shall be **realistic for the implementation**. This applies also to the observations on page 5 of the Discussion paper that the funding framework is missing and that funding programmes should be stated. Even though the embedding process has developed over the years, we believe that the EUSAIR Action Plan should stay at the policy level or policy provisions as in the EUSDR (EU Cohesion policy Provisions, EU Enlargement Policy provisions ...).

- **ACTIONS vs. PROJECTS**

When discussing the results or the added value of the Strategy, the focus often shifted from actions to projects. Slovenia absolutely supports the development of macro-regional projects, but the focus should be shifted back to actions. After all, we are setting the targets for the strategy (not the programme), meaning developing new approaches, increasing coordination in policymaking, creating networking initiatives etc. The projects are or should be a result of the macro-regional actions.

In the document "*Revision of the EUSAIR Action Plan – Position of Slovenia*", Slovenia encourages all Pillars to give more focus to capitalisation of existing results, implemented activities and projects within EUSAIR.

In this respect, Slovenia is in favour of focusing on the actions first and then separately (to the extent possible) indicate examples of implemented activities (like strategic documents, implemented projects ...) that could benefit or upgrade the actions. It should also be taken into account that some future (potential) projects cannot be defined yet, as they will be developed through one of the future Facility Point projects.

- **TARGETS vs. INDICATORS**

When developing joint actions (i.e. new approaches, increased coordination, network initiatives...) within the strategy (that is a long-term or medium-term plan) we should focus on long-term results.

When measuring the results, we cannot copy the EUSBSR model (as presented on page 9 of the Discussion paper). EUSBSR and EUSAIR are very different due to their membership, structures and working methods. In addition, we are not in favour of the proposal to use ESIF indicators (as proposed on page 10 of the Discussion paper). The strategy cannot and should not be measured by the same standards as the ESIF programmes, which have substantial financial means and have very different objectives.

We are advocating a realistic and still measurable progress within the EUSAIR (we propose to use the EUSDR model).



- **FOOD FOR THOUGHT ON EVALUATION AND REPORTING:**

When developing a system of monitoring the progress on the level of the EUSAIR, we would suggest cooperating with the European Commission. Namely, every two years the national coordinators and TSGs have to report to the European Commission on the EUSAIR progress. The latest questionnaire was very specific, also demanding the information on specific projects, their value, funding programmes ... In order to take advantage of the revision of the Action Plan and experiences with evaluation within the Facility Point project, we would suggest reporting measuring results or targets with the European Commission.

3) GOVERNANCE CONSIDERATIONS

There are many different topics regarding governance stated on pages 12 and 13 of the Discussion paper that should be addressed systematically in the future. We agree that the EUSAIR Action Plan is not the place to resolve those open issues.

We believe that many topics or questions highlighted should be addressed hand-in-hand with the development of new Facility Point projects and in close dialogue with the TSGs.