



FINAL REPORT

Technical assistance on simplification of CLLD implementation and creating channels of communication in order to ensure real and meaningful participation by local actors when planning/implementing/monitoring/evaluating the CLLD instrument

Written by: Anna Krzyżanowska-Orlik, Andrzej Brzozowy, Beata Pniewska,
Aneta Pieczykolan, Katarzyna Włodarczyk-Tomczyk
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Unit F3 Poland
Contact: Christopher Todd

E-mail: regio-poland@ec.europa.eu

*European Commission
B-1049 Brussels*

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List of abbreviations used in the document

Abbreviation	Full name
PO5	Policy Objective 5 "Europe closer to citizens"
EMFF	European Maritime and Fisheries Fund
EFR	European Fisheries Fund
ERDF	European Regional Development Fund
EAFRD	European Agricultural Fund for Rural Development
ESF	European Social Fund
ELARD	European Leader Association for Rural Development
FARNET	European Fisheries Areas Network
ATT	Another Territorial Instrument
IB	Intermediate Body
MA	Managing Authority
EC	European Commission
MC	Monitoring Committee
LAG	Local Action Group
LDS	Local Development Strategy
MDF&RP	Ministry of Development Funds and Regional Policy
MA&RD	Ministry of Agriculture and Rural Development
RDP	Rural Development Programme
CP	Cohesion Policy
PNLAG	Polish Network of Local Action Groups
CLLD	Community Led Local Development
ROP	Regional Operational Programme
PA	Partnership Agreement
CAP	Common Agricultural Policy
ITI	Integrated Territorial Investment

1. General information about CLLD

Community-led local development – CLLD is an instrument based on LEADER approach implemented in the Common Agriculture Policy.

CLLD has been implemented in Poland since 2007 during two European financial perspectives. In the 2007–2013 perspective it was implemented in two ways:

- As part of the second pillar of the Common Agriculture Policy as LEADER approach which was obligatory in Priority Axes of the Rural Areas Development Programme co-financed from EAFRD,
- As part of the Common Agriculture Policy within the 4th Priority Axis of the FISH Operational Programme co-financed from EFF.

In the 2014–2020 perspective apart from the aforementioned areas (EFF was exchanged by EFMR), CLLD implementation was allowed in the Cohesion Policy in operational programmes co-financed from ERDF and ESF. The perspective 2021–2027 will continue implementation of the instrument and its expansion.

Two Polish regions (Kujawsko-Pomorskie and Podlaskie) decided to implement multi-fund instrument in the perspective 2014–2020. Despite several barriers and obstacles, both regions declared continuation of CLLD implementation. It means that positive sides of CLLD are crucial but there is a need for introducing solutions making the instrument more transparent and “user-friendly”. It is also necessary to better promote this instrument and inform different organisations about advantages of multi-fund CLLD and bottom-up approach in the local development.

Local Action Groups play a key role in the CLLD implementation processes. Their activities influence successful realization of all processes and procedures. They are also liable for introducing features that make CLLD distinctive among other available territorial instruments:

- Bottom-up approach – a wide participation of local communities in creating and implementing local strategies,
- Territorial approach – the local strategy is prepared for a specific and coherent territory,
- Integration – combination of different economy sectors and co-operation of different interest groups,
- Partnership – LAG as a local partnership where entities from public, social and business sectors participate and co-operate,
- Innovative character – experimenting, undertaking innovative activities on a local scale,
- Devolution of management and financing,
- Networking and co-operation – exchange of experiences and dissemination of good practices.

The agriculture and fisheries policies have already created a steady CLLD implementation system and they can be referred to as mature (four financial perspectives with two main networks ELARD and FARNET, implementation systems were precisely defined, multi-funding was available). However, CLLD implementation in the Cohesion Policy is still at its preliminary phase with just the second perspective.

2. The objective of the study

The objective of the study was to deliver mechanisms that will allow to increase the effectiveness of CLLD implementation in Poland through simplification of procedures and improvement of communication and information exchanges among all participants of the process. The activities undertaken were aimed at expanding the discussion to the remaining regions together with presentation of the possibilities that CLLD provides based on good European and Polish practices.

The subject of the analysis was multi-fund CLLD programming and implementation processes that included:

- Preparation and choosing of Local Development Strategies,
- Programming of support under regional and national programmes together with Rural Areas Development Programme including CLLD,
- CLLD implementation process.

The analysis of the above processes was based elements such as: institutional structure and involvement of stakeholders and legal regulations governing those processes.

Implementation of multi-fund CLLD contains four levels:

- From EC to Member States (Ministries),
- From Ministries to MAs,
- From MAs to LAGs,
- From LAGs to final recipients (local communities).

Different relations appear at each level, and they were carefully/thoroughly analysed during the study.

3. Activities executed during the study

The kick-off meeting was organized on 16th November 2020 with EC representatives and the expert team. The aim of the meeting was to discuss stages of the study and to specify its scope. The Methodological Report was prepared within 3 weeks from the signature of the contract.

As a part of the first stage of the study Desk Research was conducted based on the following documents:

- Legal regulations existing at different CLLD implementation levels (EU regulations, Partnership Agreement, national regulations and guidelines, regional regulations) – for both perspectives 2014–2020 and 2021–2027,
- Studies and evaluations conducted so far for Regional Operational Programmes of the Kujawsko-Pomorskie and Podlaskie Voivodships, LEADER+, good practices and experiences concerning CLLD implementation in other Member States,
- Statistical data covering Local Action Groups activities.

Identification and understanding of all actors in CLLD implementation processes and their perspective was essential to identify all relations taking place during CLLD implementation. That was the second stage of the analysis. The following interviews with representatives of several institutions and actors were conducted: MAs and LAGs (from both regions implementing and not implementing CLLD in the perspective 2014–2020), the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, DG Regio and DG EMPL.

3.1. The list of in-depth interviews (videoconferences):

- 16 interviews with representatives of MAs having a vast knowledge on how to implement CLLD – depending on the region, different representatives took part in the interviews – in the case of few regions representatives of units responsible for Common Agriculture Policy implementation participated in the interviews,
- 2 interviews with LAGs' representatives from regions implementing multi-fund CLLD in the perspective 2014–2020,
- 2 interviews with LAGs' representatives from regions that did not implement multi-fund CLLD in the perspective 2014–2020,
- An interview with representatives of the Ministry of Development Funds and Regional Policy with knowledge in the scope of programming 2021–2027 perspective and multi-fund CLLD (Department of Regional Operational Programmes),
- An interview with the representative of the Ministry of Agriculture and Rural Development with knowledge in the scope of programming and implementing LEADER and LEADER+ (Department of the Common Rural Policy),
- An interview with 3 representatives of EC (DG REGIO/ DG EMPL).

The main objective of the interviews was to discover:

- Needs of development policies actors both at local (rural and urban areas), regional and national levels in Poland,
- Benefits from implementation of multi-fund CLLD (including good practices),
- Obstacles and difficulties in implementation of CLLD,
- Concerns and doubts of all actors and institutions that had not implemented the instrument before,
- Flexibility of institutions towards their role in CLLD implementation system,
- Previous ways of solving existing problems.

As a part of the second stage international workshops were organized (26th January 2021) during which good practices from other Member States were presented (Austria, Germany, and Czechia).

The third stage of analysis focused on comparing collected opinions expressed by different actors/stakeholders and as a result the main areas where discrepancies of needs and objectives of different actors were defined. This allowed for accurate identification of challenges to increase efficiency of multi-fund CLLD.

The Preliminary Report was prepared with proposals of general recommendations which were discussed during workshops organized on 22 March 2021 with participation of representatives

from the EC, Ministries and Marshal's Offices from few regions: Kujawsko-Pomorskie, Podlaskie, Pomorskie and Podkarpackie. Representatives of LAGs were also invited.

The study is concluded by the Final Report that includes recommendations for changes in procedures, increased efficiency of communication and proposal for solutions that would make CLLD implementation simpler and more efficient.

3.2. Outputs delivered:

- Methodological Report
- Organisation and moderation of workshops – 26th January 2021
- Preliminary Report
- Organisation and moderation of workshops – 22nd March 2021
- Final Report
- Organisation and moderation of workshops – 27th April 2021
- Promotional materials – podcasts (5 interviews) and leaflet
- Presentation of Final Report at URBANET meeting

3.3. The most important conclusions based on conducted interviews

3.3.1. Interviews with the MAs of Regional Operational Programmes

The participants of interviews were representatives of Departments fulfilling a role of MAs together with (in few cases) representatives of departments playing a role of intermediate bodies for RDP and other departments responsible for creation of regional development policies.

The regions presented their complex approach to territorial development treating CLLD as one of available territorial tools. ITI was referred to as a tool already implemented and in case of many regions it is planned to expand its implementation in the financial perspective for years 2021–2027. Additionally, ATT was also introduced as a new territorial tool and revitalisation programmes will be using this formula. It seems that ATTs will be implemented in all regions and they will become next territorial tools implemented quite widely in regional programmes co-financed from European funds. Moreover, MAs mentioned that they tried to programme the support in such a way that no several territorial strategies for the same territory were prepared. And therefore, they decided not to implement CLLD to make the system easier for beneficiaries.

Regions presented their arguments for and against CLLD implementation very precisely – all interviews prove that there are huge regional discrepancies proving different experiences, varied potential of institutions involved and relations between stakeholders.

Several concerns were also expressed: possibility to achieve the same goals with simpler solutions, administrative burdens resulting out of CLLD implementation, treating CLLD as a goal itself instead of looking at its implementation objectives.

The potential of LAGs was evaluated diversely in regions. Such evaluation is one of bases on how to support these entities in the future perspective. For many it was more important to support LAG potential as a local leader, animator, project executor for local communities than to create and construct a potential of further institution in the implementation system with additional bureaucratic burdens.

Another important remark was made concerning relatively small amounts of financial resources allocated for CLLD implementation and very extensive amount of work that is necessary to make CLLD successful. Additionally, representatives of MAs paid attention to the fact that no significant simplification or “protection” was introduced to avoid problems with indicators and contracting levels.

Barriers mentioned during the interviews were as following: lack of full knowledge concerning CLLD implementation, different rules for financing current expenses in different funds, insufficient financial and institutional capacity of LAGs for execution of own projects and accepting responsibility like responsibility of intermediate bodies. As a consequence, MAs fear to implement CLLD due to its alleged low efficiency and risks for delays in the regional programme implementation.

All MAs appreciate bottom-up approach which is essential for CLLD together with other features such as: partnership, co-operation and networking, territorial approach, integration of sectors.

3.3.2. Interviews with LAGs

The features that, according to interviewees, are the core of LAG functioning and existence are:

- Activities directed at the needs of local communities,
- Creating added value of activities – generating additional activities and initiatives,
- Introducing new ideas and visions, courage to undertake risks, experimenting,
- Ability to learn from own mistakes and looking for new solutions,
- Openness and creating direct relations with other stakeholders in their environment,
- Ability to collect information and verify it,
- Complex character of operations – soft and hard projects complementary to one another,
- Co-responsibility of LAGs for implementation of regional programmes.

Representatives of LAGs mentioned necessity of introducing following simplifications:

- Reducing requirements for Local Development Strategies and their shortening,
- Introducing a unique procedure for choosing operations for all funds,
- Introducing lump sums to the biggest possible scope,
- Limiting necessity of verifying rationality of expenses to a payment stage,

- Preparing a list of non-eligible costs (instead of lists of eligible and „acceptable“ costs).

3.4. Interviews with representatives of EC, MDF&RP and MA&RD

EC, MDF&RP and MA&RD are the institutions creating legal framework for CLLD implementation and therefore they play a key role in the whole system.

CLLD was introduced to the Cohesion Policy in the perspective 2014–2020 and EC has had a strong belief to treat it as a tool with a great potential influencing social awareness and creation of civil society. There are also positive examples from other Member States such as Austria (Tyrol), Germany and Czechia proving possibility and providing justification for CLLD implementation. EC representatives can see and appreciate openness for dialogue from the side of MDF&RP, however the services of the Ministry seem no to be highly involved in promotion of this instrument which is essential for a success of CLLD implementation together with dissemination of its positive effects.

The main partner for EC during talks about CLLD implementation in the Cohesion Policy is MDF&RP. The Ministry sees CLLD formula not fully adequate to the logic of the Cohesion Policy where accent is paid to its efficiency. Because of such approach the Partnership Agreement includes CLLD as not obligatory tool and leaves a decision whether to implement it or not solely to regional MAs.

MA&RD is the most experienced institution dealing with CLLD implementation – it has been implementing LEADER approach under CAP for the last three financial perspectives. The variety of LAGs is particularly stressed – there are real local animators and leaders and others that undertake no animation activities. In the opinion of a representative of this Ministry later approval of RDP for the perspective 2020+ does not constitute a barrier for CLLD implementation in regional programmes.

3.5. Summary of interviews

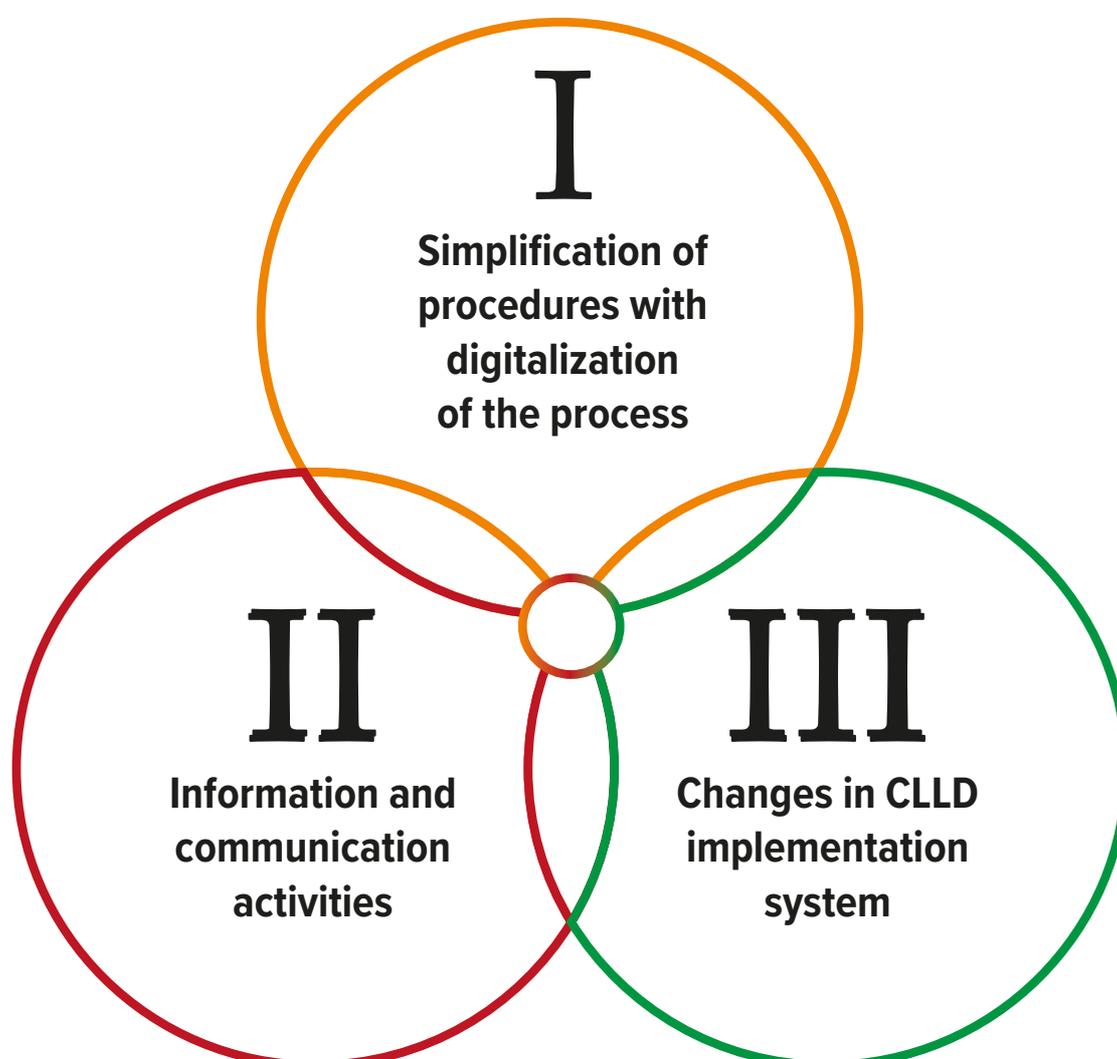
The main observation which is a result of conducted interviews is a necessity to specify roles of actors in CLLD implementation system – EC, MDF&RP and MA&RD. The lack of coordination is apparent together with no coordinated co-operation and exchange of information among those actors (particularly mentioned by MAs) what creates unpredictable and unstable environment together with information chaos.

Dissemination of knowledge about CLLD is not satisfactory. MAs would want to be fully informed – however, from the side of the Ministries there no single representation exists.

4. Recommendations

The recommendations were divided into three groups – recommendations for simplification of procedures and digitalization of the process (the 1st group), recommendations concerning information and communication activities (the 2nd group) and recommendation regarding changes in the CLLD implementation system (the 3rd group). Since CLLD is a multi-level process presented recommendations are complementary.

Recommendations for CLLD implementation



5. THE 1ST GROUP OF RECOMMENDATIONS – SIMPLIFICATION OF PROCEDURES WITH DIGITALIZATION OF THE PROCESS

1.	Simplification and shortening of Local Development Strategy (LDS)
2.	Making the process of LDS updating more flexible
3.	Precise division of tasks and competencies between LAG Office, Council and the Marshal's Office
4.	Simplification of project accounting rules
5.	Precise definition of relations between CLLD Act and Implementation Act
6.	Limiting and specifying project evaluation criteria
7.	Creation of common IT system
8.	Digitalization of project proposals submission at LAG level

5.1. Simplification and shortening of Local Development Strategy (LDS)

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

Changes in the contents of the Local Development Strategy:

1. Limitation of:
 - diagnosis of socio-economic situation to the most important conclusions being justification for planned objectives,
 - description of participation methods to a list of the most effective tools.
2. Resignation of:
 - detailed communication plan,
 - detailed criteria of projects evaluation,
 - detailed action plan,
 - detailed budget,
 - technical information on specific tasks of LAG Office employees and training plan for them and decision-making body.

The above specific information should be constituted in a form of appendices to a framework agreement which is a document requiring less time and procedural involvement in the case of updating.

5.2. Making the process of LDS updating more flexible

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

1. Limiting the requirement of full public participation when updating LDS only to a situation of changing the strategy's objectives.
2. Defining admissible scope of indicators values in LDS that do not require update of the whole strategy.

5.3. Precise division of tasks and competencies between LAG Office, Council and the Marshal's Office

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

Division of tasks connected with organizing call for proposals and evaluation of proposals:

- LAG Office – advisory function for inhabitants at the stage of proposals' preparation,
- LAG Council – choice of operations based on approved evaluation criteria and deciding on co-financing,
- Marshal's Office – verification of eligibility for submitted proposals based on the most important eligibility criteria (without repeating criteria used by LAG Council), organizing obligatory trainings for employees of LAG Offices and members of LAG Councils

5.4. Simplification of project accounting rules

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

1. Common methodology for all funds for settling current expenses (i.e., preparation, management and animation costs) using lump sum payments and simplified costs defined by MA in co-operation with both Ministries.
2. The specific list of non-eligible costs to be included in national guidelines for European funds.

5.5. Precise definition of relations between CLLD Act and Implementation Act

Responsible actors: the Ministry of Development Funds and Regional Policy, the Ministry of Agriculture and Rural Development, Marshal's Offices

- Removal from art. 23 par. 6 of the CLLD Act a notion of "significant modification" – similarly it was removed from Implementation Act during its amendment in 2017.
- Precise definition of objective for submitting by LAGs proposals for co-financing to the Board of the Voivodship (art. 23 of the CLLD Act).
- Introducing to the CLLD Act 14-day period for appealing procedure (project's evaluation), similarly to a deadline for submitting appeal concerning a result of project's evaluation in the Implementation Act.
- Introducing in art. 22 par. 5 of the CLLD Act, the institution organizing a call (LAG) as the first instance for considering appeal and the Board of the Voivodship as the second instance.
- Removing par. 6 of art.22 of CLLD Act (changes in informing the Board of the Voivodship about submitted appeal).
- Precise definition, in CLLD Act, of circumstances and procedure for changes in information about call for proposals and making changes in chosen projects similarly to rules defined in the Implementation Act.
- Resignation from excluding in art. 22 par. 8 p. 2a of application of regulation of art. 24 par.1 p. 5 of the Administrative Procedure Code during repeated evaluation.
- Including in CLLD Act non-competitive mode similarly as in the Implementation Act.

5.6. Limiting and specifying project evaluation criteria

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

1. Defining innovation criteria as innovation on a local level for instance by identifying by applicant several similar solutions within the territory where the project will be implemented or where it will have a direct influence.
2. Resignation from some evaluation criteria, for instance experience of applicant in implementation of projects co-financed from European funds.

5.7. Creation of common IT system

Responsible actors: the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy (acting jointly)

Adding CLLD tool to IT systems constructed for European funds through:

- Creation of a separate IT system in Rural Development Programme and Fisheries Programme and joining it with IT System for Cohesion Policy Funds

or

- Including elements of bottom-up approach (Rural Development and Fisheries Programme) in Cohesion Policy Funds IT System (functionality limited to the most important issues agreed jointly by the Ministries)

5.8. Digitalization of project proposals submission at LAG level

Responsible actors: Marshal's Offices with Local Action Groups, the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy

1. Creation of application generator at LAG level
2. Simplification of application proposals (one for all funds such in Scandinavia or Tyrol)

6. THE 2ND GROUP OF RECOMMENDATIONS – INFORMATION AND COMMUNICATION ACTIVITIES

1.	Creation of a task force responsible for coordination of CLLD implementation in Poland
2.	CLLD support in Poland from the EC level
3.	Ongoing dialogue of regions implementing CLLD with ministries
4.	CLLD promotion

6.1. Creation of a task group responsible for coordination of CLLD implementation in Poland

Responsible actors: the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy (acting jointly) in co-operation with NGOs and/or experts

- Creation of a task force responsible for coordination of CLLD implementation in Poland which would involve following activities:
- Creation of Internet knowledge centre with a set of updated information on procedures, legal provisions, regulations, and ways of solving typical problems and its ongoing updating by both Ministries,
- Periodical trainings and workshops for Marshal Offices, LAGs, NGOs, communes and other interested people and bodies,
- Periodical conferences and seminars,
- Networking of people and bodies dealing with CLLD,
- Appointing “CLLD contact person” in the Ministry of Funds and Regional Policy at the ministerial level – an employee who would deal with CLLD issues what would make communication between MAs and the Ministry more efficient.

6.2. System CLLD support in Poland from the EC level

Responsible actors: DG REGIO, DG EMPL, DG AGRI, DG MARE in co-operation with the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy

1. Locating in the agenda of Monitoring Committees a point concerning implementation of territorial instruments with particular attention paid to CLLD.
2. Organization of separate sessions dedicated to CLLD, good practices and progress in implementation of the instrument during annual review meetings with the EC.

3. Including in monitoring processes a stage of LDS evaluation and calls for proposals organized by LAGs.

6.3. Ongoing dialogue of regions implementing CLLD with ministries

Responsible actors: the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy (acting jointly)

- Creation of CLLD working group being a platform for ongoing dialogue for all actors taking part in CLLD implementation i.e., representatives of MAs, LAGs and the Ministries.

6.4. CLLD promotion using good practices

Responsible actors: the EC, the Ministry of Agriculture and Rural Development and the Ministry of Development Funds and Regional Policy

1. CLLD promotion actions based on specific elements:
 - showing good practices,
 - stressing innovative and bottom-up approach character of the instrument,
 - specifying benefits for actors implementing CLLD,
 - abolishing myths (for instance consequences of failure to deliver performance framework).
2. Conducting activities and actions promoting CLLD at different levels of its implementation – the EC, the Ministries, regions, local self-government units, local communities.

7. THE 3RD GROUP OF RECOMMENDATIONS – CHANGES IN CLLD IMPLEMENTATION SYSTEM

The third group of recommendations includes proposal of changes including meta-approach to CLLD implementation i.e., diversity of LAGs institutional capacity, local and bottom-up approach of the instrument, a scale of CLLD implementation among other Cohesion Policy/Common Agriculture/Common Fisheries Policies. Recommendations refer to monitoring, reporting and evaluation.

1.	Securing possibility of implementing different procedures for LDS and LAG at a regional level
2.	A change in a mode of choosing LAG own projects
3.	Global grants – expanding instrument, aligning rules for grant projects co-financed from different European funds
4.	Open calls for proposals as a basic form of organizing calls
5.	Quality of projects and long-term effects of projects
6.	A change in a way of evaluating MAs and presenting progress of regional programmes implementation by the Ministry of Funds and Regional Policy
7.	Making approach to indicators implemented via CLLD more flexible at a level of regional programmes
8.	Support of CLLD instrument as one of territorial instrument under Technical Assistance for European Funds

7.1. Securing possibility of implementing different procedures for LDS and LAG at a regional level

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

Taking into consideration a diversified potential and possibilities of LAGs in particular regions together with lots of constraints influencing amount of funds for the instrument, it is proposed to introduce a possibility of different procedures with LDS and LAG at a regional level:

1. Competitive procedure of choosing LDS (assumption that not all LAGs implement their strategies) with choosing LAGs that have institutional capacity to implement global grant. LDS evaluation criteria would be of quality and rewarding character i.e., LAG experience in a strategy's implementation or in implementation of projects of a similar character, Innovative character of the Strategy. A solution proposed for regions that want to expand obligations of LAGs.
2. In the case of implementing all submitted strategies, LDS evaluation criteria should only be access criteria.

7.2. A change in a mode of choosing LAG own projects

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy

- A non-competitive mode should be introduced for LAG own projects, which are a response to key problems of local communities identified at stage of the strategy preparation. Moreover, no actors from the CLLD territory are interested in implementation of such projects.

7.3. Global grants – expanding instrument, aligning rules for grant projects co-financed from different European funds

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

- More frequent use of global grants in CLLD implementation system in a formula functioning in the Cohesion Policy where a beneficiary (LAG is financially responsible for a correct implementation of a project) firstly submits a proposal to the Marshal's Office and then chooses final grantees.

7.4. Open calls for proposals as a basic form of organizing calls

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

- Open calls for proposals for projects implementing the Local Development Strategy

7.5. Quality of projects and long-term effects of projects

Responsible actors: the European Commission, the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy

- Resignation from monitoring LDS with global and long-term indicators such as reduction of poverty and exchanging it with a description of influence of particular project's elements on the strategy's territory where a support is planned.

7.6. A change in a way of evaluating MAs and presenting progress of regional programmes implementation by the Ministry of Funds and Regional Policy

Responsible actor: the Ministry of Development Funds and Regional Policy

- Including in the monitoring system conducted by the Ministry of Funds and Regional Policy specifics of CLLD instrument

7.7. Making approach to indicators implemented via CLLD more flexible at a level of regional programmes

Responsible actors: the Ministry of Agriculture and Rural Development, the Ministry of Development Funds and Regional Policy, Marshal's Offices

1. Indicators for Local Development Strategies as informative indicators on a regional level
2. Allowing permissible margin for error while estimating values of indicators executed by Local Development Strategies based on experiences from the perspective 2014–2020

7.8. Support of CLLD instrument as one of territorial instrument under Technical Assistance for European Funds

Responsible actor: the Ministry of Development Funds and Regional Policy

- Including in Priority 2 Point 2 of the programme *Technical Assistance for European Funds* activities concerning CLLD as one of territorial tools – similarly to ITI and ATT.

8. Summary

Two ministries (MDF&RP and MA&RD) play important but different roles in CLLD implementation connected with two different policies – Common Agriculture Policy and Cohesion Policy. MA&RD is Managing Authority for Rural Areas Development Programme 2014–2020 and Fisheries Operational Programme 2014–2020, and marshal's offices are intermediate bodies in this system. Therefore, regional authorities have no possibility to adapt their own solutions responding to specific, local needs of LAGs and to react promptly to problems appearing during CLLD implementation. In the case of the Cohesion Policy regional authorities are managing authorities for regional two-fund programmes and, despite regulations imposed by Coordination Institution from a national level, they have a significant autonomy and take full responsibility for effects of regional programme implementation.

This difference is particularly visible in the case of CLLD which is financed from different European funds. Lack of symmetry in relations to a scope of competencies and possibilities of executing tasks connected with CLLD implementation leads to a situation when managing authorities accept guidelines primarily prepared for LAGs in the Common Agriculture Policy to maintain consistency of undertaken activities.

Therefore, it is currently necessary to change thinking about the instrument, which is from one side associated with the Common Agriculture, however from the other side its potential and role in the Cohesion Policy is not yet fully recognized. The best example of this new potential are urban LAGs operating in kujawsko-pomorskie voivodship. Although so far there has not been much interest in using CLLD in urban areas, this could be a good area for elaborating new mechanisms and solutions that fill in existing gaps through, for instance involvement of ESF+.

Although the ITI instrument is implemented in a bigger number of urban functional areas, it mainly focuses on infrastructure and investment projects. CLLD could be based on ESF+ and this would allow for creating and strengthening social capital and secure complementarities between different type of projects (for instance with revitalization infrastructural projects). The benefit of CLLD implementation in urban areas would be also meeting 8% thematic concentration for supporting sustainable urban areas development.

In the current programming period (2021–2027) it is essential to better understand the instrument also based on examples from other Member States. This would allow for identifying a general framework for CLLD implementation system under the Cohesion Policy, giving it a different dimension what could encourage a bigger number of regions to take a decision of implementing CLLD in their regional programmes.

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