

Public Consultation on EU funds in the area of Cohesion

Fields marked with * are mandatory.

Introduction

[Read the introduction](#)

Guidance

- **Are you replying as a as an individual in your personal capacity?** If so, please tick the first option under question 1. You will then be invited to enter your personal details and then led directly to questions 27 to 40 which relate to EU funds in the area of cohesion.
- **Are you replying as an entity or in your professional capacity?** If so, please tick the second option under question 1. You will then be invited to enter your personal details as well as information on the entity of behalf of which you are replying and then then led directly to questions 27 – 40 which relate to EU funds in the area of cohesion.
- **In both cases, you may skip the non-mandatory questions and upload a document** (1 MB max) under point 41 and enter any other comment under point 42. Please do not include any personal data in documents submitted in the context of the consultation if you opt for anonymous publication. It is important to read the specific privacy statement for information on how your personal data and contribution will be dealt with.

About you

*1 You are replying

- as an individual in your personal capacity
- in your professional capacity or on behalf of an organisation

*8 Respondent's first name

Dorota

*9 Respondent's last name

Sienkiewicz

*10 Respondent's professional email address

D.Sienkiewicz@eurohealthnet.eu

*11 Name of the organisation

EuroHealthNet

*12 Postal address of the organisation

67, Rue de la Loi, B-1040, Brussels, Belgium

*13 Type of organisation

Please select the answer option that fits best.

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- International or national public authority
- Other

*22 Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

*23 If so, please indicate your Register ID number.

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*24 Country of organisation's headquarters

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia

- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

***26 Your contribution,**

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

EU Funds in the area of cohesion

27 Please let us know whether you have experience with one or more of the following funds and programmes

at most 6 choice(s)

- The European Regional Development Fund (ERDF)
- The Cohesion Fund (CF)
- The European Social Fund (ESF)
- The European Globalisation Adjustment Fund (EGF)
- The Fund for European Aid to the Most Deprived (FEAD)
- Employment and Social Innovation (EaSI)

28 Please let us know to which of the following one or more topics your replies will refer

at most 3 choice(s)

- Economic and sustainable development
- Employment, skills and education
- Social inclusion

29 The Commission has preliminarily identified a number of policy challenges which programmes/funds under the policy area of cohesion could address. How important are these policy challenges in your view?

	Very important	Rather important	Neither important nor unimportant	Rather not important	Not important at all	No opinion
a. Promote economic growth in the EU as a whole	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
o. Other (please give degree of importance here and fill in question 30 below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

30 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

31 To what extent do the current programmes/funds successfully address these challenges?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Promote economic growth in the EU as a whole	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
b. Reduce regional disparities and underdevelopment of certain EU regions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Address the adverse side-effects of globalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Reduce unemployment, promote quality jobs and support labour mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Promote social inclusion and combat poverty	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Foster research and innovation across the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Facilitate transition to digital economy and society	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Promote sustainable transport and mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Promote territorial cooperation (interregional, cross-border, transnational)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support education and training for skills and life-long learning	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Improve quality of institutions and administrative capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
n. Promote sound economic governance and the implementation of reforms	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
o. Other (please give degree of importance here and fill in question 32 below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

32 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

33 To what extent do the current programmes/funds add value, compared to what Member States could achieve at national, regional and/or local levels without EU funds?

- To a large extent
- To a fairly large extent
- To some extent only
- Not at all
- Don't know

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

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

EU Cohesion Programmes make significant contributions to (sub)national approaches for health and wellbeing, providing EU added value towards its priority objectives. We welcome EC point that “pooling resources at European level can deliver results that national spending cannot”. Latest Eurostat evidence that “regional GDP per capita ranges from 29% to 611% of EU average” is unacceptable. The EU can strengthen its part in addressing gross inequities. While respecting subsidiarity and competences, it is clear that many – if not all – EU Member States lack the necessary capacities to foresee, address and tackle the common challenges in social, environmental and economic fields. Weakening of EU cohesion funds could have severe consequences in countries and communities, in post-austerity measures climate.

The conditions in which people are born, grow, live, work and age affect health and are benefitted by effective implementation of the EU cohesion funds. They constitute an important instrument to reduce inequalities by direct co-investments in health and care systems, workforces, and strategic health and research infrastructures, e.g. primary and community-based health improvements in disadvantaged areas, urban/rural regeneration, social innovation, as we have promoted.

We do our best to disseminate that: yet too few citizens grasp it. As part of the civil society ESIF Structured Dialogue process, we have communicated major impacts from local to international level.

35 Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

Nearly 10% of EU total GDP is spent on health systems, with chronic diseases accounting for 80% of total healthcare costs, large proportion of which is preventable by addressing immediate conditions in which people live. It has still not entered the cohesion policy mindset. In the ESIF context we have noted how comparable and transparent social and health indicators have not been employed as effectively as agricultural and other sectors. The need to link social investment approaches, and indicators to priority objectives, the EU Semester and Social Pillar developments within Cohesion programmes is crucial.

The need to offer scope to empower community engagement at the nearest level to where investments will impact would stimulate more cost and impact effective approaches, e.g. urban connectivity and active mobility/walkability; access to facilities and spaces for recreation; improvements in safety and safety perception; sustainable food systems and food supply chains.

In addition, use of funds to build capacities of administrators and public health professionals to monitor and incorporate health and social equity in the design and implementation of programmes, collaboration and advocacy for equitable health opportunities and outcomes will lead to more sustainable and resilient societies.

EuroHealthNet advocates an approach of “proportionate universalism”: therefore universal access to cohesion funds should be possible but determined by greatest needs.

36 To what extent do you consider the following as obstacles which prevent the current programmes /funds from successfully achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Complex procedures leading to high administrative burden and delays	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
b. Heavy audit and control requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c. Available funding does not address the real challenges	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Insufficient administrative capacity to manage programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Insufficient information about funding and selection process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Lack of flexibility to react to unforeseen circumstances	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Difficulty of combining EU action with other public interventions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Insufficient synergies between the EU programmes/funds	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Difficulty to ensure the sustainability of projects when the financing period ends	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

j. Insufficient use of financial instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
k. Co-financing rates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
l. Late disbursement of funds / delays in payments to beneficiaries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
m. Insufficient linkages of the Funds with the EU economic governance and the implementation of structural reforms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
n. Legal uncertainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
o. Insufficient ownership	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
p. Insufficient involvement of civil society in design and implementation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
q. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

38 To what extent would these steps help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Alignment of rules between EU funds	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Fewer, clearer, shorter rules	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. More freedom for national authorities to set rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. More flexibility of activity once funding is eligible	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. More flexibility of resource allocation to respond to unexpected needs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Simplify the ex-ante conditionalities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. More effective stakeholders' involvement in the programming, implementation and evaluation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

39 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

40 How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication? For example, would you consider grouping/merging some programmes/funds?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

According to the "Future of Europe" Eurobarometer (November 2017), health is one of the top concerns for EU citizens and another EU-wide survey (April 2017) shows that 70% of Europeans want the EU to improve what is done for health.

Given the persistence of considerable health inequalities between and within EU Member States, and acknowledging still untapped potential of the cross-sector collaboration for health equity and relatively small health budgets dedicated to prevention and health promotion, it is recommended to ensure maximum coherence of all relevant programmes. For example by much improved indicators and metrics within the EU Semester process and improving local actors' coherent and coordinated action on reducing health gaps, meeting the local needs and integrated into local contexts.

Improving accessibility and quality of public infrastructures offers scope of action that Member States would not necessarily be able to invest in on their own: transition from institutional to community-based systems, urban and rural regeneration, climate action and environmental sustainability, social innovation and active inclusion of marginalised communities. Integrating programmes can create more visibility for vulnerable groups, investment in social equity and systems reforms in a more coherent, sustained and predictable manner EU-wide, building political support for and pursuing health gains as an objective of other policy areas.

Document upload and final comments

41 Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

6282fa8e-9e21-484c-96d3-456c77674be1/EuroHealthNet_summary_in_response_to_MFF_Consultation.pdf

42 If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

1500 character(s) maximum

Good health and wellbeing of all citizens is a precursor to cohesion, stability, and economic growth; it is inseparable from social and economic conditions. So far EU cohesion policy has facilitated progress in Member States and regions which could not have been achieved otherwise. In the next multiannual budget the EU's role for health and social equity should be further developed to support a stronger, fairer Europe.

There is a need for a common strategic vision based on EU Treaty objectives on wellbeing and cohesion, taking forward the principles of the European Pillar on Social Rights and the Sustainable Development Goals. All future EC expenditure programmes should adhere to such a strategic vision and ensure that upcoming EU policies on e.g. the digital single markets for health, food chain policy, agricultural priorities and cohesion policy are aligned and broadly reinforce one another.

Contact

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