

HLG Meeting on Simplification - 01/12/2015 Meeting on e-Governance (e-Cohesion) and Simplified Cost Options (SCOs)

UEAPME simplification proposals for SMEs

1. E-Governance/electronic exchange of information/e-Cohesion

State of play:

- For SMEs, dematerialisation of “paper procedures” and possibility to use “digital procedures” and electronic exchanges is one of their six most important demands to have better access to structural and investment funds. The e-Cohesion initiative which relates to some articles of Common Provisions Regulation – CPR (Art. 122(3) on management and control systems, 15(1)b and 15(2)b on administrative burden reduction in Partnership agreement, 59(1) on technical assistance, 96(6)c on administrative burden reduction in Operational program and Art.140 on availability of documents) are of major importance for SMEs.
- For SME project managers, the benefits to implement the electronic exchange of information e-Cohesion are:
 - simplification of forms and reports (demands, controls, audits),
 - reduction of costs,
 - simplification of archiving,
 - better and easier implementation of the SBA principle “ONLY ONCE” , giving the possibility to project managers to fill one single declaration for all managing authorities at territorial, national and EU level,
 - permanent evaluation,
 - self controlling.
- Electronic exchange of information: e-Cohesion can also provide many other services to SMEs and to managing authorities:
 - better access to statistical information on SME projects and impact analysis,
 - facilitating assistance/coaching/mentoring to help SME organisations to draft proposals and to fulfil the administrative requirements,
 - exchange of good practices and cooperation,
 - on-going information and training,
 - mediation on dispute resolution,
 - resource service,
 - “Certification tool” allowing the reduction of formalities and delays of payment.
- But implementation of e-Cohesion principles for and by SMEs needs some preliminary requirements:
 - to agree on administrative measures eligible to e-Cohesion,
 - to define the only due formalities,
 - to create an unique EU software on administrative requirement applicable at all levels,
 - to train the users,
 - to respect confidentiality, user rights, data protection of all information linked to the project,
 - to centralise the data/cloud computing: at national level.

UEAPME proposals to HLG Simplification for SMEs and stakeholders:
<ol style="list-style-type: none"> 1. to organise specific training and information actions for SME project managers to use e-Cohesion, 2. to guarantee the “ONLY ONCE” principle implementation by Member States and all managing authorities, 3. to analyse the implementation of e-Cohesion initiative in Member states for SMEs.

2. Simplified cost options

State of play:

- SCOs, as other delegated acts and application rules, are of high importance for project managers. Furthermore, the project managers have to know the rules especially in their relations with public and managing authorities, but:

- they generally do not have the time to read and understand the long and consistent (59 pages) Orientation note on SCOs (EGESIF 14-0017) of September 2014, which is drafted for managing authorities and not easily understandable by stakeholders and project managers;

- public and private authorities, auditors and controllers at national and regional level often interpret texts according to personal interpretation. This "interpretation chain" leads to misunderstanding, wrong or even false interpretations;

- the concrete impact of this process results in additional work for stakeholders, SME organisations and project managers, delays in procedure, payments and litigations;

- it also creates uncertainties and doubts for project managers and often discourage stakeholders organisations to propose actions or projects co-financed by the ESIF, as it has been the case during the previous structural funds programming period.

- Up to now, only some Member states have asked Commission to use SCOs although they are particularly effective to simplify the projects proposals by or for SMEs. SCOs are requested by SME organisations. On one hand, the SCOs have to be used by all Member States, and the current text does not need to be further simplified, but rather explained. On the other hand, due to the complexity of the text, it is necessary to provide stakeholders which are project managers and/or beneficiaries with the needed clear and practical information.

- In order to increase the use of SCOs and facilitate discussions between stakeholders organisations and public authorities based on concrete and identical information non subject to misinterpretation and to avoid any further litigations due to misinterpretation of SCOs, It is necessary to provide stakeholders with the right tools to understand the basic information on SCOs and rules they can refer to during the whole process of the management of projects.

UEAPME proposals ton SCOs o HLG Simplification:

To recommend the elaboration of a specific note summarising and explaining the key elements of the SCOs Orientation note dedicated to SMEs and drafted with practical, simple and clear words, insisting on points particularly relevant for SMEs and SME organisations at national and territorial level.

23/11/2015