MID-TERM EVALUATION ON THE IMPLEMENTATION OF THE RECOVERY AND RESILIENCE FACILITY

Technical annex

Contents

1. Introduction

The European Economic and Social Committee (EESC) has drawn up an evaluation report with the goal of supporting the European Commission's mid-term evaluation of the **implementation of the Recovery and Resilience Facility (RRF) –** an instrument to help the European Union recover from the COVID-19 crisis**,** established in February 2021 by Regulation (EU) 2021/241[1]. This report reflects the views of the social partners and civil society organisations[2] in selected EU Member States (Germany, Italy, Latvia, Portugal and Romania) on the effectiveness, relevance and added value of civil society involvement in the implementation of this instrument.

Based on the results of **five on-site fact-findings missions** to the abovementioned Member States, which enabled discussions with a number of key stakeholders to take place, **and on the responses** of a larger pool of stakeholders who completed an **online questionnaire,** this technical annex **gathers, analyses and summarises the views of organised civil society on how the RRF has been implemented in these countries from 2021 until now.**

The evaluation report and this annex aim to inform policymakers on the views of organised civil society regarding the mid-term implementation of the Recovery and Resilience Facility in selected Member States since 2021, and assess their experience and role in implementing this instrument, aiming to bring the highest added value to the European Commission's evaluation. These documents will be shared with the Commission and other relevant stakeholders.

2. Methodology and sampling

The members of the EESC study group collected the views of social partners and civil society organisations through two channels: five physical fact-finding visits to the selected countries and an online questionnaire. A total of 154 organisations took part in the consultation.

Additionally, secondary data on the EESC's past work on the subject was collected and analysed.

2.1 Fact-finding meetings

The fact-finding meetings took the form of semi-structured interviews with local civil society organisations and social partners, generally following the thematic structure of the questionnaire.

The sample of Member States was selected by the study group based on criteria adopted by the EESC Bureau on 13 December 2022. The European Commission was also informed about the sample.

The countries were selected based on:

- *political spread* e.g. high/low level of implementation, application success rates, most/least affected by the legislative proposal/programme, etc.;

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1 EUR-Lex - 32021R0241 - EN - EUR-Lex (europa.eu).

2 Together, social partners and civil society organisations are also known as "organised civil society".

- *geographical spread* i.e. by setting up five groups of Member States and choosing one from each group.

The five EU Member States selected for this evaluation report where fact-finding meetings took place were the following: **Romania (18 May 2023), Latvia (22 May 2023), Germany (9 June 2023), Italy (22 June 2023)** and **Portugal (22 June 2023).**

2.2 Questionnaire

The questionnaire was created on the EU Survey online portal, using a combination of question formats (filter questions, closed and open-ended questions, a grid). It was open from 27 April to 26 June 2023.

The aim of the questionnaire was to complement the information obtained from the fact-finding meetings. The questionnaire, composed of 28 questions, was sent to organisations in the Member States selected for the fact-finding meetings (not only those participating in the physical meetings but also other relevant organisations).

2.3 Participant breakdown

It should be noted that some participants in the fact-finding meetings also completed the online questionnaire. This explains the total of 154 organisations taking part in this consultation.

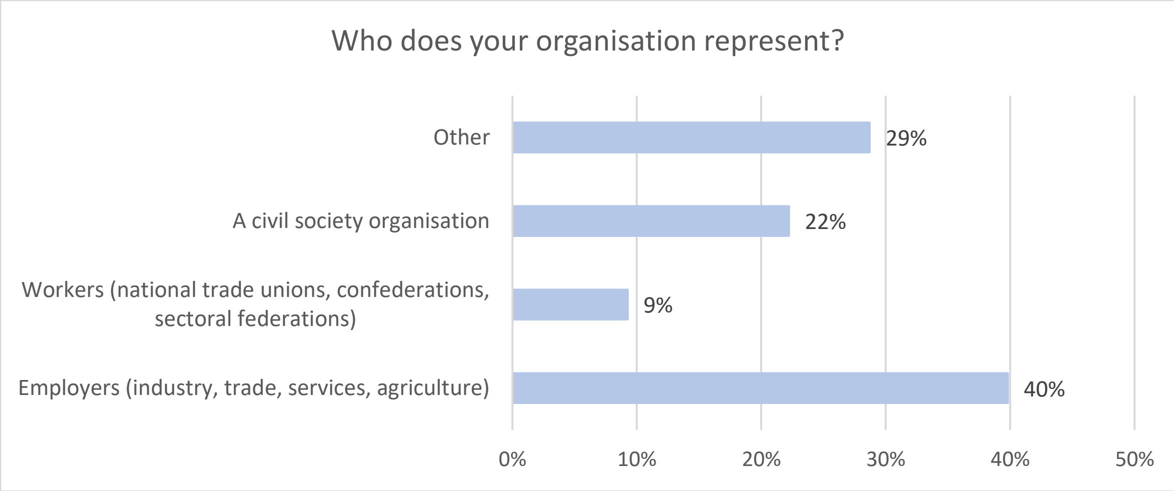
2.3.1 **Mission participants**

During the five fact-finding visits, the EESC delegation consulted a total of **79 social partners and civil society organisations.** It is important to note, however, that the total number of persons interviewed was slightly higher as on many occasions more than one representative of an organisation participated in the meeting.

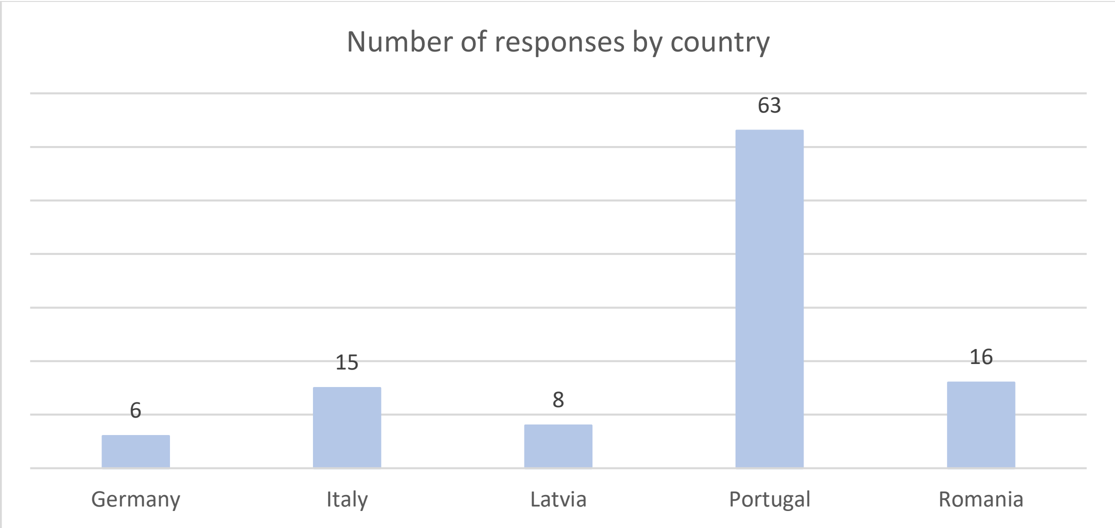
2.3.1 **Questionnaire respondents**

In addition, **108 contributions** were collected through the online questionnaire, including from: 43 representatives of employers' organisations (40%), 10 representatives of workers' organisations (9%), 24 representatives of civil society organisations (22%), and 31 respondents (29%) who considered themselves as "other". Among those who identified themselves as "other", the overwhelming majority represented either higher education institutions or research centres. Exceptions to this included several NGOs, one public authority, one intergovernmental institution, a consortium of beneficiaries, a healthcare institution and a social solidarity institution.

It should be noted that some participants in the fact-finding meetings also completed the online questionnaire. This explains the total of 154 organisations taking part in this consultation.



Regarding the distribution of answers across the five countries, the highest number of responses came from Portugal (63), and the lowest from Germany (6).



Graph showing the number of respondents to the questionnaire by country.

3. Focus of the evaluation report

The Recovery and Resilience Facility (RRF) is a temporary financial instrument established by Regulation (EU) 2021/241[3] in February 2021 to help EU countries **mitigate the economic and social impacts of the COVID-19 pandemic**. The RRF is a demand-driven performance-based instrument that allows the European Commission to raise funds and provide direct financial support to Member States for the 2021-2026 programming period.

In addition to mitigating the socio-economic impacts of COVID-19, the RRF intends to strengthen the European Union's **resilience and preparedness for the future challenges and opportunities of the "green" and "digital" transitions.** Additionally, it strives to advance economic, social and territorial cohesion within the Union and promotes coordinated action at European level.

3 EUR-Lex - 32021R0241 - EN - EUR-Lex (europa.eu).

The RRF intends to assist countries with carrying out reforms and investments that are in line with **EU priorities and country-specific recommendations** (CSRs) set out by the Council in the framework of the European Semester[4]. Actions are structured around **six pillars**: green transition; digital transformation; economic cohesion, productivity and competitiveness; social and territorial cohesion; health, economic, social and institutional resilience; and policies for the next generation. Concerning the distribution of funds across these pillars, the RRF Regulation specifies minimum percentage targets for countries to spend on the **Green Transition and Digital Transformation, of 37% and 20%**, respectively.

The EU Recovery and Resilience Facility has a **total envelope of EUR 723 billion**, including EUR 338 billion in grants and EUR 385 billion in loans. The scale of this financial support is unprecedented in the history of the European Union. The budget is allocated amongst countries in a manner that ensures greater macroeconomic support for more vulnerable countries (i.e. countries that face substantial economic and fiscal challenges)[5]. For the 2021-2022 period, the funds were distributed based on income per capita and past unemployment trends; for 2023, recorded declines in real GDP in 2020-21 will replace past unemployment trends.

To benefit from the RRF, Member States had to officially request funding by submitting national Recovery and Resilience Plans (RRPs) to the European Commission. The plans set out a detailed reform and investment agenda for the 2021-2026 implementation period across the six priority pillars. They also need to specify a clear governance framework to guide the implementation, monitoring and control of the RRPs, including planned timelines, milestones, targets and measurable indicators. Milestones correspond to qualitative implementation steps, while targets refer to quantitative steps. As the Facility is performance-based, the **disbursement of the funds will be progressive and conditional** on achieving the targets specified in the country's national plans.

Since the REPowerEU Regulation entered into force on 1 March 2023, Member States have been able to apply for additional funds by submitting an amended national RRP that includes specific REPowerEU chapters containing measures that align with the EU's REPowerEU plan (e.g. save energy, produce clean energy, diversify energy supplies).

As required by the RRF Regulation, the European Commission is currently carrying out a "mid-term evaluation" of how this mechanism has been implemented, and it has invited the EESC to contribute to this exercise.

With a view to usefully complementing the European Commission's ongoing evaluation on this topic, the EESC evaluation has focused specifically on the added value of organised civil society (social partners and civil society organisations) in implementing the RRF, and the effectiveness and relevance of this instrument in achieving its objectives.

The EESC evaluation methodology follows the European Commission's Better Regulation guidelines, in that the evaluation reports are structured around three of the evaluation criteria used by the Commission:

4 Recovery and Resilience Facility (europa.eu).

5 The fiscal implications of the EU's recovery package (europa.eu).

- **Effectiveness**: considers how successful EU action has been in achieving or progressing towards its objectives.
- **Relevance**: looks at the relationship between the needs and problems in society and the objectives of the intervention and hence touches on aspects of design. An analysis of relevance also requires consideration of how the objectives of an EU intervention (…) correspond to wider EU policy goals and priorities.
- **Added value of civil society involvement**: assesses the extent to which civil society has been involved in designing, monitoring, implementing and evaluating the EU legislation in question.

3.1 Overview of the RRF's implementation in each of the selected Member States

The following section presents a brief overview of the implementation of the Recovery and Resilience Facility in each of the five selected Member States.

- **Germany:** Germany officially submitted its national RRP to the European Commission for consideration on **28 April 2021** and received approval via the Council Implementing Decision of **13 July 2021**.[6] The German RRP has a total value of EUR 27.945 billion and does not include any requests for loans. This amount is higher than the maximum financial contribution that Germany can expect from the RRF, which is **EUR 25.6 billion in non-repayable grants**, corresponding to 3.7% of total EU RRF resources and 0.7% of Germany's 2019 GDP. So far, Germany has only received the **pre-financing grant of EUR 2.25 billion[7],** disbursed by the European Commission in August 2021.[8] This is equivalent to 9% of the country's fiscal allocation under the RRF. The remaining 91% will be paid in five instalments once Germany has satisfactorily met the identified milestones and targets.

  The German RRP consists of **15 reform and 40 investment measures**[9] grouped into **six "Missions"**, namely: (1) climate policy and energy transition, (2) digitalisation of the economy and infrastructure, (3) digitisation of education, (4) strengthening social participation, (5) strengthening a pandemic-resistant health system, and (6) modernising administration and dismantling barriers to investment.[10] The **six "Missions"** are divided into **10 more targeted components**. The plan has a strong **focus on the green transition** with measures relating to climate protection amounting to **40% of the allocations** – including key actions on decarbonisation, climate-friendly mobility and housing/construction. The RRP has an even stronger **digital** ambition, amounting to at least **52% of the allocation** and actions ranging from industry to education, social policy and healthcare, to public administration.[11] Thus, looking across the six missions, the German RRP largely exceeds the **expenditure targets** set by the RRF Regulation for the green transition (37%) and the digital

6 COM_2023_37_1_EN.pdf (europa.eu).

7 €2.25 billion in pre-financing to Germany (europa.eu)

8 Recovery and Resilience Scoreboard (europa.eu).

9 deutscher-aufbau-und-resilienzplan-darp.pdf (bundesfinanzministerium.de).

10 Germany's National Recovery and Resilience Plan (europa.eu).

11 Germany's National Recovery and Resilience Plan: Latest state of play | Think Tank | European Parliament (europa.eu).

transformation (20%). Regarding social inclusion, a major focus lies on furthering the inclusion of women and disadvantaged social groups (e.g. people with migrant backgrounds) into the labour market, as well as improving pension systems.

The German **RRP** has a strong focus on investments and reducing investment bottlenecks. A relatively low level of investment, notably in infrastructure, is one of the factors that have prevented Germany from reaching its full economic potential. By earmarking **EUR 26.5 billion** in resources for **40 investment measures, the RRP aims to enhance the country's long-term growth potential**. Next to investment into future-proofing hospitals, some of the largest planned investments relate to the green transition pillar, including: creating more sustainable and energy-efficient public and housing infrastructure (EUR 2.5 billion each) and the digital transition, including R&D and innovation support for the automotive sector, research on critical infrastructure and artificial intelligence, and the development of next-generation cloud infrastructure (total of EUR 5.9 billion). The RRP's measures align with existing national and international policy programmes, including the UN Sustainable Development Goals for 2030, the European Fund for Regional Development and the European Social Fund under the Partnership Agreement on the European Structural Funds.

Concerning the governance of the German RRP, the implementation of the plan is monitored by **a coordination unit in the Federal Ministry of Finance**. The unit will perform qualitative controls on all financial data, submit payment requests, and oversee monitoring and progress reporting on milestones and targets. It will also be responsible for detecting and reversing any potentially harmful developments that occur early on. Additionally, it will organise the implementation and monitoring of the audit and control procedures. The coordinating function of this unit is backed up by established national processes and laws. The **applicable national legislative rules and mechanisms** for monitoring and control, along with the accompanying reporting requirements, remain in effect for the RRF. The final recipients receive the funds for the RRP measures after they have been distributed according to the general funding guidelines associated with that measure, general administrative regulations, and specific funding decisions (i.e. administrative acts).[12]

The plan acknowledges that to ensure ownership by the key actors, it is critical **to involve all local governments and stakeholders**, including social partners, throughout the execution of the RRP's investments and reforms.[13] The RRP envisages that, during the implementation phase, there will be a continual process of **coordination with Germany's federal states (Länder)** with municipalities. The governance structure provides for **regular coordination meetings between the Länder and the federal line ministries responsible for reforms and investments** that directly influence the obligations of the Länder, at the request of the Länder. The Länder should also be closely involved, in a timely manner, in reporting on the progress of implementation. However, when the plan was being prepared, there was strong criticism by the German Länder of their late and insufficient involvement.

12 Germany's National Recovery and Resilience Plan (europa.eu).

13 pdf (europa.eu).

- **Italy:** Italy submitted a first draft of its national RRP to the Commission in **May 2021**. The Italian RRP received a **positive assessment from the European Commission on 22 June 2021**, followed by an approval by the Council of the European Union on 13 July 2021.

  Italy's Recovery and Resilience Plan (RRP) is the largest national plan in absolute figures and totals **EUR 191.5 billion**, equal to 10.8% of the country's 2019 GDP. This allocation amounts to a 26.5% share of the total EU RRF volume and consists of **EUR 68.9 billion in grants** and **EUR 122.6 billion in loans**.[14] The grant makes up 36% and the loan 64% of the total amount of the Italian RRP. In June 2022, Italy's grant allocation was revised slightly upwards to EUR 69 billion.

  The RRP contains **three major objectives**: green transition with 37.5% of total fund distribution (EUR 71.8 billion), digital transformation with 25.1% (EUR 48.1 billion) and 28.2% in social expenditures. A total of EUR 206 billion can be distributed according to geographical criteria, of which 40% or EUR 82 billion are allocated to the south, also providing for significant investments in young people and women.[15] The overall structure of the plan consists of six missions: 1) Digitalisation, innovation, competitiveness, culture and tourism; 2) Green revolution and ecological transition; 3) Infrastructure for sustainable mobility; 4) Education and research; 5) Inclusion and cohesion; and 6) Health. In addition, the RRP sets three horizontal priorities (youth, gender equality and territorial cohesion) that all missions must address in line with the specific challenges of the Italian economy. These six missions are further broken down into **15 components**, to be implemented through **132 investment and 60 reform measures**.

  The current **total amount of funds disbursed** to Italy under the RRF amounts to **EUR 28.95 billion in grants** and **EUR 37.94 billion in loans**[16]. Italy received EUR 8.95 billion in grants and EUR 15.94 billion in pre-financing in August 2021 after approval of the plan by the Council. The **first and second performance-based payments** were disbursed in **April and November 2022** respectively and each amounted to EUR 10 billion in grants and EUR 11 billion in loans. Thereby, Italy has so far received 34.9% of the resources, which lies above the EU average. Depending on the progress of the plan, another eight payments each for grants and loans are envisaged. The latest payment request for EUR 19 billion was submitted by Italy in December 2022. [17]

  Additionally, on 6 May 2021, a **Complementary Fund** with national resources of EUR 30.6 billion was established to further increase the RRP's firepower as part of a broader drive to modernise the country's economy. Furthermore, EUR 26 billion has been earmarked to carry out specific works and replenish the resources of the Development and Cohesion Fund by 2032. Along with this, there are the resources made available by the REACT-EU initiative, which will be spent in compliance with EU laws in the years 2021-2023. These funds total an additional EUR 13 billion.[18]

14 italy-recovery-resilience-factsheet_en.pdf (europa.eu).

15 The National Recovery and Resilience Plan (RRP) - Ministry of Economy and Finance (mef.gov.it).

16 Commission endorses Italy's third payment request (europa.eu)

17 Recovery and Resilience Scoreboard (europa.eu).

18 The National Recovery and Resilience Plan (RRP) - Ministry of Economy and Finance (mef.gov.it).

Italy has constructed a sophisticated **control mechanism** as well as a **multi-level governance framework** to ensure that the plan is carried out and monitored efficiently. The governance mechanisms, which have been incorporated in a legal act (Decree Law of 31 May 2021, No 77), clearly identify and specify the authorities accountable for monitoring and implementing the plan. The plan's governance provides for direct accountability for Italian **ministries and local governments** to carry out the investments and reforms that they are to accomplish within the specified timeframe, as well as regular, proper, and effective resource management. Local governments will play an important role, as they are accountable for about EUR 87 billion in investments.[19]

The Italian Ministry of Economy and Finance will be the exclusive point of contact with the European Commission, **monitoring progress on how reforms and investments are carried out**. Its tasks concern monitoring, reporting on and overseeing implementation, and include the establishment of an independent and dedicated audit body for the RRP. Finally, the Presidency of the Italian Council of Ministers has established a **Steering Committee** at the Prime Minister's Office to monitor progress towards achieving the plan's objectives, ensure cooperation with economic, territorial and social partners, and to interact with authorities in charge of measures.

Concerning the **involvement of organised civil society** in drafting and implementing the RRP, the reactions have been mixed. A few days before the Italian Government submitted the RRP to the Commission, the CGIL, CISL, and UIL trade unions deemed that, so far, they had not been properly involved in defining priorities, objectives, and resources, and called for trade unions to be effectively engaged in the plan's participative governance and monitoring regarding its missions, components, and horizontal priorities. Until April 2023, a total of six sector-specific round tables with trade union representatives had been held.[20]

- **Latvia:** The Latvian Ministry of Finance officially submitted the RRP to the European Commission on **30 April 2021** and received approval from the Council of the European Union on 13 July 2021. The Latvian RRP requested a support grant of **EUR 1.826 billion,** corresponding to 6% of the country's GDP in 2019 and 0.3% of the total EU RRF resources. They did not request the loan component of the RRF. So far, Latvia has received EUR 438.35 million of RRF grants; **EUR 237 million** in pre-financing in September[21], and the first performance-based payment of **EUR 201 million** on 7 October 2022. The remaining disbursements are planned in five instalments and will depend on the progress of the implementation.

  The Latvian RRP provides for reform and investment measures in six areas, namely: green transition, digital transition, reduction of inequality, healthcare, productivity, and the rule of law. The investment component entails investments in public infrastructure, capacities and processes, and support for private investment in innovation and the twin transition.[22] Concerning the

19 The National Recovery and Resilience Plan (RRP) - Ministry of Economy and Finance (mef.gov.it).

20 Department for European Policies - RRP steering committee meetings with businesses and trade unions held at Palazzo Chigi. Minister Fitto: with the decree approved today, we are strengthening and enhancing discussions with partners (politicheeuropee.gov.it).

21 Commission disburses €237 million to Latvia (europa.eu)

22 Microsoft Word - 6_EN_autre_document_travail_service_part1_v7 (europa.eu).

distribution of funds, **37% (EUR 686.6 million)** of Latvia's RRF resources are earmarked for achieving **climate objectives**, and **20% (EUR 383.5)** for the **digital transformation** of society and business activity. Next to these two primary objectives, 20% of the funds (EUR 370 million) are allocated to reducing inequality, 10% (EUR 181.5 million) to health sector projects, 11% (EUR 196 million) to the transformation of the economy and productivity reforms, and 2% (EUR 37 million) to strengthening the rule of law. In addition to respecting the CSRs from the European Semester, the RRP's measures are consistent and in line with other national policy programmes (existing and under negotiation), including the National Reform Programme, the National Climate and Energy Plan, the National Just Transition Plan, and the Partnership Agreement.

The RRP comprises **24 reforms and 61 investment projects**, across these six thematic areas. Within the climate transition pillar, Latvia's focus lies on improving energy efficiency by renovating the building stock, promoting the sustainability of the mobility and transport sector, and using renewables. The largest planned investment in the green transformation concerns reforming the Riga Metropolitan Area public transport system. Regarding digital transformation, the focus is on furthering the digitalisation of public administration and services, businesses, and SMEs and creating stimulating environments for research and innovation. In terms of economic and social resilience, the main macro-economic challenges for Latvia are the accessibility, quality and cost-effectiveness of the healthcare sector, the quality and efficiency of the education system, and social protection (e.g. minimum income, housing). The largest investment in resilience will go to strengthening university and regional hospital health infrastructure (EUR 149.5 million).[23,24]

The governance framework of the Latvian RRP is based on the existing cohesion policy framework. The cohesion policy is the EU's primary investment policy and focusses mainly on territorial cohesion, sustainable development, economic growth and mainstreaming of environmental considerations into policies and programmes across the EU.[25] The **Ministry of Finance** is the **national coordinator for the RRP**, and the main body responsible for coordinating how the plan is monitored and implemented. This role is in keeping with the ministry's pre-existing position as managing authority for the cohesion policy programmes. To ensure that **the plan is carried out effectively**, the Ministry of Finance works closely with the **line ministries** and the **State Chancellery**. By making use of the **line ministries**' existing resources and capacities (i.e. relating to administration, knowledge, experience and skills) for management and supervisory functions, the system strives to avoid additional administrative and financial obligations.

Regarding **RRF management and control, the Audit Authority,** which is an entity independent of the Ministry of Finance, develops the national RRP audit strategy, performs horizontal system audits, gives opinions about compliance with EU requirements, and prepares a summary of the conducted audits of requested payments, for submission to the European Commission. Finally, the **Central Finance and Contracting Agency** (CFCA) is responsible for contracting and carrying out the monitoring of investment projects with a focus on double funding, State aid checks, as well as overseeing detection and prevention of corruption, conflict of interest and fraud.

23 Latvia's recovery and resilience plan (europa.eu).

24 EUR-Lex - 32020H0826(14) - EN - EUR-Lex (europa.eu).

25 Cohesion Policy - Integration - Environment - European Commission (europa.eu).

Concerning **civil society involvement** in the RRP, the draft revision phase, which took place largely between February 2021 and March 2021, involved the consultation of various stakeholders during public discussions/debates, including civil society organisations, social and cooperation partners, and local authorities.

- **Portugal:** Portugal was the first country to submit its RRP[26] to the Commission on **April 22, 2021**, and the Council of the European Union endorsed the plan on 13 July 2021. The Portuguese RRP requested financial support of **EUR 16.64 billion**, of which 84% (EUR 13.9 billion) are non-repayable grants, and 16% (EUR 2.7 billion) are loans.[27] The requested amount corresponds to 7.8% of Portuguese GDP in 2019 and 2.3% of the EU's RRF resources.

  Portugal received **EUR 2.2 billion in pre-financing** in August 2021. In early May 2022, it received the first performance-dependent disbursement of **EUR 1.16 billion**[28], after the European Commission approved its progress towards meeting specified targets and milestones. The second disbursement, amounting to **EUR 1.8 billion**[29] (EUR 1.7 billion in grants and EUR 109 million in loans), was paid out on 8 February 2023. Further payments will depend on progress in implementing the RRP.

  Drawing on the **2019 CSRs**, the Portuguese RRP addresses several structural challenges that had affected the country long before the pandemic, with targeted reforms and investments.[30] These challenges span various sectors, including the **labour market** (e.g. high youth employment, gender pay gap), education, public administration, justice, social welfare and taxation systems (e.g. high out-of-pocket healthcare expenditure and inadequate minimal income), product markets, and the economy at large. The RRP groups its activities into **three missions** or strategic focus areas: **(1) Resilience, (2) Climate Transition, and (3) Digital Transition**. Measures with primary or secondary objectives to support the **Climate Transition come to 38.2%** (EUR 6.3 billion), and those concerning the **Digital Transition amount to 22.4%** (EUR 3.7 billion) of the total Portuguese RRF funds.[31]

  The three missions include 20 sub-components and align with the six pillars defined by the RRF Regulation (EU) 2021/241. **Mission 1, "Resilience"**, strives to improve crisis preparedness and response capacity and includes social, economic and environmental aspects. Some measures, for instance, strive to develop primary healthcare, social welfare, housing availability, and education. Concerning the environment, actions focus on improving forest and water management, and on the business side, there are incentives for stimulating innovative investment and economic modernisation. **Mission 2, "Climate transition"**, strives for carbon neutrality by 2050 and includes

26 PRR.pdf.

27 Portugal's recovery and resilience plan (europa.eu).

28 https://ec.europa.eu/commission/presscorner/detail/en/IP_22_1965.

29 NextGenerationEU (europa.eu)

30 https://www.ceps.eu/wp-content/uploads/2021/09/RRRP-No-5_RRPs-comparison-IT-DE-ES-FR-PT-SK.pdf.

31 Portugal's recovery and resilience plan (europa.eu).

measures (e.g. tax incentives) for furthering sustainable mobility, industry decarbonisation, and energy efficiency of residential and public administration buildings. **Measures under Mission 3, "Digital transition",** primarily focus on driving digitalisation in various sectors, including businesses, public administration and education.

The governance of the Portuguese RRP combines **centralised management** with a decentralised approach to implementation and relies on the fundamental principles of simplification, transparency and accountability, separation of functions and a focus on results. **There are four levels** of governance. The first level is an **Inter-Ministerial Commission,** chaired by the prime minister and composed of government members from relevant departments, responsible for the **political and strategic coordination of the RRP** (e.g. approval of any amendments to the RRP). The **second level** consists of the **National Monitoring Commission,** composed of an independent chair and several social and economic partners (e.g. business, academia, regions). Its main tasks are to monitor how the RRP is implemented and the results it achieves, to assess situations affecting progress and propose solutions, and promote information-sharing with civil society. The **third level** consists of an RRF-specific task force called **"Recuperar Portugal"**[32], which, as the **main managing body of the RRP**, is responsible for the technical coordination and monitoring of how the plan is carried out so that it meets its objectives.[33] Finally, the **fourth level** consists of a horizontal **Audit and Control Commission**, chaired by the Inspectorate General of Finance, tasked with assessing fraud risks, conflict of interests, and double financing and ensuring compliance with EU advertising rules.

Concerning **civil society involvement**, the drafting process of the Portuguese RRP entailed one of the most extensive public consultations of all EU Member States, resulting in 1153 external contributions to the government. The authorities published these responses and discussed how they had incorporated the feedback into the RRP proposal.[34] In addition, a transparency web portal, "***Mais Transparência***"[35], offers citizens access to information on the RRP (e.g. financed measures by instrument, list of beneficiaries).

- **Romania:** Romania submitted its RRP to the European Commission on **31 May 2021** and received approval from the Council of the European Union on **26 October 2021.** The financial support requested in Romania's initial RRP amounted to **EUR 29.2 billion**, of which **EUR 14.2 billion** (49%) were **non-repayable grants** and **14.9 billion** (51%) were **loans**.[36] The requested amount corresponds to 13.1% of the country's 2019 GDP and a 4% share of the total amount of the EU's RRF. In June 2022, Romania's grant allocation was revised downwards by 2.1 billion to **EUR 12.1 billion**.

32 Plano de Recuperação e Resiliência português (recuperarportugal.gov.pt).

33 RRRP-No-5_RRPs-comparison-IT-DE-ES-FR-PT-SK.pdf (ceps.eu).

34 https://www.eliamep.gr/wp-content/uploads/2021/11/Policy-brief-155-Kolliopoulos-final-1.pdf.

35 https://transparencia.gov.pt/pt/.

36 PLANUL NAȚIONAL DE REDRESARE ȘI REZILIENȚĂ (PNRR) (gov.ro).

As of now, Romania has received **EUR 3.62 billion in grants** and **EUR 2.73 billion in loans**[37]**.** The European Commission disbursed EUR 1.85 billion in pre-financing in December 2021 and the first **performance-based payment** in **October 2022** (EUR 1.77 billion in grants and EUR 790 million in loans). The assessment of Romania's second payment request – of EUR 2.8 billion – is ongoing. On top of the RRF financial envelope, Romania will benefit from **complementary funds from the Next Generation EU instrument,** namely REACT-EU, with a maximum of EUR 1.5 billion in 2021 and 2022, as well as the funds from **the multiannual financial framework (MFF)**.

The Romanian RRP includes **three primary objectives**: the green transition with a total fund distribution of 41% (EUR 12 billion), the digital transition with 20.5% (EUR 6 billion) and 12.4% for the education sector and youth support (EUR 3.6 billion). Overall, its RRP adopts the six-pillar structure of the RRF Regulation (see introduction) and further breaks down the pillars into **15 components**, to be implemented through **107 investments and 64 reforms**. The European Commission has found the plan to include an extensive set of mutually reinforcing reforms and investments that effectively **contribute to addressing significant economic and social challenges identified in the European Semester**.[38]

23% of the planned reforms come under the "Green Transition" pillar (P1), with Romania's focus being on improving water, waste, and energy management, access to sustainable transport, the protection of forests and biodiversity, and corporate governance of the state-owned enterprises in the energy sector. Pillar 1 is also the leading pillar in terms of the absolute number of planned projects and funding needs, receiving 52% of allocated funds. The "Smart, Sustainable and Inclusive Growth" pillar (P3) encompasses fiscal and pension reforms as well as business support. The "Social and Territorial Cohesion" pillar (P4) fosters local development, tourism and culture, and the "New Generation" pillar (P6) primarily focuses on improving education. A substantial number (30%) of the planned reforms come under the "Health and Economic and Social Resilience" pillar (P5), including capacity building in the health sector (management and human resources), reforming the protection system for adults with disabilities, and the fight against corruption.

The Romanian plan has a total of **507** milestones and targets. Most milestones were set for the first implementation period (2021-2023), with a much higher concentration of targets in the second half (2024-2026). However, by **June 2023, only 4% of the milestones and targets had been reached,** and the European Semester assessed the implementation of the Romanian RRP as "underway with increasing risks of delay".[39]

A multi-level governance structure will oversee how the Romanian RRP is carried out and monitored. The **Inter-ministerial Committee for the Coordination of the RRP** ensures coordination at the central level. It collaborates closely with the **Ministry of Investment and European Projects (MIPE)** and is responsible for reviewing progress on the plan's execution.

37 Commission endorses assessment of Romania's payment request (europa.eu)

38 Commission endorses Romania's plan (europa.eu).

39 National recovery and resilience plans (RRPs) as of 12 June 2023: European Semester assessment, payments received and milestones and targets achieved | Epthinktank | European Parliament.

The MIPE is the designated national coordinator for the plan's preparation, negotiation and approval, with assistance from the Ministry of Public Finances (e.g. signing the loan and finance agreements). Line ministries and the organisations under them ensure the **RRP's implementation** by negotiating finance agreements with MIPE. Separate from the coordination and implementation bodies, an **independent audit agency** carries out audit and control. This body has the **same audit authority as for the European Structural and Investment Funds.**

Furthermore, on 22 May 2022, MIPE launched the setting-up of an RRP **Monitoring Committee** made up of **non-governmental organisations**. The ministry selected **15 NGOs** whose areas of activity align with the plan's six pillars. Civil society was also involved in the drafting of the RRP. Since February 2021, there have been 13 public consultations with 3,900 citizens, collecting the views of Romanian stakeholders. Overall, the Ministry of Investment and European Projects received 1,700 proposals on how to update the RRP, of which 1,470 came from public debates.[40]

4. Primary data: findings and analysis

4.1 Summaries of the reports of the five fact-finding missions in:

4.1.1 **Romania**

Firstly, with regard to **the criterion of effectiveness**, the organisations consulted during the visit to Romania highlighted the following points:

- The RRF is helping Romania to implement reforms that would not have been possible without it.
- However, in terms of implementation, the problem seems to lie in the capacity of the ministries. Policies are not aligned between ministries. There is also a lack of coordination and communication between the departments.
- Implementation of the RRF has been significantly delayed and it is not yet possible to assess its effectiveness. The implementation of the reforms is perceived as achievable. However, the results will not be as obvious when it comes to investment, particularly in the private sector. It is therefore difficult to keep to the RRF timetable. Medium-term projects in Romania cannot be completed within the planned timeframe. The level of absorption of funds is low (36%).
- Municipalities had to launch the call for tenders three or four times because there were no applications. Public authorities are not very interested in accessing EU funds because they already have access to national funds, without having to undertake administratively onerous applications. It is a problem of understanding. The RRF could solve a lot of problems if we could first solve the issue of administrative capacity and understanding.
- There is not enough time for the programming exercise of the integration of the REPowerEU chapter.
- There is therefore a need for flexibility to implement the RRF, particularly for large infrastructure projects.
- The role of the monitoring committee is perceived as purely formal. It has a lot of experts. However, they are not used when there are bottlenecks. Currently, the committee cannot launch new projects under the REPowerEU chapter because of the lack of experts. A working group or similar structure should be set up with specialists from the OCS. In addition, this committee should be reviewed and reorganised according to the line ministries, and better supervision by line ministries should be ensured.
- OCS doesn't have the administrative capacity to apply for these funds or to undertake these reforms
- The needs of SMEs are growing all the time. However, in reality, there are not enough applications, mainly because we do not have access to enough information. It is preventing SMEs from applying because the list of criteria is too extensive (hundreds of pages). In addition, there is still no public platform that fully integrates information on the opportunities offered by the RRP.

40 Romania's National Recovery and Resilience Plan (europa.eu).

- A list of appropriate funding should be available, which would present all the possibilities directly without sending you to hundreds of pages of guidelines.

Secondly, with regard to **the criterion of relevance**, they underlined the following points:

- It would have been more appropriate if the investments had been aimed at the private sector, which can implement them more quickly, more efficiently and more effectively.
- Digitalisation is the pillar that will have the most to gain from investment and reform if it is carried out properly.
- In terms of the reforms and their contribution in the education sector, this is disastrous. Schools do not know how to implement the projects and coordination costs are expected to be covered by the schools. There are no incentives for them to implement RRF projects.
- The necessary reforms in the transport sector, which are very important and have an impact on society as a whole, have been neglected.
- In terms of the green transition, in some guidelines, the "Do No Significant Harm" obligation is not entirely relevant to certain areas. This makes it difficult to implement.
- The REPowerEU chapter should be entirely dedicated to SMEs and households, reducing energy poverty.
- The content of the plan should be adapted, not only in terms of indicators, but also in terms of the content of reforms (e.g. social reforms) and investments. The plan needs to be modified and renegotiated, as the context is now different.

Thirdly, with regard to the criterion of **the added value of organised civil society involvement**, they stressed the following points:

- The government is open to dialogue, but post factum. OCS stressed that they are only informed of the decision and the projects carried out. OCS is only able to evaluate the projects that have been completed or started, and nobody discusses the projects that have not yet started and the potential use of EU money to modernise our society in depth. There is also a need to become more involved in providing information to businesses and entrepreneurs.
- The RRP and its effects/impacts need to be discussed at central and local level.
- The monitoring committee should be more proactive and open to OCS. Representatives of the OCS and the business community should be able to give their opinion, as the committee is an interesting tool for implementing and monitoring the RRF.
- OCS needs to improve its administrative capacity. It has limited administrative capacity for a limited period of time. It is therefore necessary to fund the representatives of OCS in order to increase administrative capacity and thus improve consultation and involvement. There is also lack of knowledge and access to data/information on the progress of the implementation of the RRP. It would increase the legitimacy and relevance of the policies chosen and the measures taken, and to ensure truly effective implementation and impactful results.
- During the consultation, the proposals of the OCS should be centralised and their positions should be published, detailing what has or has not been accepted by OCS.
- The government should act as a mediator between the representatives of organised civil society in dialogue. Genuine consultation takes time and it is essential to take it.
- Mandatory consultation stipulated in European legislation is necessary.
- Social dialogue is the most important factor in ensuring the effectiveness and relevance of the policies and measures adopted.

4.1.2 Latvia

Firstly, with regard to the **criterion of effectiveness**, the organisations consulted during the visit to Latvia highlighted the following points:

- The majority of stakeholders **expressed very critical views of the RRF implementation process in Latvia**. A general delay in programme implementation across all pillars was noted by almost all stakeholders (with the exception of the hospital sector). From the side of the business organisations, a general concern regarding the **delay in the actual absorption of the planned RRF investments** in Latvia was noted.
- From the side of industry associations, RRF was seen as "a source of endless frustration", and up to this moment no enterprise within several major industries had received a single euro neither in enterprise innovation projects, nor in digitalisation projects.

- Many stakeholders stressed that **the distribution of the RRF funds at the national level had been based on a political agreement** – hence the available funds were allocated in a way so that all priority areas would receive something without a thorough plan to solve the existing structural problems. Another criterion for the distribution of the funds was said to have been the unmet needs in the state budget.
- The **lack of any monitoring mechanism for the national RRP implementation** was stressed.
- Lack of clarity about the implementation of the separate RRF programmes was mentioned; there were many information reports from the public authorities available but no one place where all the information could be easily accessible.
- Some stakeholders also mentioned the **lack of capacity within the line ministries** as a shortcoming in implementing the RRP.
- The participants stressed the **huge administrative burden** (stemming from the Commission) which was still increasing. However, it was underlined that the Latvian public authorities were adding to this burden at the national level as well. In general, the increase of bureaucracy and administrative burden compared to other EU programmes was mentioned.
- Regarding the principle of "Do no significant harm", it was said that at the moment it was not clear how it will be implemented/applied. Due to a lack of understanding of what it means, there was a risk to breach this principle in the implementation of the national RRP in Latvia.
- A **general serious concern by all types of stakeholders was expressed regarding the (in)ability to finish projects in the limited RRF period** (i.e., before the end of 2026).

Secondly, with regard to the **criterion of relevance**, they underlined the following points:

- Regarding the national Recovery and Resilience Plan, it was said that **the priority directions had been chosen correctly**, even though more funds should have been foreseen for the health sector. Programmes in the area of energy efficiency were said to being used most actively at present, whereas in terms of digitalisation and innovations progress was quite slow.
- A view was expressed that the national plan contained many elements on recovery but **what was missing was the part on resilience** (such elements as crisis management system, societal resilience, self-organisation capacity should have been included in the plan under resilience).
- **The lack of flexibility to adapt the national RRP to changing circumstances** was mentioned as an element which might lead to failure to achieve objectives and loss of funding. Several stakeholders mentioned that the funds should be re-allocatable across RRF priorities. Several stakeholders furthermore agreed that circumstances had already changed to a large extent since the RRF programme development had started.
- Major problems with implementation of innovation and digitalisation programmes were mentioned due to **the literal definition of a "conflict of interest"**. Therefore, stakeholders asked the European Commission to provide guidelines on how such a small country like Latvia with a very limited number of digital/innovation professionals and enterprises can actually implement these programmes, if the conflict of interest is defined literally.

Thirdly, with regard to the criterion of **the added value of organised civil society involvement**, they stressed the following points:

- In general, the **participation of civil society**, particularly of smaller NGOs, **in the planning and implementation processes of the national RRP** was said to have been **limited.** It was stated by several stakeholders that the civil society involvement had often happened based on their own initiative. In Latvia, first the draft national plan was prepared and then the consultations took place. Many civil society stakeholders regretted that there was **no real discussion about the content** and how to make this plan most appropriate for the situation in the country. A view was also expressed that the planned reforms could have been more efficient, if there had been more time for discussions with civil society stakeholders. In general, **civil society representatives felt listened to but not heard.**
- Another element mentioned was the **lack of capacity on the side of smaller NGOs**, to get involved properly in the consultation process. Lack of human resources within NGOs to engage on RRF matters was stressed several times.
- The social partners noted that during the consultation process they had eventually managed to incorporate some of the issues that were of importance to them into the national plan.

4.1.3 **Germany**

Firstly, with regard to **the criterion of effectiveness**, the organisations consulted during the visit to Germany highlighted the following points:

- Programmes set up in a problematic way at federal level creates problems at regional level because of the administrative burden. Municipalities and ministries lack the links to implement cross-cutting projects. Implementation could not be done entirely at local level. The municipalities and cities involved lack administrative capacity to implement the plan. The increase in rules to be applied affects their work and makes it difficult to adapt to their level.
- There are a lot of rules and too much red tape for small and medium enterprises (SMEs), particularly in renewable energy investment projects. Bureaucratic rules and EU projects are not attractive for them. There are no special funding structures adapted for SMEs. The same goes for EU programmes and national/federal programmes. They don't have the capacity to undertake tendering procedures. SMEs are much more dependent on finance than large companies.
- There is a need to simplify calls for tender for EU/RRP funds. At the moment, it is too difficult to access them.
- Funds and subsidies are provided without sufficient verification of the effects on the ground. The disbursement of funds is slowed down by the need to have achieved the milestones and objectives set out in the plan.
- There is a need to obtain greater flexibility in implementing this plan and extend it over a longer period of time.
- Monitoring structures for the implementation of other EU funds already exist and their use should be extended to the implementation and the monitoring of the RRF.
- It is an increasingly complex process. In addition, there is the problem of asking for more inclusion, monitoring and verification, and asking for more structure could also complicate the process further.

Secondly, with regard to the **criterion of relevance**, they underlined the following points:

- The RRP has endorsed the measures as an activity that not only increases the EU's capacity to act, but also provides opportunities to incentivise investment and reform, which would not have been the case without this tool. However, controversial issues are not addressed in the plan. The need to strengthen the pension system and the private pillar, for example, as highlighted in the CSRs, has not been taken into account. In fact, 80% of the RRP measures would have been implemented as planned by Germany, with or without the plan. So, there is no real added value in the RRP.
- As regards the green pillar, OCS believes it necessary to promote climate protection agreements, which would guarantee the security of investments.
- They stressed the need to strengthen the social component of the plan. Measures exist, but social cohesion is barely included in the RRP. Disadvantaged groups must be taken into account, and adolescents and young people must be more supported by the RRP.
- There is a need for more significant reforms and a broadening of the scope of public health. There is a problem of a lack of qualified practitioners.
- Moreover, they perceive the digital pillar as having a potential to shape industry. However, public infrastructures in Germany are lagging behind and at the same time very bureaucratic. There is also a problem with implementation of this pillar, for example, in the education sector, where there has been no progress. There are not enough skills to implement these measures. The digital gap must be closed through digitisation that embraces the whole of society, and infrastructure must be provided for this.

Thirdly, with regard to **the criterion of the added value of organised civil society involvement**, the organisations consulted during the visit to Germany highlighted the following points:

- They stated that they were only included in the first stage, but not in the drafting of the programmes/measures of the RRP. There was no structure to co-determine or shape the plan. It was even more difficult for SMEs to be involved and heard. Only a few players are systematically involved, but there is no big representation. There is a need for more transparency. The plan should have been better designed from the outset for this to be the case.
- Representatives of OCS have no control over the spending of funds. The EU RRF regulation does not provide for the partnership principle. However, this principle should have been applied. This should have been included in the legal framework from the outset in a clearer and more structured way.
- Moreover, they underlined that OCS doesn't have the administrative capacity to have experts on this plan and to monitor its implementation properly. The OCS needs to be supported so that it can be properly involved.

- When consulted, there is no feedback, no follow-up (what has been taken into account and why?). They ask for more interaction. This is a communication problem. The debate with organised civil society should be a systematic government initiative.
- The level of transparency regarding the implementation of the RRP and planned measures is very low. The RRF funds have also been used at municipal level, but there is a lack of structure for stakeholder involvement at this level.
- What is lacking in the RRP is a consultation structure similar to that used in the Structural Funds, which includes structural involvement of the actors needed for implementation. This should become mandatory for the development and implementation of any European programme. Existing structures should be used and extended for this purpose, which is more likely to happen if the EU regulation provides for it in advance and specifies the mandatory nature of the consultation.
- In addition, if civil society is excluded at the start of a programme's development, it is then difficult to monitor and positively influence implementation and there is no nature of interest.

4.1.4 **Italy**

Firstly, with regard to **the criterion of effectiveness**, the organisations consulted during the visit to Italy highlighted the following points:

- It was stressed that the view on the reforms was relatively positive. The most important reform so far is in the legal system.
- The large sums involved make this a good opportunity to reform the Italian system, in particular via digitalisation. There is, however, a problem with absorbing the amounts.
- Huge investments have been made in infrastructure.
- The "do no significant harm" principle has in practice led to substantial delays.
- It was underlined that the procedures need to be simplified, there is too much red tape and bureaucracy. The past strong reduction of resources in the administrative system has had negative consequences. The municipalities cannot meet the imposed deadlines, maybe more responsibilities should have been allocated to the regions instead. The biggest problem was seen as the bureaucracy and the lack of simplification. There have been administrative reforms, but not a lot. We need to solve the three persistent problems facing Italy: fragmentation, simplification and lack of administrative capacity, mostly at the local/territorial level.
- One problem with the implementation of the RRP is that the conditions for qualified contractors and consultants are not attractive, in particular because of the temporary nature of the work.
- For entities (companies or local authorities) with limited resources it is a problem that there is no support for preparatory work.
- There is a lack of transparency and supervision and the information on the official website is inadequate and outdated.
- As the implementation of the plan is moving too slowly, it is therefore understandable if there is pressure to revise it.
- The reduction of the powers of the Italian Court of Auditors was not seen as conducive to solid supervision of the implementation of the plan

Secondly, with regard to **the criterion of relevance**, they underlined the following points:

- It was noted that in general the effects of the RRP have been positive, and in certain cases the goals and aims of Italy have coincided with those of the six pillars. However, more emphasis should have been given to the social aspects of the plan, and in particular to the health system and education. A necessary reform should be simplifying the rules for the social economy, and areas of focus should be energy, local health care, and education.
- New projects have definitely been started. Without the important injection of funds, there would have been much less green or digital transition. The green, digital and energy transitions are accelerating a trend that already existed before. However, the importance of the MFF should not be overlooked. More emphasis should be placed on digitalisation and water supply, in particular in rural areas. The particular morphology of Italy makes territorial cohesion very difficult, and peripherality leads to poverty.
- There should be more stringent criteria when identifying and selecting sectors in which to invest.

- Involvement, transparency and cooperation are issues that need to be improved, and to be discussed with the Commission.

Thirdly, with regard to the criterion of **the added value of organised civil society involvement**, they stressed the following points:

- It is and was a massive task informing and involving the stakeholders. OCS is involved, but often too late. This should already take place at the planning phase.
- The Permanent Partnership Roundtable (PPR) was useful, but did not involve local and regional levels enough. Certain participants questioned the real added value of this body, albeit with positive effects as regards information and exchanges, and stated that the new consultative set-up is unclear. One organisation felt that involvement was fine, and it still works, even without the PPR. The main contact is still the relevant ministry. One participant felt that the change of government had not had a large effect in practice.
- The approach concerning involvement is very sectorial, and could possibly be broadened and involve more peripheral policy areas.
- There is more knowledge now, more experts and more specialists from all organised civil society representatives.
- The public administration in general is underperforming. A specific example was given of €2.5M granted but still frozen one year later because of bureaucratic silos and lack of cooperation.

4.1.5 **Portugal**

Firstly, with regard to the **criterion of effectiveness**, the organisations consulted during the visit to Portugal highlighted the following points:

- Both social partners and beneficiaries noted that public administration is strained by the simultaneous management of multiple European and national programmes. There is a lack of staff to answer to all of these demands, and there is the impression among the interviewees that there is a significant amount of gold-plating: many of the requirements made by Portuguese authorities do not seem to be demanded by the European Commission. Despite this, beneficiaries often feel that there is goodwill from the civil servants working in the projects, and that the learning curve has been a positive one, with cooperation among all actors. This is even more problematic because in RRF often more than one public entity is involved in the oversight of each single project.
- The effectiveness of the NRRP is thus affected by the lack of consistency of instructions from public authorities both in time and across institutions, generating uncertainty among beneficiaries and delays in the implementation of the projects. A question worrying beneficiaries, for example, is what will happen with expenditure that was incurred in a way that does not respect an instruction that was only sent months after the investment.
- Also affecting the implementation are the complexity of public procurement rules, the soaring inflation in raw materials and construction materials after the invasion of Ukraine, and the lack of skilled construction workers. The prices for many of goods needed for RRF investments have increased in such a way that they are no longer comparable with the prices presented in the projects.
- Consequently, social partners and beneficiaries asked authorities to allow for more flexibility, both in procurement and in the revision of approved projects to speed up the implementation and to make sure that investments are realistic given the changes of prices in needed materials. The implementation is also affected by the low investment capacity of Portuguese beneficiaries. The implementation of some projects with the current higher prices would lead to the bankruptcy of some beneficiaries. Also, paying subsidies on the basis of depreciation means that beneficiaries have to be in a position to make, early on, a large investment to be able to proceed with the project – and given the implementation delays and the RRF timeline, it is likely that some of the financial contributions on later depreciation will be lost.
- Another element to consider is redirecting funds from pillars or areas that have found little demand from potential beneficiaries to those areas for which potential investors have a larger appetite.

Secondly, with regard to the **criterion of relevance**, they underlined the following points:

- Beneficiaries were clear in saying that all critiques concern fundamentally implementation and monitoring, but this should in no way be interpreted as a critique to the relevance of the RRF as a concept. They stressed that this is a unique opportunity to finally perform long-needed large investments, for example in buildings or technological hardware. Notwithstanding this, some beneficiaries and social partners felt that, while the *recovery* element is well present, the *resilience* element is less so. The lack of investments in areas where Portugal has significant threats (such as water management) or bad performance at European level (such as energy poverty) raised questions concerning the criteria used when drafting the RRP.

- The RRP has allowed the government to keep current expenditure without significantly increasing the deficit, which is welcomed by the Commission – but raises questions among some social partners concerning the European added value. An issue where no consensus was found among interviewees, but was still very much underlined by them, was the large preponderance of the State as a beneficiary of the RRF. While trade unions were favourable to this, given that the State can invest more and have potentially larger multiplier effects, employer organisations and beneficiaries considered it a lost opportunity to generate greater economic well-being and increase economic growth.

Thirdly, with regard to the criterion of **the added value of organised civil society involvement**, they stressed the following points:

- One of the main conclusions that can be taken from the meetings with Portuguese civil society is that there was no actual involvement of social partners in drafting the programme.
- Participants noted that there was insufficient contribution from the civil society and social partners to the overall design of the RRP and the identification of priorities. Any consultation with social partners that occurred was perceived as a mere formality. There was no actual dialogue or response to the proposals that were issued.
- Concerning monitoring of the RRP and the National Monitoring Committee, participants believed that more involvement of the social partners would be fundamental.
- Participants in the meetings were of the opinion that civil society is only aware of the current state of implementation to the extent that it is shared by the media. They are lacking timely, coherent, clear communications from the public authorities. They feel that the control and monitoring mechanisms are too focused on institutional procedures and not sufficiently open to monitoring by representatives of organised civil society.

4.2 Analysis of the results based on the responses to the questionnaire and the reports of the fact-finding missions

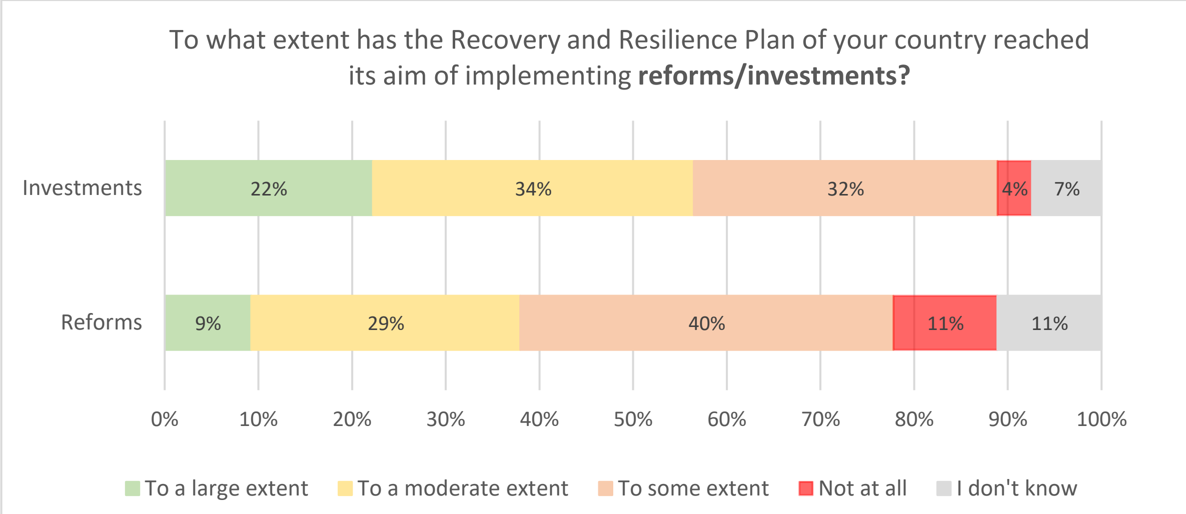
4.2.1 Effectiveness

According to the European Commission Better Regulation toolbox, the criterion of effectiveness "considers how successful EU action has been in achieving or progressing towards its objectives"[41]**.**

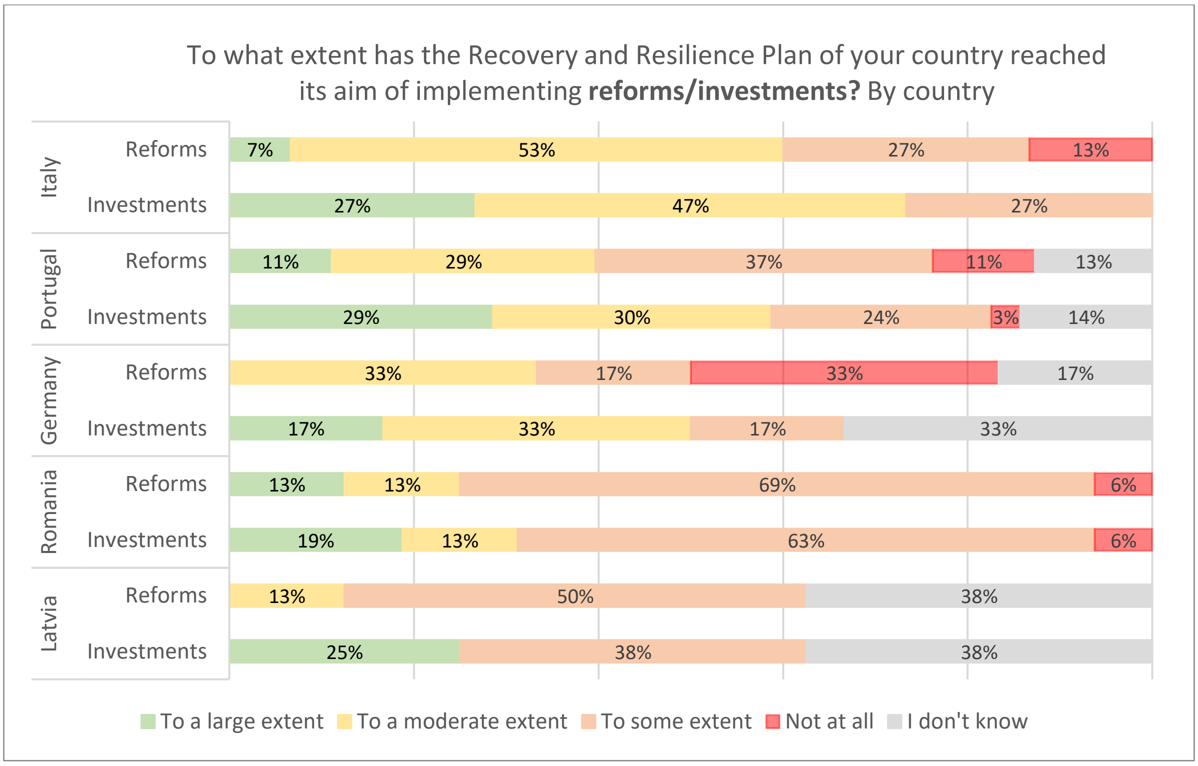
General conclusions

Asked to what extent their respective country's Recovery and Resilience Plan (RRP) had reached its aim of implementing reforms / investments (**Question 1**), the respondents held more positive views on the success of investments compared to reforms. Concerning investments, 89% of all respondents agreed that the RRP had reached this aim at least "to some extent" (22% - "to a large extent", 34% - "to a moderate extent" and 32% - "to some extent"). With regard to reforms, most respondents (40%) held the view that the RRP of their respective country had implemented reforms "to some extent" and 29% - "to a moderate extent", whereas 11% thought that it had not done so at all.

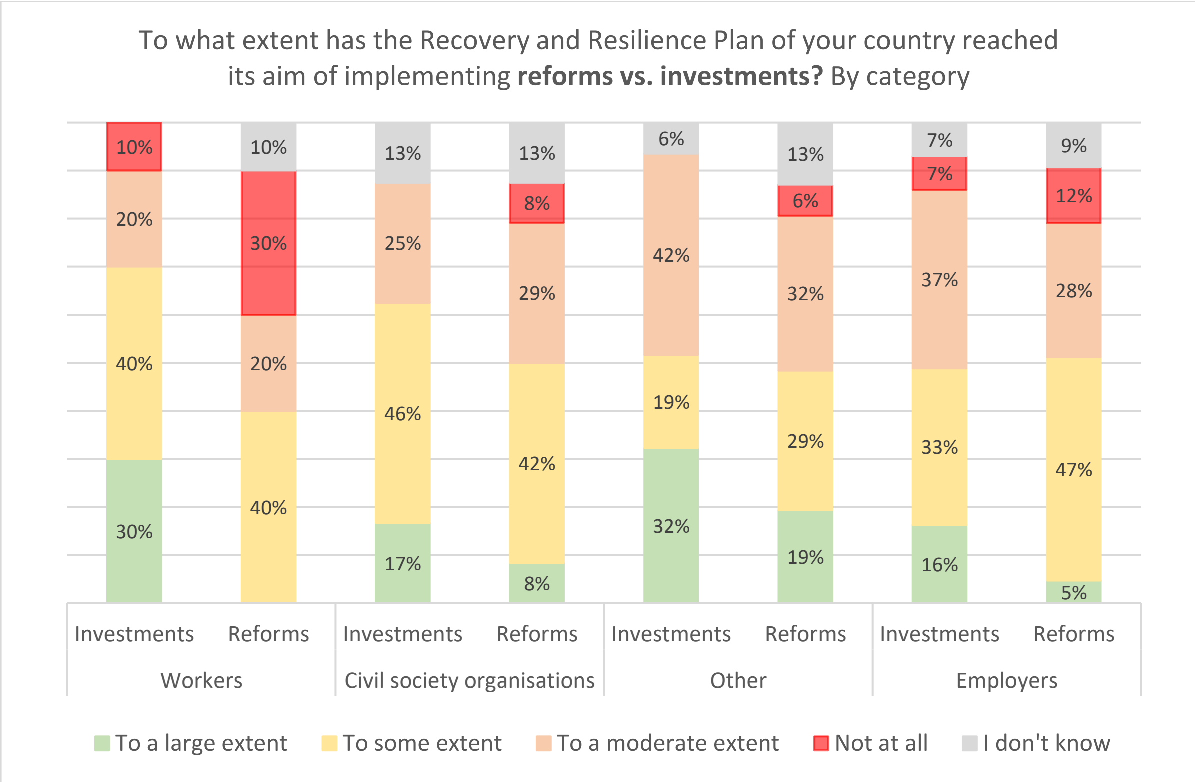
41 https://ec.europa.eu/info/sites/default/files/file_import/better-regulation-toolbox-47_en_0.pdf.



From a cross-country perspective, the views reflected the above results – in all five countries, the vast majority of respondents believed that investments had been carried out more successfully because of the RRP. The most positive views were held by the Italian respondents, 27% of whom said that investments had been implemented "to a large extent" (reforms – 7%) and 47% "to a moderate extent" (reforms – 53%), followed by the Portuguese respondents: 22% and 41% respectively for investments, and 11% and 29% respectively for reforms. The German and Latvian respondents were the least positive, with 0% for both countries assessing the implementation of reforms as having been achieved "to a large extent", and 33% (or 2 respondents) of the German respondents being of the view that it had not been the case at all.



Looking at the different categories of respondents, the views were quite consistent across the groups, with the majority of respondents in all groups assessing that investments had been carried out more successfully than reforms.



During the semi-structured interviews in **Latvia**, the stakeholders agreed that, overall, the RRP could be considered positive. However, its implementation was seriously lagging behind – a **delay in programme implementation** across all pillars was noted. In general, it was reiterated several times that the implementation of the RRF projects in Latvia had not yet started and that the whole process was extremely slow, therefore no mid-term evaluation could actually be carried out.

In this regard, a Latvian employers' representative expressed a general concern regarding a delay in the actual absorption of the planned RRF investments in Latvia. It was said that there were opportunities to invest in the Latvian economy, but they were not being used effectively. According to publicly available information on the website of EU funds in Latvia, the **level of absorption** in 2022 amounted to 4%.

In addition, **Italian** civil society representatives stressed that there was a problem with absorbing the RRF funds in the country. **Romanian** employers' representatives also noted that the level of absorption was low (36%).

Furthermore, **Romanian** civil society representatives stressed that the RRF was helping Romania to carry out reforms. Without this instrument, this would not have been possible. Romanian workers' representatives pointed out that it was halfway through the lifetime of the RRF and nothing concrete had been done so far in Romania. It was said that the RRF process was highly politicised in the country.

Furthermore, **Romanian** employers' representatives noted that there was a large deficit due to the delay in payment for the current years. Reforms and investments are significantly delayed. They could not, therefore, speak of the RRP having an impact because it had not yet been put into practice. **The delays in implementation are so significant that it is difficult to stick to the RRF timetable**. Lack of access to the World Bank report was also seen as a problem. The stakeholders noted it was clear that medium-term projects in Romania cannot be completed within the planned timeframe.

The representatives of **Italian** organised civil society (OCS) agreed that, in general, the effects of the RRP had been positive, and in certain cases, Italy's goals and aims had matched those of the six pillars. Delays in implementation were noted as well.

The **weight of bureaucracy** was stressed as the main problem slowing down the RRF process in **Latvia**. The huge administrative burden (stemming from the Commission) was said to still be increasing. However, it was underlined that the Latvian public authorities were adding to this burden at the national level. In this regard, a representative from an industry association stressed the slow pace and illogical pre-conditions/requests, stemming in particular from the regulations put forward by the Council of Ministers in order to implement the RRF. **It was also noted that the bureaucracy and administrative burden had increased compared to other EU-funded programmes**. The view was expressed that it was not normal that administrative costs made up half of the programme implementation costs.

The representatives of **Italian** civil society agreed that **the biggest problem was bureaucracy and the lack of simplification**. There have been administrative reforms, but not many. Italian employers noted that the RRP had led to an increase in an already very large public sector, while the existence of the necessary competencies/capacities remained questionable.

The **German** social partners also stressed that the **implementation of the plan represented a huge administrative burden for them**, including this evaluation process. The disbursement of funds is slowed down by the need to achieve the milestones and objectives set out in the plan. The municipalities and cities involved in carrying out the plan are also unable to implement it due to a lack of administrative capacity. The trend is for them to be given more and more rules to follow, which makes it difficult to adapt to their level. This affects their work. **There is a need to simplify calls for tender for EU/RRP funds**.

With regard to administrative capacity, the **Romanian** employers' representatives noted **that the RRF could solve problems that would not have been solved without this tool**. The money goes to central and local authorities. The big problem is the lack of experts capable of preparing and carrying out plans with EU funds. They do not have the experience/support to apply for these EU funds, so they turn to national money instead. It is a problem of understanding. The RRF could solve many problems if we could first solve the issue of administrative capacity and understanding.

Additionally, there was **serious concern about the ability to use the available funds within the planned timeframe** (i.e. before the end of 2026), and the lack of capacity on the side of public authorities, as well as the **capacity of dialogue**, was mentioned. For example, a view was expressed that the planned reforms in Latvia could have been more efficient if there had been more time for discussion (with civil society stakeholders). Digital skills were mentioned as an example – it had been planned to digitalise the work of the government and public authorities. However, by doing this, persons with disabilities and older people would be excluded. This example also showed the lack of focus on resilience.

Another critical point mentioned by an NGO representative was that Latvia as a country did not actually have enough **capacity to implement large EU funds**, such as the RRF (from the point of view of construction, technologies, human resources, etc.). Moreover, representatives from the social, education and health pillar questioned the ability of the RRP to achieve a sustainable impact, relating to a perceived inability to continue carrying out RRF reforms with national budgets at the end of the financing period.

Romanian workers' representatives agreed with the above, saying that the RRP could not be implemented properly in the long term, as Romanian beneficiaries would not be able to absorb a huge amount of money because of the deadline set and they did not have the administrative capacity to do so.

Finally, representatives from several industry associations in **Latvia** stressed that **the industries – up to this point – had received zero RRF funds** and the economic transformation had not truly started. The associations had understood RRF as a quick and effective remedy to help the Latvian economy to recover from the COVID-19 crisis, helping enterprises not only to recover but also to grow. However, the RRF process had turned out to be slow and bureaucratic, and could be said to be "a source of endless frustration".

In the interviews in **Portugal**, stakeholders expressed concerns about the RRP timeline and the risk of losing financial support if projects are not carried out on time**. This pressure may lead to suboptimal choices for the country**. **The pressure of meeting deadlines restricts the utilisation of the RRF**. This is especially the case in post-crisis Portugal, where inflation is high and the funds are not adjusted accordingly, placing additional burdens on companies. Participants underlined that, on a positive note, the RRF does promote investments in Portugal. The state's ability to provide public assistance is limited, and it would not have the capacity to promote the same number of investments without the RRF.

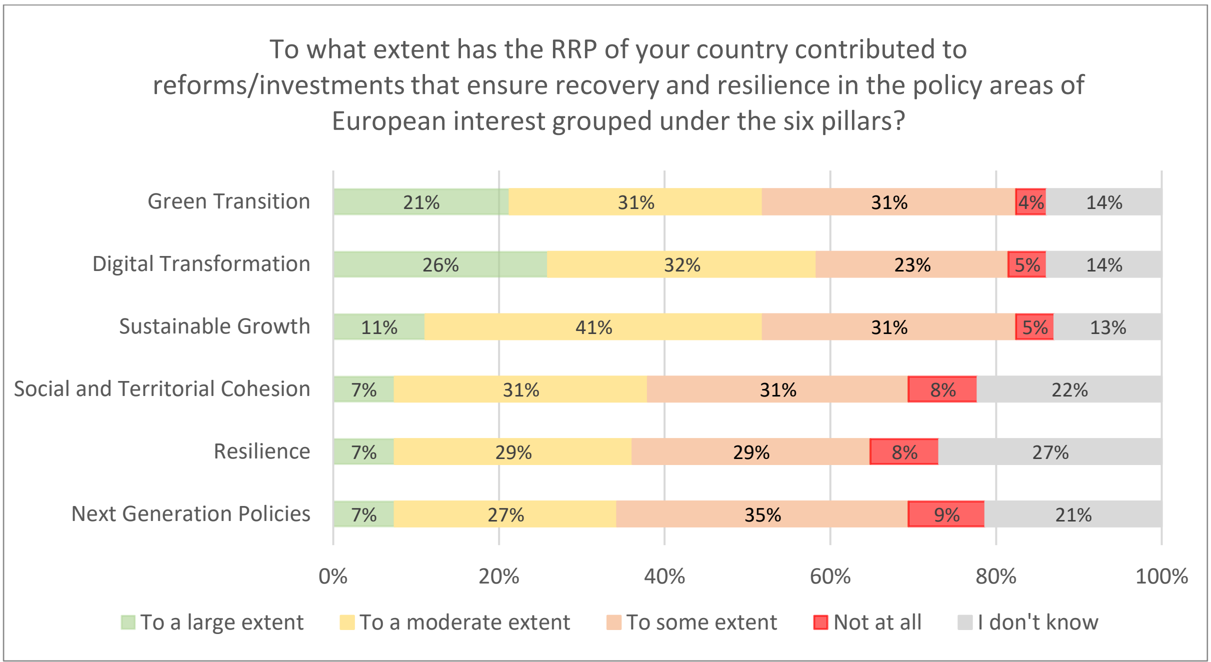
The Portuguese beneficiaries pointed out that the RRP was still at the initial stages of project implementation and, so far, has had a limited impact on the country's economy. They mentioned that **project deadlines were highly ambitious and that there had already been delays of several months and obvious financing shortfalls**. Social partners underlined that the overall implementation rate stood at only 12%, despite the programme concluding in 2026, with three years remaining. Only 17% of the milestones and targets have been met. Portugal needs to use EUR 482 million EUR per month over the next three years in order implement the RRP in full.

Additionally, participants believed that **the way in which funds had been spent was not in line with the intended purposes**. It was acknowledged, however, that Portugal was not lagging behind other countries in making RRF investments. Several reasons were cited for the low execution rate, including heavy bureaucracy, challenges in public procurement, lack of empowerment, and difficulties faced by recipients in meeting requirements and filling out paperwork. Despite the low execution rate, participants believed that they were in a better position compared to past experiences of receiving EU funds, and that ongoing RRF-funded projects had the potential to contribute to territorial cohesion.

Beneficiaries in **Portugal** maintained that they were **lacking timely, coherent, transparent clear communication from the public authorities**. There had been instances where rules of procedure had been changed midway through processes. For instance, when official guidelines on procurement were circulated (1.5 years after the approval of the first projects), some companies realised that up until then they had filed expenses in a different (non-accurate) manner. If the necessary information was not provided at the right time, it should not be acceptable to be penalised retroactively.

Regarding cooperation with the government, a big challenge has been **inconsistencies in the rules and guidelines**, which had previously forced companies to change their approach mid-process. Public and monitoring authorities had failed to respect rules that had been laid down in the initial agreement, which created additional workload and implementation delays. Moreover, some shortcomings had been experienced in the coordination between different ministries.

Respondents were also asked to give their opinion on the extent to which their countries' RRP had contributed to reforms/investments that ensure recovery and resilience in connection with each of the six pillars[42] **(Question 2)**. Overall, more than 50% of the stakeholders believed that the programmes contributed to a large or at least moderate extent towards the green (52%) and digital (56%) transitions. Only between 4% (for the green transition) and 9% (both in cohesion and future generation policies) thought that the RRP did not contribute at all to each of the pillars. Another sharp distinction was in the percentages of respondents who did not know if the RRP contributed to each of the pillars. Whereas only 13-14% were unaware of the RRP's contribution to the first three pillars (green and digital transitions, and smart and inclusive growth), the percentages ranged from 21% to 27% in the last three pillars (cohesion, health and social resilience and policies for the next generation).



Analysing the results across the type of respondents, the most positive were those belonging to "other" organisations (including academia, research, training and social institutions), where only one of the 31

42 These can be found here: Recovery and Resilience Scoreboard (europa.eu).

respondents indicated that the RRPs have not contributed in only a few of the pillars. The second most positive were employer organisations and companies, where only 2-9% believed that the RRPs have not contributed to any of the pillars. Among the worker organisations, one of the 10 respondents said the RRP did not respond to any of the pillars. Another also had a negative view concerning pillars 4 and 5. Among the 24 civil society organisations, the results were significantly less positive, with negative evaluations ranging from 8% (pillars 1 and 2) to 21% (pillar 6). Also noteworthy was the uncertainty in this category, with a fifth to a third of the respondents reporting they did not know whether or not the RRP had contributed to the different pillars.

Analysing the results across countries, it is noticeable that the most positive feedback was received from Italian respondents. There was only one negative evaluation of pillar 6, and stakeholders were especially positive concerning pillars 2, 3 and 1 (in that order). The views of German respondents were more on the negative end of the scale. For three pillars (Resilience, Next generation policies, and Economic growth), at least half of the 6 respondents indicated they either did not know or did not believe that the RRP contributed to the pillar. Answers were more moderate in Latvia. While there was only a maximum of one negative evaluation from the 8 respondents, several of them reported they did not know. This was especially the case in pillars 5 and 4, where at least half of them had no knowledge of the input of the RRP. The evaluations of the 63 Portuguese respondents were largely positive, though with significant amounts of uncertainty, with 80% answering that the RRP contributed to the first three pillars to some extent. Whereas only a maximum of 6 answered that it did not contribute to any of the pillars (the 4th, namely), at least 11% of the respondents still reported they did not know to what extent it contributed to any of the pillars, with 25-30% making this point regarding pillars 4, 5 and 6. Finally, Romanian stakeholders gave mostly positive responses (8 to 10 respondents believed the RRP contributed to the different pillars to some extent). The most positive answers concerned pillar 2, and the most negative and expressing most uncertainty concerned pillars 5 and 6.

During the semi-structured interviews in **Latvia**, it was revealed that **programmes in the area of energy efficiency** were currently being used most actively, whereas, in terms of digitalisation and innovations, the progress was quite slow. With regard to digitalisation programmes, it was said that the idea, goals and design of digitalisation support programmes had indeed been positive. However, the implementation of these programmes was extremely poor. Several years had passed, and only now had the programmes started, albeit slowly .

In this regard, the **definition of the conflict of interest was mentioned as a huge problem**, as it was still not clear how to tackle this issue, and nobody so far had been able to explain it properly. A request was made to the European Commission to provide guidelines on how such a small country like Latvia with a very limited number of digital professionals and enterprises can actually implement these programmes if the conflict of interest is defined literally.

An NGO representative noted that reforms in such areas as, for example, reducing inequality and building resilience were barely noticeable.

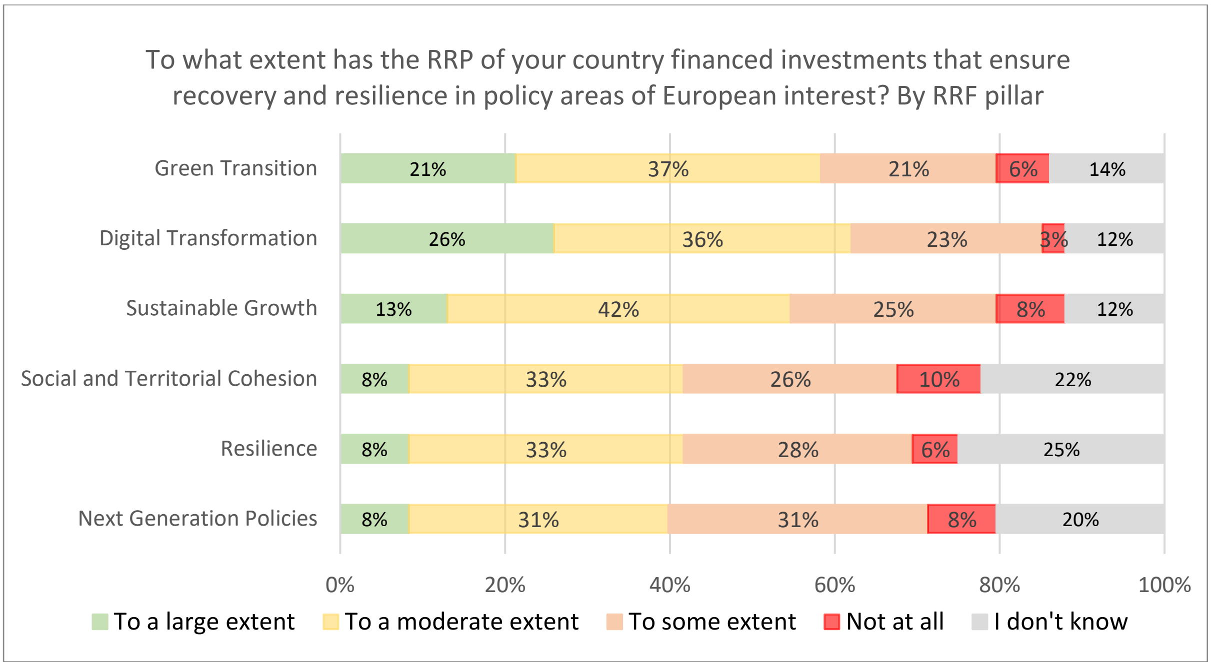
Furthermore, it was said that the youth and next generation pillar was the only one of the six RRF pillars which did not have its own section in the Latvian RRP, even though support for youth had been incorporated in other competency areas, for example, digitalisation and inequality reduction.

On the social dimension, German civil representatives noted that **disadvantaged groups** must be taken into account, and adolescents and young people must be more supported by the RRP.

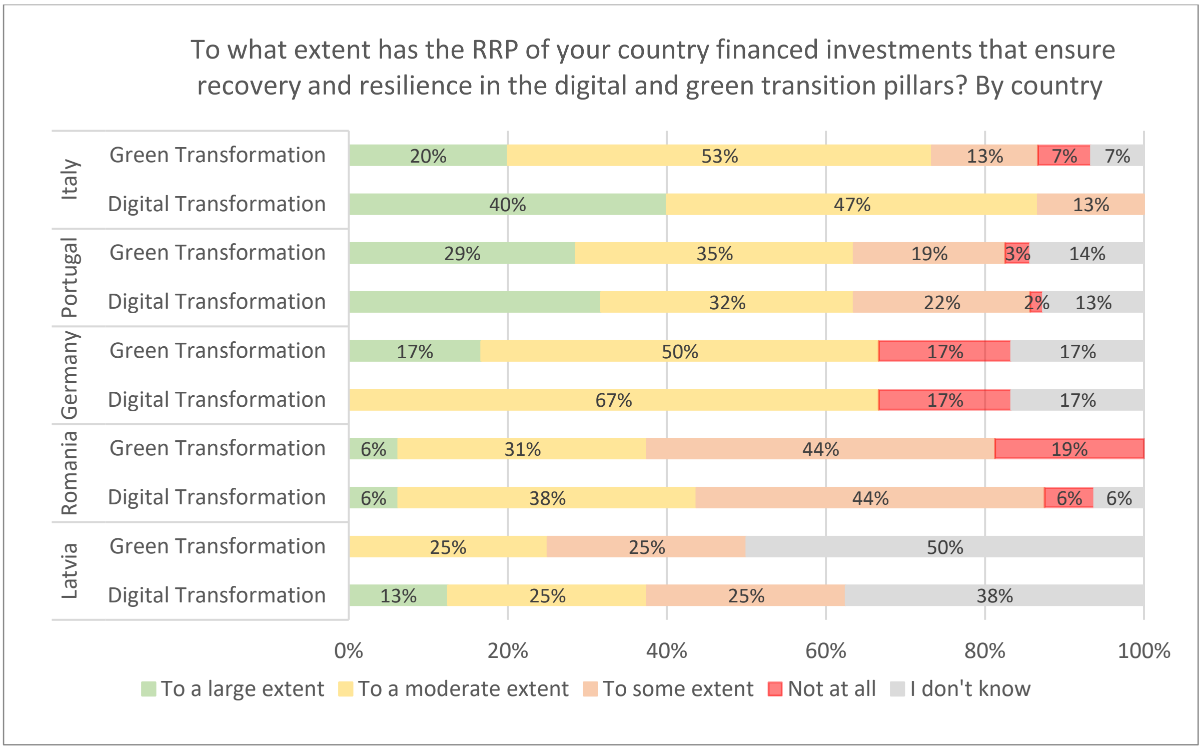
Regarding the **principle of "Do No Significant Harm"**, it was said during the interviews in Latvia that at the moment it was not clear how it would be implemented/applied. Due to a lack of understanding of what it means, there was a risk of infringing this principle when implementing the national RRP in Latvia.

Furthermore, the **Romanian** employers' representatives noted that, with regard to the green transition, in some guidelines, the "Do No Significant Harm" obligation is not entirely relevant to certain areas. This makes it difficult to implement. It is therefore not certain that the effects of certain types of investment are obvious to achieve.

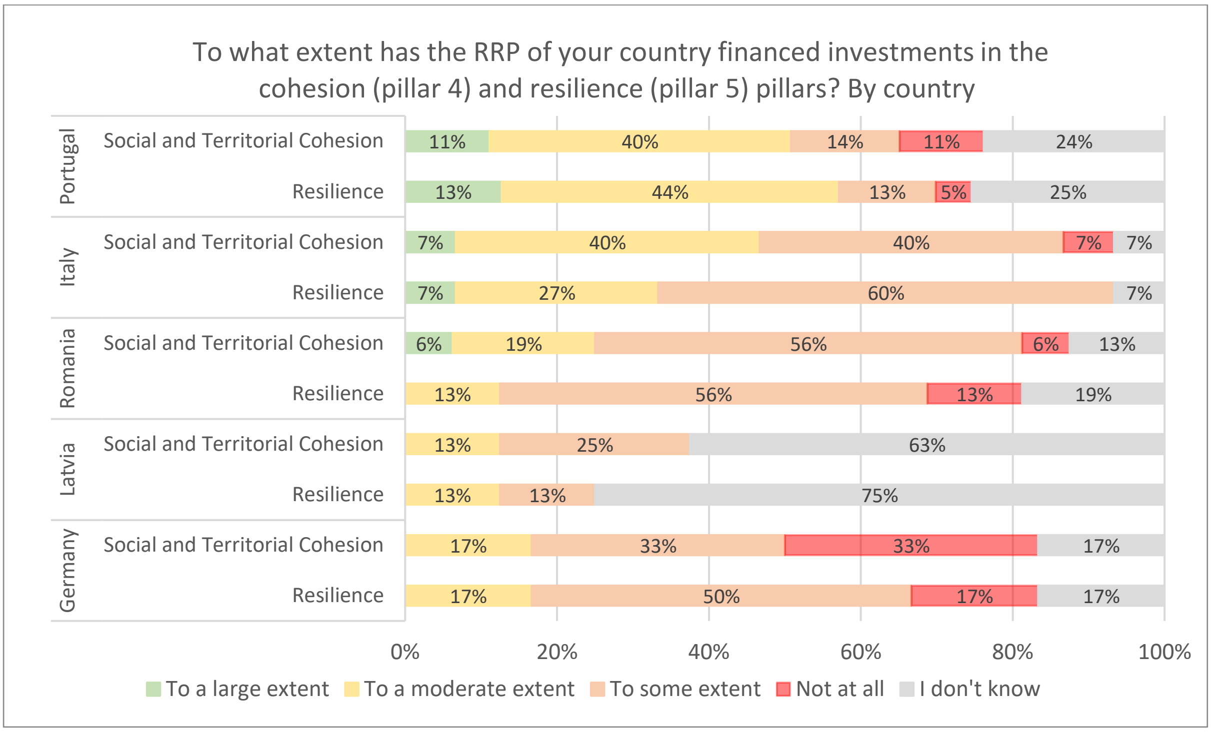
<u>Asked to what extent their country's RRP financed investments that ensure recovery and resilience in policy areas of European interest grouped under the six pillars</u> **(Question 3)**, the respondents gave the highest assessment to the 1st (Green transition) and the 2nd pillar (Digital transition), with 21% vs. 26%, considering that it had happened "to a large extent", and 37% vs. 36% "to a moderate extent". The lowest assessment was given to the 6th Pillar (Policies for the next generation, children and young people, such as education and skills), where only 8% of the respondents considered that the RRP of their country had financed investments under this pillar "to a large extent", whilst 31% thought it had done so both "to a moderate extent" as well as "to some extent".



From a cross-country perspective, slight differences to the above were noticeable: in Italy, Latvia and Romania, the 2nd pillar was perceived as having received the most investment, with 87% of the Italian respondents considering that it had done so "to a large/moderate extent", and 44% of the Romanian and 38% of the Latvian respondents sharing this view. By contrast, in Germany and Portugal, both the 1st and the 2nd pillars were rated as having equally received investment "to a large/moderate extent", with 64% of respondents saying so in Portugal and 67% in Germany.



Regarding the least investment received, respondents in Germany and Latvia believed this applied to the 4th (Social and territorial cohesion) and 5th pillars (Health, and economic, social and institutional resilience), with 17% of the German and 13% of the Latvian respondents in both pillars both providing the assessment "to a moderate extent" and 0% "to a large extent".



During the semi-structured interviews in **Latvia**, representatives across all sectors were concerned about the **timeline of the RRF**. For instance, representatives from the education pillar believed that the speed with which the project was being carried out was insufficient, creating a substantial risk that some of the funds allocated to higher education might not be discharged within the RRP's implementation period. For instance, the implementation of digitalisation reforms in universities had only gained momentum at the beginning of 2023. They underlined that **rather than being in the middle of the RRF process, Latvia was still in the very initial stages**. Representatives from the health pillar mentioned that, if the goal of the RRF was to have a new, inclusive and sustainable reform approach, it would require **more systematic involvement of various stakeholders and a longer timeframe**.

The opinions on the effectiveness of how the RRP reforms/investments were being carried out differed by sector, with healthcare representatives appearing most satisfied. They said that Latvia was moving in the **right direction concerning the goals to increase human resources and skills in healthcare**, with the Ministry of Health and NGOs carrying out relevant measures (e.g. development of methodological guidelines) and investing in R&D. However, they criticised the fact that partners for RRF funds had been selected on a per-project basis, which risks of creating a **fragmented landscape in which continuity of cooperation and lasting benefits could not be ensured**. Moreover, having funds too spread out could lead to failure to achieve the desired results and healthcare representatives suggested introducing a quota system on some tender applications to exclude certain institutions from participating.

Representatives from the social cohesion pillar perceived the RRF mechanism as a very temporary solution that could not create permanent results and regretted that there was no legislation regarding what would happen once the RRF's financing period was over. Representatives from the health, social and education sectors underlined that the RRP's **effectiveness was limited by its inflexible nature and inability to adapt to changes in conditions/circumstances**. They said that the RRF risked not achieving the desired, sustainable results if stakeholders' opinions were not listened to and the way in which the available money was spent was not gradually improved.

With regard to the **green transition**, **Romanian** employers' representatives noted that last summer the Ministry responsible had relaunched plans to access funds for environmental projects in the private sector. However, it is preventing SMEs from applying because the list of criteria is too broad.

Romanian civil society representatives mentioned the necessary reforms in the **transport sector**, which are very important and have an impact on society as a whole, had been neglected.

German social partners pointed out that all the measures that focus on decarbonising industry were not effectively linked to good practice criteria. Funds and subsidies are provided without sufficient verification of the effects on the ground. They also said that there were a lot of rules and too much red tape for SMEs, particularly in renewable energy investment projects.

Representatives from the **Italian** civil society stressed that Italy was one of the countries most dependent on Russian gas, so the transformation was seen as very timely. The aim should be structural and strategic independence. However, it was noted that networks (energy and informatics) were provided for in Chapter 2.2 of the Italian RRP, but they had never got off the ground. Certain ministries are still discussing, with each other and with the European Commission, energy cooperatives that are now way behind schedule – contrary to expectations. A particular example was mentioned: there is still no legal basis for "*isole solaria*" and "*agrisolaria*" concerning shared energy use and sale, and certain projects cannot be implemented because of a lack of agreement between local and regional authorities. These are examples of simple, but still unsolved problems.

Concerning the **digital transformation**, **Romanian** employers' representatives noted that this was the pillar that would have the most to gain from investment and reform if carried out properly. However, it was said that public sector employees did not understand that digitalisation did not mean losing their jobs but being more productive and providing better public infrastructure and enabling online services. In the public sector, there is a lack of communication between the various departments, not least because of this lack of digitalisation. In addition, current digital services were not used in the most efficient and integrated way possible. Progress has been made at central government level, but not necessarily at local level. At present, it is possible to set up a business online. However, obtaining a digital certificate to open a bank account is an ordeal, because the paper original is requested.

The **German** social partners said that digitalisation had great potential to shape industry. Public infrastructure in Germany is lagging behind and at the same time it is very bureaucratic. It is more important to review the concept: digitalisation is very important and there should be greater flexibility when implementing this plan. There is a problem with implementation: in the education sector, for example, there has been no progress. There are not enough skills to carry out these measures. Workers' prospects are inadequate, so qualifications and training are crucial.

Representatives from **German** civil society noted that regarding the digitalisation of the education sector, of course, digitisation was crucial, but disadvantaged groups must also be included to a greater extent in these digital activities. The digital gap must be closed through digitalisation that embraces the whole of society, and infrastructure must be provided for this. There is a need to focus on access to digital infrastructure. During the transition period, disadvantaged groups do not have access to this infrastructure and need more help.

With regard to **social and territorial cohesion**, the **German** social partners noted that measures existed, but social cohesion was barely included in the RPP.

Italian civil society representatives stressed that the particular morphology of Italy made territorial cohesion very difficult, and peripherality led to poverty. There is a 3-speed Italy: North, Centre and South, and specific steps should be taken to counter this.

Representatives from **Italian** civil society noted that more emphasis should have been given to the social aspects of the plan, particularly the health system and education. A key reform should be to simplify the rules for the social economy, and the priorities should be energy, local healthcare and education.

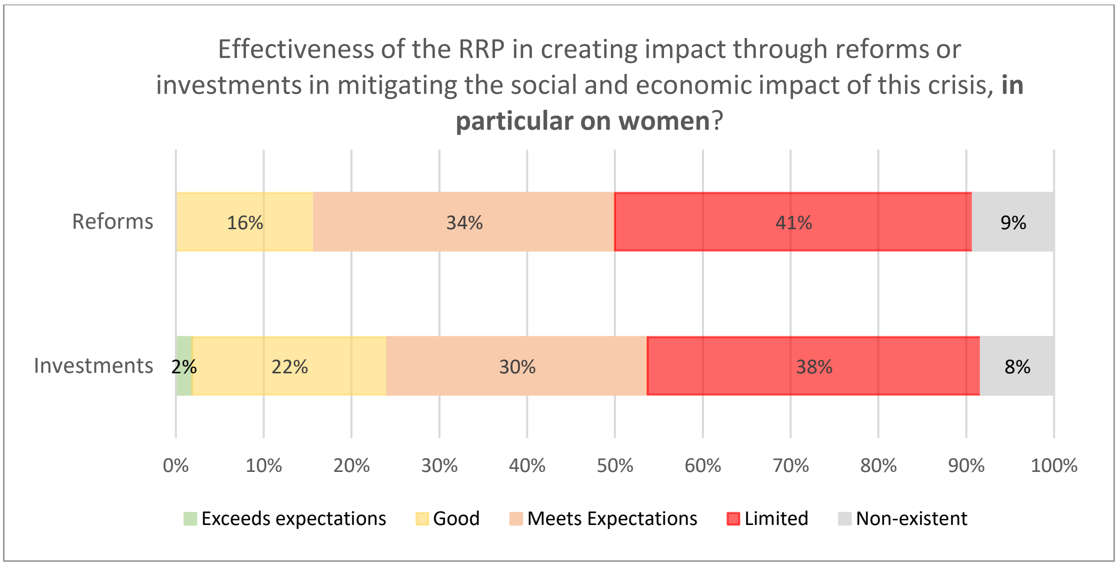
The Portuguese social partners stated that the basic pillars of the RRF – the green transition, digital transition and territorial cohesion – were not considered sufficiently in the Portuguese RRP. The plan does not focus on the main climate change-related challenges in the country that need to be tackled to increase the economy's/systems' resilience, such as water scarcity and inefficient resource management. On the digital transition, participants regretted that the RRP did not include comprehensive actions to reinforce the 5G coverage in the country. In general, European funds are provided with the understanding that their use is to be based on the specific circumstances and priorities of the relevant countries. There are, however, still restrictions related to funds including the RRF, such as meeting key targets.

Moreover, participants made the point **that agriculture had been completely and deliberately left out of the RRP**, despite there being a complete lack of a resilient farming strategy in Portugal. This is concerning, considering that Spain, for instance, has dedicated EUR 24.5 million to improve water efficiency in farming. A project called "Future Land", is the only RRP initiative that may be included in the works of the Ministry of Agriculture, and it only takes up about 0.4% of the RRF budget. Compared to this, 40% of funds are being invested in the recovery of infrastructure.

When the RRP was presented, people had high expectations of its ability to make a difference in critical areas. However, when taking a closer look at the proposed actions, the stakeholders perceive the reforms as being far removed from reality (with no consultation with the actors that can implement them on the ground) and not applicable in practice.

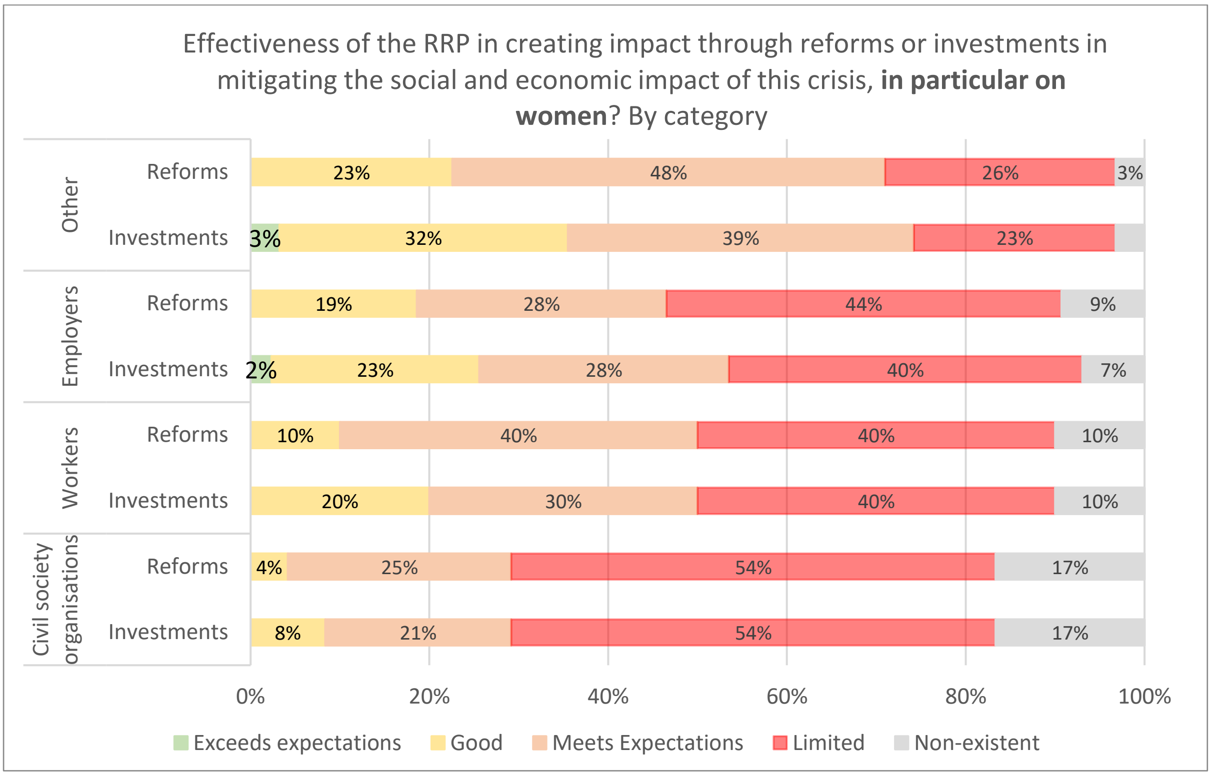
Specific conclusions

Regarding the overall effectiveness of their respective country's RRP in creating impact through reforms or investments (including spill-over effects) in mitigating the social and economic impact of this crisis, particularly on women **(Question 4)**, overall the respondents held very similar views both regarding reforms and investments. When it came to investments, 2% of the respondents even considered that the overall effectiveness of the RRP in this respect "exceeded expectations". The majority of the respondents, however, felt that the impact had been "limited" in both respects (41% for reforms and 38% for investments), whilst 34% and 30% respectively thought that it "meets expectations". Only 9% and 8% respectively held the view that the impact was "non-existent".

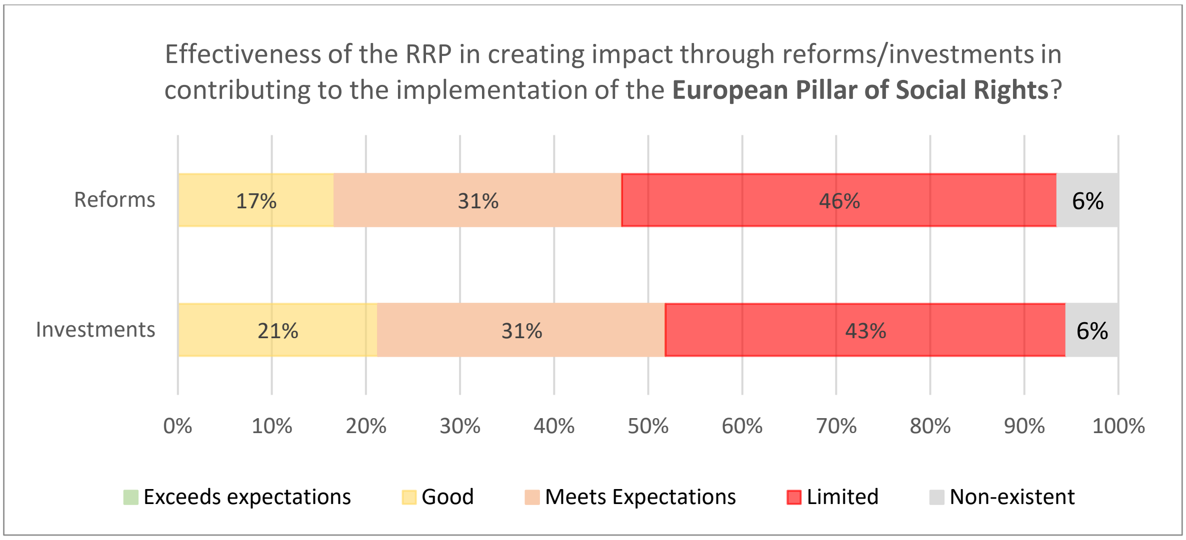


From a cross-country perspective, the results reflected the above, with a minor exception in the case of the Latvian and Romanian respondents, none of whom, with regard to the impact of reforms in mitigating the social and economic impact of this crisis, particularly on women, was of the view that it had been "good", as opposed to 22% of the Portuguese, 17% of the German and 13% of the Italian respondents.

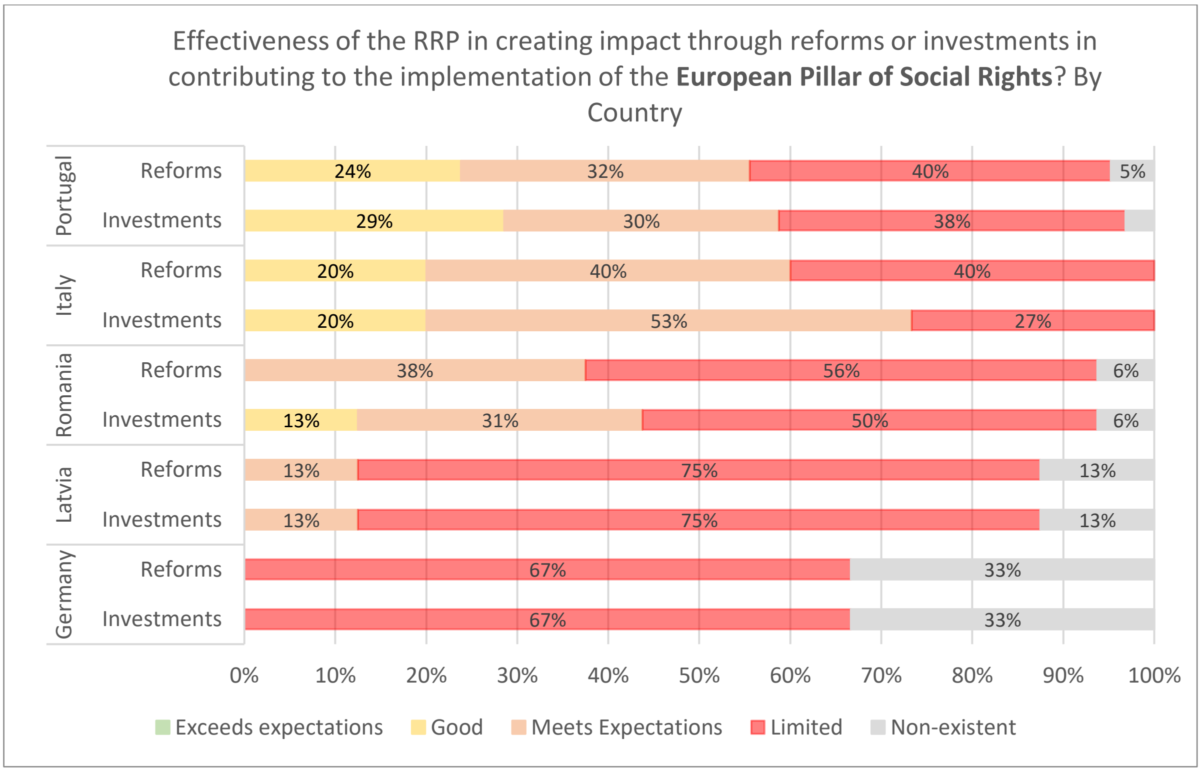
From a cross-category perspective, more pronounced differences were noticeable: employers' representatives held the most positive views (reforms: "good/meets expectations" – 19% and 28% respectively, investments: 23% and 28% respectively), whilst civil society representatives were the least positive (reforms: "good/meets expectations" – 4% and 25% respectively, investments: 8% and 21%; "limited" – 54% for both areas).



<u>Regarding the overall effectiveness of their respective country's RRPs in creating impact through reforms or investments (including spill-over effects) in contributing to the implementation of the European Pillar of Social Rights</u> **(Question 5)**, overall the respondents held very similar views both regarding reforms and investments, with the latter receiving a somewhat higher assessment (reforms: "good/meets expectations" – 17% and 31% respectively compared to investments: "good/meets expectations" – 21% and 31% respectively). The majority of the respondents, however, believed that the overall effectiveness of the RRP in creating impact through both reforms and investments in contributing to the implementation of the European Pillar of Social Right had been "limited" – 46% for reforms and 43% for investments.



From a cross-country perspective, some differences were noticeable: German respondents gave the most critical responses, with nobody being of the view that either reforms or investments had been "good/met expectations"; 67% (or 4 respondents) considered the overall effectiveness of the RRP in both areas to be "limited" and 33% (or 2 respondents) – "non-existent". In addition, the Latvian respondents held quite negative views, with only one respondent considering that the overall effectiveness of the RRP "met expectations" in both categories, whilst 75% (or 6 respondents) perceived the overall effectiveness of the RRP as "limited". The Portuguese respondents were the most positive, with 24% and 29% in favour of the reforms and investments, respectively, considering the RRP's overall effectiveness in this area to have been "good".

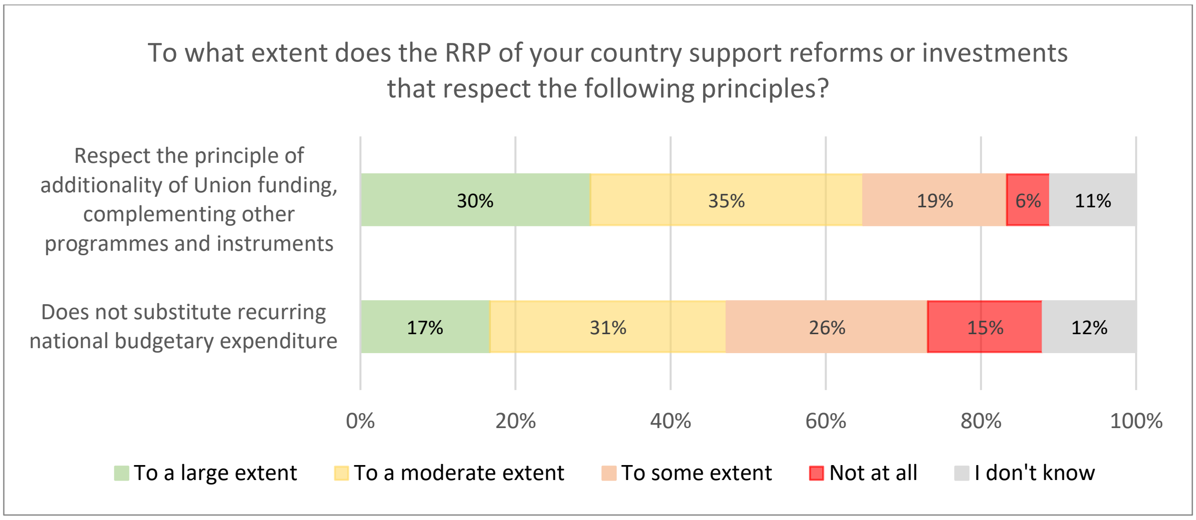


Social affairs were raised by **Portuguese** stakeholders, during the semi-structured interviews, as being not only a topic of relevance for the investments but **that the RRP's shortcomings in implementation relate to a large degree to labour market problems**. There is a lack of manpower which is rooted in the fact that labour is not duly valued in Portugal, which is a cross-cutting issue, from civil construction, to non-qualified workers, and even to highly qualified workers. There are fewer people interested in becoming civil servants, (e.g. due to unattractive salaries) which could impact negatively on the quality of the authorities overseeing transparency in the RRP. The lack of reforms in human resources, health and education, is also damaging the implementation of the RRP. There is an urgent need to improve the demographic resilience in the country, and therefore the RRP needs to address the issues of the population to a greater extent (e.g. quality work, housing, public services, mobility). Poor execution is primarily due to the absence of staff capable of carrying out their tasks. The value of labour needs to be increased to break the vicious circle.

Respondents gave quite positive answers when asked to what extent their respective country's RRP supported reforms or investments that respect the following principles: **(Question 6)**

- Does not substitute recurring national budgetary expenditure
- Respects the principle of additionality of Union funding, complementing other programmes and instruments (such as cohesion funds and InvestEU).

Between 70 and 80% of all respondents considered that the above principles were being respected in the reforms/investments supported by the national RRPs at least to some extent, with the second principle receiving a slightly higher assessment ("to a large extent" – 17% vs. 30%; "to a moderate extent" – 31% vs. 35% and "to some extent" – 26% vs. 19%).



From the cross-country perspective, the results diverged only slightly from the general trend. Notably, more of the German respondents (50% or 3 in total) considered that the first principle had been respected "to a large extent", whereas 33% (or 2 respondents) considered that the second principle had been respected "to a large extent". However, for both principles, 33% (or 2 respondents) did not know how to assess the degree to which the principles had been respected. In all other countries, a slightly higher majority of respondents considered that the RRP of their country supported reforms/investments that respected the second principle (of additionality of Union funding).

During the semi-structured interviews in **Latvia**, a civil society representative noted that one of the criteria for distributing the RRF funds in Latvia had been the unmet needs in the state budget, sometimes connecting the RRF goals put forward by the European Commission with current local needs in a very farfetched manner (for example, the improvement of working space for the firefighters connected to the mitigation of climate change). In this respect, the government explained that RRF funds were considered to be additional financing for areas where financing had been insufficient until now**. In this context, RRF could not be seen as an instrument for reforms but rather just an additional source of financing**.

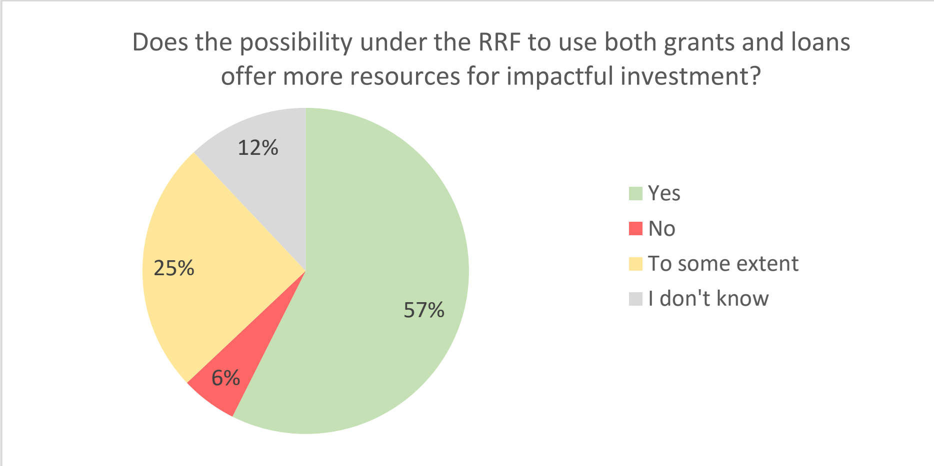
There was a **general belief among Portuguese participants that the main purpose of the RRF was to support Portuguese public administration and that the RRP did not comply with the complementarity principle**. Some participants criticised the fact that most RRF funding goes to central and local administrations (66%), with the goal of reinforcing the state's capacities and public investments, as well as expanding the availability of funds for administration while avoiding the use of national resources (to limit public debt). Participants regretted that only 44% of the RRP was reserved for the private sector, with the rest going to the public sector with the rationale that the state has to invest. Participants said that there was an excessive weight of public investment in the RRF and a lack of focus on companies and the economy in general, especially considering the RRP's goal to reform the Portuguese economy. Participants believed that the focus on public administration was created by the constant pressure caused by the RRF (and related EU measures including the European Semester) to reduce the amount of public debt. The participants noted that the public policy goals (e.g. Lisbon Strategy, the PT2020 Strategy, convergence) had mostly not been achieved. It was noted that the upcoming programme shared the same issues as previous programmes and it was therefore likely that public policy goals would continue to not be addressed adequately.

Portuguese beneficiaries **underlined that the overall implementation of the RRP was not going according to plan**, largely due to a lack of consistent rules for reporting and implementation. While they believed that the RRF would produce achievements in any case, a lot of valuable time and resources were being wasted on discussing what guidelines/codes should be applied in what situation, which was preventing the Portuguese RRP from performing to its full potential. **There is an urgent need to clarify/standardise the information sent out to recipients by managing bodies**, which is currently incoherent or even contradictory at times. Concerningly, the country does not have the appropriate authority to address these inconsistencies.

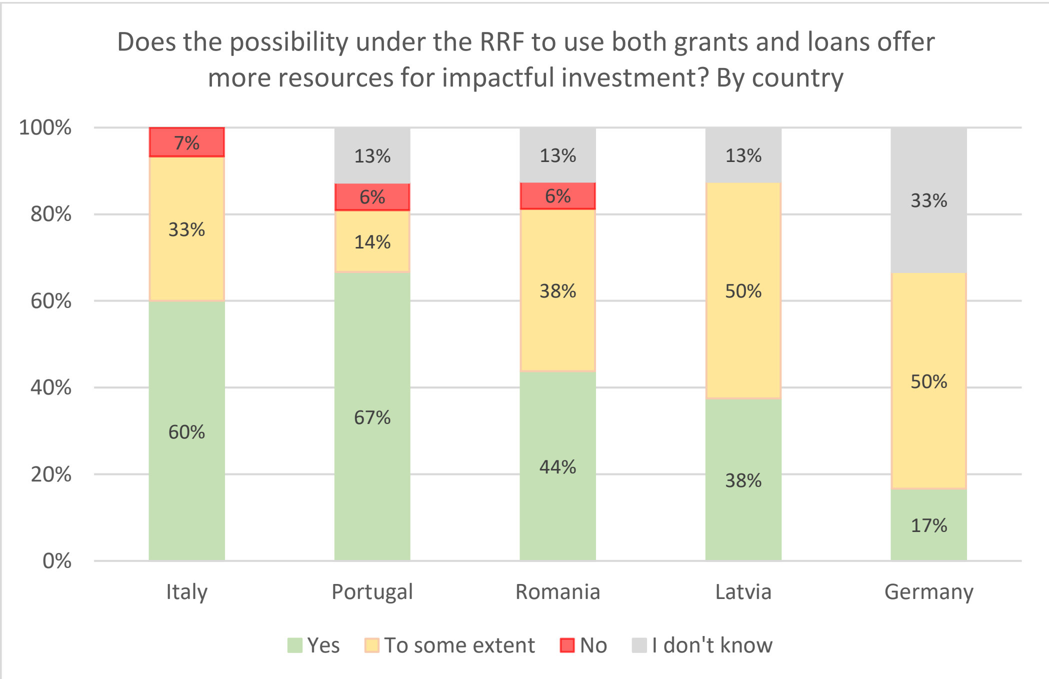
Beneficiaries mentioned that **clear rules and regulations were missing at the onset** of most of their projects, and frequently changed over the course of implementation. Moreover, intermediate bodies were not always capable of answering their questions given they were not sufficiently aware of the appropriate rules. In light of the short timeline of the RRF, one cannot afford to lose time and resources by starting to implement the RRF on terms that turn out to be erroneous.

Participants regretted that even after 40 years of being in the EU and having carried out many similar projects, the Portuguese public administration and the managing bodies continued to make the same mistakes. If the transformative potential of the RRF – or any other EU instrument – is to be harnessed, there is an urgent need for public authorities to acknowledge their flaws and change their working methods. Moreover, towards the end of the RRF's implementation period , the entire process should be rigorously assessed to ensure that the lessons are applied/used to improve future initiatives.

Asked whether they thought that the possibility under the RRF to use both grants and loans offered more resources for impactful investment **(Question 7)**, the majority of the respondents agreed with this statement (57%), while 25% thought that it was true "to some extent" and 6% disagreed.



Answers from a cross-country perspective were somewhat divergent, with the German and Latvian respondents being the least positive (17% and 38% respectively agreed and 50% (3 and 4 respondents respectively) answered "to some extent"), whilst 67% of the Portuguese, 60% of the Italian and 44% of the Romanian respondents thought that the possibility under the RRF to use both grants and loans offered more resources for impactful investment.



In terms of the different respondent categories, the views were quite similar across the three groups, with 58% of both employers and civil society representatives and 50% of workers representatives agreeing with the statement.

Some **Portuguese** stakeholders mentioned, during the interviews, that Portugal had a complex issue when it came to sustainability of public financing. They underlined that public administration had a central role in the country's development and that its shortcomings over time had led to a lot of the systemic vulnerability identified in Portugal. While 66% of RRF investments are technically reserved for public administration, a substantial amount of these funds ends up in the private/entrepreneurial sector through private procurement (e.g. investing in modern equipment, primary healthcare, housing). Instead, the main identified problem was the excessive dependence of public investments on European funding. Despite large investment needs, budgetary adjustments where Portugal has had to cut back on investments have always resulted in budget shortfalls.

Participants stated that public investments were political decisions which were being systematically used as an adjustment variable for what could be called budget consolidation. While the government claims on a yearly basis that there will be large increases in public investments (20-30%), the actual growth has been minimal. National financing as a proportion of public financing will remain very stable in relation to GDP. Participants expected there to be a global increase in public investments due to European financing, which will yield results from 2026 onwards.

Portuguese beneficiaries saw the added value of the RRF in promoting collaborative action. They praised the RRF for being an exceptional arrangement that allowed for the creation of consortia (e.g. between companies, academia, industry and public entities) on a disruptive and unprecedented scale. By requiring to act as part of consortia, the RRF has effectively established partnerships across agendas and projects, which create ample possibilities for future structural change.

The RRF allowed some institutions to conduct needs assessments and expand their activities (e.g. in scope or to include other geographical regions). Participants made the point that companies would have to start laying the groundwork that would allow them to ensure continuity of action and not lose momentum on their expanded fields of activity once the RRF ended.

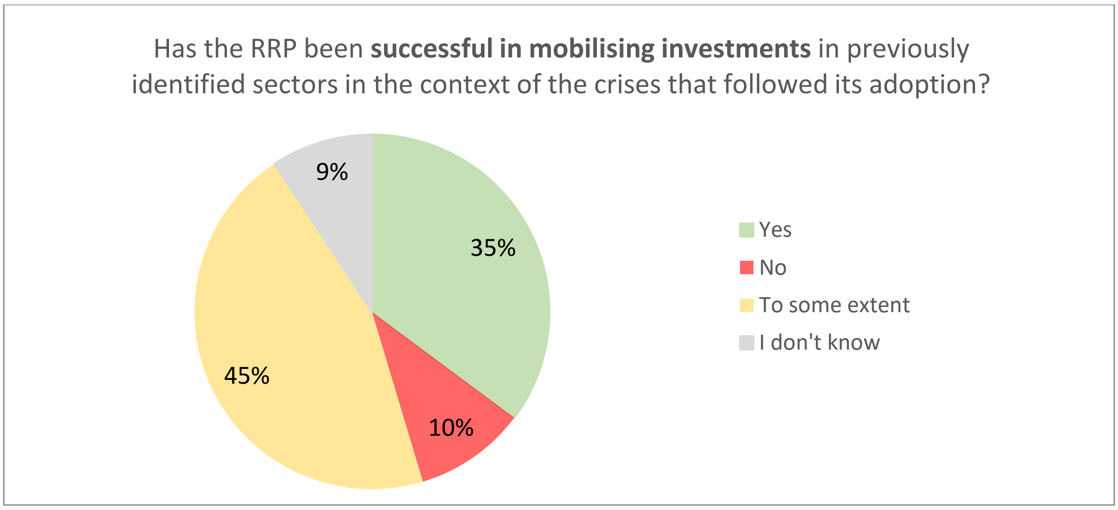
While the partnerships are very positive, beneficiaries pointed out that the novelty of working in large consortia, consisting of many partners and intermediaries, created additional implementation challenges which interfered with the timely execution of projects (e.g. differences in communication and interpretation). For instance, given the large size of consortia, the projects bring in unprecedented levels of funds that no single entity in the consortium is used to handling. Participants pointed out that several companies did not have the necessary capacity to receive and handle such financing and that, within huge consortia, only one company ending up in debt could result in projects coming to a complete standstill.

4.2.2 Relevance

According to the European Commission's Better Regulation toolbox, the criterion of relevance *"looks at the relationship between the needs and problems in society and the objectives of the intervention and hence touches on aspects of design. Relevance analysis also requires a consideration of how the objectives of an EU intervention (...) correspond to wider EU policy goals and priorities."* [43]

General conclusions

With regard to whether their respective country's RRP has been successful in mobilising investments in previously identified sectors that are still important for the country's economy in the context of the additional crises that followed its adoption (Russia's invasion of Ukraine, energy and inflation) **(Question 8)**, the majority of the respondents (45%) considered that it had been so "to some extent", whilst 35% agreed and 10% disagreed with the statement.



When it comes to the views in the different countries, they mostly reflected the above trend, namely, respondents in Romania (63%), Portugal (46%), Latvia (38% or 3 respondents), Germany (33% or 2 respondents) were of the view that their country's RRP had been successful in mobilising investments in previously identified sectors that are still important for the country's economy in the context of the additional crises that followed its adoption "to some extent". Only in Italy, did the majority of respondents (47% or 7 respondents) respond positively ("yes").

During the semi-structured interviews, a representative of an NGO umbrella organisation in **Latvia** underlined, as an important concern, the fact that the national plan contained many elements on recovery but what was and still **is missing – was the part on resilience**. Elements that allow society to react more effectively in times of crisis, such as the crisis management system, societal resilience, and self-organisation capacity, should have been included in the plan under the resilience pillar.

43 https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-47_en_0.pdf.

In Latvia, representatives from the health and education pillar appreciated the existence of a financial instrument to further Latvia's development and viewed the **six priority areas as relevant**. However, representatives from the social sector pointed out that **the interlinkage between the RRF's pillars** in the financial allocations and reform plans **had not been properly taken into account**.

German civil society representatives noted that the RRP had endorsed the measures as an activity that not only increased the EU's capacity to act, but also provided opportunities to incentivise investment and reform, which would not have been the case without this tool. The EU level was perceived positively.

Italian social partners noted that the green, digital and energy transitions were accelerating. However, this trend already existed before the RRP.

Asked about the <u>priority structural reforms that their respective country needs, and to what extent they have been included in the RRP of their country, and whether they are being implemented</u> **(open Question 9)**, the following points were stressed:

- Energy transition; climate change and the fight against water scarcity and the need for efficient management of this resource. It was said that in **Portugal**, the RRP did not address the issue of climate change, limiting itself to some interventions in two regions of the country, facing drought and water scarcity. None were being visibly implemented under the RRP.
- Reforms in the health sector.
- Economic reforms to make companies more competitive, creating jobs and promoting better salaries.
- Digital transformation, both in the public and private sectors, and increasing the resilience of companies. These reforms were included in the **Portuguese** RRP, but they were considered not to be enough, and the financial instruments were not suited to Portugal's circumstances.
- It was said that no important reform or direct significant investments had been made in the area of science in the **Portuguese** RRP, without which the country cannot achieve long-term innovative breakthroughs and a knowledge-based society.
- Reduction of bureaucracy. It was said that **Italy's** RRP did not include measures to cut red tape.
- Regarding the RRP in **Latvia,** it was said that there was a feeling that existing holes (in the budget) were being patched up and no sustainable systems were being built. For example, hospitals are being built, but there was no regular flow of people and financing. Apartments and houses are being adapted for people with disabilities, but there are no regulations which would make it possible to meet such needs in the future.
- Social and territorial cohesion, policies for the next generation, children and young people, such as education and skills.
- A true cohesion policy, and the **Portuguese** RRP was said not to cover this aspect.
- It was said that for Germany the priority structural reforms should be for instance: combatting insecure employment, strengthening collective bargaining, better training and reskilling of the workforce. These aspects were said not to be addressed by the **German** RRP.
- Digitalisation of the public sector; investments in the necessary hardware and software.
- Tax policy reform to facilitate the transition to a high added value economy, focusing especially on labour taxes, as they are an essential tool for promoting the economic transformation of **Latvia**.

- Reducing inequality – it was said that not enough funds were earmarked for this area in the **Latvian** RRP.
- Rule of Law, good governance, democracy and human rights, consolidating democratic institutions that are learning of the problems of citizens and organised civil society, qualitative social dialogue, transparency, enhancing transparency and democracy of the local administration institutions – it was said that the current political debates in the **Romanian** Parliament were far removed from citizens' needs.

During the semi-structured interviews, many of the **Latvian** civil society stakeholders stressed that the **distribution of the RRF funds at national level was based on a political agreement** ("divided" among the political parties and their interests in the budget) – hence the available funds were allocated in such a way that all priority areas would receive something without a thorough plan to solve the existing structural problems. In a way, it could be said that the decisive factor was not what was most needed in which area, but what had been promised to which political party.

An NGO representative expressed the view that the government's actions reflected a way of thinking that was less about future efficiency and more about quick politically motivated solutions. In many ways, it could be said that "Latvia missed its chance with the opportunities offered by RRF".

With regard to priority structural reforms needed in the country, it was said that the priorities in the national plan had been chosen correctly, even though more funds should be earmarked for the health sector which faces significant structural challenges in Latvia (the current allocation could be seen as a one-off financial injection). However, some concerns were raised as to whether these priorities would be implemented accordingly, as it was currently too early to judge.

Latvian healthcare representatives pointed out that there were persistent structural issues in the country's healthcare system, with **healthcare underfinancing contributing to inequality and economic stagnation**. Given these issues, they **strongly supported the RRFs investment plans** (EUR 61 million) in health systems.

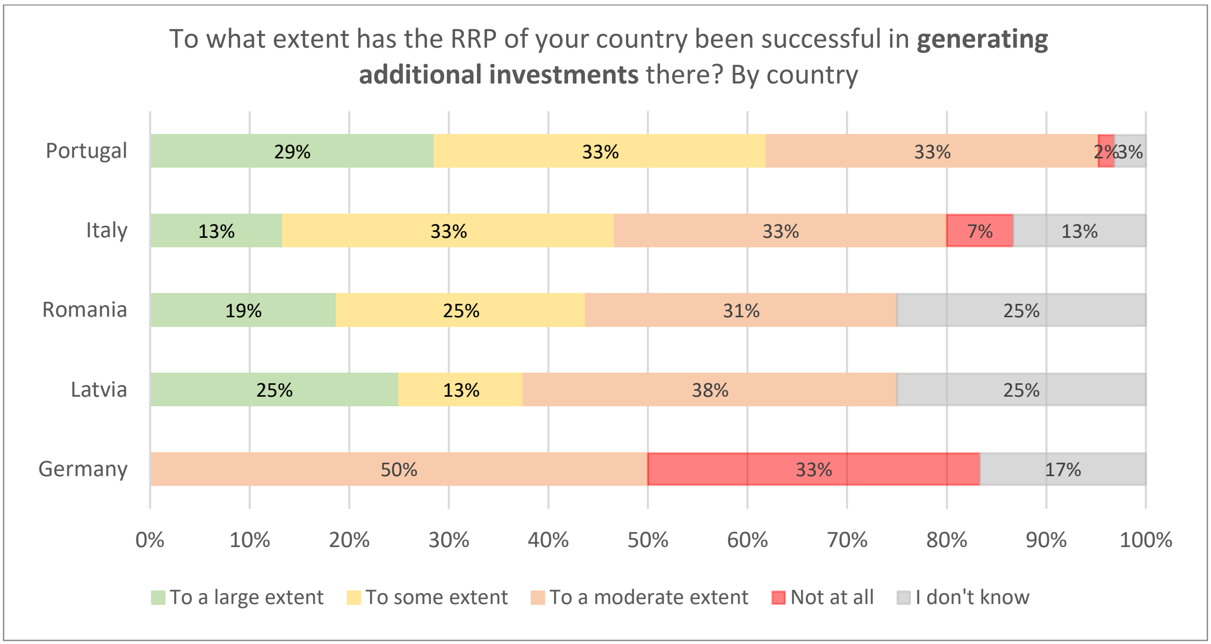
However, both representatives from healthcare and education mentioned that, by providing a lot of money to be spent in a limited period, the **RRF mechanism did not create favourable conditions for addressing national shortcomings** effectively and sustainably. Within the short RRF timeframe, it is impossible to carry out projects that will reinvent/transform a system fundamentally, especially if there is also a lack of ministerial capacity. Instead of targeting major systemic shortcomings, the RRF's format **encourages stakeholders to focus on relatively minor issues** that can be addressed within a short timeframe.

German social partners said that, as far as the reform aspect was concerned, and in particular insecure jobs, problems in education, etc., more **collective bargaining** was needed. Reforms which were already controversial in Germany and which are necessary were not included in the RRP. There are hardly any reforms in the RRP in this area and there are only reforms that everyone agrees on. Controversial issues are not addressed in the plan. The need to strengthen the pension system and the private pillar, for example, as highlighted in the CSRs, has not been taken into account.

German civil society representatives noted that there is a need for more significant reforms and a broadening of the scope of **public health**. A broader approach was needed. However, it is good that it is included in the RRP because it is a very underfunded sector.

Regarding the extent to which their respective country's RRPs had been successful in generating additional investments there (i.e. investments that would not have been made otherwise) **(Question 10)**, the majority of respondents (34%) thought that they had been so "to a moderate extent", whilst 29% were of the view that they had "to some extent" and 23% "to a large extent".

From a cross-country perspective, respondents in all countries agreed with the above trend ("to a moderate extent": 50% in Germany, 33% in Italy, 38% in Latvia, 33% in Portugal and 31% in Romania).



The only differences were noticeable in the cross-category perspective, where the majority of employers' and civil society representatives considered that their respective countries had been successful in generating additional investments there only "to some extent" (40% and 33% respectively).

During the interviews, **Portuguese** stakeholders stated there had been a lack of engagement by private companies, which is a problem that needs to be investigated and suggested that the credibility of the Portuguese development bank, and its reputation for long delays, might play a role in the low response rate for some projects. In some sectors, such as agriculture, there was a low investment rate because it was completely left out of the RRP process. Furthermore, it was mentioned that, in general, the offer/supply of goods and services was relatively limited in Portugal. **The ability to carry out current projects is limited by the short timeframe afforded by the 2026 calendar schedule**. In relation to private sector investment, the RRF conditions require consortia between many companies, R&D and universities, which does not correspond to what most private companies want. If there had been more relevant regulation and concern for the private sector, the impact of private initiatives/investments might have been greater.

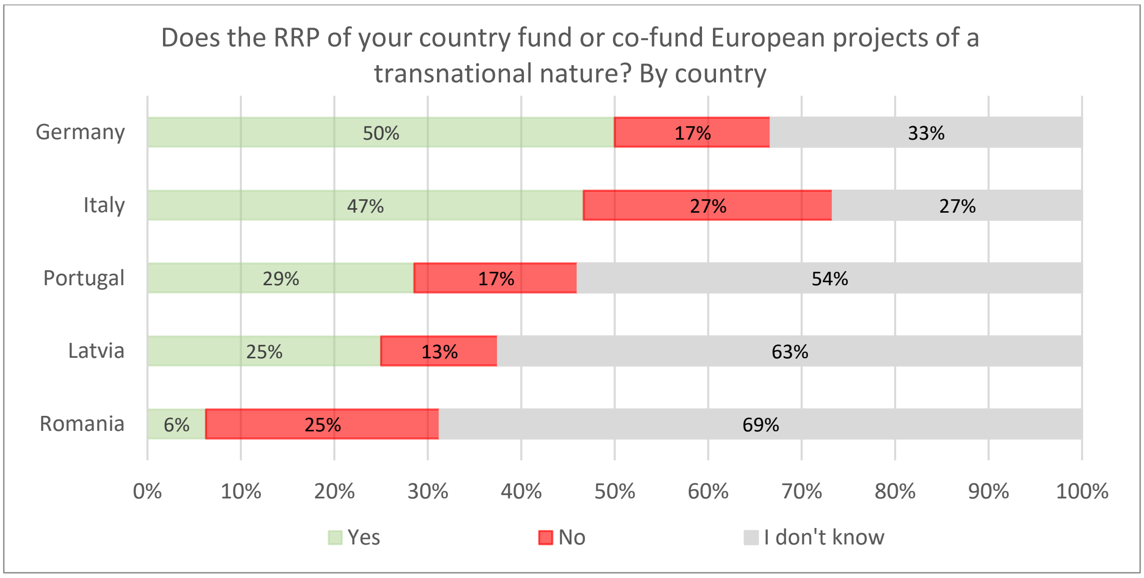
During the semi-structured interviews, the **Italian** civil society representatives **agreed that new projects had definitely been started under RRF**. Without the significant injection of funds, the green and digital transition would have been much more limited. However, the importance of the MFF should not be overlooked. Furthermore, many new targets have been identified and many of the new projects have effects that complement existing ones. It has also helped to reduce risks when starting up projects.

Italian social partners added that large investments had been made in infrastructure. However, the most important reform so far has been in the legal system.

The **German** social partners expressed the view that as far as investment was concerned, several important activities were included, and a large part related to eco-processing. But this would have been funded anyway. It is not thanks to the RRF. **In fact, 80% of the RRP measures would have been carried out as planned by Germany, with or without the plan**. They could therefore have been financed anyway. Hence, **there is no real added value in the RRP**. All the current measures are important, but Germany had already planned them beforehand and would have pursued them without the RRF. It had already taken this into account in 2020.

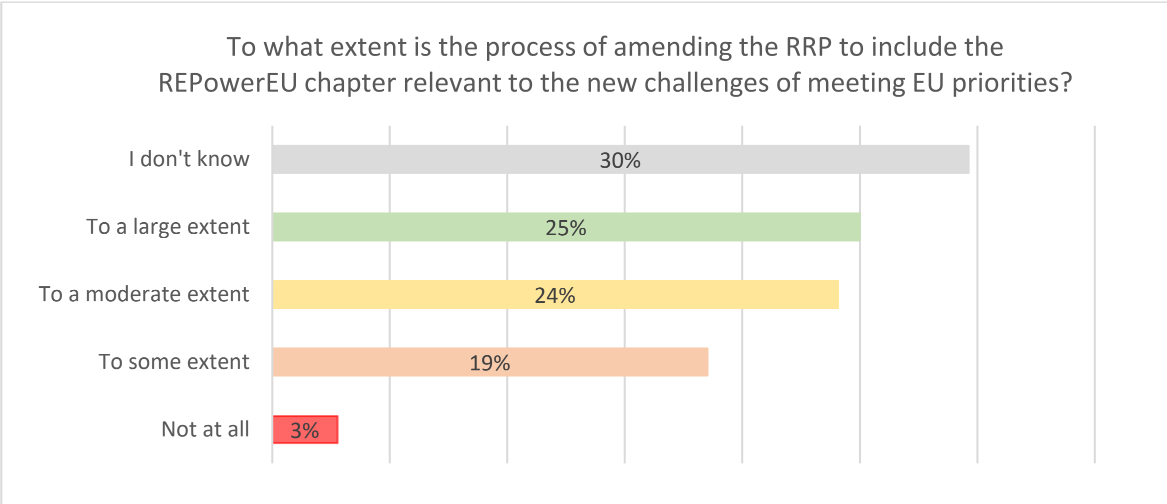
Asked whether their respective country's RRP funded or co-funded European projects of a transnational nature **(Question 11)**, the majority of the respondents did not know (52%), whilst 29% agreed and 19% disagreed.

From a cross-country perspective, views diverged with 50% (or 3 respondents) of German and 47% (or 7 respondents) of Italian respondents of the view that their countries' RRPs funded or co-funded European projects of a transnational nature, whilst the majority – 69% of the Romanian, 63% of the Latvian and 54% of the Portuguese respondents – did not have an answer to this question.



Furthermore, when looking from a cross-category perspective, the majority of the respondents from all categories did not know how to answer this question (60% of employers, 50% of workers and 42% of civil society representatives).

Concerning the process of amending the RRP to include the REPowerEU chapter relevant to the new challenges of meeting EU priorities **(Question 12)**, whereas half of the respondents said it was relevant either to a large (25%) or moderate (24%) extent, and only 3% of the respondents said it was not relevant at all, a very significant proportion (30%) did not know if it was relevant. Across the categories of respondents, the results were broadly consistent with the average. In terms of countries, Italy was the exception to this rule, with only one out of 15 not knowing if it is relevant. German and Latvian stakeholders were the least aware of the relevance of the issue. Portuguese and Romanian stakeholders reproduced the overall positive evaluation, with around 25-30% of respondents being unsure.



During the semi-structured interviews, the **Latvian** stakeholders agreed that the overarching goals of REPowerEU were useful.

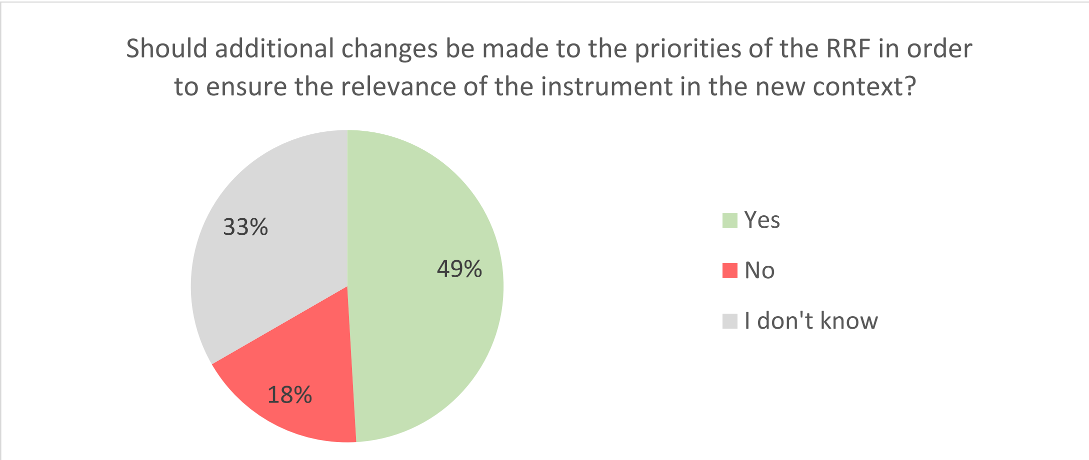
Furthermore, the **Romanian** employers' representatives said that new projects could not be launched under the REPowerEU chapter in Romania because of the lack of experts. They expressed concerns about the integration of the REPowerEU chapter: it is still secret. They were unaware of the content/nature of the final version approved by the government and sent to the EU. Moreover, large public companies have proven incapable of applying for these major projects. Participants were concerned that 99% of the reforms were based on government decisions and believed that more political decisions were needed. They were concerned about investments and losing access to potential money, as with the EU cohesion policy.

Moreover, they noted that, as far as REPowerEU was concerned, there was not enough time for the programming exercise. It appeared in a busy period, during which the cohesion plans were also produced, followed by the high-level programming for RRP and REPowerEU. Part of the programming exercise was carried out by the Ministry of Energy responsible for REPowerEU. However, there is limited administrative capacity to deal with this. REPowerEU should be entirely dedicated to SMEs and households, thus reducing energy poverty.

The **German** social partners were of the view that with REPowerEU, the recalculation and mid-term review would lead to an additional EUR 4.5 billion being received, which is a large sum of money, and would help fund existing projects. There are no new projects. However, the social partners would have welcomed it if the government had taken on board their recommendation concerning the need for more training and skills. The REPowerEU chapter proposes to do so but the government has not included this in the dedicated chapter.

Portuguese stakeholders mentioned that improving the resilience of any sovereign country required addressing some basic issues including energy, food and water (needed for industry, trade, agriculture, etc.). Portugal opted for hydrogen as an energy source, which is not being adhered to across Europe, and they risk remaining isolated. Regarding water resilience, there is still a complete lack of structural plans. Participants said there were only hasty decisions and propaganda, which is a serious danger to prioritisation and risk assessment. Participants were concerned with the relevance of certain targets (e.g. energy efficiency at 30% of buildings), which are too ambitious for certain sectors within the industry that have a large consumption due to energy-intensive factory equipment inside the buildings. There is mounting pressure from the EU for energy savings, and while Portugal does not consume that much energy, the same restrictions are imposed on all Member States. Some aspects need to addressed, such as comfort before savings. While some projects will initially be energy-intensive, since they involve building new systems/infrastructure, eventually they will bring about energy savings.

Furthermore, half of the respondents believed that <u>additional changes should be made to the priorities of the RRF in order to ensure the relevance of the instrument in the new context</u> **(Question 13)**, and one third stated that they did not know if additional changes should be made. Less than 20% believed that no changes were needed.



While employers, civil society and other stakeholders widely echoed the results of the ensemble, trade unions were very vocal (8 out of 10) about the need for these changes. Latvian and Portuguese respondents were the most unsure (50% and 40% respectively), while Romanian respondents were the most convinced of the need to introduce adaptations (11 positive answers against 2 negative, with only 3 on the fence).

When asked about <u>which specific changes they would propose</u> **(Question 13-a, open question)**, several stakeholders stressed that the inflationary crisis resulting from the Russian invasion of Ukraine, and the pandemic before it, put at risk many projects that had already been approved. The increase in the cost of construction material has been particularly serious, which, together with the lack of workers in the same sector, has delayed the implementation of investments. Flexibility in the amounts and projects covered by the programme, keeping in mind inflation rates, and flexibility in expenditure between different sections and pillars could improve and increase implementation. Given the difficulties in implementation, stakeholders from several countries believed the deadlines should be extended.

In terms of **procedures**, **Portuguese** stakeholders in particular referred to the fact that instructions from national authorities came late, contradicted previous instructions, and, given that different authorities monitored the same projects, also contradicted each other. This makes implementation difficult, brings a high degree of insecurity, and leaves beneficiaries not knowing if amounts already spent were submitted in the right way. Better coordination among national authorities and a reduction of unnecessary bureaucracy are thus needed. While gold-plating needs to be eliminated, some stakeholders suggest a move away from recurrent reporting tasks (which overload work for all beneficiaries, without much gains), and also focusing on stronger penalties for infractions. The emphasis should then be on the objectives and on executing the various projects rather than on monitoring their compliance.

Several stakeholders raised the importance of giving more attention to the green transition, though there were not many specific suggestions on how to do so. Several mentioned the need to invest in renewable energies.

Energy was indeed one of the recurring themes in the answers collected. Beyond renewables, stakeholders believed energy to be a pillar of any resilience strategy. The Union's energy independence has yet to take bigger prominence and become a goal/pillar of its own.

Continuing on priorities, several stakeholders mentioned **food sovereignty/security** as one area that needed more dedicated attention. Besides sustainability issues, agriculture and fisheries are crucial for resilience and security from the increasing geopolitical instability.

Other topics that respondents referred to as being critical were **housing, the technological sector and support for SMEs**. Several respondents referred to the issue of **skills**. As mentioned above, construction is a sector that is crucial for recovery and resilience, and one in which there are not enough workers. Beyond construction, the lack of skilled workers is felt across the economy, and stakeholders believed the RRF should help to overcome this.

Finally, while some stakeholders were of the opinion that public expenditure could help society become more resilient, more seemed to believe that more funds should be dedicated to generating private sector investments that cannot take place without an additional boost. Furthermore, private entities in the social sector believed they were at a double disadvantage in face of both state actors and private companies, being private entities whose projects generate public goods. Addressing this could work towards improving pillars 4, 5 and 6.

During the semi-structured interviews in **Latvia**, representatives from the health and social pillar believed that **repartitioning some of the investments across the RRP pillars would be necessary if Latvia was to achieve medium- and long-term benefits**. Concerning this need, they regretted that the national ministries lacked the capacity and agency to change the original RRP and reallocate money to fit changing circumstances. In fact, the Latvian Ministries had communicated to stakeholders that the RRF was an instrument wherein nothing could be changed once a project had been decided and initiated.

This explanation of the RRF methodology from the authorities was perceived as highly repressive, as such a system did not allow for addressing shortcomings detected during programme implementation (e.g. to address lacking competence in a specific project area) by reallocating funds.

Latvian healthcare representatives raised concerns that some sectors, notably digitalisation, required funding reallocation and more sustainable long-term investments (i.e. not short-term solutions).

During the semi-structured interviews in **Romania**, the workers' representatives expressed the view that **the RRP needed to be modified and renegotiated to fit the new context** – the plan no longer fit in with the current situation. Involving organised civil society is crucial in this regard.

Additionally, the Romanian employers' representatives agreed that flexibility was needed to implement the RRF. **It should not be impossible for the RRP to be renegotiated**, providing more room for manoeuvre in decisions over how much – and where – to invest in major infrastructure programmes. The RRF will no longer be in place after 2026, which is why this flexibility is crucial for this type of major project.

Romanian civil society representatives also noted that **some substantial changes should be made to the plan, particularly in the areas of education, tourism and transport**, among others. The content of the plan should be adapted, not only in terms of indicators but also in terms of reforms (e.g. social reforms) and investments.

The **Italian** civil society representatives were of the view that there should be more stringent criteria when identifying and selecting sectors in which to invest. Furthermore, they believed that the deadline for revision seemed problematic, but not impossible. They said that involvement, transparency and cooperation were issues that needed to be improved and discussed with the Commission.

Portuguese beneficiaries stated that there needed to be greater consideration for the fact that this mechanism was new for everyone, and that there **needed to be room for adjustments**. For instance, some participants revealed experiencing challenges meeting the KPIs set out in the original agreements, despite ample investments and efforts, given changes in circumstances within the country since the projects had been drafted (e.g. workforce recruitment targets).

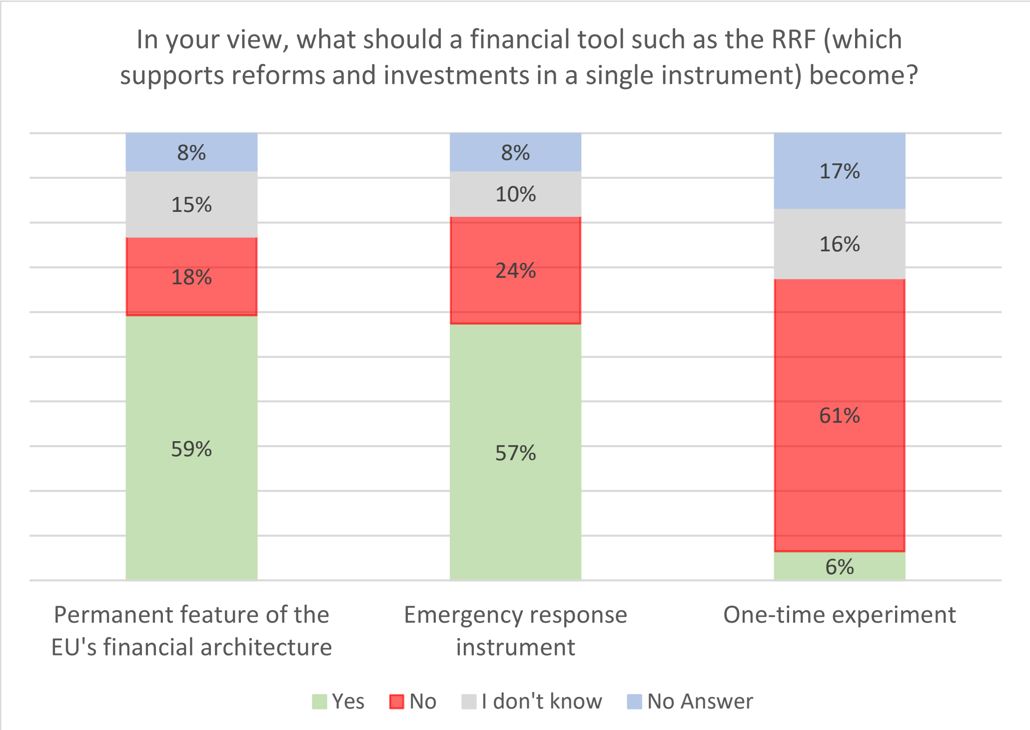
Participants stated that compared to projects of similar sizes implemented under PT2020 and PT2030[44], procedures and reporting requirements in the RRF were much more exhaustive. Inefficiencies and delays in public administration were placing large unnecessary burdens on companies, with some participants stating that they were forced to submit the same documentation up to three times because the initial submissions had expired.

The beneficiaries stated that there **needed to be greater investment in finding ways to assess the actual impact of the RRF** (e.g. on the economy, social areas, and environment), and to determine whether instruments such as the RRF could actually help Portugal take a leap forward. Moreover,

44 These consist in the partnership deals signed between Portugal and the European Commission, gathering the activities covered by the European Structural and Investment Funds. PT2020 covers the period from 2014 to 2020 and PT2030 the period from 2021 to 2027.

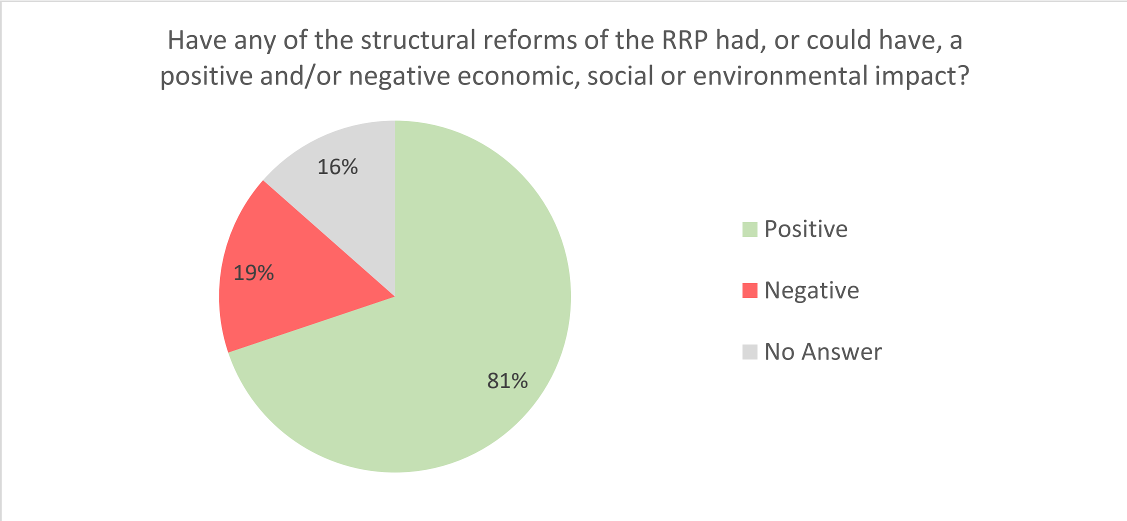
lessons from the RRF should be transposed into other structuring programmes, such as PT2030, which would be in force for a longer time.

A very expressive majority (approximately 60%) answered that a financial tool such as the RRF (which supports reforms and investments in a single instrument) should become a permanent feature of the EU's financial architecture, while only 6% said it should be a one-time experiment **(Question 14)**. The results were consistent across countries and types of respondents.



During the interviews in **Portugal**, beneficiaries stated that the **criticism on implementing the RRF in general – and in Portugal in particular – should in no way divert attention from the fact that, as a concept, it was a very positive tool** that could help Europe overcome the successive crises from the past years and reach higher social, economic, ecological and technological resilience. Some beneficiaries stated that they did not see the RRF as a tool to meet daily needs, but rather as an additional/exceptional opportunity to take quantum leaps that could not be taken otherwise. For daily matters, they mentioned other mechanisms, such as Portugal 2030 and the state budget.

Respondents were asked if any of their countries' structural RRP reforms had, or could have, a positive and/or negative economic, social or environmental impact **(Question 15)**. Stakeholders could choose to answer one or both options, or not to answer at all. 16% did not answer this question. Of the remaining 84%, almost all (81% of the total) answered that their reforms had or could have positive impacts, and about one quarter (19% of the total) answered that the reforms had or could have negative effects. These proportions did not change significantly across types of respondents, but they did change across countries. While Portugal's respondents closely echoed these percentages, of the 6 German respondents, 1 did not answer, and of the 5 remaining, 4 spoke of positive effects, with 3 also specifying negative effects as well. In Latvia, 2 did not answer, while the remaining 6 believed that reforms had or could have only positive effects. In Italy, only 1 respondent believed there were negative effects, against 12 who believed there were positive effects. In Romania, all 16 respondents believed there had been or could be positive effects, with 6 of these mentioning negative effects as well.



Respondents were also given the opportunity to write, in two open questions, if they thought the RRF could have positive and/or negative economic, social or environmental impacts **(Questions 15-a and 15-b)**.

Concerning positive impacts, multiple respondents believed that the RRF had been crucial in generating new cooperation between companies and research institutions. Several of these are of particular relevance for environmental and territorial cohesion (such as the bio-economy).

In social affairs, the RRF could contribute to better social inclusion, tackling unemployment and bridging labour market shortages through its focus on reskilling the workforce.

Topics that have been in public discourse – but not necessarily in public actions – have found new recognition and impulse thanks to the RRF. This includes in areas such as reindustrialisation and cybersecurity – both issues of high relevance in the current unstable geopolitical climate. Innovation and digitalisation (especially in public administration) have been repeatedly raised as positive effects.

Some respondents mentioned topics of particular relevance for regions of lower demographic concentration, such as water resources, reforestation, eHealth, and addressing demographic ageing.

Concerning negative impacts, multiple stakeholders criticised the very big presence of the state in the RRP, not merely as a regulator or a disburser, but also as an investor, increasing its weight in national economies and preventing the private sector from functioning properly. One of the stakeholders opposed this view, stating that the conditionality requirement acted against social welfare and was not part of the consultation with civil society.

Many contributions mentioned the inflationary effect of concentrating a large number of investments within a relatively small timeframe, while reducing the cautions needed to perform effective, durable investments. According to one of the respondents, the volume of investments at hand may lead to a new public debt crisis, as had happened after the increase in public expenditure after the financial crisis of 2007.

In this regard, some stakeholders criticised the lack of vision for long-term economic resilience and the lack of truly new and innovative types of investments grounded in significant structural reforms, which also hampered long-term economic resilience.

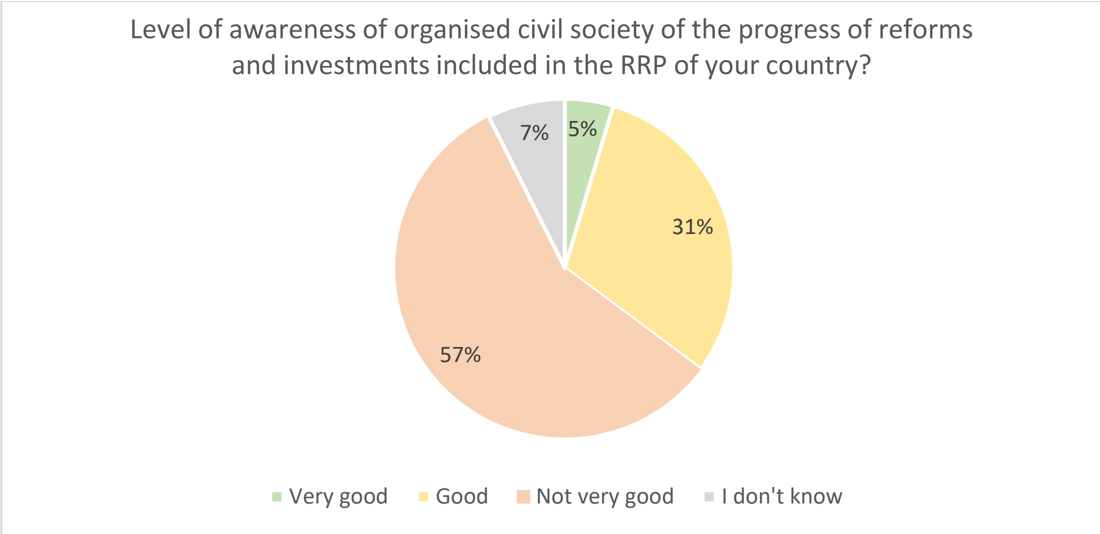
The sustainability of the impacts beyond the RRP was questioned by some, especially those covered by the European Pillar of Social Rights: employment, training and poverty. Two stakeholders criticised the lack of structural reforms in social policies and justice.

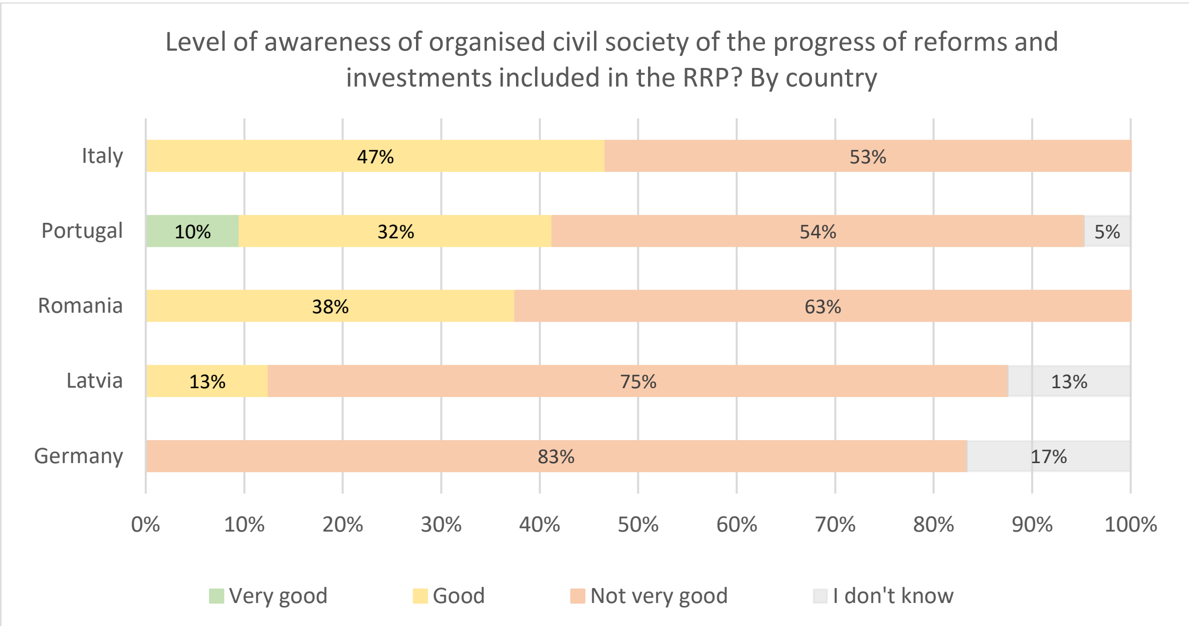
Portuguese beneficiaries from various sectors (healthcare, technology, textile) praised the EU initiative of creating an investment instrument such as the RRF, which offered organisations an unrivalled opportunity to expand and modernise their technological equipment, infrastructure, buildings and activities (e.g. vocational training). This is especially true in sectors with rapid technological advances and expensive equipment. The RRF leverages the ability of the institutions to conduct investments that they have been needing/wanting to implement for many years, but do not have the necessary budget and financing mechanisms to do so (e.g. digital and management infrastructure). The investment support of the RRF has encouraged companies to increase risks, and participants mentioned that without the RRF, they would not be able to carry out disruptive projects that represented major qualitative leaps and that were urgently needed for the companies and the national economy. For instance, investments in digitalising and expanding training may help cover Portugal's large demands for qualified professionals in several sectors.

It was further noted that the assessment of the RRF suffered the same problems as other national programmes (such as PT2020), with qualitative assessments being conducted at a very late stage. The types of assessments currently being conducted are based on statistics and data that are not quite reliable, given that the intelligence systems in Portugal need substantial investments. For instance, there is no social impact assessment for the structural funds in Portugal.

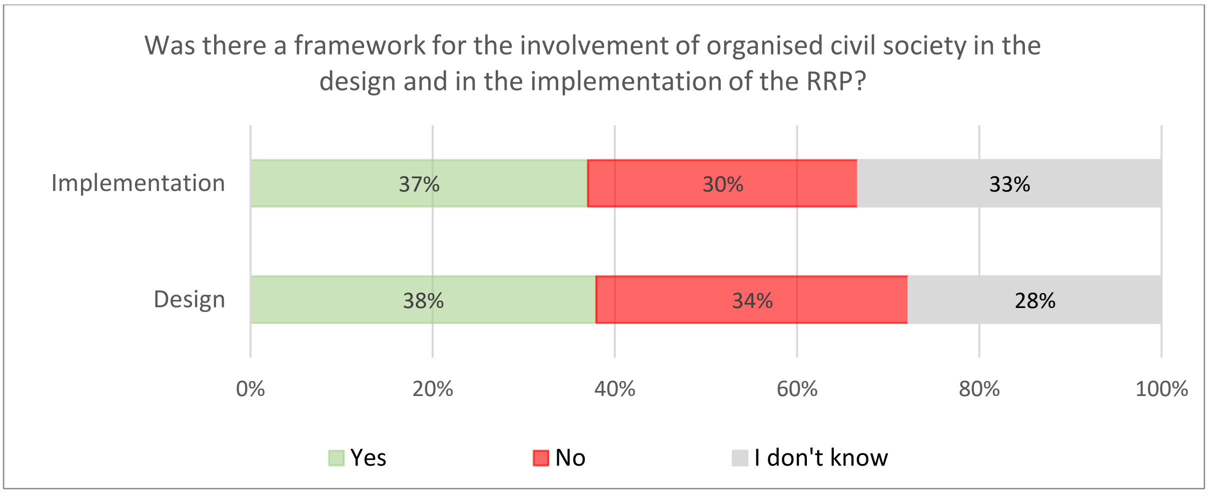
4.2.3 Inclusion of civil society and added value

Almost 60% of the respondents rated the level of awareness of organised civil society of the progress of reforms and investments included in the RRP of their country **(Question 16)** as "not very good". Among the employers, the results did not differ greatly from this, while there was a sharp contrast between negative assessments from workers' organisations (90%) and civil society organisations (79%) on one hand, and positive assessments from other types of respondents (61% "Good" or "Very good", 39% "Not very good"). The results were negative overall in all countries, but especially in Germany and Latvia, followed by Romania and Portugal. In Italy, the results were almost evenly split between "Good" and "Not very good".





With some degree of variation, respondents were divided into nearly equal thirds in **Question 17** (approximately one third answered positively, another third negatively, and another third responded that they did not know). The percentages were similar to questions on whether there was a framework for the involvement of organised civil society in the design (when identifying reforms and investments to be included in the plan) and whether there was a framework for the involvement of organised civil society in the implementation (of the reforms and investment supported by the plan) of the RRP of their country.



Among employers and the "other" category there were more positive answers than negative, whereas the opposite was observed among worker organisations and civil society. As in previous questions, the German and Latvian respondents gave the most negative assessments, while the Italian and Romanian respondents gave the most positive. While Portuguese respondents gave more positive than negative assessments, it was also the country where the largest proportion of respondents answered that they did not know whether or not there was a framework. An overwhelming majority of the respondents who said they were not aware of such frameworks were from Portugal.

Asked, in an optional open question, if there was a structured and/or permanent consultation framework, and if it had a legal basis **(Question 17-a)**, the majority of respondents provided no feedback. Nevertheless, among those that did, the results were as follows.

- In **Germany**, the German Federal Government had been asked to closely involve civil society in the design and implementation of future measures within the framework of the DARP. The partnership approach implemented by the German Federal Government took the form of a call for an opinion on the draft German Recovery and Resilience Plan (DARP) and is currently being implemented through regular DARP stakeholder dialogues. The purpose of the regular DARP stakeholder dialogues is primarily to provide information on the current state of implementation of the DARP.
- In **Italy**, a partnership table was provided for under Article 3 of Decree-Law 77 of 2022. The new governance provides for a steering committee under Article 1 et seq. of Decree-Law 13 of 2023. Some stakeholders said this was purely a formality.
- In **Romania** there is a Monitoring Committee for the implementation of the RRP and a legal framework under Law No 367/2022 on Social Dialogue.
- In **Latvia** there is a committee for EU fund oversight through which all EU-funded programmes must pass. NGOs are invited to participate and comment. They can also be involved in the decision-making / voting process. Most issues and ideas were already known and were just waiting for funding. So, in a way, organised civil society had already been involved in that.
- In **Portugal** there is also a National Monitoring Committee that has made suggestions for improvement, but its ability to influence the programme is very limited. This, according to Portuguese stakeholders, is due to the little information available and also the low political receptiveness to proposals coming from civil society in general.

During the semi-structured interviews, the **Latvian** civil society stakeholders noted that **civil society, particularly smaller NGOs**, had had limited involvement in the planning and implementation processes of the national RRP. They also stressed the lack of any monitoring mechanism for implementing the national RRP.

During the semi-structured interviews in **Germany**, the social partners emphasised that the **SMEs** had not been taken into account when the RRP had been drafted. They believed that they **had been ignored**. As a result, they did not want to be involved now either. Regarding SMEs, when the structures are smaller, it is even more difficult to be involved and heard.

Some **German** civil society organisations reported that they had only been included in the first stage, but not in drafting the RRP programmes or measures. It was stressed in this regard that if civil society is excluded at the start of a programme's development, it is then difficult to monitor and positively influence implementation. This also generates a lack of interest. Some other civil society organisations said they had been "forced" to participate, but that they **did not have the opportunity to really contribute**.

During the semi-structured interviews in **Romania**, **the workers' representatives noted that trade union representatives had not been consulted when the RRP was drawn up**, which explained the problems that had since arisen, particularly with regard to the implementation of reforms. When the plan was drawn up, there was no real consultation.

However, they noted that the Romanian Economic and Social Council organised interesting debates and launched studies as part of the RRF. The ESC is the key institution where real dialogue takes place. Representatives of government departments do not contact trade unions, and this leads to bad decisions and poor implementation of the RRP.

Furthermore, it was said that with regard to pension laws, the social partners have to be consulted before a new law is passed, however this had not been the case. They stated that they only evaluated the projects that had been completed or started, but that nobody discussed the projects that had not yet started, or the potential use of EU money to modernise their society, in depth.

Italian civil society representatives expressed the view that the Permanent Partnership Roundtable (PPR) had been useful, but **did not involve the local and regional levels enough**.

Furthermore, it was said during the semi-structured interviews in **Latvia** that the **European Commission took on a significant role in planning and supporting the national implementation** of the mechanism in Latvia. There is no tripartite dialogue between the Commission, the national government and the civil society stakeholders. Instead, dialogues take place only between the Commission and the national authorities. This could be seen as one of the reasons behind the slow speed of the process. In this respect, it was said that this was the first time that such a meeting discussing the implementation of the national RRP in such a format (social partners and cooperation partners) had taken place.

It was noted by the **Latvian** social partners that considering the broad spectrum of the topics covered by the national RRP, as well as the fact that the consultations on its design had taken place in an online environment during COVID-19, it was very difficult to follow the progress of its implementation. **They stressed the need to find one main/central forum where overall progress could be measured and discussed at regular intervals**. Policymakers could report on the progress achieved, the steps taken, and the challenges encountered, perhaps once in a quarter or half a year. So far, they had only provided such information upon request from stakeholders.

In this respect, the **Romanian** workers' representatives expressed the view that **the RRP and its effects/impacts needed to be discussed at central and local levels**. This would also require tripartite social dialogue.

The Romanian employers' representatives mentioned that they had noted that the relevant Ministry was open to dialogue. However, **it was difficult to set up a coordination mechanism. The administrative part is difficult and hinders implementation. The monitoring committee** is chaired by the Prime Minister. This committee **is responsible for coordinating the implementation of the RRF, and should therefore be more proactive and open to civil society.** Representatives of organised civil society and the business community should be able to give their opinion, as the committee is an interesting tool for implementing and monitoring the RRF.

The Romanian employers' representatives expressed the view that **the role of the monitoring committee was purely a formality**. They reported having learned about things after they had already happened. It was said that this committee comprised a lot of experts appointed from the area, however that they were not accustomed to bottlenecks. There are resources and expertise within the committee, but they are not being used to the best of their ability. In the view of the employers' representative, the meetings were organised just to tick a box.

Romanian civil society representatives shared a similar view and stressed that the representatives of the monitoring committee did not answer their calls and allowed no room for discussion. Therefore, they would like **the monitoring committee to be more balanced in terms of representing civil society**.

Representatives from organisations involved in disability/social inclusion in **Latvia** expressed that the **information that had been provided in the planning stage of the national RRP was deficient**. It appeared to be a very political decision process settled at the higher level, with **no clear or systematic way for NGOs to influence the direction or outcome** of the plan. They believed that authorities had implemented decisions concerning employment, healthcare and disabled people **without consulting the stakeholders working in these fields on the perceived relevance and efficiency of the RRP**. Consequently, several organisations expressed that they did not feel like equal partners in the RRF process, and described it as a **one-way street rather than a cooperation**.

Furthermore, it was mentioned during the semi-structured interviews that in **Latvia** during the RRF planning phase, some stakeholder questions had not been sufficiently addressed, which led to unclear expectations. This lack of **clarity created inefficiencies in the planning process**, for instance with stakeholders, providing RRP project proposals without being aware of the type of projects that would be eligible/considered for acceptance.

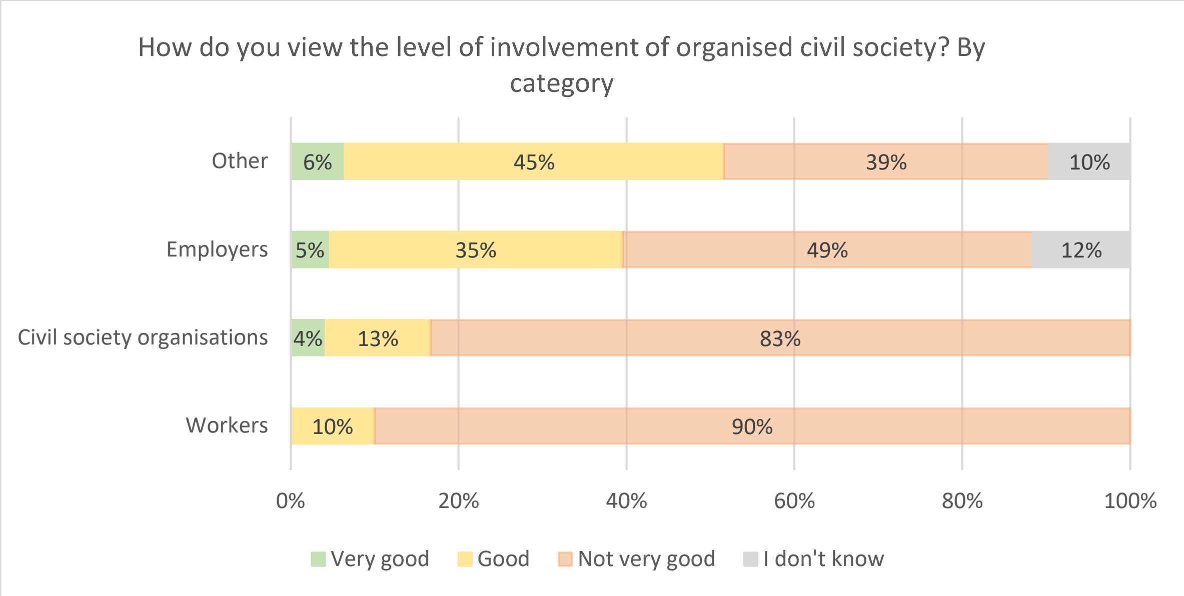
Portuguese stakeholders further lamented that rather than creating its own governance framework, the RRP had imported pre-existing arrangements/methodologies enforced under previous structural frameworks (PT2020), together with their pros and cons. This had been a strategic decision by the intermediatory public bodies that managed the RRF, because relying on existing structures allowed them to set up the RRP more swiftly. For the future, it will be crucial to erase the vices that these platforms have in terms of bureaucracy. Among others, **procedures should be simplified and there should be one single entity responsible for RRF management, rather than several managing bodies**.

Concerning RRP monitoring and the National Monitoring Committee, participants believed that **more involvement of the social partners was vital**. Moreover, there were several issues with the current assessments, including a lack of transparency in communications and deficient data quality (e.g. erroneous data quantification). Assessments were also not rigorously enforced.

The Portuguese participants were generally positive about the model on which the National Monitoring Committee was designed, however, participants underlined that it should be more diverse in terms of the areas of civil society represented. There is a stark underrepresentation of some sectors in the monitoring committee, for example of human rights and women's rights organisations.

Furthermore, it was said that the design of the RRP did not actively involve social partners and CSOs. The public consultations had been conducted in a way that for some stakeholders was the norm in their country, meaning that every organisation had shared their opinion on paper, but there had been no sharing of information on what other parties had shared. Unfortunately, very few of the recommendations had been integrated into the RRP, even those of partners that were included in the National Monitoring Committee.

About 60% of respondents believed that <u>the level of involvement of organised civil society</u> **(Question 18)** was "Not very good", and less than 40% thought it was "Good" or "Very good". Employers did not deviate significantly from this assessment, while trade unions and civil society organisations responded overwhelmingly in the negative (80% to 90%). Respondents in the "other" category gave more positive answers (51%) than negative (39%).



Across countries, only the Italian stakeholders responded mostly positively. German and Latvian respondents were overwhelmingly critical, and the percentages in Romania and Portugal were similar (approximately 60% saying the involvement was not good, and 35% saying that it was).

During the semi-structured interviews, **Latvian** civil society stakeholders expressed a rather sceptical view on civil society involvement, as they had very often **only been involved by taking the initiative to ask to be involved**. In Latvia, the draft national plan had been prepared and then the consultations had taken place. This, however, meant that it had been very difficult for the stakeholders to propose any changes to the plan during the consultation process. On top of that, the draft plan was said to have been so complete already that during the consultations the line ministries had given presentations, to which the participants had been invited to react. Hence, there had been no real discussion about the content and how to make this plan most appropriate for the situation in the country.

The Latvian social partners noted that real consultations with them had started after the largest employers' organisation and the largest trade union organisation had complained to the European Commission. Regarding the implementation process and the general progress towards the RRP goals, they said that the trade union side was involved only to a small extent (during these years there had been probably two meetings with representatives from the Ministry of Finance), also stemming from their own initiative. The employers' representative agreed that the involvement had been organised in a clumsy manner and as a formality, without any real tangible results. Many suggestions had been expressed as to how to improve the national RRP, however, they had mostly not been taken into account.

Additionally, the involvement of the municipalities in the design and implementation of the RRF in Latvia was said to have been very weak. The general assessment of civil society involvement was estimated at 5 out of 10 by the representative of municipalities.

The **German** civil society representatives echoed the above, saying that **there had been no general debate on the implementation of the RRP**. In their view, such a debate with civil society should be a government initiative. But instead, it had just been a speech, with no real results or feedback.

The **German** social partners noted that organised civil society had been involved, but that the consultation had not been effective. There was no feedback and no transparency about what was done afterwards (what was taken into account and why). **More interaction is needed**.

The **Romanian** stakeholders agreed that **organised civil society had not been sufficiently consulted.** It was said that **the government was open to dialogue, but post-factum**. They stated they were merely informed of the decisions and the projects carried out.

The **Italian** stakeholders noted that **civil society had been involved, but often too late**. Consultations should take place starting from the planning phase. Furthermore, it was said that the approach concerning involvement was very sectorial, and could possibly be made wider and involve more peripheral policy areas.

Stakeholders from all countries agreed that **a clear framework was needed**. The Romanian employers' representatives noted that when discussing implementation with the ministries, the ministries should ask them to provide information as well, and thus avoid bottlenecks by exchanging information both with them and with experts. They believed that this was a legal procedure that must be applied, and that they also needed to set up an information role.

The **German** social partners expressed that the EU RRF Regulation did not provide for the partnership principle and that this should have been included in the legal framework from the outset in a clearer and more structured way.

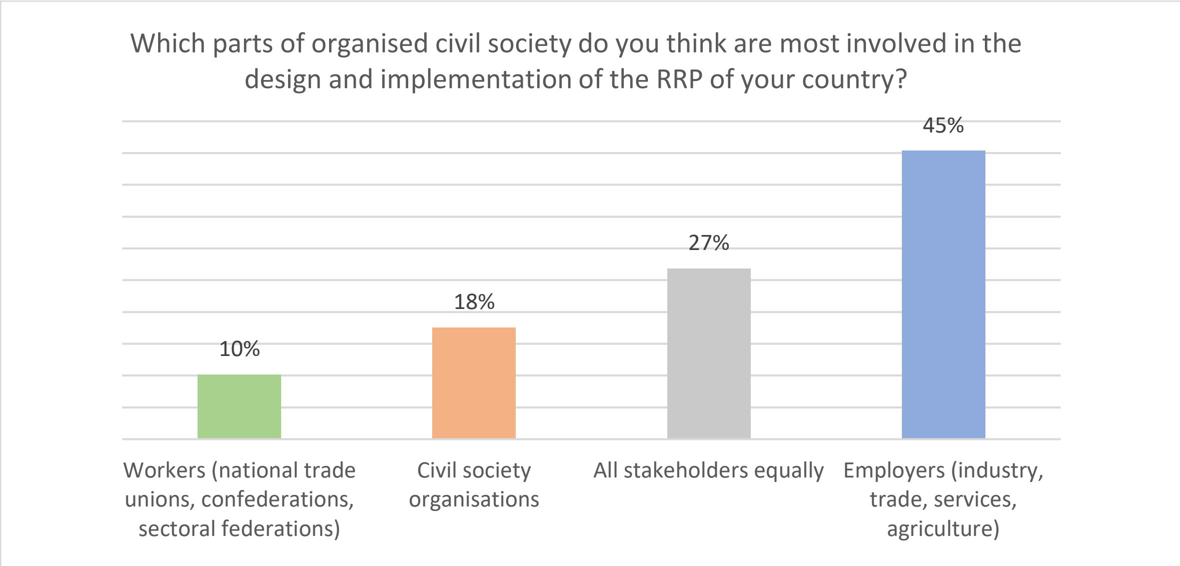
Another point shared by the different stakeholders in the different countries was the **lack of organised civil society's administrative capacity**. The **German** social partners noted that the problem was that only a few people (of the social partners) could really talk about the topic, because **they did not have the administrative capacity to have experts on this plan and to monitor its implementation properly**. The plan should have been better designed from the outset for this to be the case. Organised civil society needs to be supported so that it can be properly involved.

Some positive impacts stemming from civil society involvement and exchanges were also mentioned. In one example, an **Italian** civil society representative said that there was more knowledge now, more experts and more specialists in all CSOs.

In **Portugal**, the participants said that the Ministry of Economy had held formal consultations with civil society before the RRF was launched, with some organisations having had their voices heard before the presentation of the official RRP, but that **there had never been such low involvement/participation of social partners, trade unions and civil society in an EU fund**. None of the proposals of social partners had been integrated into the RRF, with the government stating that feedback would be reserved for PT2030. There is, however, a major difference between the RRF and PT2030: the RRF are 100% free funds and PT2030 has enormous public participation implications when it comes to the projects. The perception was that the partners were fully ignored and the consultations did not comply with the minimal formal requirements. Furthermore, they did not see their work reflected in the RRP's recent amendments.

The Portuguese participants noted that in the past, civil society involvement had been much more systematic, including convening official meetings and issuing documents. Any deficiencies in the programme that had been pointed out by CSOs had been pushed on the PT2030 agenda by the relevant ministries. For instance, urban policies are completely absent from the RRP.

With very few changes across categories of respondents and across countries, approximately 45% of the respondents believed that employers' organisations (including companies) were the part of organised civil society that was most involved in the design and implementation of the RRP of their country **(Question 19)**. Approximately one quarter believed that all stakeholders participated equally. The only exception to this was Romania, where 38% answered that civil society organisations were the most involved, 31% believed that employers were most involved, 19% believed trade unions were most involved, and 13% believed that all stakeholders were involved equally.



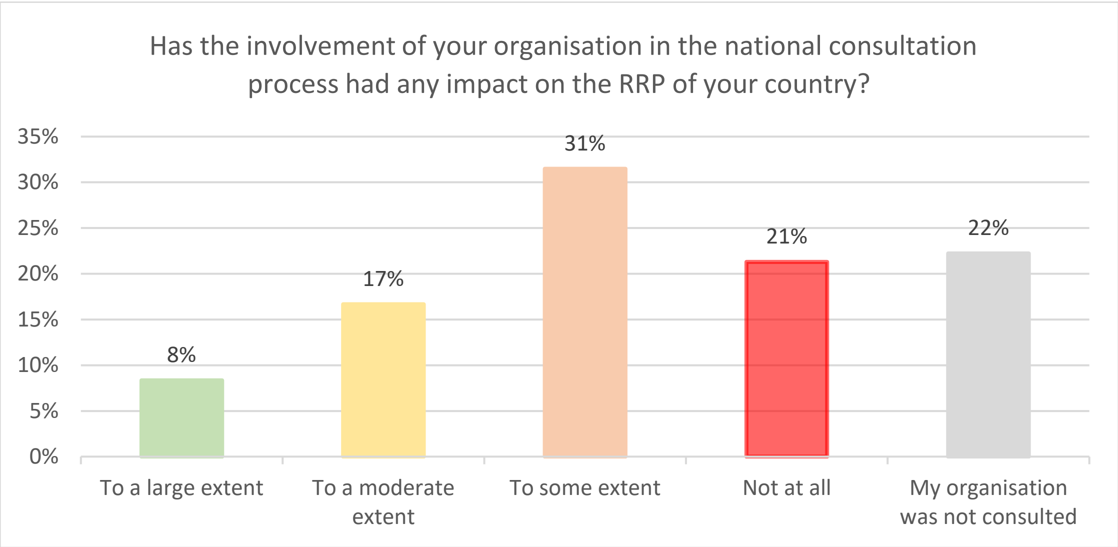
During the semi-structured interviews in **Latvia**, healthcare representatives mentioned that **their sector was relatively involved in the RRP design**, given that they had used previously established relations with national ministries as an entry point. They underlined that their institutions already had concrete reform plans, developed a long time before the RRF, which had made it easier for them to get involved in the preparatory phase with concrete suggestions and demands.

Trade union representatives in **Romania** expressed the view that **the social partners and civil society organisations were not generally consulted in the same way**. Romanian civil society representatives noted that the social dialogue only concerned the social partners and the national government, while CSOs were left on the sidelines.

A **German** civil society representative expressed the view that there was **an ongoing struggle to conduct this dialogue and to be included**. They stated that EU projects were a good example of failure, and that the stakeholders concerned were not heard because certain stakeholders were explicitly excluded. They affirmed that there was no broad consultation, labelling it a vicious circle.

The **German** social partners noted that when it came to organised civil society, there was a lack of major players involved. Only a few players were systematically involved, but that there was no big representation. This cuts off some of the voices, and thus more transparency is needed.

Only 8% of the respondents believed that the involvement of their organisation in the national consultation process had had, to a large extent, an impact on the RRP of their country **(Question 20)**, and about 21% thought they had had no impact at all, while 22% said they had not been consulted. The majority of the respondents fell into categories indicating they believed they had had a certain degree of impact (48%).



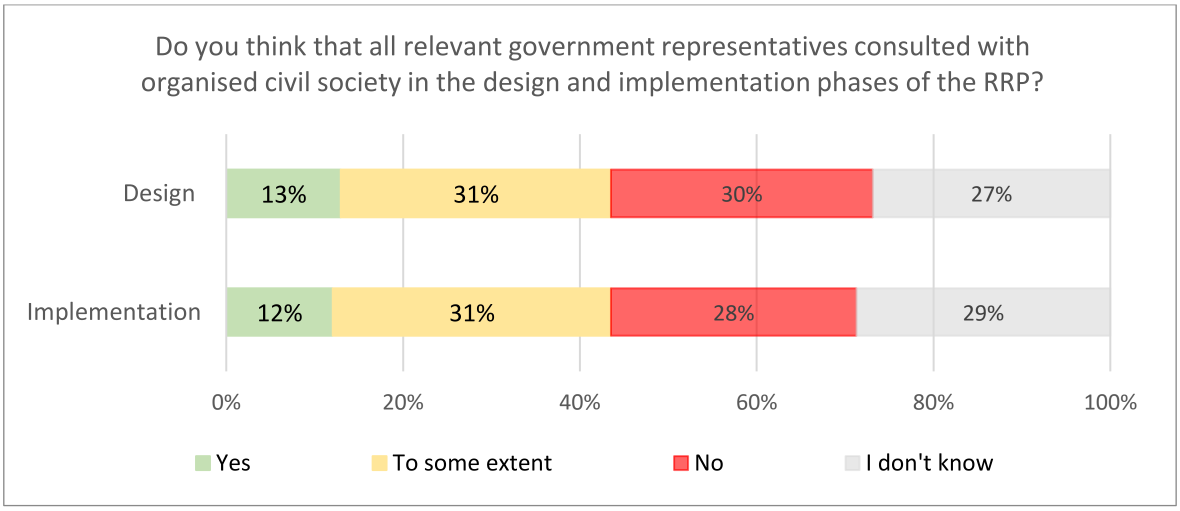
There were relatively small variations across types of respondents, with trade unions having the least positive assessment of the impact of their involvement, and other types of stakeholders having by far the most positive assessment (only 10% believed they had had no impact at all). Among the countries, Germany and Romania had the most negative assessment of their impact, and Latvia and Italy the most positive.

During the semi-structured interviews, on several occasions the **Latvian** civil society stakeholders stressed two horizontal conditions which had been included in the national plan and which resulted from the involvement of the civil society: 1) socially responsible procurement (aimed at reducing inequality by supporting vulnerable groups of society); and 2) an equal approach to all legal forms, making RRF funds available also for NGOs, as certain funds (for example, regarding technical development) were not available for associations but enterprises only; since there were 24 000 associations in Latvia, this condition was creating unequal access to funds. An NGO umbrella organisation was currently monitoring whether these two conditions were being implemented by the public authorities. It was said that the line ministries were trying to find creative solutions to ensure this.

Portuguese stakeholders noted that there were **insufficient contributions from civil society to the overall design of the RRP and in identifying priorities**. While the chosen reforms did contribute to major challenges within the sector, the was no alignment between the tender and the expectations of recipients. There should have been a more extensive and more timely consultation of CSOs. Assessing an opening for tenders takes time, and potentially requires some form of consultation with the relevant organisations. Believing in social dialogue, participants lamented that the inclusion of civil society within the RRP process had only occurred at a very late stage. Hearing social partners at the design stage of the RRP could have brought the projects/reforms in line with the reality on the ground. However, in the implementation stage a series of independent reports had been drafted, where the social partners had been able to offer their contribution. The RRF is important because of the social impact it may have, and possibility it has to empower human capital for new technologies, entrepreneurs, and workers, and make sure that companies are adapted to the new challenges.

Any consultation with social partners that occurred was perceived as a mere formality. There was no actual dialogue or response to the proposals that were issued.

Respondents were also asked to reflect on whether all relevant government representatives consulted with organised civil society in the design and implementation phases of the RRP of their country **(Question 21)**. Only 12-13% answered positively, although 31% answered "To some extent". Additionally, around 30% said that not all government representatives performed appropriate consultations.



While the percentages were similar across types of respondents, civil society organisations were the most negative, with 46% answering negatively, and around 37% answering "To some extent". To both questions, at least 50% of the German respondents answered negatively. In Italy, 2 respondents answered positively to both questions, 6 answered negatively, and another 6 answered "To some extent". In Romania and Latvia, there were few positive answers, however a considerable proportion of respondents answered "To some extent". As for Portuguese stakeholders, 2 out of 5 respondents said they did not know if these consultations had taken place.

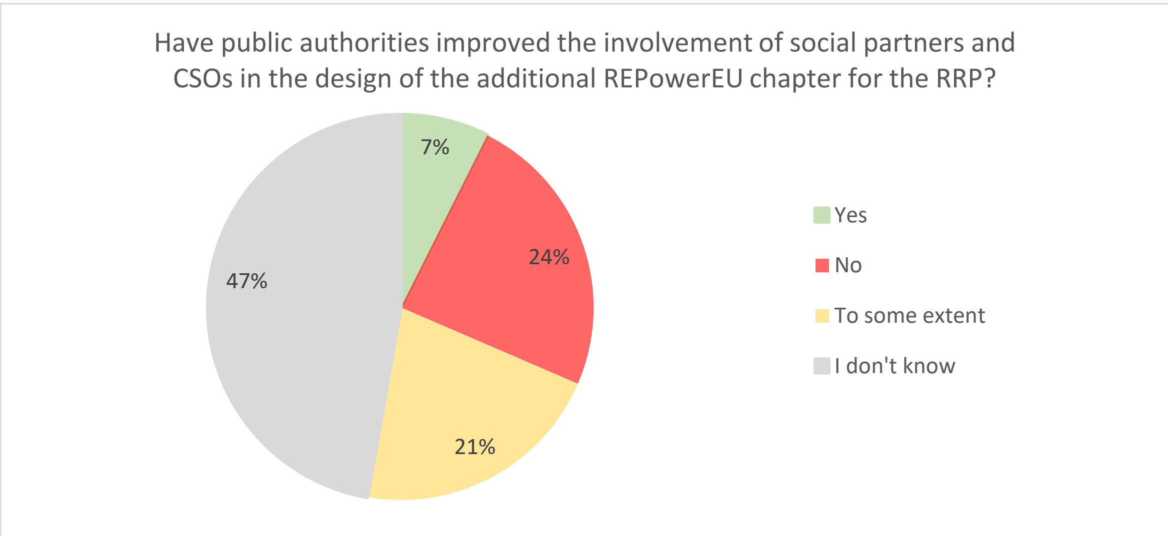
During the semi-structured interviews in **Latvia**, it was emphasised that **civil society representatives had felt listened to but not heard**; discussions had been held but they had not been overly successful. In **Portugal** the feeling was similar, with social partners stating that when the consultations had happened, it had been apparent that the plan had already been laid out. In that sense, **the involvement of civil society cannot be seen as substantial**.

The **Romanian** trade union representatives noted that even some government representatives were not involved in the negotiations. More feasibility studies are needed. The members of the Romanian parliament do not know what the RRP means or what it contains. Yet this plan should be a reference for those who draft laws. The involvement of the organised civil society and parliament is therefore crucial.

The **German** civil society representatives expressed the view that the ministry responsible for structural programmes was cooperative, however that not all ministries were.

Also in **Portugal**, participants confirmed their concerns about governance, transparency and oversight in the RRP. There are specific rules for public procurement, set out in a European Directive, whereby states have to be swift and have mechanisms to prevent misuse and fraud in the implementation of European funds. Portugal's new national anti-fraud / corruption strategy (MENAC) has not been approved yet, and fraud prevention in the RRP is only regulated by some minimal guidelines issued by the Ministry of Finance. Moreover, the general standards on corruption and the law for the protection of whistle-blowers are not being implemented. According to participants, having a solid anti-corruption framework should have been a requirement for getting the RRP approved. Given the lack of national anti-corruption measures, private compliance and consulting companies are the only ones ensuring some oversight. Even if approved, the participants questioned MENAC's ability to oversee the use of the funds in Portugal.

Half of the respondents did not know <u>whether national public authorities had improved the involvement of social partners and civil society organisations in the design of the additional REPowerEU chapter for the RRP of their respective country compared to the initial process</u> **(Question 22)**. The remaining respondents were divided between thinking that they improved it at least "To some extent" (28%) or "Not at all" (24%).



The distribution of answers varied significantly across the types of stakeholders. While employers echoed the responses of the ensemble, the majority of trade union representatives believed that there had been improvements. Civil society organisations had the most negative perception (42% saw no improvement), while 61% of the remaining stakeholders did not know if there had been an improvement or not. Portuguese and Latvian respondents also had high percentages for this answer, while German respondents mostly did not see improvements (4 out of 6).

Regarding the amending of the RRP to include the REPowerEU chapter, the **Latvian** civil society stakeholders noted during the semi-structured interviews that any assessment on its content was still too early, as this draft was currently at the stage of public consultation and the civil society stakeholders were analysing it (deadline 1 June). It was, however, again stressed that the approach to these consultations with the civil society stakeholders had been a formality. There should have been more discussions before the announcement of this draft amendment about the planned investments and reforms. **It could, in fact, be said that it had been a step back, as the consultations on the RRP had taken place online, and there had been several of them**.

Furthermore, on the REPowerEU chapter, **Latvian** respondents expressed that the government had already prepared the draft law, and that the public consultations would not bring any substantial changes to it. Besides, only written comments were expected at this stage, without any invitation to physical meetings. **The general feeling was that the civil society and the social partners were presented with a "ready" document to which they could suggest their comments**, which would not necessarily be taken into account in the final version.

During the semi-structured interviews in **Romania**, the trade union representatives said that the plan had been adopted without their participation (not even all members of parliament knew about it). In their view, it should not be possible to adopt meaningful policies for the country without consulting with trade unions first to ensure meaningful adoption and then implementation. A real and meaningful consultation is needed.

The **German** civil society representatives stated that they had been informed as part of the partnership process, but that was it. They had not been invited to sit down and discuss it with the government, and there had not been any structure to co-determine or shape the plan. They had been informed of the money available under REPowerEU and had made concrete proposals, particularly for the education sector. The ministries had responded that they could not envisage including these recommendations. The information on the REPowerEU chapter had been received from the Commission, not from the government.

Asked, in an open question, <u>on how to improve the capacity and involvement of the social partners and civil society organisations in future actions of the RRF/RRP of their country</u> **(Question 23)**, several stakeholders (mainly from Portugal and Romania) expressed the view that there were few or no early consultations with civil society. The plans were presented as very advanced drafts, and in that regard, social partners and potential beneficiaries could not really intervene in helping to shape them. The contributions made were, consequently, not taken into account.

In terms of the type of involvement, several respondents said that the type of consultation that this evaluation was following (with a questionnaire followed by auditions and interviews) was the best way to improve civil society participation. Some further specified that these consultations should also be organised in a decentralised way, in several regions of each country. While some stressed the need for formal involvement (through the national social and economic councils, where they existed), others underlined that the involvement should be substantive, and not simply to fill in legal requirements.

Multiple respondents, especially from Portugal, believed that consultations could also be divided by topics/pillars, since this would allow the different stakeholders to provide more informed opinions. This could also help to clearly prioritise those topics fundamental to increasing European and national resilience (such as food, water, energy or technology).

Finally, respondents from several countries asked for information to be more transparently organised: the information should come sooner, as described above, but also be centralised in one single unit/organisation that would be accountable for its dissemination through the media, internet and targeted stakeholders.

During the semi-structured interviews, the **Latvian civil society stakeholders found such a civil society round table to be a very useful tool. It was suggested that an event of this kind be organised by the national authorities, the European Commission or the EESC to exchange views on the implementation of the RRF**.

A similar point was shared during the interviews in Romania and Germany: **that there was a need to guarantee social dialogue / a structure for dialogue**. The Romanian trade union representatives noted that more consultation was needed to ensure that the RRP was feasible in reality, and that it was properly implemented. This consultation should have taken place from the outset, because today the plan is inadequate and does not meet current needs. It is essential to guarantee social dialogue throughout the process, in order to increase the legitimacy and relevance of the policies chosen and the measures taken, and to ensure truly effective implementation and impactful results. Social dialogue is the most important factor in ensuring the effectiveness and relevance of the policies and measures adopted.

The **German** social partners stressed that a strong structure for dialogue with the government was needed. The German civil society organisations echoed this sentiment, saying that **what was lacking in the RRP was a consultation structure similar to that used in the Structural Funds**, which included a structural involvement of the actors needed for implementation.

Another point raised was the **need for a common framework at EU level**. For example, the German civil society representatives expressed the view that this should be seen as a learning process and **should become mandatory for developing and implementing any EU programme**. In addition, they pointed out that new structures should not be created each time, and instead existing structures should be used and extended for this purpose. Incorporating this obligation into the European regulation is the first crucial step in this respect. Such an existing structure is more likely to be adopted if the regulation provides for it in advance and specifies the mandatory nature of the consultation. Where this is not the case, efforts must be redoubled.

The **Romanian** trade union representatives supported the idea of compulsory OCS consultations at European level. Respondents said that at national level there was a legal framework for social dialogue in which representatives could participate, however it was necessary to provide for compulsory consultations in European legislation to guarantee it was uniformly carried out.

They also pointed to **the role of the government**. Respondents said that the trade unions usually received requests for opinions a few days before a law was passed – this, however, is not a genuine social dialogue. The government should act as a mediator between the representatives of OCS in dialogue. Here, the government merely informs and the law is passed, regardless of whether or not a consultation has taken place. Genuine consultations take time, and it is essential that we do take the time.

Romanian stakeholders also spoke about the need for **transparency, communication and access to public information**. They stated that communication needed to be improved so that citizens could better understand and find solutions through dialogue. Moreover, during the consultation, the proposals of the social partners should be centralised and their positions published, detailing what has or has not been accepted by the social partners. This rule is rarely respected. The tables containing the comments made by the social partners should also include the names of the bodies that made them, in order to make this exercise transparent. **There is a lack of transparency in the consultation process**.

The **German** civil society representatives also stressed **the need to receive feedback** and guarantees that their recommendations would actually be taken into account.

Some stakeholders in **Latvia** stated that perhaps OCS needed to be more active for the policymakers to involve them in the design and implementation process.

Another element mentioned was that smaller NGOs, especially those dealing with social and inequality issues, **lacked the capacity** to become properly involved in the consultation process. The Romanian employers' representatives agreed, adding, on behalf of OCS as a whole, that they also needed to improve their administrative capacity in order to inform their members and the people they represented. They therefore needed experts, who would need to be paid. They stressed they did not receive membership fees, only sponsorship and EU funds. They therefore stressed the need to fund the representatives of OCS to increase administrative capacity and thus improve consultation and involvement.

Romanian stakeholders gave some **recommendations concerning the monitoring committee**, noting that the Romanian monitoring committee was guided by the 2014 EU Code of Conduct on Partnership. This code should be revised. An idea was put forth to recommend the monitoring committee be organised according to the line ministries – one for each ministry and for each reform – as the impact would be greater.

Romanian civil society representatives also agreed that the role of the monitoring committee should be reviewed. It sometimes lacks expertise on what is happening in other countries, and it would be good to share practices from other countries.

The **German** social partners also noted during the interviews that they had a monitoring committee in Germany for the implementation of other EU funds. It would be a good idea to have it extended to include the implementation of the RRF.

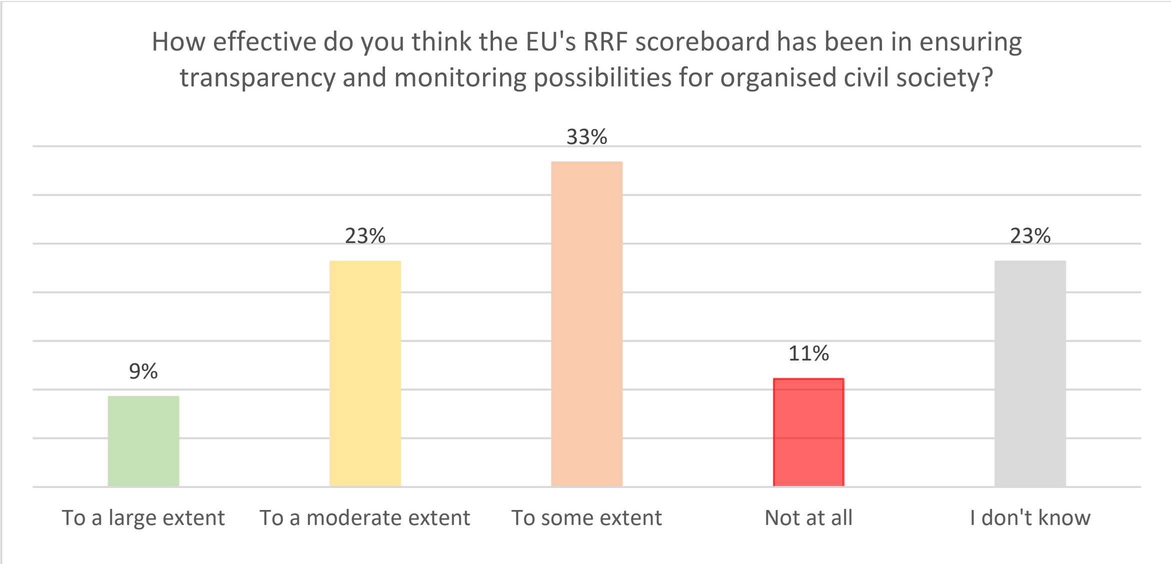
Portuguese stakeholders affirmed that **public institutions, civil society and companies were not sufficiently prepared to deal with the incoming funding**. While participants praised the fact that the

RRP provided a clear drive and impulse to turn the economy around, they were concerned that the success of the RRP relied on public institutions that were clearly overburdened. **A major flaw of the RRF is that it tries to build on a system that is heavily flawed to begin with**. Participants pointed out that Portuguese public institutions were trying to manage several overlapping programs (e.g. PT2020, PT2030, Horizon 2020 and the RRF), and were not adequately prepared to deal with the supplementary financial contribution and administrative work connected to the RRF.

The Portuguese participants **emphasised that the lacking capacity for implementing the RRP was not only an issue within public administration but also for public entities**. For some professions (e.g. programmers), Portuguese companies are experiencing large recruitment difficulties, since wages abroad are much higher and the tax burden lower. Moreover, many tech companies work with production bonuses (to reduce their risk and provide incentives), which are not funded in the RRF framework. Some participants requested that the remuneration structure in the RRF be revised.

Furthermore, the participants stated that most implementation challenges related to a mismatch between the scale of the projects/funds and the scale/capacity of the institutions. **The combination of receiving large amounts of funds to be disbursed within a short timeframe is very challenging for many institutions**. They suggested different solutions, such as revising the implementation period for projects, accounting both for the amount funded and the size of the recipient consortium. Failing this, they believed there needed to be stricter controls to only engage institutions that could guarantee the projects would be implemented within the set timeframe. Another suggestion was for projects to follow an EU cascade funding scheme, where the government gives more autonomy, but places harsher penalties on those who do not meet the agreed terms. This last option would also have a simplified management overall, given that several companies have prior experience in cascade funding.

When asked about how effective they thought the EU's RRF scoreboard (which gives an overview of how the implementation of the RRF and the national RRPs is progressing) has been in ensuring transparency and monitoring possibilities for organised civil society, results were overwhelmingly positive **(Question 24)**. Although only 9% answered "To a large extent", 65% of respondents gave a globally positive answer, against only 11% who answered "Not at all". All types of respondents and respondents from all five countries (except Latvia, where 6 out of 8 respondents were unable to answer) reproduced similar percentages.



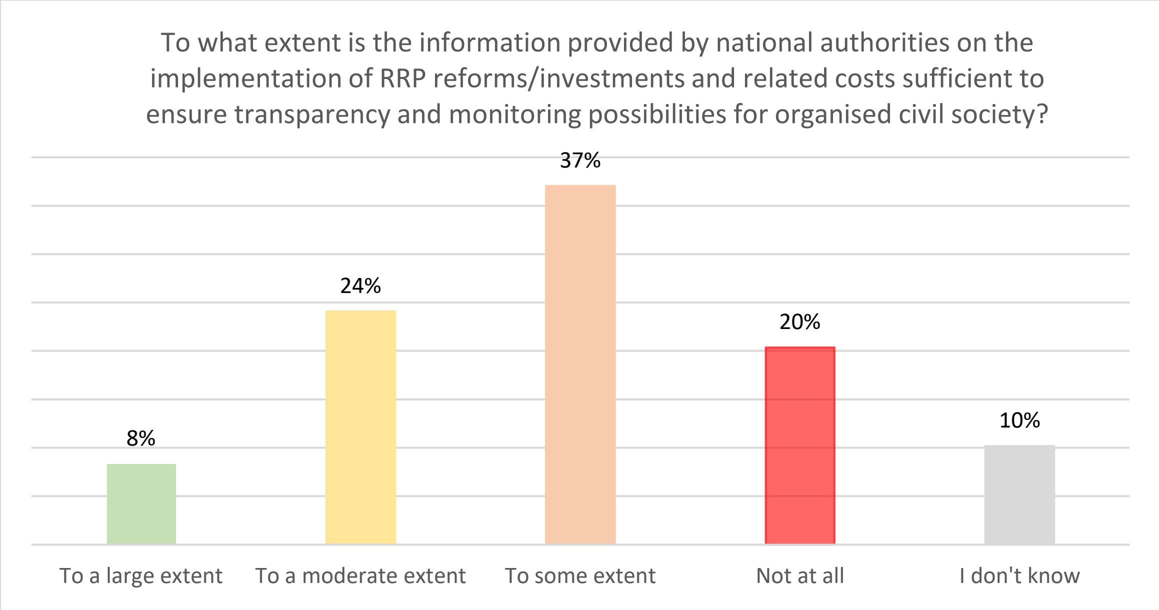
During the semi-structured interviews, **Latvian** civil society stakeholders pointed out a **lack of clarity surrounding the implementation of the separate RRF programmes**; there were many information reports from the public authorities available, but no one place where all the information could be easily accessed. More clarity and information from the responsible institution (Ministry of Finance) are needed on the progress of performance indicators and investments, and on the implementation of tangible achievements. In this respect, Latvia could use examples of best practices from other EU Member States on informing the public about what has been achieved through the RRF.

In the interviews in **Portugal**, participants also discussed how, upon the launch of the RRP, specialised monitoring committees had been created, working in parallel with the National Monitoring Committee. While meetings with the specialised committees had taken place, the committees had eventually stopped being invited and heard, meaning an end to guidance and input from civil society. Had partners been consulted before the tender applications were launched, some problems (such as the project financing falling extremely short of the actual needs) could have been avoided.

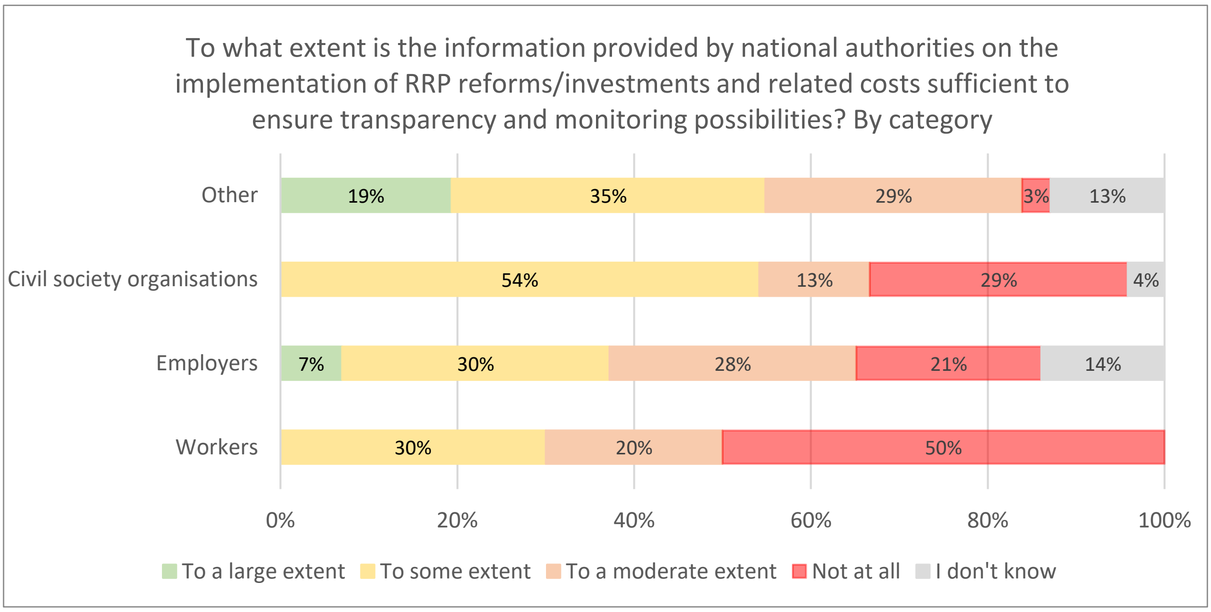
Portuguese participants lamented that civil society only knew as much as was shared by the media on the state of implementation. Only recipients or partners directly associated with the programme had precise knowledge of the current state of affairs.

It was also noted that there was a lack of planning and control management in the RRP. Civil society can only support the prevention and control of fraud and corruption in public procurement if it has open data on procurement. It is not solely about punishment, but about preventing corruption and the delays that it may cause.

Due to some stakeholders being uncertain on this matter, respondents gave both slightly more positive (69%) and negative (20%) responses regarding the extent to which the information provided by national authorities on the implementation of reforms and investments and related costs supported by the RRP of their country was/is sufficient to ensure transparency and monitoring possibilities for organised civil society **(Question 25)**.



Contrary to the preceding question, although the differences between countries were not remarkable, there were significant disparities among the types of respondents. Worker organisations were split evenly between a thoroughly negative assessment and a somewhat positive assessment. While employer organisations echoed similar responses to those of the ensemble, civil society organisations gave more negative answers (29%) than the average, though most of them remained positive. Other organisations were by far the most positive, with 84% giving positive assessments (including 19% who answered "To a large extent") against only 3% who gave negative assessments.



In **Latvia**, representatives from higher education stressed the need for all involved institutions to follow a **clearer and more systematic approach to executing RRPs**. Across social, health and education pillars, representatives stressed that they **lacked transparent access to crucial information on the RRP** (e.g. on the composition of the committee tasked with evaluating the national indicators and allocating funding). It was mentioned that involvement was not systematic, and instead required a high degree of proactive efforts on their part. NGOs active in social integration regretted that most NGOs did not have the human and financial resources to maintain a high level of engagement and to participate in working groups.

One subject raised was the lack of transparency in Latvia, where there was no supervisory mechanism to monitor the amount and sectoral allocation of expenses.

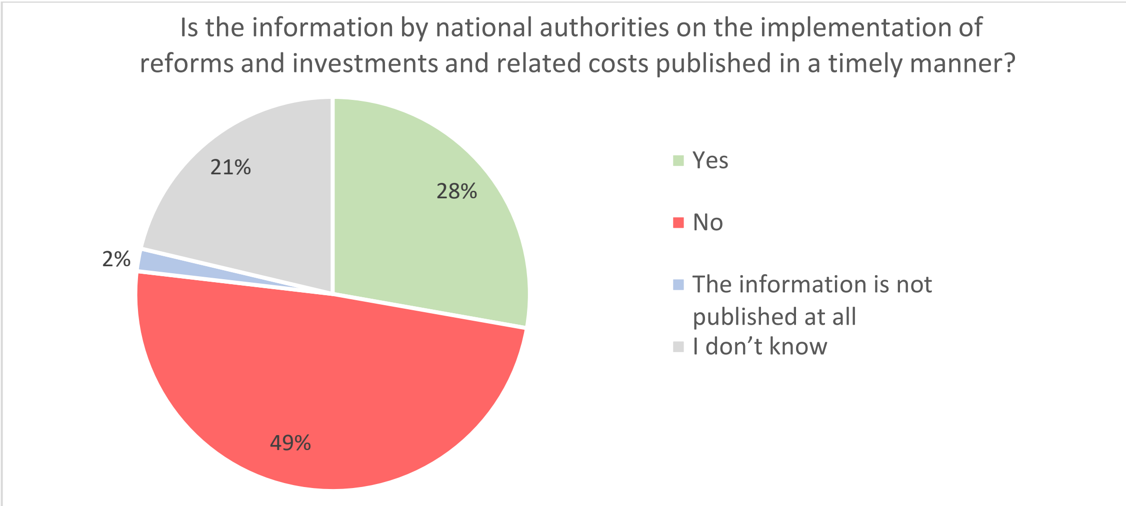
Lack of transparency and access to data was a shared concern in other countries as well. The **Romanian** workers' representatives said that the Members of Parliament in Romania were using the RRF as a pretext and were not ensuring transparency of the debate and consistency with their constitution. They stated that politicians had lost sight of the RRF's short-term objectives, and that they were unaware of the stages for implementing the plan. The workers' representatives added that some programmes were underway, however they could not assess their impact/effects because they did not have access to data on the state of implementation. It is ongoing but not in a transparent way. The money is allocated but there are no projects. The employers' representatives agreed, stating that as a representative of OCS, they were also unable to monitor the actual investments that were being made, and did not know what progress was being made. They added that there was no proactive consultation by the ministries.

The **Romanian** civil society representatives informed that there had been no transparency in drafting the plan, and that the government had not made the document public and had submitted it without consultation. The draft had then been sent to the Senate and no consultation had taken place. The political parties had negotiated behind closed doors and then submitted it to the Commission. The will of the people was not being taken into account. The representatives stated that they had submitted a request to participate as an observer on the monitoring committee without voting rights, and had received an acknowledgement of receipt of the request, but that nothing had happened. They echoed others in advocating the need for higher levels of transparency, adding that RRP measures were taken according to the political situation.

The **German** social partners agreed that the **level of transparency surrounding the implementation of the RRP and planned measures was very low**. They said that they had received no feedback. As far as the Structural Funds are concerned, the advisory groups communicate with each other, however communication is inadequate. There is no transparency about what is done afterwards (what has been taken into account and why). There is no access to data on the implementation of the RRPs. It is true that there is an EU scoreboard, but this only includes ex-post projects that have already been completed. There is no way of knowing what is underway or in preparation.

Romanian employers' representatives spoke of their **needs in terms of access to information on calls for tenders**. They said that there was a need to become more involved in providing information to businesses and entrepreneurs. Many calls for projects will be launched this year, but too few entrepreneurs have access to information. There is still no public platform that fully integrates information on the opportunities offered by the RRP. A user-friendly platform is needed, and a list of appropriate funding should be available.

Asked whether, in their view, the information provided by national authorities on the implementation of reforms and investments and related costs had been published in a timely manner (**Question 26)**, the majority of the respondents (49%) considered that it had not, while 28% thought that it had.



The responses from the respondents in the different countries largely echoed the above, with the exception of Germany, where the majority (2 people) thought that the above-mentioned information had been provided on time.

In the **Portuguese** interviews, stakeholders stated that there had been a series of improvements since 2021. Despite this, the monitoring instrument was still not managing the RRF efficiently, because it did not include a timely assessment of the material implementation of the projects; or (1) any indicators on implementation quality; (2) areas that needed more attention in terms of management; (3) critical problems that had been identified and needed to be solved; or (4) risk analysis. In light of these deficiencies, participants believed that the published assessments created an image of the implementation of the RRP that was too optimistic and did not match reality.

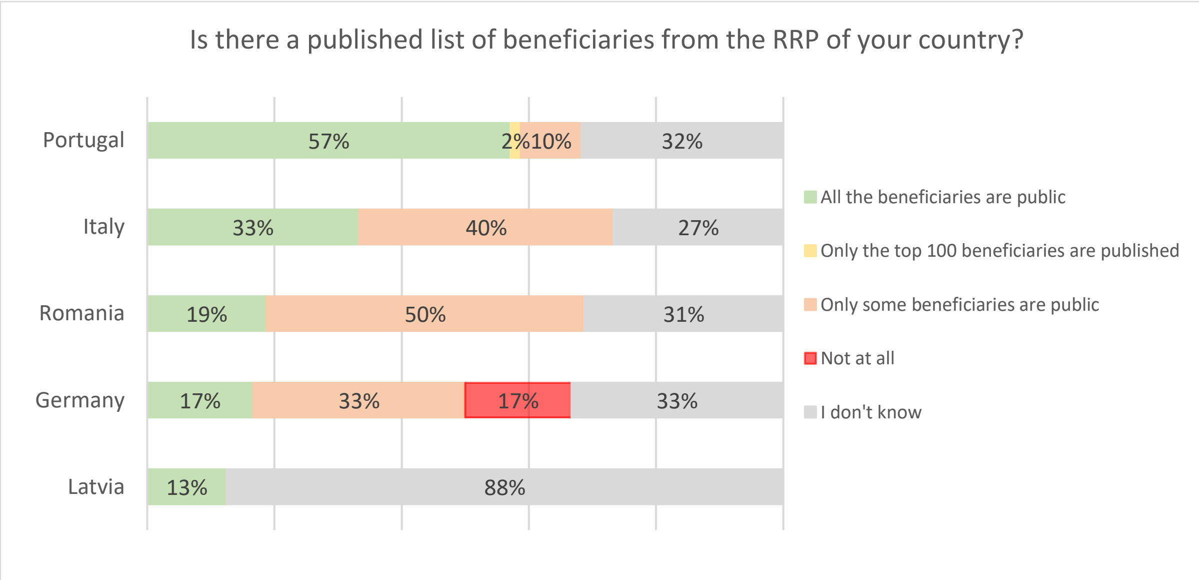
It was mentioned that some of the available data on the state of the RRP execution might lead to a positively biased understanding of the level of the current progress. For instance, data on outgoing payments to intermediate recipients is relatively acceptable, however, the implementation of the RRF by the end recipients is lagging and there is a need to understand/investigate why the end recipients are unable to, physically or financially, implement the projects that have been approved in the RRP. A first analysis conducted in the social sector showed that some institutions with approved projects who had received funding found themselves in a position whereby enforcing the programmes would make them go bankrupt (especially due to hardship and changing conditions caused by the invasion of Ukraine). This is concerning, considering that the RRF should help institutions facilitate development in the country. For instance, there is currently no construction firm building kindergartens or homes for older people. Moreover, the available workforce is lacking in numbers, and often does not allow for building to be carried out within the timeframe laid down in the RRF.

Another issue raised was that the available information was primarily financial in nature, providing information on what transfers went to which organisation, **with hardly any information on the material execution of the investments**. Regarding the governance model of the RRP, information was missing on the enforcement and application of the programme, ranging from the financial metrics to the impact on the ground. Respondents spoke of a lack of key performance indicators or assessment reports, and of the fact that the available information was curated to fit the expectations of the EU and the general public. The RRF, like other structural funds, may get lost and not achieve the desired goals.

There is a problem by default in executing public funds in Portugal, as they are often not implemented due to a lack of capacity to execute them. This is exacerbated by the fact that assessments needed to improve the situation are not conducted.

Regarding the existence of a published list of beneficiaries from the RRP in their respective countries **(Question 27)**, the majority of respondents said that such a list was public (43%), however, 35% did not know and 20% indicated that only some beneficiaries were public.

From a cross-country perspective, the answers were somewhat divergent. The vast majority of the Latvian respondents (88% – or 7 people) did not know; more than half of the Portuguese respondents (57%) said that all beneficiaries were public; and half of the Romanian respondents (8 people) believed that only some beneficiaries were public. The responses from the German and Italian respondents were somewhat evenly split between "All the beneficiaries are public", "Only some beneficiaries are public" and "I don't know".



At the end of the questionnaire, respondents were asked what other information they thought should have been made available about the RRP of their country to ensure sufficient opportunities for organised civil society to be involved in the design and/or implementation phases **(Question 28, open)**. Below is a summary of the answers received.

- Prior consultation with civil society organisations with greater opportunities for intervention should have been held; the consultation process should have been started earlier, not when the plan was almost ready.
- The consultations have mostly been limited to large top-down defined public consultations, lacking feedback directly provided to those who took the effort to actively participate. It would also be important to know which proposals have been made by NGOs, which have been agreed upon and how they are being implemented.
- Disclosure of more detailed and harmonised information on implementation by the various intermediary beneficiaries and direct beneficiaries of the RRP, as well as greater clarity and regular written information from the responsible institution (ministry) on the state of the art as

far as the implementation of measures, the achievement of milestones and targets, and the disbursement of money are concerned.

- More media presence on all channels.
- More information should be disseminated to the general public about the RRF-financed actions as well as the reforms, thus improving awareness of the changes.
- More information on how to access RRP for funding and simplifying documentation needed for access.
- The ownership of all the companies and stakeholders financed by the RRP.
- Contents of the negotiations between the Commission and the governments. What exactly was the input the Commission gave to the first draft of the RRP? What conditions did the Commission set?
- It would be helpful to have a special website with all the information, including the World Bank studies.

5. Secondary data: literature review of EESC work

In ECO/600 on ***The EESC's recommendations for a solid reform of the European Semester*** **(2023)**, the EESC pointed out that the level of participation of OCS in the Semester is insufficient and of low quality in a majority of Member States. Although there has been some improvement in the consultations on drafting RRPs, this has not been consolidated and, in some countries, there have been recent setbacks, for political reasons, in commitments to further supporting this participation.

Furthermore, the Committee noted that it is the compliance with the CSRs that makes it possible to assess the validity and effectiveness of the European Semester. Therefore, the EESC believes that the most appropriate incentive is to link their implementation to the EU budget and to receive part of the funds from it, along the lines of the RRF.

The EESC believes that the principles and general characteristics of structured and permanent involvement of OCS in the various stages of the European Semester should be defined in an EU regulation, while respecting the fact that it is up to national legislation to further specify the procedures and bodies in which this consultation is carried out, and complying with criteria of openness, transparency and representativeness.

In the EESC's view, this regulation should establish basic criteria and principles concerning, inter alia, the following issues: timetables (linked to those of the RRF and the European Semester), the formal nature of meetings and public access to documentation in due time and form, minutes, public communication of proposals and government responses and a roadmap for the implementation of agreements.

In ECO/599 on the ***Annual Sustainable Growth Survey*** **2023 (2023)**, the EESC pointed out that in 2023 the European Semester cycle will be dominated by the efficient implementation of the RRPs. These plans will place strong emphasis on the Member States' policy agendas, which must provide an opportunity to boost their economies.

The EESC welcomed the European Commission's efforts to organise dialogues with the Member States in early 2023. These dialogues consisted of an in-depth discussion between the Commission and the Member States to influence the CSR. In this regard, the EESC believes that these dialogues will promote a better implementation of the RRPs and help to ensure that any concerns are better addressed and identified through the CSRs.

The EESC continues to argue that consultations with OCS, the European Parliament and national parliaments must play a bigger role throughout the European Semester cycle in order to strengthen national ownership. The EESC believes that both the semester process and the implementation of the RRPs would benefit from better and more organised participation from the organisations involved with the EESC.

In ECO/584 on ***Gender-based investments in national recovery and resilience plans*** **(2022),** the EESC pointed out that most of the RRPs have been drawn up by the Member States without an ex-ante assessment of the impact of individual investments in terms of removing gender inequalities and making it easier for women to access and stay in the labour market. Very few Member States have taken a strategic approach with specific, cross-cutting measures and reforms to the six investment strands under the RRP. The methodology adopted by the European Commission is based on an impact assessment of how effective the measures implemented are. To this end, the EESC recommends that the Commission adopt comparable specific indicators at the evaluation stage to measure improvements in equal pay, access to the labour market, the reconciliation of work and care time, and in promoting women's self-entrepreneurship.

The EESC explained that the measures set out in the RRPs included direct and indirect measures (with different impacts in the short or medium-to-long term) to encourage women to access and stay in employment, however they were set out in a framework that was fragmented and uneven across countries.

Among the direct measures to promote women's employment, the EESC believes that providing incentives for creating stable, quality jobs for women should be given priority over other occasional incentives, and should be excluded from the State aid map. Moreover, the EESC welcomes policy measures for encouraging and supporting self-entrepreneurship that has been provided for in some RRPs, and calls for the support also to include financial and managerial training and access to financial instruments. The EESC considers it important when implementing the RRPs to take action on the taxation aspect by offering tax breaks on the second sources of household income for low-income households, and on the incomes of less-affluent, single-parent families.

Indirect measures in the RRPs include investment in childcare and care services. The EESC believes it paramount to invest resources in services for reconciling working time and time spent on long-term care, to provide additional services, and to make these services available to low-income households.

Furthermore, the EESC believes that specific investments to incentivise women's participation in the medium and long term in technical and scientific institutes and university courses (STEM), which can promote women's employment in sectors that are currently male-dominated, can no longer be postponed.

The EESC recommends that RRPs be planned and coordinated in a way that complements all other Community resources and programmes, starting with resources and programmes for cohesion and for rural areas. The Commission's assessment in the framework of the European Semester with CSRs should include these objectives with a gender perspective, using new, transparent, accessible indicators that are comparable across countries and broken down by gender.

Finally, on the involvement of civil society, the EESC points out that the available data shows that involvement of the social partners and civil society organisations has been limited and infrequent in most countries. The EESC recommends that they be fully involved in implementing, monitoring and evaluating the RRPs at European, national and local level.

In ECO/589 on ***Additional considerations on the Annual Sustainable Growth Survey*** **2022 (2022)** the EESC pointed out that the RRF had become the key tool for delivering on the EU policy priorities under the European Semester. It had helped to stabilise the economy during the pandemic and is playing a key role in responding to the current crisis. The EESC calls for the RRPs to be implemented in such a way that allows them to have a tangible impact on people's wellbeing.

Furthermore, as the CSRs are set to play a more significant role, the EESC calls for careful monitoring and a balanced approach. The EESC also calls for a reform of the Semester, which guarantees quality participation of OCS. Concerning the RRPs, the EESC welcomes the fact that the recommendation "draws on the successful application of the partnership principle", and calls for making the involvement of OCS mandatory.

In ECO/556 on the ***Annual Sustainable Growth Strategy 2021*** **(additional opinion, 2021)** the EESC was concerned about the fact that there was insufficient clarity in most Member States on the RRP governance systems and the distribution of responsibilities for their implementation between the central, regional and local levels. It was also stated that there was insufficient clarity on the appropriate mechanisms for involving CSOs and social partners in the implementation, monitoring and adjustment phases of the RRPs. The EESC strongly calls for more scrutiny on these crucial aspects for the Union's recovery.

In the EESC's view, a brief analysis of the main priorities of the RRPs showed a clear focus on the Green Deal goals. For the EESC, this is obviously important, however there are concerns regarding the implementation and the impact of some measures that seem to be not very well founded. Citizens, workers and companies must be supported in making this transition, and the targets must be defined clearly and reasonably to avoid a situation in which we have impressive political rhetoric but bad practical implementation, with added side effects "below the surface".

Moreover, the EESC emphasises that CSRs are an opportunity for improvement, and are based on consistent data. The Member States should re-evaluate their attitudes towards this tool, particularly after the COVID-19 crisis and in light of the opportunity that the RRF brings to implement structural reforms (on education, fiscal policies, labour market and social protection under the Social Pillar and the Porto Summit recommendations) that are essential for most of the Member States.

Finally, the EESC welcomes the Recovery and Resilience Scoreboard initiative. The EESC believes that this will be a very important tool that is able to boost the investment process and bring about mechanisms that could be of crucial importance for the Union. However, the EESC insists on CSO participation in this process. It is not a question of visibility. It is a question of vigilance, and the EESC also calls attention to the need to empower and prepare CSOs for this challenge. It is useless to call for CSO action if they are not prepared or do not have the resources. This represents a huge responsibility and opportunity for the CSOs.

In ECO/553 on ***Reshaping the EU fiscal framework for a sustainable recovery and a just transition*** **(own-initiative opinion – Gr. II, 2021)** the EESC remarked that there is a need to involve civil society to a greater extent in the European Semester at both national and EU level. This way, a balanced economic policy can be established, where all interests are reconciled. This is particularly the case for the governance of the RRF, where civil society involvement has not been sufficient. The partnership principle, which has long been a tradition in the governance of the European Structural and Investments Funds, should serve as a blueprint for an effective mechanism of civil society involvement.

In ECO/550 on ***The role of cohesion policy in combatting inequalities in the new programming period after the COVID-19 crisis. Complementarities and possible overlaps with the RRF and the national recovery plans*** **(own-initiative opinion, 2021),** the EESC welcomed the fact that social goals, and particularly the goal of economic, social and territorial cohesion, are embedded in the six pillars of the RRF, and that the assessment criteria for the RRPs includes their social impact. Rightly, the Member States also have to explain how the RRPs contribute to gender equality and equal opportunities for all. However, the EESC believes that the focus on fair distribution within the RRPs, and NextGenerationEU (NGEU) as a whole, needs to be greatly enhanced and made more specific.

In order to make sure that RRPs have a stronger social dimension, the EESC suggests that the Commission not only develop a methodology for reporting on social expenditure as provided for in Article 29(4) of the RRF Regulation, but that it also develop a methodology assessing the social impact of the structural reforms proposed in the RRP. In this context, the EESC stated that there was a problem with the fact that the delegated act, which provided specifications concerning the social dimension, was made available only after the RRPs had been drawn up and even after their approval.

The EESC points out that one great challenge is ensuring coherence and synergies between cohesion policy and NGEU, particularly the RRF and REACT-EU. While it is important to avoid overlaps and confusion in the implementation of programmes, it is also crucial to ensure that the programmes do not contradict or undermine each other. Moreover, the potential prioritisation of RRF funding over cohesion policy due to the pressure on quick absorption may detract attention and reduce capacity needed to deal with the programming and implementation of cohesion policy funding for 2021-2027, contributing to further delays and issues of take-up of cohesion resources.

More concretely, the EESC is concerned that, due to its different legal basis (see point 3.4 of the opinion), the provisions for reducing inequalities enshrined in cohesion policy are not reflected adequately in the rules governing the use of NGEU and the RRF. It is important that the extent and clarity of the social dimension within cohesion policy serve as a model for NGEU and the RRF. Furthermore, cohesion policy's strict rules on stakeholder consultation, and particularly the partnership principle, should be taken – at the very least – as a blueprint for RRF procedures, in order to direct investments efficiently towards measures of social inclusion and to fight inequality.

Given the conditionality of the disbursement of funds on the implementation of CSRs, the EESC points out that it is all the more important that the European Semester be reformed, including minimum standards for the consultation of social partners and civil society, as outlined in the EESC's resolution on the involvement of OCS in the RRPs[45].

Finally, the EESC calls for the systematic integration of the European Pillar of Social Rights and the social scoreboard into NGEU and the evaluation of the national RRPs. The disbursement of RRF funds to companies should therefore be linked to certain criteria such as the application of collective agreements or providing high-quality jobs on the basis of national laws and regulations derived from national social partner agreements. It needs to be ensured that the benefits of both the recovery and the green and digital transitions are shared among all people living in the European Union.

In ECO/537 on the ***Annual Sustainable Growth Strategy 2021*** **(2021)**, the EESC welcomed the fact that the Recovery and Resilience Facility Regulation had finally confirmed the importance of the genuine involvement of civil society organisations and social partners in developing national recovery and resilience plans. It also advocated establishing a binding conditionality principle requiring governments to involve social partners and other civil society organisations in planning and implementing national recovery and resilience plans and other instruments under the MFF, on the basis of minimum standards defined at EU level.

Furthermore, the EESC points out that, for the European RRF to be implemented successfully, it is essential that conditions favouring economic development be strengthened and, above all, that the single market continue to be fully functional. This particularly concerns preventing disruptions to the free movement of people and goods. Maintaining open borders in the Schengen area is still a key issue for recovery and increasing resilience, as well as for fostering European solidarity and identity. The EESC believes that Member States should not introduce any regulations that directly or indirectly restrict freedom of movement unless coordinated at EU level.

Moreover, The EESC notes that public debt stemming from borrowing to finance programmes under the RRF should not burden future generations in the EU. In this connection, the EESC recommends that Member States earmark funds from the facility for budgetary expenditure relating to the current crisis, and take it as an opportunity to make our economies and societies sustainable and equitable. The EESC also acknowledges that public investment in infrastructure and education is needed in order to ensure economic, social and environmental sustainability for future generations.

Additionally, the EESC suggests considering not counting them in the medium term towards the Member States' budget deficits in the EU's fiscal framework, given that loans under the facility are an exceptional measure in exceptional circumstances.

In ECO/527 on the ***Recovery and Resilience Facility and Technical Support Instrument*** **(2020)** the EESC expressed that the facility should support the transition towards climate neutrality and a digital economy using funds from NextGenerationEU to help alleviate the socioeconomic impact of the transition in the regions most heavily affected. In light of the COVID-19 crisis, the need for a

45 Involvement of Organised Civil Society in the National Recovery and Resilience Plans – What works and what does not? – European Economic and Social Committee, OJ C 155, 30.4.2021, p. 1.

sustainable, green and digital recovery has become even more pressing, as has the need to provide support to the most vulnerable regions.

Moreover, the EESC reiterates that it is "in favour of a strong linkage between the Reform Support Programme and the European Semester". Thus, the plans submitted by the Member States should address the main challenges identified in the European Semester and should be harmonised with the principles of European Green Deal and the Digital Agenda.

The EESC emphasises that the quick and effective coordination of action between the European Commission, the European Parliament and the European Council is needed so as to avoid delays that would jeopardise achieving the facility's goals.

Further, the EESC considers it important that Member States cooperate closely with the European Commission to approve, monitor and ensure the successful completion of the project plans submitted under the facility.

The EESC also considers it very important that every measure announced, especially those providing financial support, be accompanied by clear, business-friendly information on what type of support is provided, how an SME can effectively access the different EU financial instruments that exist, who to contact at EU level if they have questions, who the national bodies involved in channelling the funds are, who the national players that SMEs can turn to are, what the role of national banks is, and what their obligations are.

The EESC believes that the submission, approval, monitoring and completion of projects could be sped up by actively involving private sector consulting companies with global experience in the relevant areas.

Finally, the EESC emphasises that the role and views of the social partners and civil society organisations should be integrated in the plans submitted by the Member States. In particular, the EESC has already called for a more active role for OCS "in obtaining agreement between the European Commission and the Member States on the content of reform programmes".

6. List of organisations consulted

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
1. Arbeiterwohlfahrt AWO	Germany		X
2. Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege (BAGFW)	Germany	X	
3. Bundesverband der Deutschen Industrie e.V.	Germany		X
4. Bundesverband der Freien Berufe e.V	Germany		X
5. Deutscher Verein für öffentliche und private Fürsorge e.V	Germany		X
6. DHB Beamtenbund und Tarifunion	Germany	X	X
7. Europäischer Wirtschafts- und Sozialausschuss	Germany	X	
8. German Trade Union Confederation (DGB)	Germany	X	X
9. Holzforum Allgäu e.V.	Germany	X	
10. Nowega GmbH	Germany	X	
11. Agenzia per la Cybersicurezza Nazionale	Italy	X	
12. CGIL – Confederazione Generale Italiana del Lavoro	Italy	X	X
13. Confagricoltura	Italy		X
14. CONFCOMMERCIO IMPRESE PER L'ITALIA	Italy	X	
15. Confcooperative	Italy	X	X
16. CONFSAL	Italy	X	
17. Croce Rossa Italiana – ODV	Italy	X	
18. Ente Autonomo Volturno srl	Italy	X	
19. European Space Agency ESA	Italy	X	
20. Fondazione SAMOTHRACE	Italy	X	
21. L’Italia Bene comune Nuova Trasparente Europea Responsabile	Italy	X	

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
22. Legacoopsociali	Italy		X
23. Movimento Consumatori	Italy	X	X
24. Movimento europeo in Italia	Italy	X	
25. National Institute for Astrophysics	Italy	X	
26. Unione degli Universitari	Italy	X	
27. UNIONE GENERALE DEL LAVORO (UGL)	Italy	X	X
28. Association of disabled people and their friends "Apeirons"	Latvia	X	X
29. Association of Latvian Doctors	Latvia		X
30. Association of Latvian Universities	Latvia	X	X
31. Association of Latvian Young Scientists	Latvia	X	X
32. Association of Mechanical Engineering and Metalworking Industries of Latvia (MASOC)	Latvia		X
33. Association of the Latvian Chemical and Pharmaceutical Industry (LAKIFA)	Latvia		X
34. Employers' Confederation of Latvia (LDDK)	Latvia	X	X
35. Free Trade Union Confederation of Latvia	Latvia		X
36. Latvian Chamber of Commerce and Industry	Latvia		X
37. Latvian Electrical Engineering and Electronics Industry Association (LETERA)	Latvia		X
38. Latvian IT Cluster	Latvia	X	X
39. Latvian Platform for Development Cooperation	Latvia	X	
40. Latvijas Pilsoniskā alianse	Latvia	X	X
41. National Youth Council of Latvia	Latvia	X	X
42. Paula Stradiņa Clinical University Hospital	Latvia		X
43. Public Policy Center PROVIDUS	Latvia		X

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
44. Riga Eastern Clinical University Hospital	Latvia		X
45. Trade Union of Latvian Education and Science Employees (LIZDA)	Latvia		X
46. Transparency International Latvia	Latvia		X
47. Union of Local Authorities of Latvia	Latvia		X
48. ABIMOTA	Portugal	X	
49. ACMP5	Portugal	X	
50. Águas do Algarve, SA	Portugal	X	X
51. ANSUB Associação dos Produtores Florestais do Vale do Sado	Portugal	X	
52. APICCAPS	Portugal	X	
53. APIP - Associação Portuguesa da Indústria de Plásticos	Portugal	X	
54. AquaValor - Centro de Valorização e Transferência de Tecnologia da Água	Portugal	X	
55. Armis Sistemas de Informação Lda	Portugal	X	
56. Associação Fibrenamics	Portugal	X	
57. Associação Nacional de Criadores de Ovinos Serra da Estrela	Portugal	X	
58. Associação SFCOLAB – Laboratório Colaborativo para a Inovação Digital na Agricultura	Portugal	X	X
59. Associação Tempus	Portugal	X	
60. ASSOCIAÇÃO TURISMO DE LISBOA	Portugal	X	
61. AUTOMAISE	Portugal	X	
62. Biond- Associação das Bioindústrias de Base Florestal	Portugal	X	
63. Biotrend SA	Portugal	X	
64. BLC3 – Campus Tecnologia e Inovação	Portugal		X
65. CENFIM, vocational education and training	Portugal		X

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
66. Centro Clínico Académico-Braga (2CA-Braga)	Portugal	X	X
67. Centro Hospitalar de Entre o Douro e o Vouga	Portugal		X
68. Centro Hospitalar Universitário de Santo António, E.P.E	Portugal	X	X
69. CGEAV	Portugal	X	
70. CGTP – IN	Portugal		X
71. Champalimaud Foundation	Portugal	X	
72. CITEVE	Portugal		X
73. CoLAB ForestWISE	Portugal	X	X
74. CONFAGRI	Portugal		X
75. Confederação dos Agricultores de Portugal	Portugal	X	X
76. Confederaçao dos Comércios e Serviços	Portugal		X
77. Confederação Empresarial de Portugal	Portugal		X
78. Domingos da Silva Teixeira, S.A.	Portugal	X	
79. Dreamplas, lda	Portugal	X	
80. Escola Superior de Enfermagem de Lisboa	Portugal	X	
81. Escola Superior de Enfermagem do Porto	Portugal	X	X
82. Escola Superior de Enfermagem do Porto	Portugal	X	
83. ESI ROBOTICS	Portugal	X	
84. Fórum Oceano	Portugal		X
85. Grupo Visabeira	Portugal		X
86. Health Cluster Portugal	Portugal		X
87. HFA	Portugal	X	

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
88. iBET – Instituto de Biologia Experimental e TEcnologica	Portugal	X	
89. IHM – Investimentos Habitacionais da Madeira, EPERAM	Portugal	X	
90. INESC-ID	Portugal	X	X
91. INESTEC	Portugal	X	X
92. INSA, I.P. – Instituto Nacional de Saúde Doutor Ricardo Jorge	Portugal	X	
93. Instituto Politécnico de Castelo Branco	Portugal	X	
94. Instituto Politécnico de Setúbal	Portugal	X	X
95. Instituto Politécnico do Cávado e do Ave	Portugal	X	
96. Instituto Politécnico de Beja	Portugal		X
97. Instituto Politécnico do Porto	Portugal		X
98. ISCTE	Portugal		X
99. Laboratório Nacional de Energia e Geologia	Portugal	X	
100. Lusofona University	Portugal	X	
101. LusoSpace	Portugal	X	
102. More – Laboratório Colaborativo Montanhas de Investigação	Portugal	X	
103. Ordem dos Economistas Norte	Portugal	X	X
104. Plasoeste	Portugal	X	
105. Portalegre Polytechnic University	Portugal	X	
106. Portuguese Technological Centre of Footwear	Portugal	X	
107. Procalçado – Produtora de Componentes para Calçado, S.A.	Portugal	X	
108. Redcatpig	Portugal	X	
109. Riasearch Lda.	Portugal	X	

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
110. Santa Casa da Misericórdia de Lisboa	Portugal	X	X
111. Sirplaste – sociedade Industrial De Recuperados De Plásticos Sa	Portugal	X	
112. Smart Energy Lab – Association	Portugal	X	X
113. Sociedade Agrícola Boas Quintas, Lda	Portugal	X	
114. SOLANCIS – SOCIEDADE EXPLORADORA DE PEDREIRAS SA.	Portugal	X	
115. STAR Institute - Associação de Investigação Ciência e Tecnologia Aplicadas	Portugal	X	
116. Startup Madeira	Portugal	X	
117. Taviraverde, Empresa Municipal de Ambiente, E.M.	Portugal	X	
118. Tourism International Academy	Portugal		X
119. Transparency International Portugal	Portugal		X
120. UGT Santarém	Portugal	X	X
121. União das Mutualidades Portuguesas	Portugal		X
122. Universidade Católica Portuguesa	Portugal	X	
123. Universidade de Coimbra	Portugal		X
124. Universidade NOVA de Lisboa	Portugal	X	
125. Viagens Abreu, S.A.	Portugal	X	
126. Visor.ai	Portugal		X
127. Vista Alegre Atlantis	Portugal	X	
128. AgroTransilvania Cluster	Romania	X	
129. AmCham Structural Funds Committee	Romania		X
130. Asociatia "Patronatul Tinerilor Intreprinzatori din Romania" (PTIR)	Romania	X	X
131. Asociatia Camera de Comert Americana in Romania	Romania		X

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
132. Asociatia Declic	Romania	X	X
133. Asociatia partNET – Parteneriat pentru Dezvoltare Durabila	Romania		X
134. Asociatia Pro Infrastructura	Romania		X
135. Asociatia Solar Decatlon Bucuresti - proiectul EFdeN	Romania		X
136. Businessromania	Romania		X
137. CEZ ROMANIA	Romania	X	
138. CNSLR - FRATIA	Romania	X	
139. Collaborative Laboratory AccelBio	Romania	X	
140. Confederatia Patronala Concordia	Romania		X
141. Confederația Sindicală Națională MERIDIAN	Romania	X	X
142. Confederatia Sindicatelor Democratice din Romania	Romania	X	
143. Confederation of Romanian Democratic Trade Unions (CSDR)	Romania		X
144. Fundatia Corona	Romania	X	
145. National Council of SMEs from Romania	Romania	X	
146. Organizația Femeilor Antreprenor (OFA UGIR)	Romania		X
147. PartNET Association – Partnership for Sustainable Development	Romania	X	
148. Pro Infrastructure Association	Romania	X	
149. Roma Education Fund România	Romania		X
150. Romanian Economic and Social Council	Romania		X
151. Școala Gimnaziala Basesti	Romania	X	
152. Societatea Nationala de Cruce Rosie din Romania	Romania	X	X
153. The General Union of Industrialists of Romania (UGIR)	Romania	X	

Organisation name	Country	Consulted via online questionnaire	Consulted at in-person meeting
154.TPA Romania	Romania	X	
Total	**154**	**108**	**79**