



Brussels  
REGIO.DDG.D.2/DP

via e-mail

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Dear [REDACTED]

A number of Interreg cross-border programmes have established regional antennae/information points to bring the programme closer to potential beneficiaries. These are small offices located in the border region (generally on each side of the border(s)) and working on the promotion and development of the programme. Their tasks vary and may cover a combination of the following:

- a) providing general information on the programme;
- b) contributing to the generation of projects (proposing ideas, searching partners, designing the project, etc.);
- c) advising applicants on procedures (e.g. how to fill the application form);
- d) pre-selecting projects (e.g. before the official submission);
- e) assessing the applications (e.g. providing comments or marks);
- f) deciding on the projects (e.g. in the monitoring committee or a steering committee).

Some of these regional antennae/information points depend entirely on the Joint Secretariat and some of them depend on a regional administration (entirely or partly). Regarding their funding, some are funded entirely by the programme, some partly, some not at all (e.g. funded by regional administrations).

These regional antennae/information points can be useful, especially when their tasks cannot be carried out by the Joint Secretariat alone (e.g. for programmes covering a wide territory with different languages). Indeed, they can promote Interreg locally, using the language of the citizens and stakeholders, and bring in their knowledge of regional needs/potentials as well as possible partners. In particular, the tasks information (a) and advice (c) mentioned above are useful in this context.

However, in some cases, the combination of tasks in these regional antennae/information points can raise concerns regarding the extent to which segregation of duties is ensured. It is clear that the same person or same body (e.g. department) cannot generate projects (b) and at the same time carry one of the following tasks: (d) pre-select, and/or (e) assess, and/or (f) decide on these projects. The assessment and selection of projects has to be carried out by another body (another person and another department) than the one generating the project. Otherwise, there is an improper segregation of duties, which may lead to a conflict of interests.

The Commission needs to be assured that the management system of each programme does not contain structures that might lead to potential conflicts of interest. If regional antennae/information points are part of the organisation of a programme, they need to respect a clear segregation of duties as described above.

In this context, I would like to refer as well to the recently published Commission Guidance on the avoidance and management of conflicts of interest under the Financial Regulation (2021/C 121/01): [https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest\\_en](https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest_en).

In the case of the Interreg Meuse-Rhine, we understand that the system still working under the 2014-2020 programme will be considerably improved for Interreg VI. The Joint Secretariat (JS) under the responsibility of the managing authority will be supported in its tasks by Regional Antennas (RAs) based in the subregions of the programme area, and partly financed from Technical Assistance.

The RAs predominantly focus on project acquisition and programme communication. They are so to say the MA/JS's "regional pillars". On the one hand, they have a good understanding of the programme strategy and its opportunities, have a programme area wide cross-border vision and profound knowledge of the programme's intervention logic and regulatory framework. On the other hand, they have detailed knowledge of the specific socio-economic structure of their respective territory and have access to key actors in the sectors targeted by the programme as well as knowledge of the structuring ecosystems in their particular region.

In order to guarantee a strict separation of functions and to avoid any suspicion of conflict of interest, the RAs may not intervene and are not involved in the assessment and selection processes of projects. They are also not allowed to represent their region in any programme committee. In close coordination with the JS, the RAs can assist in supporting projects and beneficiaries during the implementation stage and closure. In addition, a written agreement with legal status will formalize the RA's operational management by the MA coordinator on the one hand and management on personnel matters by the RA's employer on the other hand. A newly created position of "Team leader RAs" within MA/JS will organize an effective coordination and cooperation between the RAs and the other functions within MA/JS.

On the basis of the above description, we conclude that the situation is satisfactory.

Yours sincerely,

(e-signature)

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