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Subject:	COMMISSION STAFF WORKING DOCUMENT - EXECUTIVE SUMMARY OF THE EVALUATION Mid-term evaluation of the cohesion policy programmes 2021-2027 financed by the European Regional Development Fund (ERDF), the Cohesion Fund and the Just Transition Fund (JTF)
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Delegations will find attached document SWD(2025) 327 final.

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COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE EVALUATION

**Mid-term evaluation of the cohesion policy programmes 2021-2027 financed by the
European Regional Development Fund (ERDF), the Cohesion Fund and the Just
Transition Fund (JTF)**

{SWD(2025) 299 final}

1. Context and scope

This executive summary presents the main findings of the mid-term evaluation of the European Regional Development Fund (ERDF), the Cohesion Fund (CF), and the Just Transition Fund (JTF) 2021-2027. The three funds collectively cover one-quarter of the EU's long-term budget under the 2021-2027 multiannual financial framework (MFF) and a substantial share of all cohesion policy funds. Given their considerable size and broad scope, the three funds serve as a crucial instrument for fulfilling the objectives of the EU's political agenda.

The purpose of the mid-term evaluation is to make as comprehensive an assessment of the 2021-2027 programming period as possible at this stage – recognising the delayed start of implementation due to various factors. This includes taking stock of the progress in implementation of the ERDF, CF and JTF; analysing the take-up of the main legal novelties and the consequences of more recent changes. The evaluation provides evidence to support the usefulness of the ongoing mid-term review of programmes. Additionally, the mid-term evaluation process – along with the 2014-2020 *ex post* evaluation – informs the debate on the future of the EU budget and on the Commission proposal for the 2028-2034 MFF. Finally, the mid-term evaluation serves as a baseline for the *ex post* evaluation of the 2021-2027 period, to be completed by the end of 2031.

The analysis is based on the qualitative and quantitative information provided by managing authorities on selected operations, expenditure, as well as output and result indicators. It also builds on pertinent studies published by the Commission and other relevant institutions. Extensive stakeholder engagement work, including a survey, several interviews and a seminar, further complement the analysis. A limited modelling exercise has been carried out to shed light on the possible implications of recent changes in the regulatory environment. The mid-term evaluation is carried out in line with the five Better Regulation criteria: effectiveness, efficiency, coherence, relevance and EU added value.

2. Findings

Effectiveness

Implementation started late but accelerated and caught up with 2014-2020 levels in 2024. Under the 2021-2027 legal framework, a range of simplification measures were put in place to help speed up initial implementation processes. **The reasons for the delay are largely external** and relate to the COVID-19 crisis and the unprovoked Russian war of aggression against Ukraine, both of which could not be foreseen. At the same time, the simultaneous implementation of EU-level crisis response instruments, in particular the Recovery and Resilience Facility (RRF), created challenges due to prioritisation of implementing measures with shorter deadlines. Some opportunities for simplification, for example Simplified Cost Options (SCOs) and Financing Not Linked to Costs (FNLC), remained underexploited which did not help speed up implementation.

The introduction of the JTF channelled key resources to operations supporting the climate transition, but the novelty of the fund – in terms of its structure, governance and even types of beneficiaries – also created challenges at the beginning of the programming period. Implementation started later but caught up with the other funds and is accelerating fast. Observed activities are in line with the JTF's objectives. The inclusive approach to preparing the Territorial Just Transition Plans (TJTP) has resulted in ambitious plans that clearly focus on mitigating the negative economic and social effects of the transition for the most impacted territories and social groups by the shift towards climate neutrality. The inclusiveness ensured at the preparation stage sets an example of good practice for Member States as regards enhanced partnership and multi-level governance.

The three funds covered by the evaluation are well-suited to tackle regional disparities. The logic behind the interventions is based on territorial challenges, which makes programming and implementation possible at both national and regional (decentralised) level. However, administrative capacity to meet the needs defined in territorial strategies is a key prerequisite and requires that corresponding capacity building actions are carried out to ensure successful implementation. However, ensuring sufficient administrative capacity to meet the needs specified in the territorial strategies is a key prerequisite for success. This means that appropriate capacity building measures must be taken to ensure successful implementation. **At the same time, the policy's effectiveness is conditional on the quality of governance and administrative capacity. Partnership and multi-level governance have a clearly positive effect on programme design and implementation** when they are applied effectively, but there is still room for improvement in the areas of stakeholder engagement and decision-making.

Multilevel governance and the involvement of regions and local authorities undoubtedly add value by increasing the effectiveness of ERDF/JTF/CF programme implementation. However, there is still room for improvement on partnership-based cooperation and governance rules.

A stronger focus on reforms, along with improved governance arrangements, will be necessary in the future. Most of the enabling conditions are currently met (98% of the thematic conditions and all but one of the horizontal conditions) and corresponding reform processes have been triggered, showing a stronger link between the strategic framework and the financial disbursements of the ERDF and CF. These conditions are strong policy drivers in areas like transport, smart specialisation, and climate planning. However, the application of uniform conditions seems to limit their capacity for addressing local needs and challenges as they evolve over time. Tailoring these conditions to specific national and regional contexts, potentially at a territorial level below NUTS2, could boost their effectiveness. Moreover, creating enabling conditions linked to Policy Objective 5 'Europe Closer to Citizens' and the JTF may enhance synergies between investments and corresponding sectoral policies.

Efficiency

Simplification measures and novelties introduced in the 2021-2027 legal framework are helping reduce administrative burden, decreasing costs for programme authorities and

beneficiaries at all stages of implementation compared to the 2014-2020 programming period. This is largely thanks to the obligatory electronic exchange of correspondence and other e-cohesion requirements. Several persistent obstacles to implementation – generally linked to administrative capacity – have been partially overcome. Despite the positive reception of the simplification measures (SCOs, FNLC), their uptake remains limited and uneven across Member States for the funds covered by the evaluation, while the different nature of the operations supported allowed for a higher take-up under the ESF+. Challenges include reporting and auditing requirements, as well as the application of the revised General Block Exemption Regulation (GBER), indicating a need for further capacity building.

The 2025 mid-term review of programmes offers an opportunity for aligning the programmes with current and emerging EU political priorities, while also aiming to accelerate investments through simplification, greater flexibility and financial incentives.

The ERDF, CF and JTF monitoring system has improved compared to the previous period, providing more detailed information on investments and making it more suitable for evidence-based policy learning. It relies on a more complete set of common output and result indicators, which ensures greater transparency of the result-oriented approach used in the current period.

However, the monitoring system could be further improved in terms of data availability and consistency to better serve evaluation needs and inform the assessment of the supported projects' impact. To be able to present an EU-level set of project data, the Commission collects the lists published on individual MAs' websites and standardises these data to ensure coherence across all programmes. It then publishes the results on Kohesio. While the project-level data on Kohesio are valuable, the system still faces significant challenges in harmonising data across different levels and ensuring that the data are of sufficient quality to support counterfactual analysis. Consequently, simplification and enhanced consistency through more automated data transmissions at operation level were considered as part of preparations for the 2028-2034 period.

The clearer design of the enabling conditions in 2021-2027 compared to the ex-ante conditionalities in 2014-2020 has further improved the efficiency of programming and implementation activities. It allowed national authorities to prioritise interventions and successfully align them with the broader strategic frameworks. The reduced number of conditions and simplified compliance criteria helped reduce the overall administrative costs. The requirement that the enabling conditions remain fulfilled over the entire programming period also helps achieve a lasting effect and increases the effectiveness of investments.

Coherence

In ERDF, CF and JTF programmes, coordination mechanisms have been introduced between cohesion policy funds and other EU funding instruments, with varying degrees of coordination. The evidence clearly points to the existence of such mechanisms in all the funds under examination at various levels – strategic, programme-specific and operational. The degree of coordination varies between funds, and it is particularly high for (1) Horizon Europe and ERDF, (2) the Connecting Europe Facility and the CF, and (3) the ESF+ (in the

context of Policy Objective 4 ‘Social and Inclusive Europe’), Interreg and the JTF. Conversely, coordination and synergies are less pronounced or play a less important role in the case of the European Maritime, Fisheries and Aquaculture Fund (EMFAF), the European Agricultural Fund for Rural Development (EAFRD), and migration and home affairs funds (Asylum, Migration and Integration Fund – AMIF, Instrument for border management and visa – BMVI, and Internal Security Fund – ISF).

Member States achieved synergies by making use of the RRF and resources from the funds covered by the evaluation to support different parts of the same investment or to support complementary measures. Synergies can also be achieved when reforms supported by the RRF benefit investments supported by the funds under evaluation. While their specific designs, goals and characteristics make a direct comparison impossible, the enabling conditions and the RRF reforms can be seen as mutually reinforcing and even partially overlapping in some areas. This means that a single, more streamlined approach may be advisable in the future.

Some mature projects initially planned under the funds covered by the evaluation were transferred to the Recovery and Resilience Plans (RRP). This has likely contributed to the delay of the programming and implementation. The significant influx of new resources from both instruments has resulted in insufficient administrative capacity.

Partnership Agreements, the European Semester, and individual programme documents provide frameworks for aligning priorities at national, regional and EU level, while National Reform Programmes integrate the funds under evaluation into the broader context of economic and social policy. Sectors like research, innovation, and transport are characterised by a high level of policy coherence, while rural development remains less integrated. In decentralised systems, the ERDF, CF and JTF align well with regional needs, whereas centralised approaches sometimes fail to reflect local goals correctly. Stakeholders view the three funds as a tool for strengthening place-based strategies, addressing governance challenges and promoting regional cooperation. However, the existence of a multitude of strategic and programming documents results in varying degrees of consistency and duplication.

EU horizontal priorities and principles are integrated into ERDF, CF, and JTF programming to varying degrees. Allocations for climate action exceed minimum regulatory requirements and amount to more than double of the 2014-2020 funding. Climate action in the 2021-2027 period accounts for approximately 33% of ERDF (compared to a 30% target), 56% of CF (compared to a 37% target), and 100% of JTF expenditure. Biodiversity goals are also supported with significant financial resources, although this is highly variable and almost insignificant in some Member States. Funds and programmes also comply with the ‘do no significant harm’ principle, albeit with some difficulties in assessing this compliance, and promote gender equality strategies and action. In addition, climate proofing of investments serves to avoid potential negative long-term climate impacts. The prioritisation of climate, biodiversity and gender equality is also reflected in the selection criteria, composition of monitoring committees and programme partnerships. The above mainstreaming requirements and concentration rules provide a frame for programme

authorities' choices in terms of programming, including when increased flexibility is called for. The funds also support other EU horizontal priorities, such as clean air, without providing a quantitative requirement for these measures.

EU added value

The ERDF, CF and JTF provide resources to address specific development challenges which would not be tackled to the same extent without this support. What constitutes this added value can be broken down into four main dimensions:

- **Continuity:** The three funds under evaluation create added value through the long-term strategic perspective that underlies them, and the clear expectations and certainty throughout the ERDF and CF funding periods. The mid-term evaluation shows that considerable added value is created thanks to the possibility to draw up investment plans, and finance long-term investments with resources provided by the funds under evaluation, independently of national budgetary and political cycles.
- **Additionality:** EU resources are critically important in less developed regions and areas where local resources would be insufficient to pursue public investments in key areas, including rural areas, the outermost regions and islands. They are also of great importance in more developed regions, as they support areas such as innovation, climate action and just transition.
- **Place-based approach and partnership:** Unique added value is also created by the vertical (multi-level) governance mechanism – applied by the three funds – which links the EU, national and regional levels through the use of the place-based approach and horizontal partnerships.
- **Administrative capacity building:** The territorial approaches empower stakeholders at sub-national level and increase their participation in the implementation of the ERDF, CF and JTF, thus strengthening the multi-level governance framework and generating capacity at sub-national and sub-regional level. This helps build better public administration in all Member States and has a positive effect on other forms of cooperation with regional and national funds, which can and should be developed further

The ERDF, CF and JTF also contribute to the provision of European public goods, where such interventions support EU priorities. These goods include counteracting climate change and environmental degradation, supporting the digital transformation, trans-European transport, and inter-regional and cross-border cooperation and defence. While these areas would still receive support without the ERDF, CF, and JTF, the speed and scope of that support would be significantly reduced.

Relevance

The partnership-based approach ensures the involvement of different categories of stakeholders in programme design and implementation. It also ensures that ERDF, CF and JTF resources are allocated to measures aiming to reduce regional disparities. Approximately 72% of ERDF resources target less developed regions, while JTF funding supports specific sub-regional needs. Concentration requirements, which set minimum investment requirements for a more competitive and smarter Europe (Policy Objective 1 ‘Smarter Europe’) and greener and low-carbon Europe (Policy Objective 2 ‘Greener Europe’)

and for sustainable urban development, are exceeded in all Member States thanks to the choices made by the managing authorities.

The programmes successfully integrate the challenges and recommendations identified in the European Semester, which increasingly provides an analysis of needs at sub-national level and a list of recommendations. Document analysis, financial analysis and consultation activities show strong alignment of the programmes with the challenges and priorities identified in the 2019 and 2020 European Semester, although with significant thematic and geographic variations. Specific mechanisms, including the mid-term review, will be used to assess the subsequent Semester cycles (2022, 2023, 2024), in which the territorial approach and the cohesion funds feature prominently.

The funds continue to be highly relevant to achieving the EU's policy objectives. The adopted ERDF, CF and JTF allocations of the programmes show a very high degree of alignment with both the Council's Strategic Agenda and the Commission president's Guidelines. In addition, the three funds actively contribute to areas for policy action identified in the 2023 JRC foresight report and the areas to boost growth listed by the Draghi report, which ensure their continued relevance in the foreseeable future.

The 2025 mid-term review is currently underway and offers a valuable opportunity to align the programmes with emerging needs, evolving circumstances and EU priorities. These include competitiveness, decarbonisation, defence and eastern border regions as well as affordable housing, water resilience, and the energy transition.