



## **Public Consultation on the Operational Programme of the Baltic Sea Region Programme 2014-2020**

### **Comments by the Union of the Baltic Cities UBC**

The Union of the Baltic Cities, as the leading city organization and network in the BSR, is keenly interested in developing cooperation across borders for the benefit of our inhabitants. During the last over 20 years, the number of paying Member Cities has grown to more than a hundred from all BSR countries, which testifies that the cities feel they can get added value from such cooperation.

The UBC member Cities are implementing practical cooperation projects mainly through sectoral Commissions active in practically all fields of life.

The UBC has warmly welcomed the adoption of the EU Strategy for the Baltic Sea Region and its Action Plan. In our opinion, this Strategy can greatly contribute to the streamlining and focusing of regional priorities and work as well as help to promote cooperation between different stakeholders. In our opinion, first signs of additional value are already visible, while the work must be continued and intensified.

We also attach great importance to the multi-level governance concept included in the EUSBSR and its Action Plan. Its possibilities should be fully utilized, because that would bring a great number of new stakeholders from various sectors of society – small and big – into joint action. There is still a huge reservoir of untapped resources, both human and material, which has not yet been mobilized for the development of our common region. Among these key stakeholders are cities and regions.

The Baltic Sea Programme can, and should, continue to be key instrument in enabling funding for viable projects in the coming funding period 2014-2020.

The UBC, in its Board meeting in Tampere (18 March 2014) discussed the experiences from the Baltic Sea Programme so far and the draft Operational Programme for 2014-2020.

1. As a starting point, it was noted with appreciation, that a public consultation had been launched. In our opinion, transparency and active communication are important prerequisites for active participation by stakeholders. Accordingly, the UBC encourages the Technical secretariat and all competent Programme authorities to enhance communication about the Programme, its implementation and results, in cooperation with stakeholders.
2. Concerning the role of cities and regions in the BSR Programme implementation, the UBC Board took note of a worrying trend that the share of local/regional level has been diminishing during last years. This all the more regrettable, as the role of cities as engines of growth and innovation is continuously increasing. While the new draft Programme emphasizes this role of cities, it is our understanding that their role is not yet recognized in a satisfactory way. In this, we share the opinion of our member City of Gdynia, which has submitted its own opinion. We invite relevant authorities to take this into account in producing the final version.

3. The EUSBSR was adopted in the middle of the last BSR period, and therefore it was natural that their synchronization was not ideal. However, the new BSR Programme can build on the priorities of the Region as formulated in the EUSBSR and its Action Plan. While the draft Programme and the Action Plan may differ in many ways, we see that in general they point to the same direction. However, we think that the way the EUSBSR and its Action Plan (including the flagship projects) are referred to, is clearly too weak. In our opinion, the BSR Programme should clearly state that it will finance, as a priority, activities included in the EUSBSR Action Plan – naturally provided they fulfill the quality criteria.
4. The implementation of the EUSBSR is entering into a critical stage, the key task being now to deliver practical results. Therefore, the discussion about governance and leadership of the Strategy is of greatest importance. In this discussion, the role of PACs and HALs, in addition to the NCPs, has been stressed and they have been requested to deliver more. However, fulfilling this is very difficult, if there are not enough material resources to do the job. Therefore, the UBC strongly supports the opinions of a great number of PACs and HALs – some of which are our members - who in their joint letter to DG Regio and the BSR Programme 2014-2020 Joint Programming Committee express great concern about the proposed level of Technical Assistance from the BSR Programme 2014-2020. If this assistance is not substantially raised, it may well endanger the successful implementation of the Strategy. These financial issues affect all PACs and HALs, but they would be even more felt by those organisations which are non-state actors, like cities, NGOs and regions in many countries.
5. The Programme encompasses, in addition to EU Member States or parts of them, also partner countries of Belarus, Norway and Russia. Many of the challenges can – as the draft Programme states – only be tackled in cooperation between the EU and partner countries. This is also stressed in the EUSBSR and its Action Plan, which includes a specific Horizontal Action Neighbours to promote this dimension “across the borders”. UBC, which includes also Norwegian and Russian cities as its key members, stresses the importance of this inclusive approach. Therefore, we emphasize that everything should be done to reach an agreement – based on the relevant regional development strategies - with partner countries to enable cooperation. During times of international tension, special effort should be made to achieve this in the interest of the BSR as a whole.
6. UBC also wants to draw the attention to the social issues, including gender equality, which are important for the full mobilization of the full potential of our societies. The Baltic Sea Region is on Top of Europe in many key aspects because our societies are emphasizing education, culture, equality, innovation, transparency and other “soft values”. We share the opinion of our Member City Umeå, which in its comments of the Strategy would like to see equality more prominently taken into account in the draft Strategy.
7. The UBC will be pleased to continue cooperation with the BSR Programme during the next period, not only as active project participant, but also expresses its willingness to take part on the Programme level in various advisory or other bodies, as seen useful by the JPC and other Programme structures.