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Second Thematic Evaluation Report Small Projects Fund

FINAL VERSION



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1. INTRODUCTION

This Report is drafted in compliance with Article 35 of the (EU) Regulation no. 1059/2021 (Interreg Regulation) that sets that the managing authority shall carry out evaluations of the programme to improve the quality of programme design and implementation and to assess their effectiveness, efficiency and impact.

The INTERREG VI-A Italia-Slovenija 2021-2027 Programme (hereinafter "Programme") includes an evaluation activity that spans the entire programming period. As outlined in the Evaluation Plan, updated by the Monitoring Committee on October 2nd, 2024, and agreed upon by the Evaluation Working Group (hereinafter "WG") during the meeting on May 30th, 2024, this activity requires the submission of four thematic evaluation reports, two extended evaluation reports, and one impact evaluation report. Each report will include a synthesis assessing the coherence of financed projects with environmental objectives, as defined in EU Regulation 2020/852, and with the "Do No Significant Harm" (DNSH) principle, utilizing environmental indicators established in the Programme Monitoring Environmental Plan (available on the Programme website: <https://www.ita-slo.eu/en/documenti/valutazione-del-programma>).

In accordance with the Evaluation Plan, this Second Thematic Evaluation Report specifically examines the effectiveness of the Programme's interventions, focusing on achievements by the Small Projects Fund.

2. GENERAL OVERVIEW OF THE SMALL PROJECT FUND

This section presents the key findings derived from a comprehensive desk analysis. The research involved a thorough review of existing documentation, including EU Regulations, Programme definitions, action plans, and evaluation reports of the previous programming period. The aim is to display foundational information and establish a clear understanding of the subject matter, laying the groundwork for subsequent in-depth analysis and evaluation.

2.1 REGULATIONS AND PROGRAMME DEFINITION AND REQUESTS

Article 2 of the Regulation (EU) 2021/1060 defines the “small project fund” as “an operation in an Interreg Programme aimed at the selection and implementation of projects, including people-to-people actions, of limited financial volume”.

The Regulation (EU) 2021/1059, which regulates Interreg Programme, dedicates Chapter III, Section III to “Operations and small project funds”. Within this section, article 25 focuses on “Small project funds”. It states that the total contribution to small projects fund within an Interreg programme shall not exceed 20% of the total allocation. The beneficiary shall be a cross-border legal body or an EGTC and shall select the small projects which are implemented by the final recipients.

Simultaneously with the drafting of the Programme, the process for the selection of the European Capital of Culture 2025 was taking place. On December 31, 2019 the first bid book presented by Nova Gorica was submitted and on December 18, 2020 the cross-border cooperation Nova Gorica-Gorizia was announced to be European Capital of Culture (ECoC) for the year 2025.

The second Bid Book 2025 GO! illustrates the three goals of the European Capital of Culture: one cross-border European city; a green, vibrant city with a high quality of life; an innovative, entrepreneurial-minded city. To better understand the impact of the projects within the ECoC the Document sets a list of indicators that are linked to the three objectives.

Recognizing the need to support and promote the ECoC, the Programme was drafted to help leverage this opportunity. Following the definition and rules set out by the European Regulations, the Programme foresees the SPF as “a tool that contributes to Programme objectives’ achievement and helps overcoming cross-border obstacles to cooperation by building trust between citizens and institutions, raising awareness, promoting mutual understanding and networking”.

These premises set the basis for supporting the European Capital of Culture 2025 Nova Gorica-Gorizia through the Small Project Fund and led to the appointment of the EGTC-GO as sole beneficiary of the fund to implement a bottom-up approach in selecting a new set of project proposals.

The EGTC-GO is an Italian public body with legal personality, founded by the Municipalities of Gorizia, Nova Gorica, and Šempeter-Vrtojba in 2011. Its purpose is to identify and address common challenges that can make the cross-border territory more competitive and attractive.

Three main pillars were considered for the finalization of the EGTC-GO area's territorial strategy:

- Capitalizing on two European programming periods of the Italy-Slovenia programme to maximize the effectiveness and efficiency of public investments.
- Revitalizing the "border economy" by using an innovative approach to transform the concept of a border from a weakness (a barrier) into an opportunity (a territorial specificity for shared local development of mutual and reciprocal benefit for the population of the two states).
- Increasing the provision of common local services for the citizens of the three municipalities, leveraging the excellence of the area.

The EGTC-GO represents the first case, on a European scale, of implementing an integrated territorial investment based on a common strategy as a single beneficiary. According to the outcomes of the questionnaire conducted for the ITI Thematic Report of May 2020, the EGTC-GO was "very important for the networking on local and regional level." That same Report highlighted the improvement of cooperation and communication thanks to the EGTC-GO and the Sole Beneficiary approach.

Through this approach, the Programme set the SPF to achieve the goals of the Programme and its Specific Objective 4.6: "Enhancing the role of the culture and sustainable tourism in economic development, social inclusion and social innovation".

In order to implement the SPF and its core objective an Action Plan was developed by the EGTC to set the timeline, the budget distribution, the guiding principles and the financial management. During the first meeting held on September 20th, 2022, the Monitoring Committee asked for a second version of the Action Plan comprehensive of the modifications and updates requested by the Committee. The new Document was submitted on December 1st, 2022 and approved by the MC on January 4th, 2023.

The *Action Plan for the implementation of the SPF ECoC GO!2025 Nova Gorica-Gorizia through Interreg Italy-Slovenia Programme 2021-2027* specifies the SPF budget in 8.241.970,00 €, of which 6.593.576,00 € from the ERDF Programme and 1.648.394,00 € from the Italian National cofinancing fund and it states that the SPF is a 'support tool for the European Capital of Culture 2025, complementary to the projects that will be implemented and have already been planned in the context of the BidBook'. After submission, projects proposals have to be selected following a procedure based on administrative and eligibility checks, quality assessment and State Aid assessment. According to the Action Plan, the criteria must take into account the contribution to ECoC 2025 and Programme indicators, cross border relevance and impact, implementation capacity, thematic and context relevance, quality of the draft budget and involvement of relevant stakeholders.

The Plan reaffirms the concept of the EGTC-GO as Sole Beneficiary and managing body of the SPF. Two types of projects will be eligible to funding:

- Projects from 30k up to 100k of 12 months duration (Typology A)
- Projects from 30k up to 200k of 24 months duration (Typology B)

Furthermore, a two-level reporting system is established: from final recipients to EGTC-GO and from that to First Level Control / Managing Authority. The final recipients are responsible for reporting on their project activities to the EGTC-GO both during the project implementation and upon its completion. This reporting includes a detailed description of the activities and photo documentation. For costs reported under the real costs option, the final recipients must provide all necessary documentation as specified in the Manual on eligibility of expenses for the SPF. The EGTC-GO internal financial unit is tasked with verifying the reports submitted by the final recipients. Furthermore, on-site visits and audits may be scheduled as part of the verification process.

The Sole Beneficiary is subject to the Programme Management Verifications and audit checks. These controls are defined in the Interreg VI-A Italy-Slovenia Manual of eligibility of expenses and are governed by the Subsidy Contract. The EGTC-GO must report its own costs related to the management of the SPF, as well as the costs reimbursed to the final recipients of the funded small projects. The SB report will be accompanied by a comprehensive "project package" for each small project, which includes the activity report, the cost checklist, and payment receipts.

For the purpose of efficient project management and monitoring, the Programme utilizes JEMS (Joint Electronic Monitoring System) a purpose-built monitoring system developed by INTERACT in collaboration with various European Cooperation programmes for the electronic registration, monitoring, and storage of data related to

financed projects. Crucially, all data exchanges between project applicants/beneficiaries and the Programme authorities are conducted exclusively through the JEMS platform. The system is designed to manage all project phases, encompassing everything from the submission of proposals and the subsequent project assessment, to the financing decision and contracting process, and finally, from the reporting of project activities to the submission of participants' expense reimbursement requests.

Following the approval of the Invitation Letter no. 04/2022 for the 'Small Project Fund - SPF' and its Application Package during the 5th Written Procedure of the Monitoring Committee (02/12/2022 – 04/01/2023), a formal request was issued to the EGTC-GO. The invitation letter to the Sole Beneficiary was based on the updated version of the Action Plan. The Letter describes the specific principles and procedures of the SPF and the Sole Beneficiary's duties towards the Programme. According to the Document, the EGTC-GO, together with the three municipalities involved in the EGTC group, must ensure simplified and efficient management procedures to overcome legislative and linguistic obstacles.

To effectively measure the success of the SPF operation, the Invitation Letter specifies the output targets of OS 4.6 to be acquired by financing the operations as follows:

OUTPUT INDICATOR	EXPECTED CONTRIBUTION
RCO 115: Public events across borders jointly organized	At least 50 joint events
RCO 85: Participation in joint training schemes	3 training schemes involving 10 participants each according to ECoC experts forecast
RCO 83: Strategies and action plans jointly developed	1 strategy / action plan
RCO 116: Jointly developed solutions	2 solutions as foreseen by ECoC experts

RESULT INDICATOR	TARGET
RCR 79: Joint strategies and action plans taken up by organizations	Final target (2029) of 7
RCR 81: Completion of joint training schemes	Final target (2029) of 91

The Invitation Letter includes a series of prescription, guiding principles and instruction for the Sole Beneficiary. Specifically, it prescribes the EGTC-GO to implement the SPF via public calls, with simplified application packages and simplified reporting procedures. The projects must have a cross-border impact and should address the whole Programme area. As a general rule the projects should have two partners, one per Member State. Nevertheless, small projects with a total budget up to 50k can be submitted by one partner when demonstrating that results and outcomes have a transnational impact. Lastly, the Invitation Letter requires the SB to electronically submit its application for the SPF Operation using JEMS.







In September 2025, an updated Programme revised the specific scopes of the SPF. While maintaining the general aim of overcoming cross-border cooperation obstacles, this objective is now further defined by: enhancing efficient public administration, promoting legal and administrative cooperation, and fostering cooperation between citizens, civil society, and institutions.

3. FINDINGS OF THE ANALYSIS

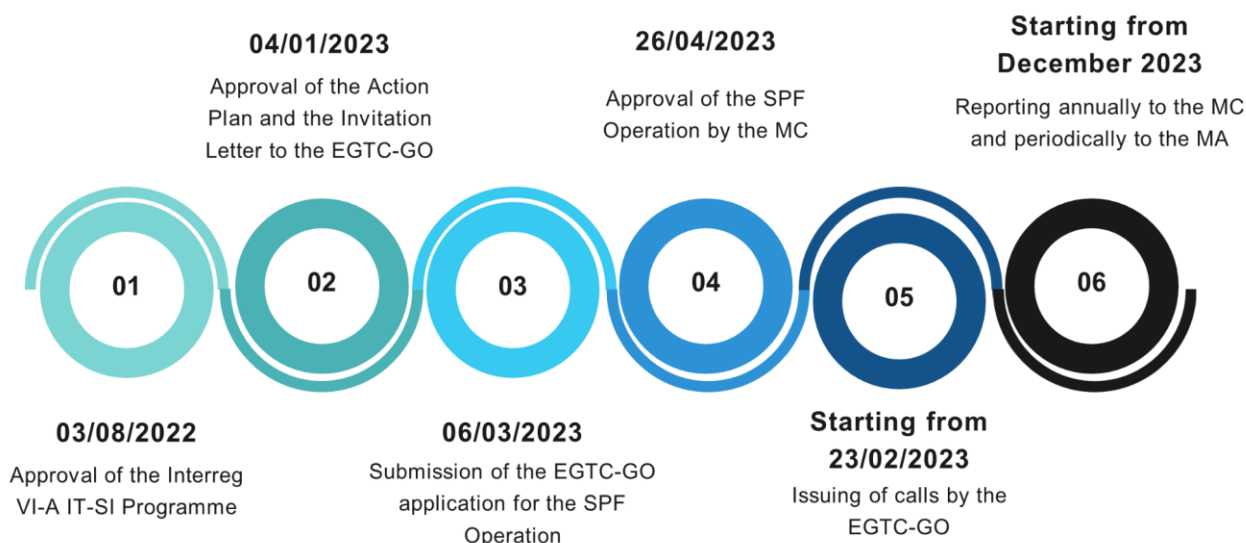
The outcomes of the analysis allowed reconstructing the Small Projects Fund (SPF) intervention logic examining its contribution by meeting Programme area requirements and supporting the strategy of the European Capital of Culture 2025 Nova Gorica - Gorizia.

3.1 SPF GOVERNANCE AND MANAGEMENT

a. Roles and responsibilities map

 Managing Authority (MA)	 Joint Secretariat (JS)	 Sole Beneficiary (SB) – EGTC GO	 Monitoring Committee (MC)	 Working Group on Evaluation	 Final Recipients
Programme Coordination and Management	Support to the MA	Management of the Small Project Fund	Programme decisions and monitoring	Oversee the evaluation activities	Management of activities, activities and communication performer
Programme drafting	Projects assessment and communication manager	Creating streamlined and efficient management frameworks for the benefit of final recipients	Programme adoption and examination of any issues affecting the performance and the measures taken to address these issues	Propose and review of the evaluation plan	Project submission
Establish and apply non-discriminatory, transparent criteria and procedures for the selection and financing of the Operations	Assist beneficiaries and partners in the implementation of operations	Implementing SPF through public calls and selecting small projects to be implemented by final recipients	Approval of the methodology and criteria used for the selection of operations, including any changes thereto	Monitor and review evaluation reports and findings	Performing Project activities including the communication of the Project progress and dissemination of results
Informing the Monitoring Committee and Commission about the financing of Operations and their progress, and the communication and visibility actions performed by the Programme	Project back office (check on projects progress reports) management, monitoring and control	Reporting on the implementation of both work packages at the Monitoring Committee meetings	Tracking and examination of the progress implementation and the achievement of milestones and targets of the Programme	Propose recommendations for improving SPF implementation	Reporting to the SB about the Project progress

b. Decision-making process



c. The role of Sole Beneficiary

The Small Projects Fund (SPF) project was submitted to the Managing Authority as required by the Invitation Letter that was consistent with the recommendation in Interreg Regulation No 1059/2021 that encourages Member States to empower EGTCs to manage sub-programmes, integrated territorial investments, or small project funds. As a result, EGTC-GO was appointed as the Sole Beneficiary of the SPF, largely due to its foundational role in the Capital of Culture 2025 candidacy and its crucial involvement in its execution.

Under the SPF, EGTC-GO, as the Sole Beneficiary, was tasked with creating streamlined and efficient management frameworks for the benefit of final recipients. This was intended to mitigate legislative and linguistic barriers, especially given the involvement of three municipalities within the EGTC group, ensuring broad engagement across the Programme area.

In adherence to Article 25 of the Interreg Regulation, EGTC-GO was responsible for selecting small projects to be implemented by final recipients. During this selection process, EGTC-GO had to prevent any double funding and foster synergies with other funding sources related to ECoC 2025 – European Capital of Culture. The Sole Beneficiary was required to implement the SPF through public calls, utilizing simplified application packages (focused on results and milestones) and reporting procedures, as outlined in the Simplified Cost Options Methodology in section 5 of

the SPF's Action Plan. EGTC-GO also needed to publish these calls and adhere to the expenditure schedule and reporting tranches stipulated in the Subsidy Contract with the MA and assure that all project activities would end by September 1, 2027.

The primary responsibilities of EGTC-GO include:

- I. **Fund Management and implementation:** Operating as the Sole Beneficiary of the SPF.
- II. **Call Management:** Drafting and issuing public Call(s).
- III. **Stakeholder Communication:** Managing direct communication with potential final recipients and stakeholders.
- IV. **Engagement Activities:** Organizing workshops, public hearings, and implementing other participatory tools for stakeholders and final recipients.
- V. **Project Selection:** Assessing and selecting project proposals received from the calls.
- VI. **Evaluation Support:** Assisting the Managing Authority (MA) and selected experts in the ex-ante definition of objectives, mid-term reviews, and ex-post evaluations, particularly concerning SPF implementation.
- VII. **Annual Reporting:** Reporting annually to the Monitoring Committee on ongoing activities.
- VIII. **Dissemination and Visibility:** Managing dissemination, communication, and visibility activities in collaboration with the MA, in accordance with the Guidelines for the application of the Programme Visual Identity.

d. Monitoring Sole Beneficiary activities

The SPF is managed as a Programme operation, this requires a division of the project into two work packages. WP1 focuses on fund management and governance by the SB, while WP2 addresses the funding of the small projects. The Sole Beneficiary is responsible for reporting on the implementation of both work packages at the Monitoring Committee meetings.

3.2 PROGRESS OF THE SPF IMPLEMENTATION

a. Fund management and governance (WP1)

According to the Invitation Letter and the SPF Action Plan, the SB issued 3 calls for proposals adopting simplified application packages and reporting procedures, and carried out actions to help the final recipients during the whole process with any

issues they might encounter. Furthermore, a number of handbooks and guidelines were produced, both in Italian and Slovenian, to help the final recipients in their work and to assure transparency in the selection of proposals. Hereby a list of the most important:

- Operational Handbook (Manuale Operativo / Operativni Priročnik)
- Guidelines of Eligible costs (Manuale ammissibilità delle spese/ priročnik o upravičenosti izdatkov)
- JEMS Handbook (Manuale JEMS / Priročnik JEMS)
- Project assessment guidelines (Manuale di valutazione / Priročnik za ocenjevanje)

The SB also provided a number of checklists, videos, templates and documents to help the final recipients in their tasks.

In addition to these documents, the SB organized several events to present the opportunities offered by the SPF, infodays to present the calls for proposals and technical workshops to help interested applicants in the draft of proposals and use of the JEMS tool to submit the application. Hereafter the events calendar:

Date	Subject	Site
February 2023	SPF GO! info days: Presentation of Call 01/2023	Gorizia, Venice, and Štanjel
March 2023	Technical workshop: Call documentation	Nova Gorica
December 2023	Technical workshop: Communication guidelines	Online
April 2024	SPF GO! Info days: Presentation of Call 02/2024	Gorizia, Tolmin, Portogruaro
September 2025	SPF GO! Info days: Presentation of Call 03/2025	Gorizia, Ajdovščina, Venice

Two more instruments to help potential proponents were implemented by the EGTC-GO: a partner search form to help organisations with project proposals to find their partner in the Programme territory, a dedicated phonenumber helpdesk for

potential proponents and final recipients to contact EGTC-GO staff.

For the management of the small projects funding, the SB has a customized JEMS. Applicants submit the proposals and EGTC-GO officers or appointed experts perform the assessment and record data via the platform. All financed projects record expenditures data in the system database and the control process of final recipients' expenditures is performed by the EGTC-GO with two external experts and the outcomes of verification are recorded in JEMS.

More information about the outcomes of the 3 calls and procedures for the assessment, monitoring and control of financed projects are available in the next section.

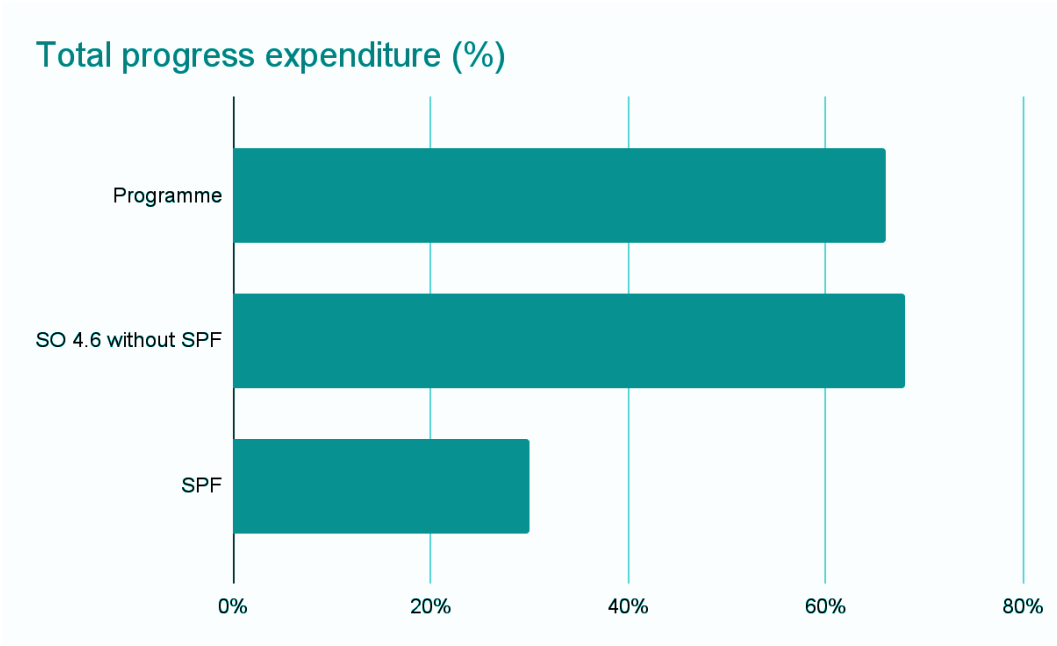
For the management (WP 1) and projects funding (WP 2) of the SPF, the SB has submitted the expenditure to the MA. The current data are (November 2025):

	SPF allocation	SPF total expenditure
WP 1 - Management	1.236.295,50	589.080,34 (48%)
WP 2 - Projects	7.005.674,50	1.854.433,00 (26%)
Total	8.241.970,00	2.443.513,34 (30%)

The SPF reached a total progress of 30% of the total allocation of the fund. A comparison with the Programme expenditure is helpful to understand the progress of SPF.

	Total allocation	Projects expenditure
Programme	88.623.329,14	58.934.122,44 (66%)
SO 4.6 without SPF	27.414.390,04	18.692.482,52 (68%)

The data indicates that SPF expenditure progress reached 30%. This performance is lower than the 66% reported for the total Programme expenditure and the 68% achieved by other non-SPF projects under SO 4.6.



b. Monitoring small projects progress (WP2)

The SB, as of today November 2025, issued 3 Calls for proposals, as established in the Action Plan, requiring that projects must feature a clear and unequivocal cross-border impact extended to the entire eligible area. A thematic focus encourages proposals that promote:

- 1. active inclusion and participation of children and youth under 30,
- 2. value green and aquatic areas through socio-cultural initiatives,
- 3. develop cross-border content utilizing existing public infrastructure,
- 4. operations that foster social cohesion via accessible sports and physical activity.

Projects are co-financed at a 100% rate for all partners, guaranteed by the ERDF and the Italian national fund. Non-public entities may request an advance payment up to 50% of the eligible budget against adequate bank guarantees.

The main features of the 3 calls are listed in the following table:

		1st call	2nd call	3rd call
Projects financial size	<i>1 final recipient</i>	30-50.000 €	30-50.000 €	30-50.000 €
	<i>2 final recipients</i>	30-200.000 €	30-150.000 €	30-100.000 €
	<i>Max budget</i>	200.000 €	150.000 €	100.000 €
Submission deadline		21/4/2023	14/5/2024	17/10/2025
Max Projects duration		24 months	18 months	12 months

As reported by the SB during the 4th and 6th meeting of the Monitoring Committee, the reduction both in budget and project duration for the 2nd and third call is justified by the approaching of the Go!2025 and the willingness to focus on small projects up to €100K.

To ensure comprehensive coverage across the entire area of action, the thematic focus of the three calls was diversified.

First call:

- Go Share/Go Green/Go Europe;
- Capacity development;
- Residency and more

Second call:

- Active inclusion and participation of children and youth (under 30);
- Green mobility, social and environmental sustainability;
- Promotion and enhancement of a culture of multilingualism;
- Promotion of well-being and social cohesion in sports and physical activity accessible to all.

Third call:

- Initiatives that promote the active inclusion and participation of children and youth under 30 through co-design processes, with the goal of enhancing their skills,

fostering employability, and stimulating structured relationships with cultural, institutional, and local stakeholders;

- Enhancement of green spaces and aquatic environments, such as rivers, lakes, streams, lagoons, and coastal areas, through socio-cultural, artistic, and environmental awareness initiatives;
- Development of cross-border content aimed at enhancing public interest infrastructure already present in the Programme area;
- Promotion of well-being and social cohesion in sports and physical activity accessible to all.

For the 3 calls, partnership is composed of two entities—one from Italy and one from Slovenia—from the eligible NUTS 3 area, though a single proponent is allowed exceptionally for smaller projects (from € 30.000,00 up to € 50.000,00) if outcomes and results have a transnational impact. Entities that were Lead Partner in a SPF call are ineligible to submit a proposal as Lead Partner for the following calls.

Regarding expenditure, personnel costs are reimbursed using a 20% flat rate of real costs, and administrative costs at a 15% flat rate of eligible personnel costs, while costs for Consultancies, Equipment, and Infrastructure are treated as real costs, requiring expenditure documentation.

Proposals have to be submitted electronically via the JEMS monitoring system. The selection process involves a multi-stage evaluation: first, a check of formal and eligibility requirements, followed by a quality assessment where projects scoring 85 points or more are eligible for funding, and finally, checks on financial capacity (for private LPs) and State Aid compliance.

The quality assessment of proposals is composed of two parts: strategic criterion and operational criteria. The first one includes an evaluation of the context of the project, the impact on cross-border cooperation, the legacy and results of the project, and of the partnership. The second criterion focuses on management, communication, an evaluation of the workplan and of the financial plan. Each criterion allows to assign a score that contributes to the evaluation of the proposal.

Following the formal and quality assessment checks, the eligible project proposals are organized into a ranking list. Funding follows the highest-scoring proposal downwards using the entire available budget for the call. In the second and third call, in the event that two or more proposals receive the same final score, specific criteria are applied to break the tie prioritizing projects with the highest strategic score in the criterion of “coherence with the thematic focus of the call”. Should the

tie persist, the earlier date and time of the application submission to JEMS determines the final ranking order.

Once the ranking is finalized, the EGTC-GO formally approves the projects selected for funding. The Lead Partner of each selected project is then notified of the successful outcome and officially invited to start the contracting phase. This phase requires the Lead Partner to provide all necessary final documentation, particularly concerning State Aid compliance and, if applicable, the bank guarantees required for the requested advance payment. Upon successful submission and verification of these documents, the SB proceeds to sign the Subsidy Contract with the Lead Partner. This contract formally establishes the rights and obligations of both parties and constitutes the legal framework governing the project implementation, including provisions for eventual financial corrections and the resolution of any disputes related to its execution.

Final recipients are responsible for semi-annual reporting to the EGTC-GO during and at the end of the project, including a description of activities and providing documentation as required by the Manual on eligibility of expenses.

According to the Guidelines on Controls and Reporting for SPF GO! 2025 Projects (*Linee guida sui controlli e la rendicontazione dei progetti SPF GO! 2025 / Smernice za kontrole in poročanje projektov SPF GO! 2025*), the control process for SPF final recipients, performed by the EGTC-GO with external experts, requires beneficiaries to submit through JEMS semi-annual expenses reports and progress reports about performed activities. The eligible expenditures are limited to the project implementation period.

Reporting involves a two-step process: final recipients upload documentation to JEMS, and EGTC-GO performs an initial review and validation of eligible costs. The Lead Partner then submits the reimbursement request via JEMS. Administrative verification is generally concluded within three months, if there are no requests for supplementary documentation.

Controllers verify compliance across several areas, including documentation completeness, adherence to EU and Programme eligibility rules, procurement conformity, and project implementation. The positive control outcomes, recorded in JEMS, allow the final recipient to present reimbursement requests that are subsequently liquidated by the EGTC-GO within 30 days. Project expenses, after being paid out to the final recipients, are included in reimbursement requests

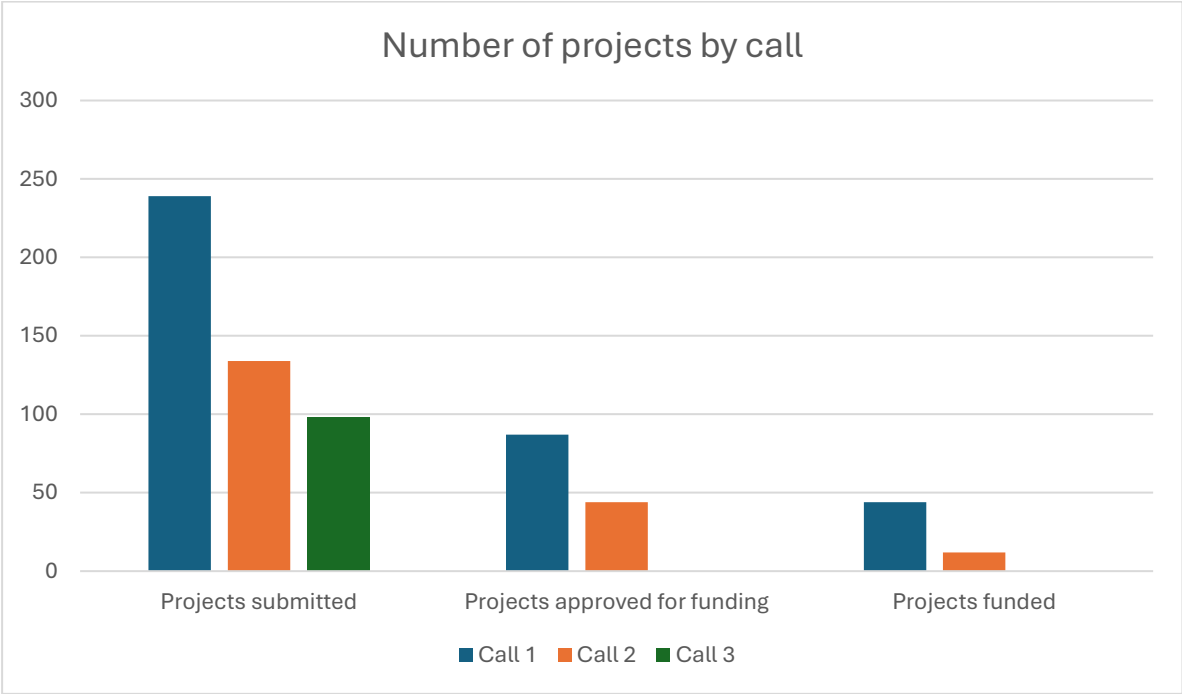
submitted by the SB to the Programme. National controllers verify these reimbursement requests.

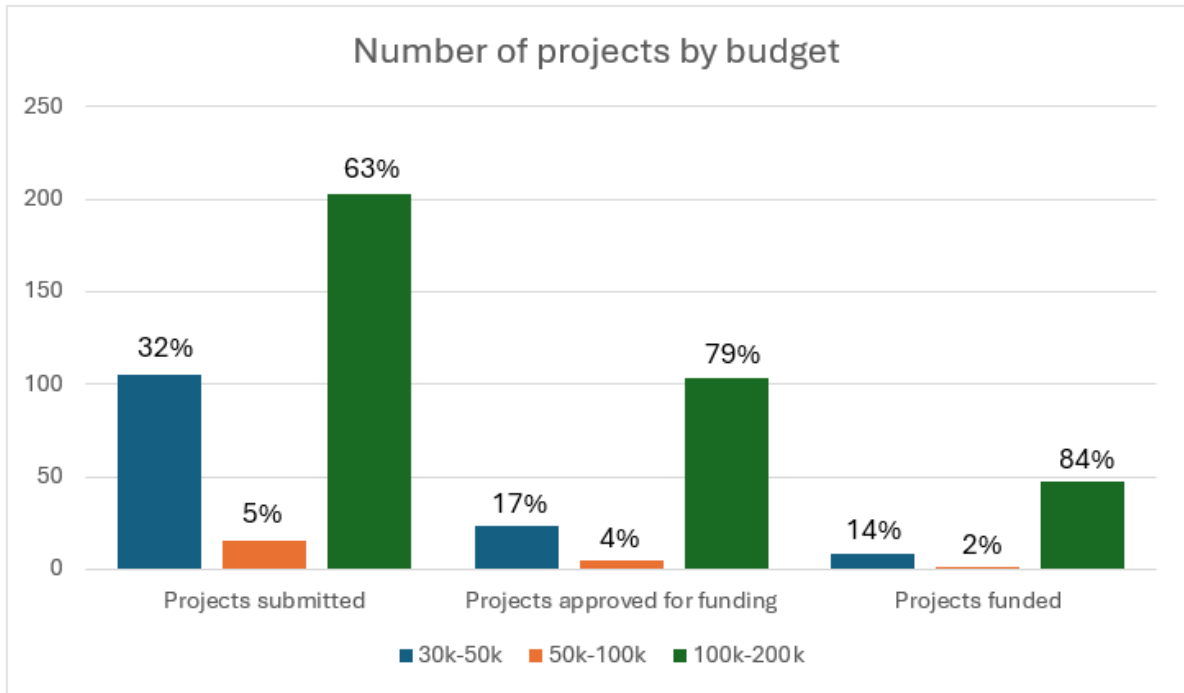
c. Focus on Projects

As of November 2025, the data shows that a total of 239 project proposals were submitted in the first call, of which 87 scored above 85. On the second call a total of 134 projects were submitted, with 44 achieving a score higher than 85. On the third call the total number of project proposals is 98 and assessment is still ongoing.

Initially, 27 of the 87 projects approved in the first call were funded. In early 2024, the Friuli Venezia Giulia Region allocated an additional fund of €3,200,000.00, which made it possible to fund more projects, bringing the total for this call to 44. In the second call, 44 projects were approved, of which 12 were funded.

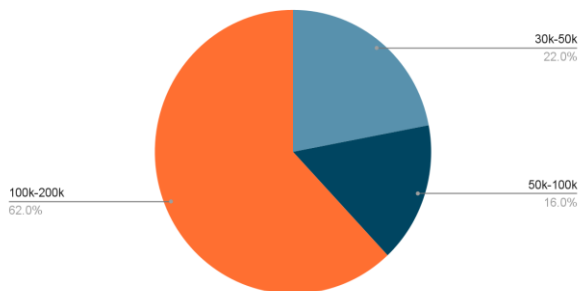
A significant number of project proposals requested funding exceeding €100k (137 in the first call and 66 in the second). Finally, a small minority of the funded projects involved only a single partner: 5 in the first call and 2 in the second.



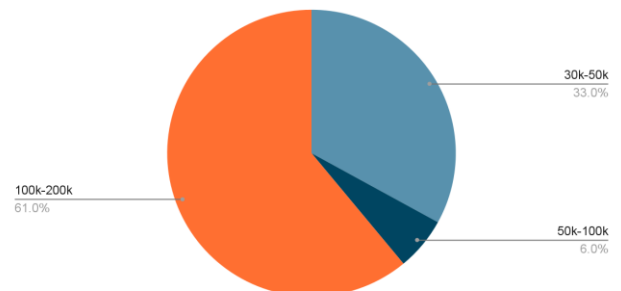


The following charts analyze the rejected proposals after the formal check for the first two calls.

Percentage of projects rejected at formal check in Call 1 (by requested funding)

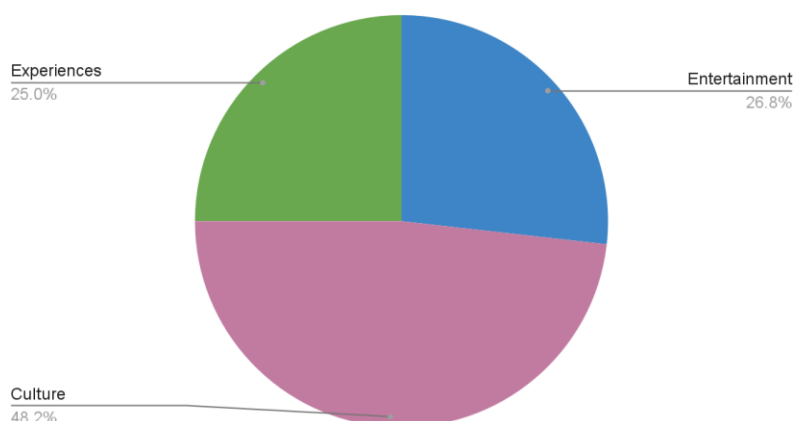


Percentage of projects rejected at formal check in Call 2 (by requested funding)



Note that most projects with a budget between €30,000 and €50,000 have only one applicant, therefore, in order to make the analysis homogeneous with the ones above, instead of analyzing proposals considering the number of partners, projects with smaller budgets are compared to projects with larger budgets.

Number of projects by thematic area



Considering the thematic areas of the funded projects, there is a focus on entertainment (15), culture (27) and experiences, sport included (14).

As required by OS 4.6 and recalled by the 3 calls, all funded projects are based on environmental sustainability.

d. Field research results

To better understand the contribution of interviews performed for this report, a separate paragraph is given with the outcomes.

The interviews were conducted with representatives from Regione Veneto, Regione Friuli Venezia Giulia, the Managing Authority (AdG), the Joint Secretariat (JS), and the Slovenian National Representative and Monitoring Committee component to evaluate the fund performance. The Italian National Representative (Dipartimento politiche di coesione) gave instead a written response.

A significant focus of all interviews has been the management of the fund by the EGTC-GO, which acted as the Sole Beneficiary.

A recurring theme was the excessive regulatory burden, which undermined the fund goal of simplification. Criticisms were expressed by the Joint Secretariat and the Sole beneficiary that rigid EU Interreg regulations were to be applied to the small projects without any significant simplification in comparison to regular projects. The following issues arise due to lack of simplification:

- Significant administrative difficulties and reporting burdens for small associations and new beneficiaries, which are not equipped for such complex rules.
- The effort required by the Sole Beneficiary to manage the SPF was comparable to that of managing ordinary, larger projects, leading the role of the Sole Beneficiary

comparable to that of an intermediate body present in the past programming periods.

The interviewees remarked that choosing the EGTC-GO as Sole Beneficiary of the SPF was an advantage due to its cross-border nature and local recognition, though the following deficiencies were perceived:

- It was reported that the EGTC-GO lacked autonomy and required much support from the Managing Authority and Joint Secretariat for many management, monitoring, and control aspects.
- Concerns were raised about a potential conflict of interest, as the EGTC-GO was responsible for managing the call, signing contracts, and performing quality control on the same projects. It is not clear if there is a separation of functions (selection and funding vs performance assessment).
- Criticism was expressed about a lack of transparency by the Sole beneficiary, particularly regarding the projects selection, and doubts emerged on the competence of experts appointed to perform the proposals assessment.

The fundamental structure of the fund, particularly the financing of projects with only one partner, was criticized. It was reported that this model "misses the essence of Interreg cooperation," which is to make subjects from different states work together and called it a "step backward" to past programming periods at the end of the 90's. Furthermore, it was remarked that the one partner principle weakens the core concept of partnership fundamental to cross-border projects.

There was widespread scepticism among all interviewees regarding the long-term impact and legacy of the funded projects. A general fear was expressed of an "Only one step effect," where activities cease the moment funding ends, as projects lacked a clear plan for future periods. It highlighted the difficulty in demonstrating the actual impact of "scattered" micro-financing on the area. It was noted that many activities were "soft" or minimal upgrades of existing annual events, lacking genuine innovation or a strategy for capitalization of the best projects in terms of impact and innovation. Furthermore, the implemented model failed to facilitate synergies between the small SPF projects and larger strategic projects.

The project assessment methodology was identified as a major cause for the above issues. Significant criticism was reported, including a high gap between scores from external experts and poor technical assessments. This resulted in many projects deemed meritorious not receiving funding due to the flawed ranking system and the assessment evidences provided to the MC were reported as too synthetic and lacking transparency. It was also pointed out that the Monitoring Committee (MC)

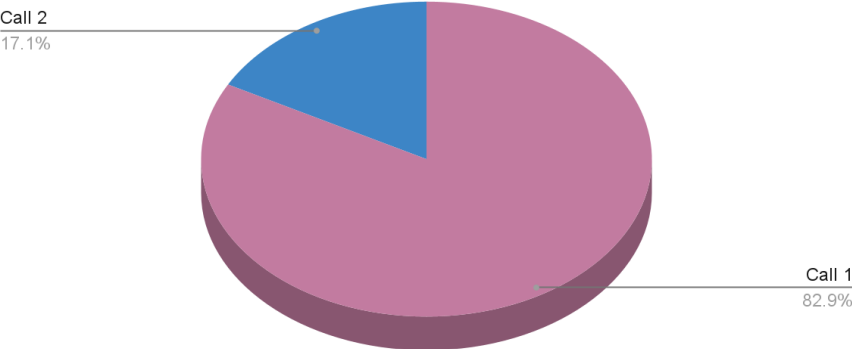
had a limited role and lacked direct access to information on the projects, with a general shortage of feedback.

Despite the heavy criticisms, several positive outcomes were acknowledged. The main positive aspect was the EGTC-GO's ability to involve new, smaller entities and associations that are typically less accustomed to European project planning. It was also highlighted that the great number of project proposals demonstrated a strong interest from the territory in Interreg instruments.

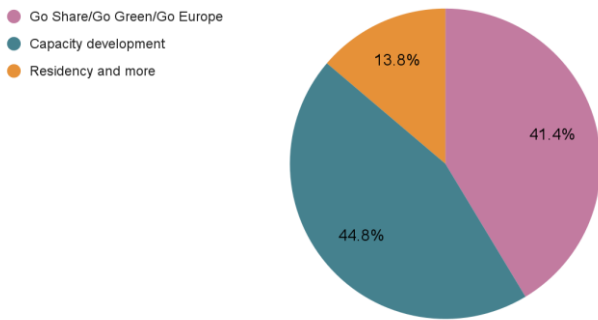
Interviewees provided several suggestions for the future programming period though the new draft regulations do not include a fund comparable to the actual SPF. All of the interviewees report the necessity to rethink the model of SPF starting from the introduction of administrative simplifications at regulatory level for small projects and, for part of the interviewees, reduce project funding amounts (e.g. up to €50,000). To ensure the cross-border approach is maintained, the experience of the one partner projects should not be repeated. Many agreed that, in project selection, the SB should involve cultural and tourism authorities. Also monitoring should be improved by defining a clear data set to be shared periodically with the JS, MA, and the MC from the beginning to avoid distortions. A further suggestion is to support newcomer beneficiaries with more workshops during projects life from proposal submission to the closing of financial reporting.

Another set of interviews and a questionnaire were conducted to gather the opinions of the final recipients. A total number of 35 beneficiaries (of which 13 Italians and 22 Slovenian) answered the questionnaire and 7 partners of 5 projects followed up with an interview.

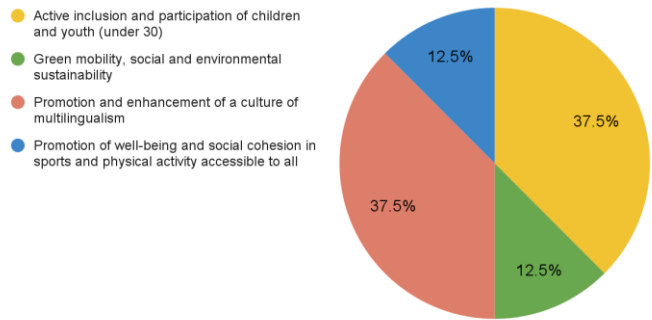
Distribution of questionnaire responses by call



Distribution of questionnaire responses of the first call by thematic focus



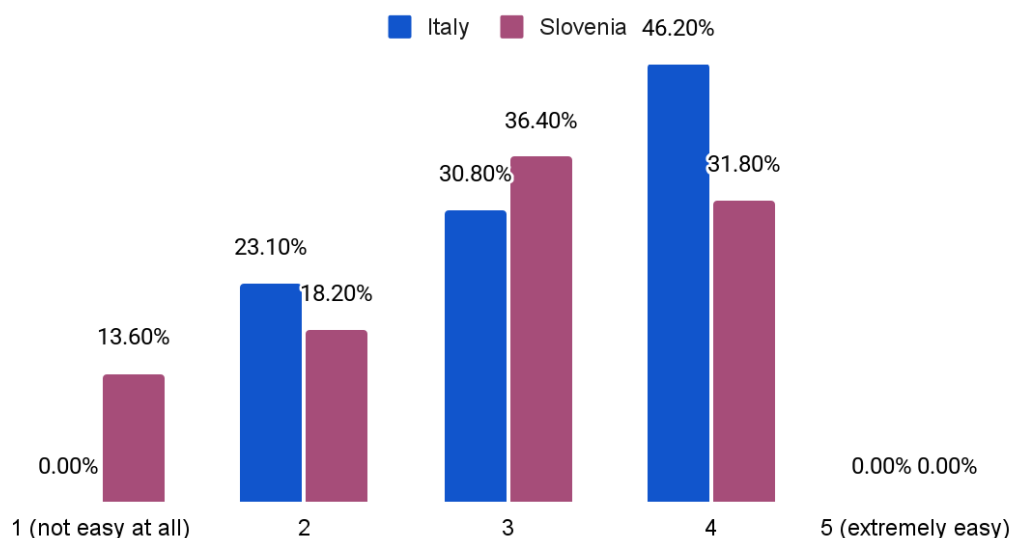
Distribution of questionnaire responses of the second call by thematic focus



The analysis of the awareness of the UE funding system shows that a large number of final recipients already knew of the existence of this kind of opportunity, and only the 8.6% of respondents never heard about EU funding for projects. Furthermore, 45.7% of them were aware of the opportunity of financing small projects before the current Programme, showing that 54.3% are newcomers.

The respondents generally perceive participation in the SPF as moderately accessible. However, the questionnaire corroborates the findings coming from other interviews regarding the complexities associated with the reporting, monitoring, and reimbursement phases.

Perception of how easy it was to participate in the SPF (5 = extremely easy, 1 = not at all easy)

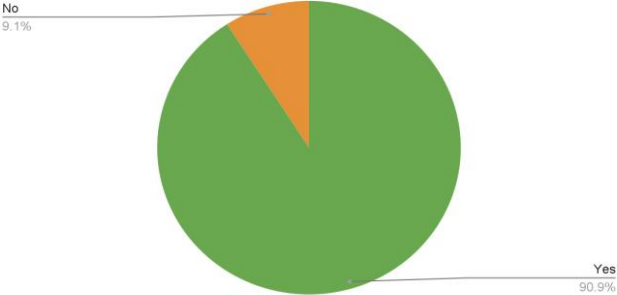


Information provided by the SB during the events were perceived as useful, particularly in the Slovenian part (81%) and for the 50% of the Italian respondents,

and the support offered by the EGTC-GO to the single final recipients on their input was perceived as useful (91.4%).

The analysis of the effect of the SCOs during the project implementation shows a sharp contrast. Slovenian final recipients find it useful in reducing the administrative burden, while more than half of their Italian counterparts did not.

Did the use of Simplified Cost Options/flat rates (SCOs) help reduce the administrative burden during project implementation? (Slovenia)



Did the use of Simplified Cost Options/flat rates (SCOs) help reduce the administrative burden during project implementation? (Italy)



3.3 THE COMMUNICATION STRATEGY

This section is based on the interviews with the Communication Manager for the Interreg IT-SI Programme and the Deputy Director of the EGTC-GO, and contextual information available on the Programme and EGTC-GO websites.

a. Internal communication

Communication between the Programme Managing Authority and the Sole Beneficiary is characterized by structured reporting, despite ongoing technical challenges. The Programme considers for communication matters the SPF as a single project with its own budget and website section. However, difficulties persist in database alignment and updating the main Programme website. Specifically, technical issues with aligning the beneficiary database hinder the creation of sub-pages for SPF projects on the main site, resulting in misaligned progress percentages.

To ensure effective oversight and coordination, a formal agreement mandates EGTC-GO to publish a monthly summary of events, including all project news, on the SPF website. Each news requires approval by the Programme team before publication. The Sole Beneficiary, for EGTC-GO internal organization, drafts a monthly event schedule to keep the team informed.

It would be more effective if EGTC-GO utilized the Programme website more

comprehensively by providing detailed project descriptions, rather than limiting updates to monthly event news. This would better reflect true progress and impact, which is currently obscured by static advancement percentages. This highlights that, while formal processes for information exchange are in place, technical integration and full data transparency between the Sole Beneficiary and the Programme could be improved.

b. Communication with small projects beneficiaries

The Programme has supported the final recipients by providing visibility materials like roll-ups for events and ensuring Programme presence. A crucial aspect of their role is maintaining brand compliance and controlling logo usage, which has reportedly improved citizen participation. While acknowledging that citizens may not distinguish between "EGTC-GO" and "Interreg," the Programme Communication Manager emphasizes the mandatory requirement for all projects to highlight European funding. Furthermore, the SPF integrates broader European priorities, as environmental considerations are now a prerequisite for reimbursement requests, even in the absence of a specific environmental communication strategy.

To cover the whole area involved in the Programme, the presentation events took place in each region (Veneto, Friuli Venezia Giulia, Slovenia).

c. SPF dissemination of opportunities and results to the general public

The SPF has adopted a communication strategy that leverages the high public visibility of the European Capital of Culture (ECoC) to maximize outreach, a decision supported by concrete traffic metrics. The Programme Communication Manager (CM) explained that the SPF is treated as a single large project, without a separate communication strategy. The CM noted the significant audience of the Sole Beneficiary's site, particularly in the context of GO! 2025, making it strategically beneficial to redirect news there. However, the CM expressed concern that this relationship has benefited the ECoC more than the Interreg Programme, with the Interreg IT-SI brand occasionally being overlooked.

The Sole Beneficiary provided compelling data to support the strategy of using the ECoC platform for broad dissemination. The EGTC-GO strategically links the SPF to the ECoC through a dedicated section on the GO 2025 platform, which is also accessible via a web application. A notable discrepancy in traffic was reported: the EGTC-GO site receives approximately 5,000 monthly visitors, while the ECoC platform recorded 2 million views in its first six months. This stark difference confirms the effectiveness of using the ECoC's tourism-oriented platform to connect with the general public.

While the project and SPF logos were intentionally designed in collaboration with the EGTC-GO to be visually appealing and incorporate the recognizable “GO” and “EGTC” elements, the CM correctly identified the ongoing challenge of ensuring the public fully understands that the successful "GO! 2025 in action" results are fundamentally rooted in the European cohesion and cross-border cooperation funding provided by the Interreg IT-SI Programme.

The EGTC-GO actively promotes small project visibility through a well-defined communication strategy. This includes using social media platforms (Facebook, Instagram, LinkedIn) as a central hub for "SPF in action" news, where beneficiaries are encouraged to tag the EGTC-GO and its team members for wider re-sharing. Additionally, the monthly event schedule facilitates internal coordination and assists beneficiaries with planning and exposure opportunities.

4. ANSWERING THE EVALUATION QUESTIONS AND CONCLUSIONS

This chapter is structured around the Evaluation Questions defined in the Evaluation Plan and in the Methodological document, with conclusions and key findings derived from the comprehensive desk research, interviews, and thematic analysis. Each question is addressed in detail to provide a substantiated assessment of the SPF performance, following the methodological framework agreed upon by the Working Group.

SO 4.6. - ENHANCING THE ROLE OF CULTURE AND SUSTAINABLE TOURISM IN ECONOMIC DEVELOPMENT, SOCIAL INCLUSION AND SOCIAL INNOVATION

Which are the cultural and sustainable tourism (enhancing economic development, social inclusion and social innovation) approaches in the approved projects?

The cultural and sustainable tourism approaches adopted by the SPF are deeply rooted in the specific themes and evaluation criteria set by the Programme. The projects funded under Call 01/2023 were guided by themes such as "Go Share/Go Green/Go Europe", "Capacity building", and "Residencies", while Call 02/2024 specifically targeted "Active inclusion of children and youth", "Green mobility and environmental sustainability", "Plurilingualism", and "Well-being through sport". These thematic priorities were enforced through specific strategic evaluation criteria, which assessed each proposal contribution to the ECOC 2025 strategy, its cross-border impact, and its thematic relevance and innovative approach. As a result, the approved projects demonstrate a strong focus on cultural approaches that enhance economic development through heritage valorization and creativity. In terms of sustainable tourism, the approaches prioritize slow tourism, environmental enhancement, and the creation of green cross-border itineraries and sustainable mobility solutions. Social inclusion is addressed through initiatives promoting youth participation and the active involvement of local communities and minorities, particularly in projects funded under the second call which had a specific focus on younger generations and social cohesion through sport. Finally, social innovation is reflected in the adoption of innovative cooperation models, the use of new technologies, and participatory approaches that engage civil society in the cross-border area.

Which are the developed solutions to be highlighted as good practice?

Based on the analysis of the implemented activities and the feedback gathered through interviews and written contributions from stakeholders, the solutions highlighted as good practices are those that effectively integrate sustainable tourism communication, a strong focus on the local territory, and strategic support to the ECOC 2025. Regarding communication for sustainable and local tourism, the

evaluation identifies as a best practice the development of integrated tools designed not merely for promotion, but for the strategic management of tourist flows. These solutions successfully direct visitors towards less developed areas and promote slow tourism models, thereby ensuring the sustainable use of natural resources while enhancing the visibility of the cross-border region.

Furthermore, a distinct strength emerging from the analysis is the focus on the local territory. This involves solutions that decentralize the cultural offer, engaging peripheral villages and small associations that are often excluded from major circuits. This approach has proven effective in fostering genuine bottom-up participation and building administrative capacity among new beneficiaries, creating a model of cooperation that is deeply rooted in the territory.

Finally, regarding the support to the ECoC strategy, the most effective solutions are those that actively enrich and diversify the cultural and tourism offer of the cross-border area. The analysis highlights the creation of new, inclusive cultural products—such as cross-border artistic ensembles, bilingual educational initiatives, and sports programs—as a key best practice. These initiatives directly contribute to the vibrant schedule of the Capital of Culture by offering innovative content that blends education, social inclusion, and tourism experience. This expanded offer is systematically amplified through its integration into the official ECoC digital platforms, ensuring a cohesive and accessible cultural proposition that enhances the overall attractiveness of the territory for visitors.

THE PROGRAMME GOVERNANCE ON SB

Could the projects funding and management procedures performed by the SB be considered as a good practice?

The EGTC-GO's management of the SPF involved several commendable practices. The development of comprehensive handbooks and guidelines (Operational Handbook, Guidelines of Eligible Costs, JEMS Handbook, Project Assessment Guidelines), coupled with technical workshops and infodays, significantly aided final recipients. The provision of a partner search form and direct phone support also contributed to an accessible process. The integrated use of JEMS for all project phases, from submission to expenditure control, provided a structured and transparent system. However, the interviews revealed criticisms regarding the excessive regulatory burden, particularly for small associations, and concerns about the Sole Beneficiary's autonomy and potential conflict of interest in selection and quality control, which temper the extent to which these procedures can be universally considered "good practice" without significant simplification. Measures to avoid the potential conflict of interest within the procedures should be taken.

Clarity of roles and responsibilities between MC, MA and SB-EGTC GO

The roles and responsibilities are formally defined in the Interreg Regulation and the Invitation Letter. The MA is responsible for overall Programme coordination and management, the MC for Programme decisions and monitoring, and the EGTC-GO as the Sole Beneficiary for the operational management of the SPF. In the case of SPF there is no requirement for prior approval of the calls launched by the SB (see Section 7.1). The Sole Beneficiary is tasked with implementing public calls, selecting projects, and reporting to the Monitoring Committee. Despite these formal definitions, interviewees indicated that the EGTC-GO lacked sufficient autonomy and required extensive support from the MA and JS for various management, monitoring, and control aspects. This suggests that while roles were formally assigned, the practical execution and clear delineation of operational responsibilities, particularly regarding the SB's independence, encountered challenges. Concerns about a potential conflict of interest, where the EGTC-GO managed calls, signed contracts, and performed quality control on the same projects, also highlighted a perceived lack of clear functional separation.

Were financial, human, and time resources (of the SPF management structure) used in a cost-effective manner?

The assessment of cost-effectiveness for the SPF management structure yields mixed findings. On one hand, the investment in developing extensive support materials (handbooks, guidelines, videos) and organizing numerous events (infodays, technical workshops) indicates a commitment to assisting beneficiaries and ensuring proper implementation, which can be seen as an effective use of resources to build capacity. The use of JEMS also streamlined administrative processes, potentially contributing to efficiency. However, interviewees noted that the administrative effort required by the Final recipients to manage the small projects was comparable to that of managing larger, ordinary projects. This suggests that the goal of simplification, intended to optimize resource use for small projects, was not fully achieved due to the application of rigid EU Interreg regulations. The perceived lack of autonomy for the EGTC-GO, requiring significant support from the MA and JS, could also imply a less-than-optimal use of resources within the broader management structure, as additional oversight and assistance were consistently needed.

COMMUNICATION STRATEGY

Were the communication actions effective?

The communication actions, primarily leveraging the high visibility of the European Capital of Culture (ECOC), were effective in terms of broad outreach. The significant

traffic on the ECoC platform (2 million views in six months compared to 5,000 monthly visitors on the EGTC-GO site) demonstrates successful dissemination to the general public. Social media engagement (Facebook, Instagram, LinkedIn) further enhanced visibility, with beneficiaries encouraged to tag the EGTC-GO for wider re-sharing. However, the Programme Communication Manager expressed concern that the Interreg IT-SI brand was sometimes overlooked in favor of the ECoC.

Did these actions reach, and at what degree, the beneficiaries of the fund? Does the SPF address the needs of the target groups?

The SPF communication strategy reached beneficiaries through multiple channels. The SB organized several infodays and technical workshops to present funding opportunities and guide applicants through the proposal drafting and JEMS submission process. Handbooks and guidelines (Operational Handbook, Guidelines of Eligible Costs, JEMS Handbook, Project Assessment Guidelines) were produced in both Italian and Slovenian. A partner search form and direct phone support were also provided. This comprehensive approach indicates a high degree of effort to reach and support potential and actual beneficiaries, addressing their needs for information and technical assistance. The large number of project proposals received (239 for the first call, 134 for the second, and 98 for the third) further suggests that the opportunities were widely communicated and that there was significant interest from target groups.

How well is the SPF aligned with the objectives of the European Capital of Culture 2025? Are the small projects consistent with the SO 4.6 of the Programme?

The SPF is aligned with the objectives of the European Capital of Culture (ECoC) 2025 Nova Gorica-Gorizia. The Interreg Italy-Slovenia 2021-2027 Programme was drafted specifically to leverage the ECoC opportunity, appointing EGTC-GO as the sole beneficiary to implement a bottom-up approach. The ECoC's three goals (one cross-border European city; a green, vibrant city; an innovative, entrepreneurial-minded city) are supported by a list of indicators, and the SPF projects contribute to these. The Action Plan for the SPF explicitly states it is a 'support tool for the European Capital of Culture 2025, complementary to the projects that will be implemented and have already been planned in the context of the BidBook'. Project selection criteria also take into account the contribution to ECoC 2025 indicators.

Regarding consistency with Specific Objective 4.6 ("Enhancing the role of the culture and sustainable tourism in economic development, social inclusion and social innovation"), the SPF was set to achieve this goal. The thematic areas of the funded projects show a focus on entertainment, culture, and experiences (including sport),

all of which align with the cultural and social innovation aspects of SO 4.6. Furthermore, all funded projects are based on environmental sustainability, a key requirement of SO 4.6, and the calls for proposals explicitly promoted themes related to green mobility, social and environmental sustainability, and enhancement of green/aquatic environments.

Which is the citizens' awareness of the small projects outputs and results?

While direct metrics on citizens' awareness of specific small project outputs and results are not explicitly provided, the communication strategy aimed to maximize this. The proposed methodology was not able to obtain a significant number of answers from the citizens. As a consequence the data were insufficient to assess public awareness of SPF. However, a Programme-level questionnaire took place in early-mid 2024 and successfully yielded useful data on SPF. The strategic linking of the SPF to the ECoC platform, which recorded 2 million views in its first six months, significantly increased public exposure. The EGTC-GO's active promotion of small project visibility through social media, where beneficiaries are encouraged to tag the EGTC-GO for wider re-sharing, also contributes to public awareness. The Programme Communication Manager noted that citizen participation improved, even if citizens may not distinguish between "EGTC-GO" and "Interreg." The mandatory requirement for all projects to highlight European funding further aimed to connect the activities with their source of support, thereby fostering awareness of the broader impact of EU funding at the local level. However, a concern was raised about the challenge of ensuring the public fully understands that the "GO! 2025 in action" results are fundamentally rooted in the Interreg IT-SI Programme.

EGTC GOVERNANCE AND MANAGEMENT ON SMALL PROJECTS FINAL RECIPIENTS

The governance and management of the SPF by the EGTC-GO played a pivotal role in the implementation phase, acting as the interface between the Programme's rigid regulations and the operational reality of the final recipients. As the Sole Beneficiary, the EGTC-GO was responsible for selecting and monitoring projects implemented by final recipients.

From the perspective of the final recipients, the management style of the SB was highly appreciated. Feedback collected in the field research highlights that the EGTC staff was perceived as efficient and solution-oriented. This supportive approach was essential, given that many project partners were newcomers to Interreg and had never participated in European projects before. To bridge the knowledge gap, the EGTC-GO implemented a robust support system, producing comprehensive handbooks and organizing technical workshops and info-days.

However, despite the proactive support from the SB, the governance framework faced structural challenges that burdened the final recipients. The administrative load remained significant for small projects, often requiring a large percentage of the budget to be allocated to external experts due to the partners' inexperience and the complexity of the rules. The analysis identifies financial reporting and public procurement procedures as the most complex issues encountered by partners. Although Simplified Cost Options (SCOs) were applied to personnel (20% flat rate) and administrative costs (15% flat rate), the remaining budget lines (external services, equipment, infrastructure) required reporting on real costs, demanding extensive documentation.

A critical governance issue identified was the financial flow. The reporting process involves a two-level check (Final Recipient to EGTC, then EGTC to Programme), which contributed to long waiting times for payments. This delay put some partners, particularly small associations without access to bank credit or liquidity, in jeopardy. Furthermore, the IT management tool, JEMS, was described as not user-friendly for financial reporting and lacking necessary features, adding to the administrative difficulty.

CHARACTERISTICS AND IMPLEMENTATION

What challenges or limitations have you observed in implementing SPF/small projects?

The primary challenge observed in the implementation of the SPF was the significant disconnect between the fund's objective of simplification and the excessive regulatory burden imposed on both the Sole Beneficiary and the final recipients. Field research confirmed that rigid EU Interreg regulations were applied to small projects without meaningful simplification, creating significant administrative difficulties. This was especially challenging for the target group: small associations and new beneficiaries often lacking prior experience with EU funding. Interviewees noted that the administrative effort required from the SB and the final recipients was comparable to that of managing larger, ordinary projects, contradicting the goal of an agile, small-scale instrument.

Governance of the fund presented its own limitations. The EGTC-GO was managing such a fund for the first time and required extensive support from the Managing Authority and the Joint Secretariat.

What are the key characteristics of small projects in the Programme, especially when compared to standard projects?

The key characteristics of the SPF projects, when compared to standard Interreg operations, are their delegated governance model and smaller scale. The fund was

designed as a single operation managed by a Sole Beneficiary (SB), the EGTC-GO, rather than the Managing Authority (MA) and Joint Secretariat (JS). A primary characteristic of this model was the intention to simplify the administrative workload for the Programme bodies. However, this simplification was only partially achieved, as the SB ultimately required intensive, ongoing support from the MA and JS. The SPF was also characterized by its specific thematic focus as a support tool for the ECOC GO! 2025 and its unique partnership rules. This structural simplification successfully lowered the entry barrier, attracting a high percentage of newcomers to the Interreg programme .

ADMINISTRATIVE ASPECTS

What are the administrative advantages and disadvantages of SPF/ small projects, both at Programme and project levels?

At the project level, the primary administrative advantage for final recipients was the implementation of Simplified Cost Options (SCOs). The SPF utilized a 20% flat rate for personnel costs (BL1) calculated on real costs, and a 15% flat rate for administrative costs (BL2) calculated on the eligible staff costs. Further advantages included a simplified application form, the option for non-public bodies to receive a 50% advance payment (pre-financing), and the ability for projects under €50,000 to be run by a sole partner, removing the complexity of partnership agreements.

However, these advantages were largely overshadowed by significant administrative disadvantages at all levels. For final recipients, the promise of simplification was undermined because the main budget lines (BL4-Consultancies, BL5-Equipment, BL6-Infrastructure) remained based on "real costs". This meant small associations, often new to EU funds, still had to navigate complex rules for procurement, VAT, and State Aid.

At the Programme level, the administrative burden was merely shifted, not reduced. It was reported by Programme authorities that the SPF management was the most burdensome of all projects, requiring continuous support from the MA and Joint Secretariat. This view was corroborated by the implementing entity, which stated its management effort was comparable to that of managing ordinary, larger projects due to the exceptionally high level of commitment needed to provide intensive, one-on-one support to inexperienced beneficiaries.

Was the process of application, selection, and implementation of projects efficient and administratively simple and transparent?

The application phase was designed to be simple, utilizing a simplified application form. However, mixed opinions arose among the final recipients on this topic, with some of them describing the IT system as not adapted for the specific needs of the

SPF. Its rigid, standardized fields could not be customized or removed. This inefficiency forced the Sole Beneficiary to create offline guides.

The selection process, while formally structured in three steps (administrative check, quality assessment, and State Aid check), was criticized by monitoring bodies (MA and MC) for a lack of transparency. Furthermore, the selection methodology itself was questioned, with reports of poor technical assessments. The summary assessments provided to the Monitoring Committee were also described as being too brief to allow an effective oversight.

The implementation phase was not administratively simple for final recipients. While the use of Simplified Cost Options (SCOs) for personnel and administrative lines was a positive step, the requirement to report remaining budget lines on a "real cost" basis maintained a high administrative burden. Beneficiaries, often newcomers to EU funding, reported difficulties with financial reporting and public procurement procedures. Furthermore, the financial flow was described as inefficient; technical constraints within the IT system requiring separate reporting and reimbursement steps, combined with a multi-level validation process, contributed to payment delays that posed liquidity risks for smaller associations.

MONITORING

What are the main challenges in monitoring the implementation of the SPF by the MC/MA?

Given the findings of the analysis in the previous parts regarding the roles of the MC and MA, several conclusions can be drawn concerning the difficulties in monitoring the implementation of the SPF (see "The Programme governance on SB"). Interviewees reported that the MC had a limited role and lacked direct access to information on the projects, with a general shortage of feedback. This suggests a potential gap in the flow of information from the SB to the higher-level monitoring bodies. Furthermore, the communication between the Managing Authority and the Sole Beneficiary, while structured, suffers from technical challenges in database alignment and updating the main Programme website. The synthetic nature of proposals assessments provided to the MC was also a point of criticism, indicating that the level of detail was insufficient for effective oversight.

Which monitoring procedures concerning SB performance have been carried out? Which corrective actions can be implemented to improve Programme control on the SPF progress?

Monitoring procedures concerning SB performance include formal reporting by the EGTC-GO to the Monitoring Committee annually on ongoing activities, and reporting on the implementation of both work packages (WP1: fund management;

WP2: small projects funding) at Monitoring Committee meetings. The Sole Beneficiary is also subject to Programme Management Verifications (the so-called First Level Controls (FLC) in the previous programming period) and audit checks, as defined in the Interreg VI-A Italy-Slovenia Manual of eligibility of expenses and governed by the Subsidy Contract. The SB submits reimbursement requests to the Programme, which are then verified by national controllers.

To improve Programme control on SPF progress, several corrective actions can be implemented and suggestions are reported in the section Recommendations (see Section 7).

To what extent has the entire Programme area benefitted from the SPF?

The SPF aimed to benefit the entire Programme area by overcoming cross-border obstacles and fostering cooperation. The Invitation Letter required projects to have a cross-border impact and address the whole Programme area. Thematic focuses were diversified across the three calls, and presentation events for the SPF were held in each region (Veneto, Friuli Venezia Giulia, Slovenia) to ensure comprehensive coverage. The EGTC-GO also provides a partner search form to help organizations find partners in the Programme territory, facilitating wider participation. Both the Action Plan and the Invitation Letter stress the importance of implementing the activities involving the whole Programme area, not only the territory of the European Capital of Culture. In order to achieve this goal a selection criterion was set to measure the impact of a project on the whole Programme area (see Section 7 for recommendations on the topic).

However, the field research results indicate mixed perceptions regarding the extent of benefit to the entire Programme area. While the fund successfully involved new, smaller entities and demonstrated strong interest from the territory (evidenced by the large number of proposals), widespread skepticism was expressed regarding the long-term impact and legacy of the funded projects.

The strong link to the ECoC 2025, while beneficial for visibility, was described as a "double-edged sword" that focused applications geographically on the Gorizia-Nova Gorica area, making it difficult to attract applicants from the broader Programme territory.

The analysis on the projects partners origin reflects this finding. As stated in the Progress Report N.1 a large number of final recipients comes from the territory near the European Capital of Culture. However, a smaller, but still present, number of partners came from other regions/provinces (including 1 partner from the Italian Provinces of Pordenone, Treviso and Venice; 3 partners from the Slovenian region of Obalno-kraška; Gorenjska and Primorsko-notranjska with 2 partners each).

Did the projects effectively contribute to cross-border cooperation and community connections?

The significant number of project proposals received demonstrates a strong interest from the territory in Interreg instruments and a willingness to engage in cross-border initiatives.

Interviewees voiced concerns that the fund's fundamental structure, particularly the provision for financing projects with only one partner, deviates from the established principles of genuine Interreg cooperation. This approach was perceived as potentially weakening the core concept of cross-border partnership and consequently limiting the depth of collaboration and community connections compared to multi-partner projects. Furthermore, questions were raised regarding the long-term sustainability and effectiveness of the cooperation achieved, suggesting that without clearer strategies for capitalization and legacy, the overall contribution to deeper cross-border integration might be constrained.

5. COMPARISON WITH OTHER INTERREG PROGRAMMES

To contextualize the findings regarding the Small Projects Fund (SPF) in the Interreg VI-A Italia-Slovenija 2021-2027 Programme, this section provides an overview of how other Interreg Cross-Border Cooperation programmes have approached the funding and management of small-scale projects.

The comparison focuses on two distinct models: the Classic Intermediary Model (delegated management, as defined by Interreg Regulation Article 25) and the Direct Management Model (integrated small-scale projects). This analysis highlights the strategic choices made by neighboring programmes and provides a basis for post-2027 recommendations.

5.1 THE CLASSIC INTERMEDIARY MODEL (ART. 25 SPF)

This model is defined by the delegation of management to a specialized intermediary body, which is seen as being closer to local stakeholders.

- **Interreg Italy-Austria (ITA-AUT):** This is the textbook example of the Art. 25 model. The programme has implemented a CLLD “Community-Led Local Development” approach to local development that involves citizens at the forefront of the management of activities and decision-making processes. The development strategies cover four different geographical areas and each focuses on the specific needs of the area in question. They are implemented through the action of LAGs – Local Action Groups, the main element in coordinating and implementing these strategies.

Eligible projects can be small (up to €50,000) or medium-scale (up to €200,000) and fall within four cross-border development strategies covering four different geographical areas, each addresses on the specific needs of the related territory:

- Terra Raetica "Terra Raetica": Landeck, Imst, Val Venosta, Engadina Bassa;
 - "Wipptal": Wipptal Tyrol, Wipptal Alto Adige;
 - "Dolomiti Live": Osttirol, Val Pusteria, Alto Bellunese;
 - "HEurOpen": Hermagor, Gemonese, Canal del Ferro and Val Canale, Carnia.
- **Interreg Italy-Switzerland (IT-CH):** As an external border programme, it is not bound by Article 25. However, it operates a *de facto* SPF model, financing a Sole Beneficiary that manages an open call for proposal. The programme has a history (2014-2020 programming period) of "Small Projects" (e.g., *Progetti di piccola dimensione*), which were managed directly by the MAJS. Although the results were

not significant, the Programme decided to adopt the strategy based on the territorial diagnostics and the results of the stakeholder consultation. The SPF was activated in the area of Terra Raetica, a community operating since 1997 between the regions of Imst (Austria), Landeck (Austria), Vinschgau (Autonomous Province of Bolzano - South Tyrol), and the Lower Engiadina/Val Müstair Region (Canton of Graubünden). Structured cross-border collaborations between these territories are described above in the paragraph of Interreg Italy-Austria. Terra Raetica would serve as a "pilot" area, but the establishment of a SPF could also be considered for additional areas during the programming period. The Fund is activated under ISO1B to ensure that, as the programming evolves, the bottom-up cooperation needs most strongly felt by local communities, stakeholders, and civil society representatives can emerge freely. During the implementation phase, it may be considered to include beneficiaries from adjacent functional areas (e.g., the Province of Sondrio).

5.2 THE DIRECT MANAGEMENT MODEL (SMALL-SCALE PROJECTS)

This model prioritizes thematic alignment over administrative delegation. Small projects are funded, but they are managed like all other projects by the MA/JS.

- **Interreg Italy-Croatia (ITA-CRO):** This maritime programme explicitly **chose not to implement** the Article 25 SPF. The programme's rationale was to ensure that all funded projects, regardless of size, contribute directly to the main thematic priorities (e.g., Blue Innovation, Climate Change, Culture & Tourism).
 - Instead, they have "Small-Scale Projects" (SSPs) defined by a budget cap (e.g., up to €200,000 Total Cost).
 - These projects apply to standard calls alongside "strategic" or "standard" projects and are selected based on the same thematic criteria, albeit with simplified application forms.
- **Interreg Greece-Italy (GRE-ITA):** This neighbouring maritime programme follows an identical logic to Italy-Croatia. It does not use the Art. 25 SPF and instead funds SSPs through its standard thematic priority calls.
- **Interreg Italy-France (Alcotra):** Alcotra utilizes a specific strand dedicated to citizen engagement (PO6). Within this, it has a "people-to-people" component (Action 6.2) that functions as a simplified funding mechanism for micro-projects. This functions *similarly* to an SPF, aiming to fund small local initiatives, but it is deeply integrated into the programme's unique territorial governance structure (e.g., the "Territorial Plans") rather than being a fully delegated Art. 25 fund in the same way as Italy-Austria.

- **Interreg Slovenia-Austria:** While the Austria-Italy border utilizes a Community-Led Local Development (CLLD) model, the Slovenia-Austria programme adopts a centralized approach. Here, small-scale projects (typically up to €30,000) are managed directly by the Managing Authority rather than through a delegated intermediate body. The Programme operates on the basis of the Open Call system. This means that applicants can submit project applications continuously after the Open Call is launched as long as funds are available. Proponents submit the project proposal via Jems.
- **Interreg Slovenia-Croatia:** It utilizes direct "Small-Scale Project" calls with a simplified cost option and a maximum project budget of approximately €30,000. A crucial distinction lies in the financial magnitude of these instruments. The SPF within Interreg Italy-Slovenia manages a substantial allocation of €11.2 million in public funds. This volume is comparable to the CLLD resources in Italy-Austria but stands in sharp contrast to the other programmes. For instance, the Interreg Slovenia-Croatia programme allocates only approximately 2% of its total budget (approx. €800,000 - €1 million) specifically to small-scale projects.

6. HIGHLIGHTS FOR THE USE OF SPF IN TERRITORIAL COOPERATION POST 2027

6.1 THE EVOLVING CONTEXT: INTERREG POST-2027

The 2028-2034 programming period is being shaped in a challenging geopolitical and economic environment. The 9th Cohesion Report and extensive public consultations (concluded in 2024-2025) have highlighted new pressures on the EU budget, including defense, strategic autonomy, and recovery.

Within this context, Interreg has to demonstrate its unique value. This value is twofold:

1. **Strategic:** Tackling shared challenges (e.g., climate adaptation, health, transport) that cannot be solved by one Member State alone.
2. **Foundational:** Overcoming the persistent administrative, linguistic, and cultural barriers that hinder true European integration at the local level.

It is this second "foundational" element where small projects are indispensable. Stakeholder feedback, particularly from organizations like the Association of European Border Regions (AEBR), has been unanimous: the "Interreg soul" resides in its smallest projects.

6.2 THE INDISPENSABLE ROLE OF SMALL-SCALE FUNDING

Small-scale instruments, primarily the **Small Project Funds (SPFs)**—currently mandated by Article 25 of the Interreg Regulation (EU) 2021/1059 for Cross-Border Cooperation (CBC) programmes—and **Small-Scale Projects (SSPs)**, are the primary entry point for new actors.

Key Contributions:

- **Accessibility:** They allow small entities (NGOs, schools, cultural associations, small municipalities) to participate in EU cooperation without the administrative burden required for large projects.
- **Trust-Building:** They are "laboratories of cooperation." By funding local sports events, cultural exchanges, or joint educational workshops, they build the fundamental human trust necessary for later, more complex strategic initiatives.
- **Addressing Local Barriers:** SPFs are agile and can target very specific, local "border obstacles" that larger projects, focused on policy objectives, often miss.

- **Visibility:** They make "Europe" tangible to citizens who would otherwise never interact with EU funding, thereby strengthening the policy's legitimacy.

6.3 REGULATORY OUTLOOK AND SIMPLIFICATION (2028-2034)

The central theme of the Post-2027 debate is **radical simplification**. The current (2021-2027) SPFs, could have been more successful if, as cited by many Managing Authorities and beneficiaries, auditing and reporting would have been significantly reduced.

The forthcoming legislative proposals (expected to revise the Common Provisions Regulation (CPR) and the ETC/Interreg Regulation) are being defined now, and the pressure to reform small project implementation is wide.

Key Demands and Regulatory Proposals:

1. **Embracing Trust-Based Management:** The main discussion revolves around moving away from "real cost" verification (auditing every invoice) for small projects.
2. **Mandatory Simplified Cost Options (SCOs):** Stakeholders are demanding that the new regulations mandate the use of **lump sums** or **standard scales of unit costs** for all projects below a certain threshold (e.g., €100,000 or €200,000). This would shift the focus from financial inputs to project outputs and results, drastically cutting the audit burden.
3. **Rethinking the SPF Model:** The current model (Art. 25) requires an intermediary body (e.g., an EGTC or Euregio) to manage the fund. While effective in some borders, this is a rigid process. Proposals for Post-2027 include making this model *optional*, allowing programmes to also manage a "Small-Scale Project" call directly, provided simplification is guaranteed.
4. **A "Small Project" Guarantee:** There is strong support for retaining a mandatory financial allocation (e.g., a percentage of the programme budget) dedicated specifically to these small, accessible projects in *all* Interreg strands, not just CBC.

CONCLUSION

For Interreg VII (2028-2034) to succeed, it must balance its strategic ambitions with its foundational purpose. Small Project Funds and Small-Scale Projects are not an optional "add-on"; they are the mechanism that embeds European cooperation at the community level. The new regulations, currently in their final drafting stages, must institutionalize trust and simplification (especially via SCOs) for these projects. Failure to simplify risks alienating the very citizens and local organizations that Interreg was created to unite.

7. RECOMMENDATIONS

This chapter presents a series of recommendations designed to enhance the effectiveness and efficiency of future SPF or similar small-scale funding instruments in the post-2027 programming period. The suggestions are derived from the comprehensive findings presented in the preceding sections, addressing identified challenges in governance, management, administrative complexity, cross-border impact, monitoring, and communication.

7.1 SPF GOVERNANCE AND MANAGEMENT

Prioritize Radical Simplification at the Regulatory Level:

- **Mandate Simplified Cost Options (SCOs):** Advocate for and implement mandatory use of lump sums or standard scales of unit costs for all small projects below a certain threshold (see Section 6).
- **Reduce Administrative Burden for Final Recipients:** Actively seek and implement mechanisms to simplify application packages, reporting procedures, and overall administrative requirements for small associations and new beneficiaries, ensuring they are not comparable to those for larger, ordinary projects.
- **Simplify the legislative framework:** Adopt a new set of rules addressing specifically small-scale instruments with smart, simple and clear procedures and legal requirements (see Section 6).
- **Implement findings of OSI experience:** Modify the SPF framework taking into account the OSI experience. The Strategic Operation could be integrated by a work package with the purpose of financing and manage smaller final recipients (local performers) to carry out actions of local interest with cross border impacts.
- **Careful selection of the Area:** To safeguard Programme equity, the area of intervention must be strictly selected in accordance with strategic priorities. Acknowledging that the main results may concentrate in a limited territory is crucial, as this could lead to certain Programme areas being marginalized.
- **Reduce maximum funding for projects:** In order to focus on small scale projects, a reduction of the maximum funding (€200.000) should be considered.

Rethink the Sole Beneficiary (SB) Model and Governance:

- **Increase SB autonomy and capacity:** If the intermediary body model (like EGTC-GO) is retained, ensure the SB is empowered with sufficient autonomy and resources to manage the fund independently, minimizing the need for extensive support from the MA and JS but improving the communication with the MC. To ensure an appropriate balance between SB autonomy and MC oversight, a formal

mechanism for the prior approval of calls for projects by the MC should be implemented.

- **Clear delineation of functions:** Implement robust internal controls and clear separation of functions within the SB, particularly between project selection, contracting, and performance assessment, to avoid any potential conflicts of interest and enhance transparency.
- **Involve cultural and tourism authorities:** Actively involve relevant authorities (depending on the future SO of SPF) in the project selection process to ensure alignment with strategic territorial development goals.
- **Focus on local communities:** maintain the Sole Beneficiary effort of targeted intervention on local communities.
- **Clear and comprehensive Action Plan:** Implement a clear and comprehensive Action Plan at the outset of the process, ensuring a defined structure for managing resources. The Action Plan should contain a clear and fast communication procedure between the SB, JS and MC in order to make the competent bodies always aware of the progress of the SPF.

Strengthen Cross-Border Impact and Long-Term Legacy:

- **Mandate multi-partner projects:** Reiterate and enforce the requirement for small projects to involve partners from both Member States to strengthen the core concept of cross-border cooperation. The "one-partner" project model, which was widely criticized, should be avoided.
- **Focus on project legacy and capitalization:** Encourage and require project proposals to include clear plans for the sustainability and capitalization of results beyond the funding period. Develop mechanisms to identify, scale up and sustain the most impactful and innovative small projects.
- **Facilitate synergies:** Actively promote and create opportunities for synergies between small SPF projects and larger strategic projects to maximize overall programme impact across the territory.
- **Strengthening the strategic thinking:** Redefy the SPF as a strategic incubator, not just a funding source. The design of sequential calls should be linked, allowing them to build upon previous results and ensuring that initial "seed" funding evolves into a long-term, sustainable impact. The SPF should be linked with a more general and comprehensive operation such as the ECoC in the current Programme.

Enhance Monitoring, Transparency, and Communication:

- **Define clear and comprehensive data sets:** Establish a clear, consistent, and comprehensive data set for monitoring small project progress and outcomes. This

data should be shared periodically and proactively with the JS, MA, and MC from the outset to avoid distortions and improve oversight.

- **Improve information flow and accessibility:** Ensure the Monitoring Committee and other relevant bodies have direct and comprehensive access to information on small projects, moving beyond synthetic assessments. Ensure accurate and up-to-date information is readily available on programme websites.
- **Targeted support for newcomers:** Continue and expand workshops and dedicated support throughout the project lifecycle, from proposal submission to financial reporting, specifically for new and smaller beneficiaries.

Benchmarking and Performance Assessment:

- **Benchmark management costs:** Consider if it is worth to regularly benchmark the management expenditure for the SPF (or similar instruments) against comparable funds in other Interreg programmes to assess cost-effectiveness and identify areas for optimization. The Action Plan should be adapted to reflect a more cohesive strategic approach. Considering the limited €1 million budget for the third call, funding previously successful proposals (score >80) would have been a more pragmatic alternative, requiring to the proponents an update to the work plans to ensure relevance of achievements and results.
- **Refine assessment methodology:** Address past criticisms of the project assessment methodology, ensuring robust, transparent, and fair assessment criteria that accurately reflect project merit, strategic alignment and the peculiarities of the small projects system. Furthermore, a preliminary discussion among experts before scoring should be considered to allow an effective, clear and transparent proposal assessment. Share criteria and assessment methodology with the MC before its application to proposals. Redefine the Non-Repetition of the LP criterion as not essential to stimulate newcomers' participation.

7.2 COMMUNICATION STRATEGY

- **Strengthen Programme branding and awareness:** While leveraging widely recognized platforms (like the ECoC), ensure that the Interreg Programme's brand and its fundamental contribution to project results are consistently and prominently highlighted. Implement clearer visual guidelines and messaging to help the public distinguish and attribute successful initiatives to European cohesion funding, rather than primarily to local partners or events.
- **Enhance information flow and accessibility:** Improve technical integration between the Sole Beneficiary's platforms and the Programme main website. Address database alignment issues to enable the creation of detailed sub-pages for SPF projects on the Programme site, offering comprehensive descriptions beyond

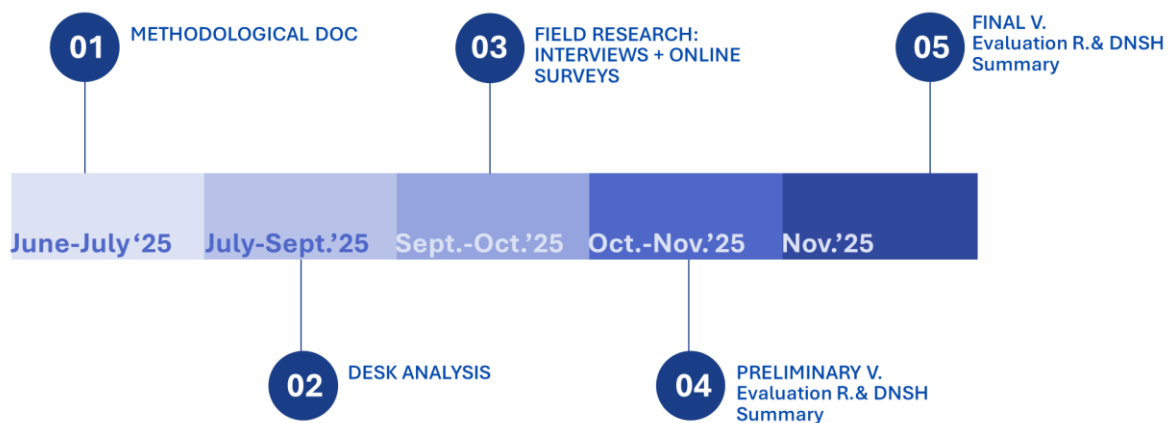
monthly event news. This will provide a more accurate and transparent reflection of progress and impact to both the public and monitoring bodies.

- **Enhanced reporting detail:** The SB should provide more detailed project descriptions and progress updates on the Programme website, beyond just monthly event news, to offer a more accurate reflection of achievements and impact.
- **Targeted communication for cross-border impact:** Develop communication strategies that specifically emphasize the cross-border nature and collaborative aspects of projects. Highlight stories and outcomes that clearly demonstrate how cooperation between different Member States addresses shared challenges and builds community connections, moving beyond a single-entity focus.
- **Measure Citizen Awareness Effectively:** Implement specific mechanisms and indicators to regularly assess citizens' awareness of small project outputs and results, as well as their understanding of the Interreg Programme's role. This could include targeted surveys, feedback channels, and analysis of media coverage to gauge the effectiveness of dissemination efforts.
- **Tailored Support and Visibility for Final Recipients:** Maintain, continue and expand tailored communication support for projects final recipients, including workshops on communication best practices, guidance on EU visibility rules, and opportunities for amplified exposure through Programme channels. Encourage beneficiaries to actively use Programme-specific hashtags and branding in their own outreach.
- **Proactive Dissemination of Good Practices:** Systematize the identification and dissemination of particularly impactful and innovative small projects. Use these success stories to demonstrate the tangible benefits of the SPF to a broader audience, inspiring future participation and showcasing the value of cross-border cooperation.

8. WORKING GROUP COMPOSITION AND CONTRIBUTION OF EACH COMPONENT

Function	Resources involved	Tasks/ activities
SENIOR Expert	Marina De Nigris	<ul style="list-style-type: none"> • Coordination of the Working Group; • Interaction with the MA; • Scientific supervision of Working Group activities and products released.
JUNIOR Expert	Emiliano Bona	<ul style="list-style-type: none"> • Preparatory activities for the required products: Desk analysis, Analysis of monitoring data, Interviews and surveys online; • Drafting of the evaluation report.
JUNIOR Expert	Mariia Iliasova	<ul style="list-style-type: none"> • Preparatory activities for the required products, infographics design; • Monitoring of environmental aspects and sustainable development objectives including integration of the DNSH principle; specifically, verification of compatibility of projects with environmental objectives under Regulation (EU) 2020/852 concerning environmentally sustainable economic activities; • Drafting of executive summary on the Do No Significant Harm (DNSH) principle for the report.
Additional expert	Antonella Bertolotti	<ul style="list-style-type: none"> • Preparatory activities for the required products: Desk analysis, Analysis of monitoring data, Interviews and online surveys; • Supporting the drafting of evaluation reports and related summaries.
Additional expert	Anuska Stoka	<ul style="list-style-type: none"> • Supporting Field Researches by Interviews and online surveys to the Final recipients and analysis of findings.

9. EVALUATION PHASES AND TIMING



10. METHODOLOGIES FOR THE ANALYSIS PERFORMANCE



ANNEX I - SYNTHESIS ON THE DNSH PRINCIPLE APPLICATION AND RESULTS

In matters of environmental objectives, the Strategic Environmental Assessment (SEA) (see Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment; the SEA Protocol and the Procedure for the SEA, the Environmental Impact Assessment and the Integrated Pollution Prevention Control procedure) for the Interreg Programme aims to ensure the integration of environmental considerations in the Programme. An Environmental Statement is attached to the Report to bring this information to the attention of the public and the relevant environmental authorities, enabling all subjects who participated in the environmental assessment to verify how the procedure's results have been integrated into the Programme.

The Assessment concludes that none of the seven Specific Objectives (SOs), including SO 4.6, would have a significant adverse environmental impact. Nonetheless, the Document encourages all applicants applying to SO 4.6 to explain how their proposed actions consider the potential increase of tourist flows, improvement of the sustainability of their tourism offer and/or contribute to reduction of carbon footprint of their tourism products/services, as well as effective and sustainable use of natural resources or contribute to regeneration of the environment and ecosystem services.

To comply with the provisions presented in the Assessment, the Invitation Letter no. 04/2022 requires the Sole Beneficiary to ensure that the actions implemented by the project conform with the DNSH principle. Consequently, the Document establishes the following three guiding principles for project design: environmental sustainability by design, impact on habitats and species of EU interest, and preventive archeology.

The table below provides an overview of the financed projects' compliance with environmental principles:

Principle	Description	Relevant document	Measures actually taken
Environmental sustainability by design	<p>Projects should foresee sustainable solutions integrated in project design.</p> <p>The SB should explain how the proposed actions take into consideration potential increase of tourist flows, improvement of the sustainability of their tourism offer and/or contribute to reduction of carbon footprint of their tourism products/services, as well as effective and sustainable use of natural resources or contribute to regeneration of the environment and ecosystem services.</p>	Invitation Letter	Applicants had to describe into the application form how they include the “Environmental sustainability by design” principles into their project.
Impact on habitats and species of EU interest	Any impact reference should be found in the application form even if the impact is neutral. Any potential impact on Natura 2000 sites requires the activation of an Appropriate Assessment procedure.	Invitation Letter	Applicants had to evaluate the possible impact on the environment of their project.
Preventive archaeology procedures	With respect to Landscape and Cultural heritage issues, any potential infrastructure projects shall include the preventive archaeology procedures indicated by both national legislations. It is intended as best practice to guarantee the conservation of the state of the sites and assets of archaeological interest, where relevant.	Invitation Letter	Applicants for infrastructural projects were required to submit a document evaluating the environmental and landscape impact of their proposed work.

The focus on environmental aspects is also present in the themes of the three calls for proposal, which focus on environmental protection and green economy:

- Call 01/2023: Go Share/Go Green/Go Europe
- Call 02/2024: Green mobility, social and environmental sustainability
- Call 03/2025: Enhancement of green spaces and aquatic environments, such as rivers, lakes, streams, lagoons, and coastal areas, through socio-cultural, artistic, and environmental awareness initiatives

A fundamental requirement across all calls is that final recipients must comply with all relevant European, national, and regional environmental legislation.

From the interview conducted with the actors involved in the SPF experience it can be concluded that due to the nature of the funded projects it is hard to assess their effect on the environment. However, both the field and the desk analysis highlight no significant negative impact of the small projects on the environment and a general alignment with the DNSH principle.

ANNEX II - REPORT RESUME (SUMMARY OF FINDINGS)

The evaluation activity of the INTERREG VI A Italia-Slovenija 2021-2027 is performed as required by the Evaluation Plan, approved by the Monitoring Committee of the Programme on May 15th, 2023 and updated on October 2nd, 2024.

This report is drafted following the methodological note shared with the WG and approved by the Managing Authority on August 5th, 2025 and presents all the information and data gathered and analysed by the evaluator in order to answer the evaluation questions set for the Small Projects Fund.

Article 2 of the Regulation (EU) 2021/1060 defines the “small project fund” as “an operation in an Interreg Programme aimed at the selection and implementation of projects, including people-to-people actions, of limited financial volume”.

The EGTC-GO (European Grouping of Territorial Cooperation) was appointed as the Sole Beneficiary to manage the fund due to its experience in cross-border territorial strategy.

The SPF has a total budget of 11.441.970,00 € of which 6.593.576,00 € provided by ERDF funds, 1.648.394,00 € funded by Italian national co-financing and 3.200.000,00 € allocated by Friuli Venezia Giulia in 2023. The EGTC-GO is responsible for selecting projects through a bottom-up approach via public calls, managing the fund, and reporting to the Programme authorities.

Two types of small projects are eligible for funding:

- Projects from 30k up to 100k of 12 months duration (Typology A)
- Projects from 30k up to 200k of 24 months duration (Typology B)

A two-level reporting system is in place: from final recipients to the EGTC-GO, and from the EGTC-GO to the Programme authorities. The JEMS (Joint Electronic Monitoring System) platform is used for all management phases, from application to reimbursement. The SPF must achieve specific output and result indicators, including organizing at least 50 joint cross-border events and developing joint strategies and solutions.

The desk analysis allowed to draft the following list of the roles of the Programme authorities and bodies and their responsibilities:

- Monitoring Committee (MC), performs Programme decisions and monitoring
- Managing Authority (MA), performs Programme Coordination
- Joint Secretariat (JS), supports the MA

- Working Group on Evaluation, performs Programme recommendations and evaluation review
- Communication Officer, is the responsible of Programme communication
- Sole Beneficiary (SB), performs Fund management and implementation
- Final Recipients, performs the management of activities

The operation, managed by the EGTC-GO as Sole Beneficiary to support the European Capital of Culture 2025, successfully met the aim of the SPF by attracting a significant number of applications and engaging a high percentage of newcomers to the Interreg Programme, thanks to the introduction of simplified access mechanisms, the focus on local communities and the use of flat rates for personnel and administrative costs.

A second output of the evaluation concerns the governance and management, where the EGTC-GO effectively provide intensive and appreciated support to final recipients, although the objective of administrative simplification was only partially achieved due to the persistence of real-cost reporting for major budget lines, significant technical inefficiencies related to the JEMS platform, liquidity risks for small associations and excessively complex legislative framework.

The study finds issues in the implementation phase, as while the fund acted as a booster for territorial animation, the existence of single-partner projects and the lack of a capitalization strategy raised concerns among monitoring bodies regarding the genuine cross-border nature of the initiatives and their long-term legacy, risking a fragmentation of resources into "one-off" events without structural continuity.

The communication strategy effectively leveraged the visibility of the GO! 2025 Capital of Culture to reach a wide audience, although this strong association sometimes overshadows the visibility of the Interreg Programme itself, suggesting a need for better branding balance.

The report was able to produce a positive response to both the evaluation questions for SO 4.6:



Evaluation question	Answer
Which are the cultural and sustainable tourism (enhancing economic development, social inclusion and social innovation) approaches in the approved projects?	The cultural and sustainable tourism approaches adopted stem directly from the specific themes of the calls for projects and are enforced by strategic evaluation criteria assessing ECOC 2025 contribution, cross-border impact and innovative approach. This framework



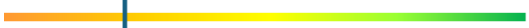
	<p>ensured a strong focus on heritage valorization and slow tourism to foster economic development, while simultaneously addressing social inclusion and innovation through targeted youth participation and new participatory cooperation models.</p>
<p>Which are the developed solutions to be highlighted as good practice?</p>	<p>The solutions identified as good practices effectively integrate sustainable tourism communication, a focus on the local territory, and support for the ECOC 2025 strategy. This includes the strategic management of tourist flows to less developed areas and the decentralization of cultural offers to engage peripheral communities. Furthermore, the development of inclusive cultural products, such as bilingual educational initiatives, enriches the ECOC program and ensures lasting visibility through digital integration.</p>




The report outlines strategic improvements for the future of the Small Project Fund (SPF) in the post-2027 period:



- Simplify the legislative framework and reduce administrative burden for final recipients.
- The role of the Sole Beneficiary (SB) should be refined to ensure greater autonomy while strictly separating project selection from control functions to avoid conflicts of interest, and ensuring transparent data reporting to the Monitoring Committee.
- Eliminating the "single partner" model, enforcing mandatory cross-border partnerships.
- Focusing on the legacy and capitalization of projects beyond the funding period.
- Strengthen the visibility of the Interreg brand, ensuring it is not overshadowed by other platforms like the European Capital of Culture.
- Provide continuous support to final recipients through workshops, manuals, etc.
- The area of intervention must be strictly selected in accordance with strategic priorities.





Synthetic evaluation of findings



Document reference	Findings	Goals Achievement (score 1-5)
2.1 Regulations and Programme definition and requests	<p>The EU and Programme requests were all accomplished at the best.</p> <ul style="list-style-type: none"> ● The SPF is defined under Article 25 of Regulation (EU) 2021/1059 as an operation for small-scale projects, with a total budget of €11,441,970 (6,593,576 € ERDF+ -1,648,394 € national co-funding + 3.200.000,00 € funded by FVG region). ● The EGTC-GO was appointed as the Sole Beneficiary to manage the fund, leveraging its pivotal role in the European Capital of Culture 2025 (Nova Gorica-Gorizia) strategy. ● The fund supports Specific Objective 4.6 (culture and sustainable tourism) and utilizes JEMS for all management phases, although technical limitations in the platform have been noted as a constraint. 	<p>Totally achieved (5/5)</p> 
3.1 SPF governance and management		
a. Roles and responsibilities	<p>Roles and responsibilities are well defined and shaped</p> <ul style="list-style-type: none"> ● The Managing Authority coordinates the Programme, the Monitoring Committee oversees decisions, and the EGTC-GO (Sole Beneficiary) handles operational management. ● The Joint Secretariat provides support to the MA and assists in project assessment. 	<p>Totally achieved (5/5)</p> 

<p>b. Decision-making process</p>	<p>Though reporting flows are defined, the information is not sufficient and lacks of transparency</p> <ul style="list-style-type: none"> ● The process involves a sequence of approvals, from the Programme adoption (Aug 2022) to the EGTC-GO application submission and the issuing of calls starting Feb 2023. ● Reporting flows are established annually to the Monitoring Committee and periodically to the Managing Authority. 	<p>Partially achieved (3/5)</p> 
<p>c. The role of Sole Beneficiary</p>	<p>The role and activities to be performed by the SB are well defined.</p> <ul style="list-style-type: none"> ● The EGTC-GO is responsible for creating streamlined frameworks to overcome legislative/linguistic barriers and selecting projects via public calls. ● Critical tasks include preventing double funding, fostering synergies with ECoC 2025, and adhering to strict expenditure schedules to ensure completion by Sept 2027. 	<p>Totally achieved (5/5)</p> 
<p>d. Monitoring Sole Beneficiary activities</p>	<p>Though monitoring flows are defined, the information is not sufficient and often not furnished to the MC/MA within the deadlines.</p> <ul style="list-style-type: none"> ● Monitoring is structured around two Work Packages: WP1 for fund management/governance and WP2 for small project funding. ● The Sole Beneficiary must report on both packages to the Monitoring Committee, submitting reimbursement requests verified by national controllers. 	<p>Partially achieved (2/5)</p> 

3.2 Progress of the SPF implementation	<p>The SB issued three calls and produced extensive guidance material (handbooks, workshops) to aid beneficiaries, yet expenditure progress is only at 30%, significantly lagging behind the Programme average of 66%.</p>	<p>Partially achieved (2/5)</p> 
a. Fund management and governance (WP1)	<p>The SB successfully meets his tasks of creating streamlined frameworks, though with help of MA and JS. However, the expenditure progress is not in line with the Programme progress.</p> <ul style="list-style-type: none"> • The WP1 expenditure is 48% of the total allocation. • Management tools included a dedicated helpdesk and partner search, but the complexity of the JEMS system required additional offline guidelines to navigate mandatory fields. 	<p>Partially achieved (3/5)</p> 
b. Monitoring small projects progress (WP2)	<p>The themes of the 3 calls align with the ECoC. The submission and selection procedures are defined.</p> <ul style="list-style-type: none"> • 3 calls with budgets and durations progressively reduced (max €100k and 12 months for the third call) to align with the GO! 2025 timeline. Themes focus on youth inclusion, green initiatives, and social cohesion. • The SPF expenditure for WP2 is 26% of the total allocation. • Proposals submitted via JEMS undergo a multi-stage evaluation requiring a quality score above 85, where funding follows a ranking list prioritized by strategic coherence. Partnerships generally consist of Italian and Slovenian entities, though single proponents are permitted for smaller budget tiers under specific conditions. 	<p>Partially achieved (3/5)</p> 

	<ul style="list-style-type: none"> Selected Lead Partners sign a Subsidy Contract and manage implementation through semi-annual reporting on JEMS, subject to strict administrative controls by the EGTC-GO. Reimbursements are processed after validating compliance with EU rules and eligibility criteria, utilizing flat rates for personnel and administrative costs. 	
c. Focus on Projects	<p>A considerable number of proposals were submitted with a lot of them scoring above 85 raising questions of lack of strict selection criteria.</p> <ul style="list-style-type: none"> A total of 239 project proposals were submitted in the first call, of which 87 scored above 85. On the second call a total of 134 projects were submitted, with 44 achieving a score higher than 85. On the third call the total number of project proposals is 98. Funded projects are heavily concentrated in the "Culture" sector (48.2%). 	<p>Partially achieved (2/5)</p> 
d. Field research results (simplification goal)	<p>Excessive regulatory burden on SB and Final recipients, lack of autonomy for EGTC-GO in carrying out its tasks. Widespread skepticism regarding long-term legacy and one-partner projects.</p> <ul style="list-style-type: none"> Interviews revealed a disconnection between the simplification goal and the excessive regulatory burden applied to small projects, which was comparable to standard operations. Critical issues include a lack of autonomy of the EGTC-GO and potential conflicts of interest between selection and control functions, skepticism regarding the long-term legacy of the projects. Widespread skepticism on the capacity of one-partner projects to cross-border cooperation. 	<p>Partially achieved (2/5)</p> 

3.3 The communication strategy		
a. Internal communication	<ul style="list-style-type: none"> ● Formal reporting is in place, but technical issues persist in aligning databases and updating the main Programme websites with detailed project info. ● The lack of detailed sub-pages for SPF projects on the main sites obscures true progress, limiting transparency for monitoring bodies. 	<p>Partially achieved (4/5)</p> 
b. Communication with small projects beneficiaries	<ul style="list-style-type: none"> ● Support was provided via visibility materials and strict brand compliance checks, which improved citizen awareness of EU funding. ● However, distinguishing between the "EGTC-GO" brand and the "Interreg" brand remains a challenge for beneficiaries and the public. 	<p>Partially achieved (3/5)</p> 
c. SPF dissemination of opportunities and results to the general public	<ul style="list-style-type: none"> ● Linking SPF to the ECoC successfully maximized reach, far outperforming the EGTC's own site traffic. ● A critical downside is that the strong ECoC and EGTC identities often overshadow the Interreg Programme brand, diluting the visibility of the EU's specific contribution. 	<p>Partially achieved (3/5)</p> 
4. Evaluation Questions		
SO 4.6. - Enhancing the role of culture and sustainable tourism in economic development,	<p>SPF successfully met the requirements of SO 4.6.</p> <ul style="list-style-type: none"> ● The cultural and sustainable tourism approaches adopted stem directly from the specific themes of the calls for projects and are enforced by strategic evaluation criteria assessing ECOC 2025 contribution, cross-border impact and innovative approach. This 	<p>Partially achieved (4/5)</p> 

social inclusion and social innovation	<p>framework ensured a strong focus on heritage valorization and slow tourism to foster economic development, while simultaneously addressing social inclusion and innovation through targeted youth participation and new participatory cooperation models.</p> <ul style="list-style-type: none"> ● The solutions identified as good practices effectively integrate sustainable tourism communication, a focus on the local territory, and support for the ECOC 2025 strategy. This includes the strategic management of tourist flows to less developed areas and the decentralization of cultural offers to engage peripheral communities. Furthermore, the development of inclusive cultural products, such as bilingual educational initiatives, enriches the ECOC program and ensures lasting visibility through digital integration. 	
The Programme governance on SB	<p>Significant autonomy and governance weakness of the SB. Good support of SB on Final recipients.</p> <ul style="list-style-type: none"> ● While the EGTC-GO provided valuable support tools (handbooks, helpdesk), the governance model suffered from a lack of autonomy and required heavy support from the MA/JS. ● The potential conflict of interest—with the SB managing calls, contracts, and quality control simultaneously—was highlighted as a significant governance weakness. 	<p>Partially achieved (3/5)</p> 
EGTC governance and management on Small Projects final recipients	<p>Excessive administrative burden and difficulty in using JEMS, only partially overcome by strong support of SB.</p> <ul style="list-style-type: none"> ● Final recipients praised the EGTC staff's solution-oriented support, which was crucial for "newcomers" to the Interreg world. ● However, the administrative burden remained oppressive due to "real cost" reporting requirements for major budget lines and a slow 	<p>Partially achieved (3/5)</p> 

	<p>financial flow caused by multi-level checks, posing liquidity risks for small associations.</p> <ul style="list-style-type: none"> ● JEMS not user friendly for the SPF final recipients and the SB. 	
Administrative Aspects	<p>Use of JEMS and SCOs was praised but the simplification of procedures remained insufficient.</p> <ul style="list-style-type: none"> ● The introduction of Simplified Cost Options (SCOs) was a positive step, but it was insufficient as the main budget lines (services, equipment) still required complex real-cost documentation. ● The JEMS platform was criticized for being rigid and not adapted to SPF specificities, creating inefficiencies and delays in the reimbursement process. 	<p>Partially achieved (3/5)</p> 