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and North Africa  
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**Mr. Christian Danielsson**

Director-General for Neighbourhood and  
Enlargement Negotiations  
European Commission

**Mr. Marc Lemaître**

Director-General for Regional and Urban  
Policy  
European Commission

**Subject: post 2020 perspectives for external cross-border cooperation in the Euro-Mediterranean area**

Dear Directors,

I am writing this letter on behalf of the 13 countries which participate in the ENI CBC "Mediterranean Sea Basin" Programme (hereinafter 'ENI CBC Med'), namely Cyprus, Egypt, France, Greece, Italy, Israel, Jordan, Lebanon, Malta, Palestine, Portugal, Tunisia and Spain.

During its last meeting held in Valencia on 18 and 19 of July 2018, the Joint Monitoring Committee, which is the decision-making body of the Programme, extensively discussed the architecture proposed for external cross-border cooperation beyond 2020, as defined in the proposal for a Regulation on the European territorial cooperation goal (Interreg) published on 29 May 2018. The members of the Joint Monitoring Committee have decided to submit this letter to express their concerns over a scenario which would lead to the integration of the current external cross-border cooperation programmes, supported under the European Neighbourhood Instrument, into the Interreg Regulation.

The proposal of the European Commission represents a radical change in the way cross-border cooperation at Mediterranean level between Member States and Partner Countries has been successfully conducted since 2007. Based on the key principles of equal partnerships and common benefits, the Programme has become a privileged framework for "people-to-people" cooperation through which national authorities, local institutions, organisations representing the civil society and the private sector can jointly prepare and implement together projects in response to some of the most relevant economic, social and environmental challenges in the Mediterranean.

During the 2007-2013 period, the 95 funded projects, which were carried out by 731 organisations, produced tangible impact in key strategic sectors, including SMEs development, enhancement of cultural heritage, professionalization of young people, women's empowerment, promotion of renewable energies and better water and waste management. Over 10 million people benefitted from these projects in terms of new and improved services. More information on the results of the 2007-2013 edition of the Programme can be found in the report "[Acting together for the Mediterranean](#)".

The results achieved since 2007 have encouraged a significant number of partners from Northern and Southern Mediterranean to take part in the Programme, contributing to a huge participation in the various calls for proposals launched so far, as highlighted by the nearly 2,500 projects submitted.

Over the years, the Programme has strengthened the efforts of institutional capacity building among the participating countries, cementing the principles of co-ownership and mutual understanding. In this regards, the Programme is a unique tool which allows for multilevel and multi-thematic cooperation across borders in the Mediterranean area, emphasizing the valuable role of the European Union, in association with Partner Countries, in the construction of an area of shared prosperity and security.

Whilst the 13 participating countries welcome the objective of simplifying the implementing rules of future programmes, they are concerned that the envisaged level of approximation between internal and external cooperation could affect the advanced degree of efficiency, partnership and trust achieved so far.

All participating countries consider that the new approach put forward in the proposal for Interreg Regulation would greatly risk losing the special characteristics of the Mediterranean and diminishing the momentum of success that have been attained during the past period, leading to weakening the Programme's attraction of potential partners, undermining the integrity and eventually the sense of purpose that motivates cross-border cooperation.

Given the specificities of the Mediterranean area, more flexible implementation modalities have been applied to external cross-border programmes, as a vital element to ensure their success.

However, the model proposed by the European Commission raises a series of risks which could potentially jeopardize the sound functioning of the Mediterranean Sea Basin Programme in the next EU cycle.

One critical issue is related to the thematic objectives contained in the proposal for Interreg Regulation which would integrate the Mediterranean Sea Basin Programme into a larger "maritime cooperation framework". In fact, adding issues like migration, border-crossing management and security changes significantly the scope of cooperation and would lead to diverting fundamentally from the key topics acknowledged by the participating countries, following extensive territorial analysis, as priority sectors to be tackled through cross-border cooperation. Furthermore, the participating countries stress that the above objectives are of strategic nature and relate to the official policies between the EU and its partners' governments, let alone that the political and

technical nature of these objectives cannot be handled by individual organizations and the private sector.

Other challenges highlighted by all countries are the possible decrease of the financial support to future programmes (70% of EU co-financing in the draft Interreg Regulation and 90% in the NDICI Regulation) and the lack of mechanism for anticipating funds at project level, while these elements have proved to be key drivers for ensuring the participation of the institutions and organizations from Partner Countries and make the Programme attractive to the Euro-Mediterranean partnership. Partner Countries also deplore the unnecessary modifications to the responsibilities in case of recoveries.

A further concern is the uncertainty about the continuation of the current cooperation area which potentially embraces all the Partner Countries covered by the European Neighbourhood Policy. Besides boosting cooperation between the Northern and Southern rims of the Mediterranean, the Programme also acts as a powerful accelerator for South-South cooperation.

Having considered the above, the 13 participating countries regret that the model of cooperation designed by the European Commission cannot preserve the specific features of external cross-border programmes in terms of thematic orientation, financial and implementation rules: this new setting could gradually lead to weakening and later losing the interest of the Northern and Southern Mediterranean Countries in the Programme, as well as the valuable experience gained so far.

On the contrary, the members of the Joint Monitoring Committee firmly believe that the Programme needs to be preserved and further expanded in the next EU programming cycle, in order to support the objectives and values of all parties involved, and advance meaningful relationships under the European Neighbourhood Policy umbrella.

Finally, the 13 participating countries would like to reassert through this letter their unwavering commitment to the Programme and strong support to maintaining its special characteristics during the 2021-2027 period.

We believe that a direct exchange would be very useful to further discuss the issues addressed in this letter. I will contact you to plan a meeting in Brussels.

I thank you very much for your time and consideration, as well as for your support to the continuation of the Mediterranean Sea Basin Programme beyond 2020.

Yours sincerely,

**Anna Catte**

Director-General of the Managing Authority and Chair of the Joint Monitoring Committee

ENI CBC Med Programme

Autonomous Region of Sardinia

