

Operational Evaluation – Interreg Central Baltic 2021- 2027

Report by Oxford Research

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Client

Regional Council of Southwest Finland

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1. Executive summary

This report presents the findings of the operational evaluation of the Interreg Central Baltic Programme 2021–2027, conducted by Oxford Research on behalf of the Managing Authority, hosted by the Regional Council of Southwest Finland. The evaluation was carried out between August 2025 and June 2026 and covers the programme’s performance across its full thematic and operational scope. Its purpose is twofold: to provide an independent, evidence-based assessment of the programme’s performance during the current period, and to generate findings and recommendations that can directly inform the design of the 2028–2034 programme period.

The evaluation is structured around fifteen evaluation questions defined in the terms of reference, divided into an impact component and an operational component. The evidence base draws on surveys of granted regular projects, denied regular projects, small projects and Monitoring Committee and Member State representatives; in-depth interviews with programme staff, Monitoring Committee members, and all National Contact Points (NCP); and three in-depth case studies covering the Small projects, eight completed legacy projects from previous programme periods, and a case study on the regions bordering Russia.

The overall picture that emerges from the evaluation is of a programme that performs solidly across a broad front, with strengths in environmental cooperation, employment and mobility, and SME export promotion, and with an operational infrastructure, particularly in pre-application support and the NCP function that is consistently valued by its users. At the same time, the evaluation identifies a set of structural problems whose persistence across multiple programming periods indicates that they require structural solutions rather than further incremental adjustment.

Impact component: a coherent programme with variation across objectives and an unresolved indicator tension

The programme’s intervention logic is broadly clear and intentional. The environmental objectives, particularly the circular economy and coastal and marine environment strands, are assessed as the strongest thematic fit for the region, grounded in the shared environmental challenges of the Baltic Sea that can only be addressed through joint action. SME export promotion and employment mobility are also well-regarded and coherently designed.

Two objectives face structural challenges. The scale-up companies objective struggles to attract the right type of actors, since fast-growing companies tend to have their own international networks and limited incentive to engage in structured programme

cooperation. CO2 reduction in transport hubs could be better communicated and faces technical measurement difficulties: baseline emissions data for specific geographic areas often does not exist, and a documented consequence is that qualified consortia have chosen not to apply rather than commit to a result they cannot honestly promise.

A cross-cutting tension runs through the entire indicator framework. Projects describe indicators as having distorted their project design; programme management describes the same indicators as intentional and appropriate instruments for ensuring measurable results. Both positions are internally coherent. The practical consequence is that some projects adapt their design to fit indicators rather than needs. This is documented regardless of intent, and the cross-border cooperation dimension that justifies Interreg's existence is systematically invisible in the indicator framework, which measures what projects produce but not why cross-border cooperation was necessary to produce it.

The programme's current thematic relevance is strong, but forward-looking confidence is lower. Resilience, security, and preparedness are the most consistently named post-2027 priorities. The programme's seven objectives were designed before the geopolitical disruption of 2022 and have not been updated to reflect the changed situation, particularly for border regions.

Strategic contributions at local, regional and national level are documented in specific sectors, most notably in business development and innovation, where project results contributed to national cluster policy reform, and in rural tourism, where project findings fed into national policy dialogue. However, these contributions are not systematically harvested or communicated at programme level, and the capitalisation function established in the current period was too little resourced and too late to address this gap.

Operational component: strong support infrastructure, but persistent structural barriers

The programme's pre-application support is one of its clearest operational strengths. The nCP function is decisive in enabling participation, particularly for first-time applicants and smaller organisations. The application and monitoring system, Jems, is considered user-friendly relative to comparable EU funding instruments, and the project webspace, which gives each project a dedicated online presence within the programme's own platform, is the most significant communication innovation of the current period.

Against this positive background, three structural problems are documented with sufficient consistency and severity to warrant priority attention.

The first concerns selection transparency. Lack of transparency in the selection process is the single most consistently documented negative finding in the entire evaluation, as a substantial share of projects consider the selection criteria unclear. Until recently, denied

applicants received no written explanation for their rejection. The improvements introduced in the latter part of the current period, which includes written rejection rationale, access to follow-up consultation, immediate publication of results, are the right response and are already producing effects, but they were introduced late and have not yet reached all potential applicants' awareness.

The second concerns administrative burden. The timesheet and hour-reporting system is the most widely criticised specific procedure across all data sources. It is described as outdated, disproportionately burdensome and not suited to how modern project work is organised. National controllers act inconsistently across countries, causing delays in reimbursement that in documented cases have reached ten to twelve months, which is a timeframe that is unsustainable for small NGOs without financial reserves, and that structurally excludes precisely the actor types the programme most wants to attract. The centralisation of the national control function to the secretariat is a structural solution.

The third concerns capitalisation. The active work of connecting project results to policy processes and securing their reuse has been treated as something of a side activity rather than a core function throughout the current period. A dedicated capitalisation role was created only approximately one year before the evaluation was completed, and it immediately competed with project management responsibilities. The result is that project-level results are rarely aggregated, documented or communicated at programme level in a way that makes them visible to policy audiences or replicable by future projects.

Border regions: a structural mismatch that requires a structural response

The targeted call for EU external border regions activated new actors and distributed approximately 22 million EUR toward the eastern border regions. It was a reasonable response to an unforeseen geopolitical situation. As a thematic instrument for addressing border regions' actual needs, however, it was inadequate by design: it applied a geographic eligibility criterion to existing objectives without modifying those objectives, addressing where projects came from without addressing what they were for.

The most urgent needs of the eastern border regions include economic reorientation, resilience and civil preparedness, maritime security cooperation, people-to-people activities to replace what was lost from Russia cooperation programmes, and sustainable tourism development. Currently, these do not map onto the programme's current seven objectives.

Swedish participation requires a financing solution, not a communication response

Swedish participation in the programme is structurally suppressed by the staff cost hourly unit rate, which does not adequately reflect Swedish labour costs, and by the absence of dedicated national co-financing for Interreg in Sweden. It should be acknowledged that these are not exclusively Swedish challenges: cost increases relative to the staff cost hourly unit rate affect all participating countries to varying degrees, and not all Member States have national co-financing available for Interreg. What makes Sweden's situation distinct is the combination of the highest nominal unit rate in the programme area with salary levels that outpace it most significantly, alongside the absence of a national co-financing mechanism that could compensate for the gap. Swedish actors are generally aware of the programme; the problem is not information but financial viability. Communication investments directed at Swedish actors will not yield meaningful results without changes to the underlying financing conditions.

Legacy projects: the programme's long-term value is most visible in cooperation sequences

The legacy project case study covers eight completed projects from previous programme periods across business development, rural tourism, health technology, agricultural trade, vocational education and service design. In all eight cases, results continue to be used or to influence practice years after project closure. The clearest and most consistent finding is that results survive when they are embedded in the core operations of the lead partner organisation, and that the programme's long-term impact is most visible not in individual projects but in sequences of related projects that build institutional capacity and cooperation networks cumulatively over time.

Key recommendations

Each chapter in this report ends with a set of recommendations addressing the evaluation questions covered in that chapter. A consolidated list of all recommendations, organised into ten thematic categories into an easily accessible overview, is provided at the very end of the report. Below, the evaluation's most central recommendations for the next Central Baltic programming period are summarised.

- A permanent and dedicated border region measure should be designed from the outset of the next period, with its own thematic content reflecting border region realities, its own dedicated funding, and an adequate support infrastructure. This measure should not replicate the targeted call model but should develop thematic priorities that reflect what border regions can deliver and what they most need,

drawing on the transition planning work already conducted by the regions and the European Commission.

- Resilience and civil preparedness should be introduced as a thematic priority, calibrated carefully to what is realistically deliverable through cross-border cooperation. Before this priority is formalised, structured dialogue with other Interreg programmes in the Baltic Sea region should be conducted to ensure complementarity and avoid thematic crowding across the programme portfolio.
- The capitalisation function should be established with dedicated staffing, a clear mandate and adequate resourcing from the very beginning of the next period. A capitalisation call, that is, a dedicated funding mechanism allowing projects or consortia to build on and synthesise results from the broader portfolio, is worth exploring as a concrete instrument.
- Centralisation of the national control function to the Joint Secretariat should be a structural ambition for the next period. Alongside this, the timesheet requirement could be replaced with output-based reporting, and a pre-financing facility for smaller organisations should be introduced to address the liquidity problem.
- Mandatory pre-application consultation for first-time applicants should be considered. This is the single improvement most consistently identified across the evaluation's evidence base as likely to make a meaningful practical difference to application quality and to the equity of access to the programme.
- The improvements to selection transparency introduced in the current period should be retained and treated as minimum standards for the next period, accompanied by proactive communication of the assessment methodology before and during each call.
- The Swedish participation problem requires advocacy at the national level for dedicated Interreg co-financing and an assessment of whether the flat-rate provision can be adjusted to better reflect Swedish labour costs. Swedish NCPs should be engaged from the earliest stages of the next programming process.

2. Introduction

This chapter sets out the context and purpose of the evaluation. It begins with an overview of the Central Baltic Programme: its structure, objectives and place within the broader Interreg framework. This before describing the evaluation assignment, its scope and the questions it addresses. The chapter concludes with a brief account of how the report is organised and the evaluation's methodology.

2.1 About Interreg Central Baltic

The Interreg Central Baltic Programme is a European Territorial Cooperation programme funded under the European Regional Development Fund (ERDF) for the 2021–2027 programming period. The programme supports cross-border cooperation between Finland (including Åland), Estonia, Latvia and Sweden, with a total ERDF allocation of approximately 152 million EUR. Its geographic scope covers 29 regions in the four countries.

The Central Baltic Programme 2021–2027 belongs to the European Territorial Cooperation framework, better known as Interreg, which is one of the principal instruments through which the European Union supports cooperation across national borders. Interreg is organised around three strands: cross-border cooperation (Interreg A), transnational cooperation (Interreg B), and interregional cooperation (Interreg C). The Central Baltic Programme operates under the cross-border strand (Interreg A) and represents the sixth successive Interreg programming period overall, whilst the Central Baltic programme itself has existed since the 2007–2013 period.

The programme is structured around seven programme objectives (POs) organised under four thematic priorities:

- Priority 1: Innovative business development
 - PO1: More exports by SMEs. As a result of cross-border cooperation, companies are expected to achieve sales and contracts on target markets.
 - PO2: More new scaled-up growth companies. As a result of cross-border cooperation companies are expected to achieve scaled-up status as, for example attracted investment, developed new product or expanded team.
- Priority 2: An improved environment and resource use
 - PO3: Joint circular economy solutions. As a result of cross-border cooperation, product and service cycles and chains are improved.
 - PO4: Improved coastal and marine environment. As a result of cross-border cooperation, the load of nutrients and other harmful substances to the Baltic Sea is reduced from various sources.

- PO5: Decreased CO2 emissions. As a result of cross-border cooperation, CO2 emissions are reduced from intermodal transport nodes and areas.
- Priority 3: Improved employment opportunities
 - PO6: Improved employment opportunities on labour market. As a result of cross-border cooperation, people's competitiveness on labour market and entrepreneurship capabilities are improved and additional anti-discriminatory policies are applied by organisations.
- Priority 4: Improved public services and solutions for citizens
 - PO7: Improved public services and solutions for the citizens. As a result of cross-border cooperation, solutions are taken up or upscaled by organisations.

Projects funded through the Central Baltic Programme must meet a set of defining characteristics that reflect the programme's core logic and strategic intent. Each project must be anchored in one of the seven programme objectives and must demonstrate that cross-border cooperation adds clear value to addressing the challenge at hand, that is, that the project's aims could not be achieved, or could not be achieved as effectively, through national approaches alone. Partnerships must include organisations from at least two of the programme's participating countries, and eligible partners span a broad range of actor types: public organisations, NGOs and private partners may all participate, provided their involvement is relevant to the project's implementation. Projects are expected to produce results that contribute measurably to the programme's output and result indicators, and their results should be sustained after the project period ends.

In addition to regular projects, the programme funds a small projects instrument designed and intended to widen participation in cross-border cooperation by reducing administrative and financial barriers for organisations with limited EU project experience. The current period has also included a targeted call for EU external border regions, more specifically the Finnish regions of Etelä-Karjala, Etelä-Savo and Kymenlaakso, the Estonian regions of Kirde-Eesti, Kesk-Eesti and Lõuna-Eesti, and the Latvian regions of Vidzeme and Latgale. This call was initiated following the suspension of the Russia cross-border cooperation programmes in 2022.

The operational evaluation at hand is commissioned by the Managing Authority of the Central Baltic Programme, which is hosted by the Regional Council of Southwest Finland. This evaluation covers the full 2021–2027 programming period and is designed to serve two distinct purposes. The first is accountability: to provide an independent, evidence-based assessment of how well the programme has functioned. The second is learning: the purpose is to generate findings and recommendations that can directly inform the design of the upcoming 2028–2034 programming period, which is expected to begin its preparation in the near term.

The evaluation has been conducted by Oxford Research, a Nordic consultancy with extensive experience in evaluating European territorial cooperation programmes. The evaluation was carried out between August 2025 and June 2026.

2.2 About the evaluation assignment

The evaluation is structured around fifteen evaluation questions defined in the Terms of Reference, divided into two components. The first component, the impact component, addresses the programme's strategic performance: whether its intervention logic is coherent, whether it is relevant to regional needs, whether its indicators adequately capture what it achieves, and whether it has produced durable contributions to strategies and to the long-term development of the region. The second component, the operational component, addresses the programme's functional performance: how well it communicates with and supports applicants, how transparent and effective its selection process is, how burdensome its implementation procedures are, and how well it communicates and capitalises results.

More precisely put, the fifteen evaluation questions addressed in this report are as follows. In the impact component:

- Impact Question 1. Is the programme's intervention logic clear and straightforward? What works and what does not work for each of the programme objectives? Are there any improvements needed?
- Impact Question 2. Is the programme relevant to the current and upcoming needs and challenges in the region, including needs of EU external border regions? What needs and challenges might there be relevant for the Central Baltic programme, especially thinking of the post-2027 period? Could there be any other regions relevant to join the Central Baltic programme area and why?
- Impact Question 3. To what extent do the output and result indicators reflect the expected objective aims and the needs and challenges of the regions? Are the procedures related to reporting the indicator values clear, easy to follow and understandable for projects? Are there possibilities for improvements both in respect of selection of indicators and reporting of those?
- Impact Question 4. Are there examples of project results directly contributing to local, regional, national or EU-level strategies, including sectoral strategies, in the region? What are the best practice examples and what would be the most relevant activities to ensure a contribution? Which EU-level strategies is the programme most suited to contribute to and how?
- Impact Question 5. Are there examples of projects benefitting from the complementarity with other funding opportunities, including national

programmes and other Interreg programmes in the region? What are the barriers, if any?

- Impact Question 6. What is the net impact of the Central Baltic programme (of previous programme periods) up to now in different sectors of economy and in different regions? To what extent are the results of finished projects sustainable? Are there any improvements possible to ensure the sustainability, durability, and usability of CB project results in areas of programme objectives?

The operational component of the evaluation and this report include the following questions:

- Operational question 1. To what extent is the programme visible for potential applicants? Does the programme ensure clear and understandable information about project application and selection? Which communication channels work best and for whom? Are there possibilities for improvement?
- Operational question 2. Is the application procedure clear and understandable to potential applicants? How easy is it to prepare and submit an application? How does the one-step vs. two-step process affect quality and decision time? What are the pros and cons of each?
- Operational question 3. Is the support provided to applicants during the application process sufficient and well-targeted? Do applicants understand and benefit from it? How does it affect application quality?
- Operational question 4. Did the targeted call to border regions allow for better coverage of their needs? How successful are applicants from the enlarged programme territory compared to others? Which applicant types and regions succeed most within specific objectives, and why?
- Operational question 5. To what extent does the assessment procedure allow for selection of relevant projects? Is the process clear, understandable, and transparent? Are there possibilities to improve the methodology?
- Operational question 6. To what extent do programme procedures allow for easy and efficient implementation, monitoring, and reporting? What are the most common barriers and opportunities for improvement? Is the project modification process clear and efficient?
- Operational question 7. To what extent do the communication activities and tools serve the objectives of the programme to ensure the visibility of the programme and other aims of communication? Is programme communication clear and understandable to the target audience? What works best and for whom? Are there any possibilities to improve?
- Operational question 8. Are projects visible to their target groups and the public? Which communication and visibility measures by projects could be considered good practice and why? To what extent does the programme ensure visibility of

results and achievements of projects? To what extent does the programme ensure re-use of project results? Which activities and for whom would be the most relevant to capitalise project and programme results with the aim of policy development at a relevant scale?

- Operational question 9. How do projects plan to ensure sustainability of project results and durability of activities, outcomes or outputs after projects have finished? What will foster it and what will hinder it? Are there practices worth highlighting? How do projects ensure positive impact on horizontal principles promoted by the programme? Could there be any possibilities for improvements?

The questions above will hence be addressed in their respective components in this report, with the exception of Impact question 6, on the net impact of previous programme periods and the sustainability of completed projects, which is addressed as a separate case study. This report includes two additional case studies, which are presented in greater detail in the following chapter.

2.3 Structure of this report

This report is organised into eight chapters. Following the executive summary and this introduction, the following subchapter describes the evaluation's methodology, covering the data collection methods used, the scope and response rates achieved, and the analytical approach applied. It also identifies the principal limitations that should be borne in mind when interpreting the findings.

Chapter 3 addresses the five impact questions examined in the main evaluation, each in a dedicated section. The sixth impact question, on the net impact of previous programme periods and the sustainability of completed projects, is not addressed in this chapter but in the legacy projects case study in Chapter 7. Chapter 4 addresses the nine operational questions in the same format, with each question examined in a dedicated section.

Chapters 5 through 7 present the evaluation's case studies. Chapter 5 covers the border regions with a particular focus on Kymenlaakso, Louna-Eesti and Latgale. Chapter 6 examines the functioning of the small projects, and Chapter 7 presents the legacy project case study covering eight completed projects from the 2007–2013 and 2014–2020 programme periods. Each case study chapter combines its own findings, conclusions and recommendations.

Chapter 8 brings together the evaluation's overarching conclusions and a consolidated set of recommendations, drawing on findings from across all evaluation questions and case studies.

2.4 Method

This chapter briefly lays out the methods and data conducted in the evaluation at hand.

Evaluation design and approach

This evaluation employs a mixed-methods design combining quantitative survey data with qualitative evidence from semi-structured interviews, in-depth case studies and document analysis. The design reflects the plan from the Terms of reference and Implementation Report and the dual purpose of the evaluation: to provide an independent, evidence-based assessment of the Central Baltic Programme’s performance across its impact and operational dimensions during the 2021 to 2027 period, and to generate findings and recommendations of sufficient depth and specificity to inform the design of the 2028 to 2034 programme period.

Neither surveys alone nor qualitative evidence alone would have been sufficient for either purpose. Surveys provide broad coverage across the population of programme stakeholders and allow quantitative patterns to be identified with a degree of generalisability, but they cannot explain the mechanisms behind those patterns or capture the contextual complexity that makes findings actionable. Qualitative evidence from interviews and case studies provides that explanatory depth but is not by itself sufficient to establish how widespread a finding is or whether it reflects a pattern rather than a unique experience. The combination of methods addresses both sets of limitations, and the interaction between quantitative and qualitative evidence is central to how findings are developed throughout the report.

Data collection took place between August 2025 and May 2026, progressing from document review and survey design through to quantitative data collection, qualitative interviews and case study work. An Inception report was produced at the outset of the evaluation, defining the evaluation framework, the evaluation questions, the data collection instruments and the analytical approach. The findings presented in this report are based on the complete dataset.

Data collection methods employed

Document review

The evaluation began with a review of programme documentation. Materials reviewed included but were not limited to key programme documents and documentation, programme manual, monitoring committee minutes, reports and programme statistics, the Terms of reference and the Implementation report for the evaluation, and programme-level communication materials. This documentary foundation provided the baseline understanding of the programme’s design, objectives, procedures and intended results.

For the case study components, document review was extended to cover project-level materials including application documents, reports and final reports for legacy projects. For the border regions case study, three additional external documents provided important strategic context: the Finnish Government's Programme for Eastern Finland, published in January 2025; the OECD report on Transition Strategies for Finland's Eastern and South-Eastern Border Regions, published in 2025; and the AKKE development project call document for Eastern and Northern Finland, which outlines thematic priorities for the instrument.

Key documents have been revisited during the analysis phase of the evaluation.

Surveys

Four separate surveys were conducted as part of the evaluation, each designed specifically for its target group and administered online.



The first survey targeted lead partners of granted regular projects. 84 complete replies and 20 incomplete replies were received. The survey covered the full range of evaluation questions, including programme relevance, cross-border added value, indicator clarity, application and implementation experience, support quality, communication and sustainability planning.

The second survey targeted lead partners of denied regular projects, meaning applicants who submitted a full application during the current programme period but did not receive funding. 23 denied projects replied. This survey was designed to capture the perspective of applicants whose experience of the programme differs structurally from that of granted projects, and whose views on the selection process, support quality and communication provide a counterweight to the picture that granted projects present.

The third survey targeted members of the Monitoring Committee and Member State representatives. Thirteen complete and six incomplete replies were received. Given the small overall size of this group, the response rate represents a fairly sufficient share of the

committee's active membership. As noted above, percentage figures from this survey should be interpreted with appropriate caution given the small absolute numbers involved.

The fourth survey was conducted as part of the Small projects case study, targeting lead partners of small projects funded in the current period. Twenty of the thirty funded small projects responded.

Interviews

In-depth semi-structured interviews were conducted with a wide range of programme stakeholders across all participating countries. All interviews were conducted based on guides prepared specifically for each respondent type or group, designed around the evaluation questions most relevant to the respondent's role and experience.

Interviews were conducted with all programme staff with thematic or operational responsibilities, including but not limited to the Head of the Managing Authority, the project manager responsible for the EU external border, the thematic project managers, the programme's Communication Manager, select members of the Monitoring Committee. Interviews were also conducted with National Contact Points from all participating countries, including interviews representing southern and northern Sweden respectively, and with the Åland NCP given the distinctive characteristics of Åland as an autonomous island territory.

In addition to programme staff and NCP interviews, in-depth interviews were conducted as part of the three case studies, as described below.

Case studies

Three case studies were conducted to provide in-depth evidence on specific aspects of the programme.

Case study	Legacy projects	Small projects	Border regions
Data sources consulted	8 completed projects from 2007–2013 and 2014–2020. One interview per project, plus project reporting.	The dedicated survey, plus 5 in-depth lead-partner interviews across thematic and geographic spread.	Finnish, Estonian and Latvian regions sharing a border with Russia. One Monitoring Committee interview per country, lead-partner interviews from two projects per region, and document review.

The legacy projects case study examines eight completed projects from the 2007 to 2013 and 2014 to 2020 programme periods: CAITO, INNOREG, SMEDGE, HealthAccess, Breedexpo, Springboard, BTP and ServiceD. These projects were selected to provide coverage across different partnership structures and programme periods. One interview was conducted per project, with the lead partner or a principal project manager from the original implementation period. The case study also included project reporting.

The small projects case study draws on both the dedicated small projects survey and five in-depth interviews with small project lead partners. The projects interviewed were Women Go Tech, CoMe Stronger, HERO, the Business Academy, and Expertise from Experience, selected to provide thematic and geographic diversity within the small projects portfolio.

The border regions case study focuses on the Finnish, Estonian and Latvian border regions, drawing on in-depth interviews with the monitoring committee members of each targeted border region in the study (one per country), as well as project interviews with lead partners from two projects from each focused border regions and document studies.

Analytical approach on the data

Survey data was analysed using descriptive statistics. Given the relatively small absolute numbers involved (particularly in the Monitoring Committee survey), results are reported as percentages but should be interpreted with appropriate caution. Throughout the report, survey figures are used to establish the overall direction and strength of a finding, while qualitative evidence provides the explanatory context.

Interview data was analysed thematically, with findings organised around the evaluation questions. All interviews were conducted on a not-for-attribution basis. Findings are presented at an aggregated level, and statements or views cannot be traced to individual respondents. Throughout the report, findings attributed to programme staff, nCPs or respondents across multiple countries reflect convergence across multiple independent data sources rather than the view of any single individual. Findings attributed to specific case study projects are identified as such.

The synthesis of findings across methods was guided by the principle of triangulation: where multiple independent data sources point to the same conclusion, confidence in that conclusion is correspondingly higher. Where data sources diverge, as they do, for example, on the question of indicator distortion, where programme staff and project respondents hold different and internally consistent positions, both perspectives are presented and the divergence itself is viewed as a relevant finding.

Limitations on the data to consider when reading the report

Several limitations should however be noted when interpreting the findings in this report. Survey respondents are not a random sample of the programme's stakeholder population. Organisations that engage actively with evaluations tend to be more experienced and more likely to have formed views about their experience. The views of actors who chose not to respond may differ from those who did.

The survey of denied projects is analytically important but structurally more difficult to implement than the survey of granted projects. Denied applicants tend to be less motivated to participate and harder to contact. Every effort was made to collect data from denied project respondents, but the perspective of this group should be interpreted with awareness of potential self-selection effects.

Further, the evaluation was conducted during an active programme period, meaning that many projects were still in implementation at the time of data collection. Assessments of results, sustainability and impact are therefore necessarily preliminary for projects that have not yet closed.

Finally, the legacy projects case study draws on interviews with individuals who were involved in projects completed up to fifteen years ago. Respondents' recollections are thus subject to the natural limitations of memory and to the tendency to reconstruct events considering subsequent developments. Where possible, interview accounts were cross-referenced with documentary evidence from project reports.

3. Impact component

This chapter addresses the impact questions defined in the evaluation's Implementation report and terms of reference. Together, these questions examine whether the programme is doing the right things: whether its design is coherent, its thematic priorities relevant, its indicators fit for purpose, and its results durable and strategically significant. They are questions about programme value rather than programme function, and answering them has required drawing on the full breadth of the evaluation's evidence base: survey data from projects and applicants, survey data from monitoring committee members, interviews with programme staff and national contact points, the legacy project case studies, and the border regions case study.

The questions are addressed in sequence, each in a dedicated section. The sections follow a common structure: a substantive findings and analysis section organised around the key analytical observations that the evidence supports, followed by an overview of the conclusions and a set of recommendations that translate those observations into actionable directions for the programme to consider when designing the next programming period.

A note on the scope of the chapter: Impact Question 6, which concerns the net impact of previous programme periods and the sustainability of results from completed projects, is not addressed in this chapter. It is examined in depth in the legacy projects case study in Chapter 7, where the question can be treated with the level of project-specific detail that it requires. Readers seeking the evaluation's response to Impact Question 6 are hence directed to that chapter.

The five impact questions examined in this chapter cover the clarity and coherence of the intervention logic across all seven programme objectives; the programme's relevance to current and future regional needs including those of EU external border regions; the adequacy of the indicator framework and the clarity of reporting procedures; the extent to which project results contribute to local, regional, national and EU-level strategies; and the complementarity of the programme with other funding instruments.

3.1 Impact question 1: A broadly coherent intervention logic, with variation across objectives and an unresolved indicator tension

This section addresses the first impact question, concerning the clarity and coherence of the programme’s intervention logic. It examines how well each of the seven programme objectives is designed and communicated, where the design works well and where it faces structural challenges, and what the evidence suggests about the cross-cutting tension between the indicator framework and project design choices.

The overall intervention logic is assessed positively, but the aggregate figure conceals important variation

Survey data from the Monitoring Committee and Member State representative survey presents a broadly positive picture: 84% of respondents consider the intervention logic clear to a large or very large extent. This is a strong figure that reflects satisfaction with how the programme has structured its ambitions across seven distinct objectives. It would be a mistake, however, to read this headline result as suggesting that all seven objectives function with equal clarity and effectiveness.¹ The qualitative evidence that underlies the aggregate figure reveals a more differentiated picture, in which some objectives function as designed, others face structural challenges that cannot be resolved through better communication, and at least one presents difficulties that can be seen to be rooted in the incompatibility between its result requirements and the technical realities of the problem it is designed to address.

Understanding why this variation exists, and what it means for the programme’s effectiveness, requires examining each objective in turn. It also requires attending to a cross-cutting dynamic that affects the intervention logic across all objectives: the relationship between the programme’s indicator framework and the design choices made by the projects it funds. This is addressed at the end of this section, after the objective-by-objective analysis.

Below is a heatmap aimed at illustrating the key points of this chapter and the strengths and possibilities for development for each of the programme objectives. It is a summary

¹ Further, as noted above, the Monitoring Committee survey results should be interpreted with caution given the small number of respondents, which limits the extent to which findings can be considered representative of the committee as a whole.

of the key points and should be read as a rudimentary summary of what is said in the chapters below.

Programme objective	Intervention logic	Cross-border value	Future relevance	Overall assessment
PO1 - SME exports	Clear and coherent	Countries struggle to reach these markets alone	Consistent regional need	Strong
PO2 – Scale-up companies	"Born global" firms don't need the programme	Hard to justify why cross-border adds value	Structural recruitment problem remains	Could be stronger
PO3 – Circular economy	12/13 MC members rate it working well	Shared supply chains across the region	Strong – results may just take longer to show	Strong
PO 4 – Coastal environment	Mature, well-established logic	No country can fix the Baltic Sea alone	Nature restoration would be a natural extension	Strong
PO5 – CO ₂ reduction	Most "not working" flags in survey; baseline data often doesn't exist	Rationale exists but hard to measure	Relevant but needs communication overhaul	Mixed
PO6 – Employment	12/13 MC members rate it working well	Anti-discrimination subcomponent doesn't work in practice	Clear need across the programme area	Strong
PO 7 – Public services	Works for small projects; fails when ambition is transformative	Legal differences across countries limit joint delivery	5/13 MC members flag it as not working well	Mixed

Green: works well

Yellow: Mixed, works in part

Red: Structural challenges not fixable by communication alone

PO1 on SME exports to distant markets functions well and reflects a coherent and well-communicated design

PO1 is among the most positively assessed objectives. The intervention logic is well-settled and clearly communicated, and the evidence from consultations, project monitoring and the survey data is consistent with this assessment. The objective is deliberately narrow: it targets export to markets outside the EU internal market, and it requires projects to pursue concrete, hands-on export activities that produce actual sales rather than research, strategy or analysis. This design is intentional. The EU internal market is already covered by national export promotion instruments, and the specific comparative advantage of a multi-country cooperation programme lies in combining partner networks, market contacts and commercial knowledge across borders in ways that no single national programme can replicate. Projects that target, for example, the Japanese, American or Brazilian markets by pooling the linguistic capacity, existing

client relationships and business intelligence of partners from Finland, Estonia, Latvia and Sweden are doing something qualitatively different from what any of those countries could do alone. This is a clear and defensible intervention logic, and the evidence suggests it has been well understood and well implemented.

A minor definitional ambiguity is noted in relation to the concept of “a sale”. In the context of manufactured goods, the definition is unambiguous. In services and tourism, the transaction that constitutes “a sale” is less straightforward, and the programme's guidance has not fully resolved how this should be interpreted across different sectoral contexts. This is a fine-tuning issue rather than a structural problem, but it has created some uncertainty in consultations and should be addressed explicitly in the next period's manual.

PO2 on scale-up companies is structurally the most challenging objective

PO2 is the objective where the gap between the programme's ambition and its demonstrable achievement is widest, and this finding is consistent across all data sources consulted in the evaluation. The objective targets fast-growing, ambitious companies with the potential to scale across borders. The challenge is that these companies, precisely because they are fast-growing and ambitious, tend to operate internationally under their own initiative and through their own networks. They are, in a common formulation used across interviews, “born global”: they do not need a cooperation programme to give them an international perspective, because that perspective is already central to their business model. Persuading them to commit six to twelve months to a structured project within a programme framework, when they could be pursuing their growth agenda through their existing commercial relationships, is a structural recruitment problem that no amount of call design or communication can fully resolve.

The problem is compounded by the difficulty of defining a clear cross-border added value for this objective. For export promotion, the cross-border rationale is straightforward: combining networks and knowledge across borders opens markets that no single country could access alone. For scale-up companies, the rationale is less obvious: the most compelling version of the argument is that bringing together talent, capital and technical capacity from multiple countries creates business combinations that would not emerge within a single national ecosystem, but this claim is difficult to substantiate within the timeframe of a typical project and is not captured by the available indicators. The result is an objective that attracts interest from organisations that support companies, rather than from the companies themselves, and that produces cooperation structures which are sometimes more about the programme than about genuine joint commercial ambition.

A two-step application model has been identified within the programme as a potential structural response to this challenge: a first stage in which partnerships develop a genuine joint strategy and market approach, followed by a second stage in which that strategy is implemented with programme support. This would reduce the risk that partnerships form primarily to access funding and develop their common rationale only after the funding is secured, which is a pattern the evidence suggests has occurred in some PO2 projects. The evaluators consider this a well-reasoned proposal that deserves consideration in the next period's programming process.

PO3 on circular economy is among the strongest objectives, well suited to the programme's geographic scope

PO3 receives consistently positive assessments across the evaluation dataset, with 12 out of the Monitoring Committee and Member State respondents flagging it as working well. The intervention logic is clear: projects target specific stages of product and service value chains, develop solutions for reducing waste or extending the life of materials, and demonstrate these solutions in a cross-border context that draws on the region's shared supply chains and production networks. The shared environmental and industrial geography of the Central Baltic region, including its common forestry sector, shared sea-based trade routes, overlapping agricultural systems and similar waste management challenges, provides a genuine basis for cross-border cooperation on circular economy themes that is not replicated elsewhere in Europe.

A challenge that is underappreciated in the overall positive assessment concerns the time horizon over which PO3 results materialise. In some sectoral contexts, particularly construction, the changes to supply chains and product cycles that a project initiates take years to become observable. A project that completes within its scheduled timeframe may have set in motion changes that are only visible two or three years later. This creates a systematic mismatch between what the programme can measure at the point of project closure and what the project has actually achieved. The practical consequence is an incentive to set conservative indicator targets and a systematic understatement of the objective's contribution. This issue is addressed in greater detail in the chapter on Impact Question 3.

PO4 on coastal and marine environment benefits from established international frameworks and a long track record of cross-border cooperation

PO4 can be described as a mature theme with a well-established history in the programme's predecessor periods. The Baltic Sea's environmental condition is a

genuinely shared problem: nutrient loading, biodiversity loss, pollution from maritime shipping and the cumulative impact of multiple national coastlines on a single enclosed body of water cannot be addressed by any one country acting alone. The existence of international frameworks including agreed targets, monitoring systems and shared governance structures provides both a strategic anchor for PO4 projects and a ready-made audience for their results. Projects under the PO4 target specific pollution sources or environmental quality challenges and develop joint approaches to addressing them across national boundaries. Their individual results feed into a cumulative programme of environmental governance whose value extends beyond what any single project achieves.

The baseline and indicator challenges that affect PO5 are less severe for PO4, because the relevant environmental monitoring data is generally available at the scale at which projects operate, and because established methodologies for measuring reductions in nutrient loads, pollutant concentrations or invasive species presence provide a workable framework for result measurement. The intervention logic for PO4 is well-communicated, well-grounded in technical and scientific practice, and consistently implemented.

PO5 on CO2 reduction is the most widely criticised objective, facing distinct communication and technical measurement problems that require separate responses

PO5 receives the highest number of “not working well” flags in the Monitoring Committee and Member State representative survey, and this critical assessment is consistent across multiple data sources. Understanding what lies behind this finding requires separating two distinct problems that are frequently conflated in how the criticism is expressed.

The first problem is one of communication and interpretation. PO5 is a narrowly focused objective: it funds projects that reduce CO2 emissions from the activities and actors present at specific transport hubs and intermodal nodes. It does not fund transport infrastructure development, and it is not a general environmental objective that “happens to be associated” with transport. This distinction is important but has not always been adequately communicated: many applicants and monitoring committee members have interpreted PO5 as funding transport-related activities more broadly, which has led to a mismatch between the applications that arrive and what the objective is designed to fund. Improving the clarity and specificity of how PO5 is communicated, including concrete examples of what a qualifying project looks like and what one does not, would reduce this mismatch without requiring any change to the objective’s design.

The second problem is of more technical nature and a bit less tractable. When projects under PO5 are required to establish a baseline for CO2 emissions from a geographically bounded transport hub, they frequently discover that no prior measurement of those

emissions exists. The emissions from the activities at a specific port, railway junction or multimodal freight facility may never have been systematically recorded, which means that establishing a credible baseline requires either a dedicated measurement exercise at the project's own cost and time, or a negotiated approach based on proxy data or prior research. The programme has been flexible in accepting the latter, but this flexibility has limits, and the uncertainty it creates remains a genuine deterrent for otherwise qualified applicants. A documented case from the evaluation illustrates the severity of this problem: a consortium with relevant expertise and appropriate ambitions for PO5 ultimately decided not to apply because it could not credibly commit to demonstrating a measurable CO2 reduction within the project period, given the technical measurement difficulties it anticipated. This could be considered a direct cost to the programme's effectiveness: it lost a project that its own design was intended to attract, because the result definition could not accommodate the realistic technical conditions of the work.

PO6 on employment opportunities is assessed positively overall but contains a subcomponent that does not function as intended

PO6 is among the positively assessed objectives: 12 Monitoring Committee and Member State respondents flag it as working well. The intervention logic in its basic form is clear and easy to communicate. Projects facilitate training and mobility opportunities for workers or job seekers across borders, with outputs measured by the number of participants who begin training and results measured by the number who complete it successfully. This logic is well understood and consistently applied, and the consultations through which programme staff help applicants interpret the indicator requirements are effective at resolving the comprehension difficulties that arise from the EU common indicator terminology used in the written documentation.

A structural question that arises in relation to this objective concerns whether the employment challenges PO6 addresses are genuinely shared across the entire geographical programme area in the way that cross-border cooperation programmes typically require. A possible view on this question could be the following: the challenges do not have to be identical across countries for cross-border cooperation to be justified. The value of cross-border employment and training cooperation need not primarily lie in solving a shared problem jointly, but rather in exposing participants to different labour market systems, widening their professional outlook, and facilitating mobility that individual national programmes would not generate. Two-partner projects are explicitly permitted and funded, which means the programme does not require the large multi-country consortia that some other objectives attract.

The element of PO6 that functions most poorly in practice is the anti-discrimination subcomponent, which targets employer behaviour change. Producing measurable changes

in how employers recruit, accommodate and retain workers from underrepresented groups is an ambition that individual projects cannot reliably deliver within a standard two-to-three-year timeframe. Changing employer behaviour further requires sustained engagement, cultural change processes and might require regulatory pressure that goes beyond what a cooperation project can provide. The one documented case where this component showed stronger results involved chambers of commerce as partners, whose membership relationships with companies provided the access and leverage that the programme's typical partner base cannot replicate. This is a finding about the limits of what the programme can achieve through its current partner base in this domain, and it points toward either a redesign of this component or a more realistic calibration of what results it can credibly claim.

PO7 on improved public services functions well for smaller-scale ambitions and less well for more transformative ones

PO7 receives mixed assessments: 12 Monitoring Committee and Member State respondents flag it as working well, but 5 also flag it as not working well, the joint highest negative score alongside PO5. This split is not difficult to explain when the range of ambitions that fall under PO7 is examined: the objective encompasses both modest, practical cooperation between public service providers who want to share approaches and learn from each other across borders, and ambitious attempts to create entirely new public services that function seamlessly across national boundaries. These two project types have different intervention logics, different risk profiles and different conditions for success.

For the more modest type of project, PO7 seem to function well. Partners identify a shared service challenge, develop a joint improvement or solution, and produce a result that enhances a public service at local, regional or national level. The ambition is calibrated to what cross-border cooperation can realistically deliver, the activities are concrete and manageable, and the results are observable within the project period. The "small project"-format is particularly well-suited to this level of ambition, and the evidence from small projects in PO7 is consistently more positive than from regular projects.²

For the more ambitious type of project, the challenges are structural. Creating a cross-border public service that functions coherently across different national legal frameworks, administrative systems and service delivery standards requires either that the legislative barriers between countries be resolved or that the project work around them. The programme naturally does not have a mandate to change national regulations, which

² More on the "small project"-format in the chapter dedicated to the Small projects-case study.

means that legislative differences must be addressed by the projects themselves. Programme staff expect projects to identify these barriers at the application stage and build relevant activities to address them into their work plans, and note that a preparation cost provision exists for exactly this purpose. In practice this provision seems to be rarely used effectively, and projects frequently encounter the legislative complexity they should have anticipated only after they have started implementation. This is partly a project management failure and partly a programme design gap: the signal that legislative pre-work is both expected and resourced has not been communicated with sufficient clarity or insistence in the guidance documentation.

The indicator framework creates a cross-cutting tension between programme intent and project experience

Running through the evidence for all seven objectives is a question about the relationship between the programme's indicator framework and the design choices made by project applicants. This question is worth examining because the different positions taken on it are both internally consistent and genuinely irreconcilable, and the tension between them has concrete consequences for the quality of the programme's funded portfolio.

From the perspective of many project respondents, indicators have functioned as de facto objectives rather than as measurement instruments. Projects have at times been designed to hit specific indicator targets rather than to address the underlying challenge that an objective was created to solve, and in some cases applicants have selected programme objectives not because those objectives best fit their genuine ambitions but because the indicator requirements in a preferred objective were seen as too demanding or too narrow to accommodate their project design. The outcome, in this reading, is a portfolio of projects that are technically compliant but might be thematically suboptimal. This observation should however be interpreted carefully. The indicators were designed to measure progress toward objectives that were themselves grounded in a regional needs analysis conducted at the time of programming, and in that sense the framework was coherent at the point of design. The tension that has emerged since reflects at least two distinct dynamics: first, a shifting challenge landscape (particularly following the geopolitical changes of 2022) that has moved some regional needs beyond what the current objectives can accommodate; and second, a more structural issue in how the indicator framework interacts with applicant behaviour, where narrow or demanding indicator requirements create incentives to select objectives strategically rather than on the basis of genuine thematic fit.

This points to a difficult balance that the programme will need to weigh consciously in the next period. Indicators that steer projects toward specific, measurable goals serve a legitimate purpose: they create focus, enable aggregation of results across the portfolio, and provide accountability for public investment. But steering that is too tight might carry

its own costs, as it can produce a portfolio that is internally consistent but might miss valuable opportunities, and it can push applicants toward compliance behaviour rather than genuine ambition. The evaluators do not offer a conclusive answer to where exactly the right balance lies, as this is ultimately a strategic and political judgement for the programme to make. What the evidence does suggest is that the current calibration might sit closer to the steering end of the spectrum than is optimal, and that the next programming cycle presents an opportunity to reconsider that balance deliberately rather than by default.

From the programme’s perspective, this reading misunderstands the purpose and function of indicators. The programme’s explicitly expressed position is that the commitment to result orientation is fundamental and intentional: the programme wants to fund what can be measured, because measurability is the condition for demonstrating that public money has produced public value, something that in itself must be considered a reasonable premise. Further, this means that an indicator does not distort a project’s design; rather, it disciplines it. A project that cannot define a concrete, measurable result it commits to delivering is not a project the programme wants to fund, regardless of how genuine its general ambitions may be. From this perspective, what critics call “indicator distortion” is simply the programme exercising its legitimate prerogative to fund demonstrable results rather than diffuse, unmeasurable cooperation.

Both positions are internally coherent, and as evaluators we do not deem ourselves to be in a position to adjudicate between them on principle. What can be established empirically is that the practical consequence of the current situation is a gap between how applicants understand indicators and how the programme intends them to function, and that this gap generates a series of documented costs: misaligned project designs, suboptimal objective selection, project staff consultation time consumed by indicator interpretation, and in at least one documented case the deterrence of a qualified applicant who concluded that the result definition could not accommodate their genuine ambition. Resolving these costs does not require either side to abandon its position. Rather, it requires better and more concrete guidance at the application stage, specifically on the distinction between the programme objective, the expected result, and the indicator used to measure it, developed with first-time applicants specifically in mind.

Conclusions and recommendations

The programme’s intervention logic is broadly coherent, and the overall design reflects deliberate and considered choices. The two objectives with the most documented structural challenges, PO2 and PO5, are acknowledged within the programme as learning points for the next period, and the evaluators consider this acknowledgement well-founded. Across all seven objectives, the indicator framework creates a tension between the programme’s intent and projects’ experience that is best addressed through improved

guidance rather than structural redesign. For the next programming period, the evaluators recommend the following:

- A two-step funding model should be explored for PO2. This would involve an initial partnership and planning phase, in which a genuine cross-border rationale is developed and a joint market strategy or common agenda is articulated, followed by an implementation phase in which the agreed plan is executed with programme support. This model could reduce the risk of partnerships forming primarily to access funding rather than to pursue a genuine common objective and could provide a structured opportunity for the cross-border added value of the cooperation to be demonstrated before a full funding commitment is made.
- For PO5, two distinct responses are warranted. The communication of the objective should be substantially improved, with explicit and concrete guidance on what qualifying activities look like and what they do not. Alongside this, the programme should explore whether baseline measurement support can be made available to applicants at the application or inception stage, reducing the technical burden that currently deters qualified consortia from applying.
- For PO3, the indicator framework and post-project reporting arrangements should be reviewed with a view to accommodating results that materialise after project closure. Follow-up reporting at defined intervals post-closure, or the acceptance of interim milestones as evidence of progress toward longer-term results, could reduce the systematic understatement of the objective's contribution that the current measurement-at-closure approach produces.
- For PO7, the next period's programme design should more explicitly differentiate the ambition level between the small size project format and regular projects. For regular projects with transformative ambitions around cross-border service creation, the programme should require and resource more substantive pre-application engagement with the legislative and administrative barriers that such ambitions inevitably encounter.
- Across all objectives, the programme should consider investing in clearer, more practical and more example-based guidance on the indicator framework, with the specific aim of helping first-time applicants understand the distinction between what the programme is designed to achieve thematically, what a specific project is expected to deliver as a concrete output, and how the result it commits to will be measured. This guidance should be designed as a standalone resource specifically for first-time applicants, rather than integrated into the comprehensive programme manual, and should be available from the earliest stages of each call.

3.2 Impact Question 2: The programme is relevant to current regional needs, but themes require an update for it to address future challenges

This section addresses the second impact question, concerning the programme's relevance to current and future regional needs. It examines how well the programme's thematic priorities align with the challenges facing the programme area today, what themes are emerging as priorities for the post-2027 period, and what the evidence suggests about the specific situation of EU external border regions and the structural barriers to Swedish participation.

The visual below summarises the key strengths, potential post 2027-themes, and thematic gaps:

Current strengths	Emerging for 2028–34	Structural gaps
Environmental cooperation Circular economy and coastal and marine environment; a naturally shared, cross-border problem	Resilience and preparedness The most widely and urgently cited cluster since 2022	People-to-people cooperation Not fundable under any of the current objectives, could be relevant for border regions
Employment and mobility Structural labor market differences create a genuine cross-border incentive	Nature restoration A deepening of the existing environmental strand, anchored in the updated EU Baltic Sea Strategy	Border region reorientation No differentiation for first-time entrants from the established constituency
SME export promotion Fills a gap in national provision, where properly targeted		Redundant security pivot If every Baltic Interreg programme would come to prioritize security at once, established strengths risk neglect

Current relevance: Strong thematic fit for current needs, particularly in environmental cooperation and employment

The programme is broadly considered relevant to the current needs and challenges of its participating regions. Among granted regular projects, 82% consider the programme addresses current needs to a large or very large extent, and among Monitoring Committee and Member State representatives the figure reaches 86%. These are strong headline figures that reflect thematic alignment between what the programme funds and what the regions need.

The environmental objectives receive the most consistent endorsement. The circular economy strand and the coastal and marine environment strand are repeatedly identified across data sources as particularly well-suited to the programme's geography and the cross-border nature of the challenges they address. This assessment is grounded in a straightforward observation: the environmental condition of the Baltic Sea is inherently a shared problem. No single country can address nutrient loading, biodiversity loss or maritime pollution independently, and the long-standing cooperative structures around Baltic Sea environmental governance provide a natural institutional architecture within which Central Baltic projects can meaningfully position their contributions. The employment and mobility objective is also consistently considered relevant, particularly given the structural differences in labour market conditions across the programme area that create genuine incentives for cross-border skills development and mobility. SME export promotion to distant markets is considered relevant where it is properly targeted, reflecting a gap in national programme provision that a multi-country cooperation programme is well-placed to fill.

A shifting challenge landscape emerges for post-2027

The forward-looking picture is less positive. Only 50% of Monitoring Committee and Member State representatives consider the programme well-positioned to address upcoming challenges - a substantial drop from the 86% who consider it relevant to current needs. This divergence does not reflect retrospective scepticism about the programme's performance but rather a forward-looking signal for the programming process that is now beginning: as the programme area prepares for the 2028–2034 period, the question is not whether the thematic configuration will change, as it will, and a new set of objectives will be developed based on current and foreseen needs, but what that update should prioritise and why.

Several post-2027 themes emerge consistently across data sources. The most widely and urgently cited cluster concerns resilience, preparedness and supply security. The changed security situation in the Baltic Sea region following the Russian full-scale invasion of Ukraine in 2022 has elevated preparedness from a background policy consideration to a foreground priority for multiple stakeholder groups across all participating countries. The specific vulnerability of island territories, rural border communities and regions with particular infrastructure exposure has been noted as a dimension that the programme has not previously been designed to address. Stakeholders across the programme area are consistent in noting that preparedness-related cooperation is both urgent and realistic within an Interreg framework, provided ambitions are calibrated to what a cross-border cooperation programme can credibly deliver. Piloting preparedness activities, training civil society actors, and facilitating cross-border coordination among relevant authorities are identified as realistic entry points. Full-scale security implementation, by contrast, is not an Interreg function and should indeed not be presented as one.

Nature restoration emerges as another consistently mentioned future theme. It is understood as a natural deepening and continuation of the existing environmental strand rather than a new departure, and programme staff responsible for environmental objectives consider that substantial remaining potential exists in this space. The updated EU Baltic Sea Strategy action plan, which has been made available in time to inform programming for the next period, could provide a strong strategic anchor for continued environmental cooperation and for nature restoration specifically.

A concern raised across multiple sources deserves particular analytical attention. If all Interreg programmes operating in the Baltic Sea region simultaneously prioritise security and resilience in the next period, other thematic areas could risk being neglected. Environmental cooperation, social inclusion and employment are established programme strengths. Abandoning or substantially reducing them in favour of a security-oriented pivot could sacrifice accumulated institutional knowledge and tested cooperation models without necessarily producing better security outcomes, since the same security priorities would be funded redundantly across multiple programmes. Structured dialogue between programmes operating in the same region is therefore not merely a coordination formality but a substantive condition for effective use of EU resources in the next period.

Border regions face a structural mismatch between their most urgent needs and what the programme can offer

The programme's current capacity to address the specific needs of EU external border regions is limited, albeit not by poor design choices that can be corrected but by a fundamental structural condition: what border regions seem to most urgently need falls largely outside the scope of what a cross-border cooperation programme of this type can provide. The loss of the Russia cooperation programmes removed access to investment-type support that enabled physical infrastructure development, building restoration and direct community-level investment. Interreg Central Baltic does not fund these activities and cannot hence replicate this function regardless of how calls are designed or how funding is allocated.

What the programme could realistically do for border regions is thus different in kind. It could more heavily strive towards supporting the integration of border region actors into western-facing cooperation networks, facilitating connections in export promotion, scientific cooperation, vocational skills and public service development that help these regions reorient their economic and institutional relationships. This is a valuable contribution, but it needs to be understood clearly as such rather than presented as a substitute for the investment-type support that was lost.

Within what the programme can realistically offer, a gap is consistently documented across data sources. People-to-people cooperation, cultural exchange and sustainable

tourism were previously supported through the Russia cooperation programmes as vehicles for building civil society ties across borders. These activity types are not currently fundable under any of the Central Baltic programme's seven objectives, which (for sensible reasons) are all structured around thematic outputs rather than relationship-building or tourism development, as it has “outgrown” the “networking phase” in the programme development and maturity. The loss of this type of cooperation has been felt in border communities where civil society ties were built over many years and have no direct replacement. Given that new border regions have been included into the Central Baltic framework, a need now seems to exist to develop westward-facing networks that can serve as the foundation for future, more “result oriented” cooperation.

A further structural observation concerns how the programme applies its thematic priorities. The same seven objectives with the same indicator requirements currently apply across the entire programme geography. There is no differentiation to account for the fact that border regions entering the programme for the first time, often with actors who have no prior Interreg experience and whose most pressing concerns relate to economic reorientation rather than circular economy or CO2 reduction, face a fundamentally different starting position from the programme's established participant base. The targeted call addressed the geographic dimension of this gap by requiring a threshold share of partners from border regions, but it did not address the thematic dimension. This means the call activated border region actors without providing them with objectives that were designed for their situation. It is worth noting the context in which this decision was made: the targeted call was conceived at a late stage in the programming period, under financial rules requiring that transferred funds be spent in a timely manner, and following Monitoring Committee discussions that resulted in a deliberate agreement to pursue this approach. Given those constraints, the call was a reasonable instrument for what it was designed to do. The evaluators' observation is not that the decision was wrong in context, but that a geographic eligibility mechanism applied to existing thematic objectives has structural limits that should inform how border region support is designed from the outset of the next period.

Swedish participation is suppressed by financing conditions that communication cannot resolve

Swedish participation in the programme is structurally lowered by a set of cultural and financing conditions that cannot be resolved through communication investments or outreach activities, and this is confirmed consistently across multiple data sources. The staff cost hourly unit rate is set at a level that does not adequately reflect Swedish labour costs, creating a competitive disadvantage for Swedish partners relative to partners from other programme countries. In projects with modest overall budgets, this disadvantage is significant enough to discourage lead partners from actively seeking Swedish

involvement, since including a Swedish partner consumes a disproportionate share of the available budget relative to the activities that partner can deliver.

The absence of dedicated national co-financing to this type of programme compounds this problem. Swedish regional authorities' co-financing budgets are in most cases already fully committed to ERDF and ESF programmes, leaving no available reserve for Interreg participation. This means that even Swedish actors who are motivated to participate and have relevant expertise face a genuine financial barrier that is not of their own making. The result is that Swedish participation is suppressed not because Swedish actors are unaware of the programme or uninterested in what it funds, but because the financial conditions make participation structurally disadvantageous particularly when compared to other funding sources.

This is a problem that requires structural attention, while noting that the programme has limited direct control over the staff cost hourly unit rate level. The evaluators consider that this qualification, while accurate, should not be used to defer action. Advocacy for a higher staff cost hourly unit rate, call design that explicitly seeks Swedish expertise in areas of comparative advantage, and early nCP involvement in the next programming process are all within the programme's capacity and should thus be pursued in parallel.

The question of additional regions is superseded by the more fundamental question of differentiated treatment within the existing area

Twenty-nine percent of Monitoring Committee and Member State respondents express support for the addition of further regions to the programme area, with Latgale, Etelä-Savo and Lithuania mentioned most frequently. The more consequential question is not which regions should join but what thematic changes the next programme should make to better serve the regions it already covers. The current programme was designed for 2021–2027 challenges, and it is expected that the 2028–2034 period will bring a substantially updated set of objectives developed through the programming process now beginning. That process will need to address, among other things, the very different starting positions, institutional capacities and thematic needs across the programme area - a question that is both analytically important and politically sensitive, as it is already part of active Member State discussions and will be central to the upcoming programming negotiations.³

³ This question is addressed in the border regions discussion above and in greater depth in the Border Regions case study.

Conclusions and recommendations

The programme is currently relevant to regional needs, with particular strength in environmental cooperation, employment mobility and SME export promotion. The forward-looking picture is more uncertain: only half of Monitoring Committee and Member State representatives consider the programme well-positioned for future challenges, and the themes that are most consistently identified as priorities for the next period, that is, resilience, preparedness and nature restoration are not well-served by the programme's current thematic design. Border regions face a structural mismatch between what they most need and what the programme can offer, which the targeted call addressed in geographic but not thematic terms. Swedish participation is suppressed by structural financing factors that require structural remedies. For the next programming period, the evaluators recommend the following:

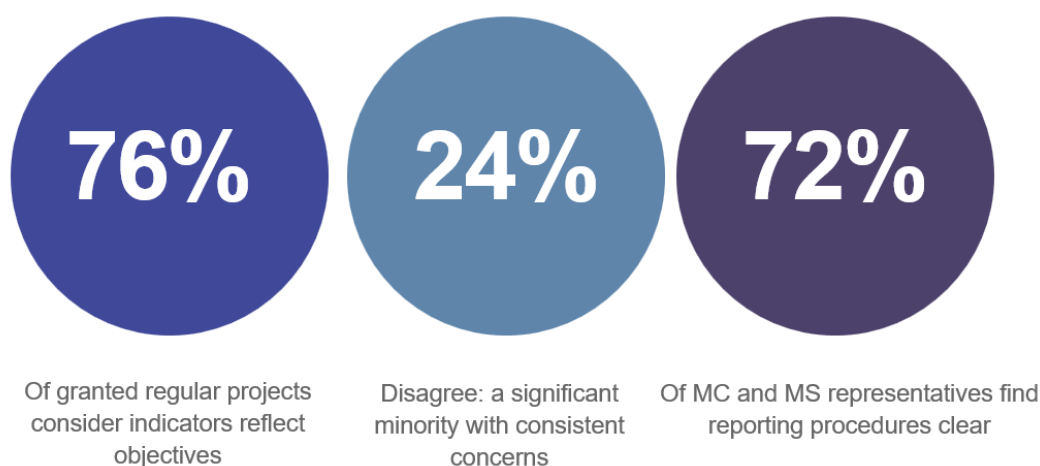
- Resilience and civil preparedness should be included as a thematic priority, calibrated carefully to what is realistically deliverable through cross-border cooperation. Before this priority is formalised, structured dialogue with other Interreg programmes in the Baltic Sea region should be conducted to ensure that the overall portfolio of programmes remains complementary and that established environmental and social priorities are not (at least wholesale) sacrificed in a simultaneous pivot toward security across multiple programmes.
- People-to-people cooperation and sustainable tourism could be introduced as eligible activity types in the next period, with the explicit purpose of addressing the gap left by the closure of Russia cooperation programmes for border region civil society and community actors.
- A permanent border region measure could be designed from the outset of the next period rather than introduced reactively. This measure should then have its own thematic content reflecting the realistic scope of what Interreg can deliver for regions in economic and institutional transition, its own dedicated funding, and a support infrastructure adequate to the task of engaging actor types that have limited prior Interreg experience. The European Commission's communication on eastern border regions and the forthcoming ERDF regulation's provision for sustainable and resilient border regions provide relevant regulatory framework.
- The Swedish participation problem requires advocacy toward the national level for dedicated Interreg co-financing and exploration of a higher flat-rate provision, alongside call design that explicitly seeks Swedish institutional expertise in areas where Sweden has a comparative advantage. Swedish NCPs should be engaged from the earliest stages of the next programming process.

3.3 Impact Question 3: The indicator framework is broadly functional but does not fully capture programme achievements; reporting procedures create barriers

This section addresses the third impact question, concerning the adequacy of the programme's output and result indicators and the clarity of indicator reporting procedures. It examines whether the indicator framework captures what the programme and its projects achieve, where it falls short, and what changes would improve both the framework's design and its accessibility for first-time applicants.

The survey figures conceal variation

Among granted regular projects, 76% consider that the indicators reflect the objectives to a large or very large extent, while 24% disagree. Among small project respondents, the picture is similarly mixed, with projects broadly accepting the indicator framework in principle while raising persistent concerns about its practical application. Among Monitoring Committee and Member State representatives, 72% consider that indicator reporting procedures are clear and understandable to projects. These figures suggest a broadly functional system: the indicator framework is not broken. What the qualitative evidence reveals, however, is a set of structural limitations that are consistent, well-grounded and consequential enough to require attention in the next period's design.



The indicator framework reflects a deliberate philosophical choice that is not without costs

The programme's commitment to result orientation is explicit and intentional: Central Baltic wants to fund what can be measured, and indicators are the instrument through which that commitment is operationalised. This position is coherent and defensible. Interreg programmes have historically been criticised for funding cooperation processes without demonstrating tangible results, and the Central Baltic Programme's insistence on measurable outcomes is a considered response to that criticism.

The practical implementation of this philosophy has required navigating a structural tension between EU common indicators, which are designed for a larger scale and a different context than Central Baltic, and programme-specific indicators that better reflect what the programme actually funds. The programme has invested considerable effort in negotiating with the Commission to arrive at indicator formulations that are more fit for purpose than the common indicators alone would allow. Programme staff acknowledge that common indicators are sometimes poorly suited to the programme's thematic specificity and geographic scale, and there is an expressed preference at the management level to move away from dependence on them entirely. Whether this is achievable in the next period is uncertain, since the regulatory trend runs in the opposite direction, but the aspiration reflects a genuine understanding of the problem.

The cross-border cooperation dimension is systematically invisible in the indicator framework

The most structurally significant limitation of the indicator framework is one that programme staff acknowledges: the indicators measure what projects produce, but not how or why cross-border cooperation was necessary to produce it. Output and result indicators capture the number of people trained, the number of product chains improved, the tonnes of emissions reduced, or the number of public service improvements delivered. It should be noted that several indicators do explicitly include the word "joint" or reference cross-border activity, and that cross-border partnership is of course a funding requirement for all projects. What the framework does not capture, however, is whether the cross-border dimension was substantive: whether the result could only have been achieved through international cooperation, or whether it could equally have been delivered by a single-country project that happened to meet the eligibility threshold..

This is however not a secondary or “cosmetic” concern. The cross-border added value of cooperation is the central rationale for Interreg's existence and the primary justification for EU co-financing at rates that typically exceed what would be available through national programmes. A framework that measures what projects produce but not why cross-border cooperation was the right way to produce it is thus incomplete in its account

of programme value. For example, in employment objectives the indicators capture the number of people who complete training but miss entirely the international dimension, the partnership development effort and the broader exposure to different labour market systems that make (or ought to make) Central Baltic training projects distinctively valuable compared to purely national training activities.

Result definitions in some objectives are too narrow, having an exclusionary effect

A further limitation concerns the definition of what counts as a result in specific objectives. For environmental objectives, and for CO₂ reduction in particular, the requirement that projects demonstrate a measurable change against a defined baseline creates difficulties that are not resolvable through better guidance. In some geographic areas and for some activity types, the baseline data simply does not exist. Emissions from a specific transport hub, for example, may never have been measured before the project attempts to establish a starting point. The programme has been flexible in accepting baseline approaches grounded in prior research rather than requiring numerical measurement, but this flexibility has limits and does not resolve the fundamental problem for all applicants.

The most consequential documented effect of this is that qualified applicants have chosen not to apply at all. A consortium with relevant expertise and appropriate ambitions for PO5 concluded, after examining the application requirements, that it could not credibly commit to demonstrating a measurable CO₂ reduction within the project period. The decision not to apply was not a reflection of the project's quality or relevance but of a mismatch between what the result definition required and what the project could honestly promise within a realistic timeframe. This is a direct cost of the current framework: the programme lost a project it should have been able to attract.

The time horizon of results is misaligned with the indicator measurement point in some objectives

A related problem concerns timing. In the circular economy objective, meaningful supply chain and product-level changes typically take years to materialise after the project activities that initiate them. A project that successfully pilots a new approach to materials recovery, for example, may see the full adoption and scaling of that approach only two or three years after project closure. The current indicator framework measures results at the point of closure, creating an incentive to set conservative targets and systematically understating the long-term contribution of projects that operate on longer impact timelines. This problem is not resolvable within the current monitoring architecture, but it points clearly toward the need for a post-project follow-up mechanism in the next period.

First-time applicants struggle to interpret the indicator framework

At the procedural level, the distinction between programme objectives, output indicators and result indicators is consistently described across data sources as difficult for first-time applicants to understand. This finding holds across the regular project survey, the small projects survey and the interview evidence, and it is notably consistent regardless of sector or country of origin. The language used in the programme manual and application documentation, drawing heavily on EU evaluation terminology such as “participations”, “result indicators”, and “target values”, presupposes a familiarity with the conceptual framework of EU evaluation that most applicants entering the programme for the first time cannot be expected to have.

The practical consequence is that applicants without prior Interreg experience often cannot distinguish between what the programme is trying to achieve thematically, what they are expected to deliver as a concrete output, and how the result they commit to will be measured. Several small project respondents describe the indicator system as “blurry” or hard to operationalise in the context of their specific project idea. This does not prevent applications from being completed as pre-application consultation, with nCPs for initial guidance and with the Joint Secretariat’s thematic project managers for substantive questions about programme objectives and indicator logic that typically resolves the confusion in individual cases, but it places a disproportionate burden on consultations to do work that clearer written guidance could do. It also means that applicants who do not seek consultation before applying, or who cannot access it easily, are at a structural disadvantage relative to those who can.

The programme’s response to indicator-related difficulties is consultation-dependent

Central Baltic’s current response to the comprehension challenges described above is to invest heavily in pre-application consultation, where NCPs and secretariat project managers help applicants translate their project ideas into the programme’s formal framework. This is a valuable and well-regarded service, and the evaluation’s overall assessment of pre-application support is positive. However, relying on consultation to resolve systematic comprehension problems that could be addressed through better written guidance could be considered a fragile solution in two respects: first, because it depends on applicants actively seeking consultation, which not all do; second, because it places ongoing pressure on the Joint Secretariat’s thematic project managers, who are the primary programme-side contact for questions about objectives and indicator logic, to handle a volume of indicator-related queries that should not necessarily require interpersonal resolution at all. This in turn limits their capacity available for more complex and project-specific guidance tasks.

The table below summarizes the key findings in this chapter:

Limitation	Where it occurs	Documented consequence
Cross-border dimension is invisible	All objectives	Indicators capture what projects produce but not whether cross-border cooperation was necessary to produce it: the central rationale for Interreg's existence is unmeasured
Result definitions too narrow	PO5 (CO2 reduction) most acutely; others where baseline data is unavailable	A consortium with relevant expertise chose not to apply because it could not credibly commit to a measurable result within the project period: a direct loss of a project the programme should have attracted
Impact timeline misaligned with measurement point	PO3 (circular economy); objectives where supply chain or behavioural change takes years	Projects set conservative indicator targets, and the framework systematically understates long-term contribution; real results that materialise after closure are invisible
Framework is difficult for first-time applicants to interpret	All objectives; most acute for NGOs and border region applicants with no prior Interreg experience	Comprehension burden falls on pre-application consultations; applicants who do not seek consultation face structural disadvantage; NCPs and secretariat staff absorb queries that better written guidance could resolve

Conclusions and recommendations

The indicator framework is broadly functional and reflects a coherent philosophical commitment to result orientation, but it carries three documented structural limitations that collectively reduce the programme's effectiveness and its capacity to account for its own value. It does not capture the cross-border cooperation dimension; it excludes qualified applicants in objectives where the result definition cannot accommodate realistic impact timelines, and it is systematically difficult for first-time applicants to interpret. These limitations are not resolvable through consultation alone, and they should be addressed through design changes in the next period. For the next programming period, the evaluators recommend the following:

- A cooperation quality dimension to be introduced into the indicator framework. This could take the form of a narrative requirement in applications and reports that specifically addresses why cross-border cooperation was necessary to

achieve the project's results, and what it produced that a national approach could not have. This would not replace quantitative output and result indicators but would complement them with an account of programme value that the current framework cannot provide.

- Result definitions in objectives where the realistic impact horizon exceeds the project period, particularly the circular economy and CO2 reduction objectives, could be broadened. Accepting interim milestones as result evidence, allowing results to be documented in phases, or requiring follow-up reporting at 12 to 24 months post-closure are all mechanisms worth exploring. The current framework's measurement point at project closure is appropriate for many activity types but not for all, and the cost of not adjusting it is the systematic loss of projects with genuinely relevant ambitions.
- The written guidance on the indicator framework should be substantially improved, specifically targeting the distinction between programme objectives, output indicators and result indicators, and designed with first-time applicants in mind. Short, practical examples showing how specific project ideas translate into the programme's formal structure should reduce the comprehension burden that currently falls on pre-application consultations with the Joint Secretariat's thematic project managers. This is not a replacement for consultation but a precondition for consultation to be used most effectively, addressing complex project-specific questions rather than standard conceptual clarifications.

3.4 Impact Question 4: Strategic contributions exist and are documented in some sectors, but the programme has not systematically harvested or communicated them

This section addresses the fourth impact question, concerning the extent to which project results contribute to local, regional, national and EU-level strategies. It examines where documented examples of strategic contribution exist, what conditions produce them, and how the programme can more systematically harvest and communicate the strategic value of its portfolio.

Perceived contribution is high, but documented examples are scarce

Among Monitoring Committee and Member State representatives, 85% consider that project results contribute to relevant strategies to a large or very large extent. This is among the most positive figures in the entire survey dataset. It is also one of the most

difficult figures to interpret, because the survey did not generate corresponding concrete examples when open responses were invited. The gap between a strong self-assessment and the absence of substantiating evidence is itself a finding of some significance. It suggests that the perception of strategic contribution is genuine, but that the mechanisms for identifying, documenting and communicating concrete examples of that contribution are insufficiently developed.

This pattern is consistent with what programme staff describe when asked directly about strategy contributions. Across most objectives, the answer is that contributions are expected and intended, but that systematic evidence of actual uptake is not available at the programme level. Projects are asked at application stage to identify which strategies they intend to contribute to, and programme staff can point to these stated intentions, but the link between stated intention at application and documented contribution at closure or beyond is rarely tracked in a way that produces usable programme-level evidence.

The most compelling examples come from the business development and innovation strand

The clearest and most thoroughly documented cases of strategic contribution come from the legacy projects examined in the case study component of this evaluation, particularly within the business development and innovation strand. A series of projects focused on science park development and technology transfer produced results that eventually influenced national cluster policy, prompting a government ministry to initiate a nationwide cluster establishment programme through which field-specific clusters were created in health technology, information technology, electronics and mechatronics. This represents a direct and documented case of project results shaping national policy, the highest level of strategic contribution that a cooperation programme reasonably could achieve - and it arose from a sustained sequence of related projects that collectively built institutional capacity and credibility over multiple programming periods.

The same project sequence produced a second form of horizontal impact: the science park model developed through Central Baltic cooperation has been adopted as a blueprint by emerging science parks and incubation centres across southern and eastern Europe, channelled through the International Association of Science Parks network. This is a form of strategic and methodological contribution that extends beyond the programme area and demonstrates that Central Baltic results can have a reach wider than their geographic origin.

The rural tourism strand provides a documented example of contribution to national strategic dialogue

A second well-documented example of strategic contribution comes from the rural tourism strand. Research findings developed within a Central Baltic project on transport connectivity and its implications for international tourism were formally presented to national tourism authorities. In one participating country, the project team was invited by national authorities specifically to elaborate on these findings, and the research directly fed into national strategic dialogue on tourism infrastructure and international market access. This is a form of horizontal impact that does not rise to the level of policy change but represents a documented contribution to the evidence base from which policy is made, achieved through active engagement with the relevant national bodies rather than passive publication of results.

The vocational education strand illustrates the value of strategic embeddedness from the outset

A third pattern documented in the legacy case studies concerns the conditions under which strategic contribution is most reliably achieved. A Central Baltic project in vocational education and training was explicitly designed to deliver on a need identified within the EU Baltic Sea Strategy action plan. The project was commissioned by the strategy: it addressed a gap that the strategy had defined, it used the strategy's governance structures as a dissemination channel, and its results were reported to stakeholders at national and EU levels who were already oriented toward the strategic question the project addressed. The built-in dissemination pathway through the strategy's own structures meant that results reached policy-relevant audiences without the project team having to construct those pathways independently.

This case is analytically significant because it illustrates a model that the programme has not systematically promoted but that consistently produces stronger strategic contributions than projects that construct strategy references after the fact. The difference is between a project that is designed to serve a strategic need and a project that cites a strategy in its application to meet an eligibility expectation. The former produces results that strategy owners want and are prepared to use; the latter produces results that may be relevant but arrive without a prepared audience and anchoring.

Environmental objectives have a strong structural relationship with EU-level strategies, but alignment remains general

For the environmental objectives, Central Baltic's relationship with EU-level strategies, particularly the EU Baltic Sea Strategy and the national water management and marine

strategies required by EU legislation, is the most structurally embedded of any thematic area. Projects in the coastal and marine environment strand are required to connect to relevant national strategies, and the programme has sought to support the Baltic Sea Strategy's action plan. However, programme management acknowledges that this alignment has until recently been managed at a general level: projects are asked to state which strategies they support, but not which specific action plan measures or sectoral targets they contribute to. The updated Baltic Sea Strategy action plan, which has been made available in time to inform next period programming, creates an opportunity to move from general to specific alignment - a shift that programme staff consider both feasible and desirable.

Public services and employment show weaker and more fragmented strategic contributions

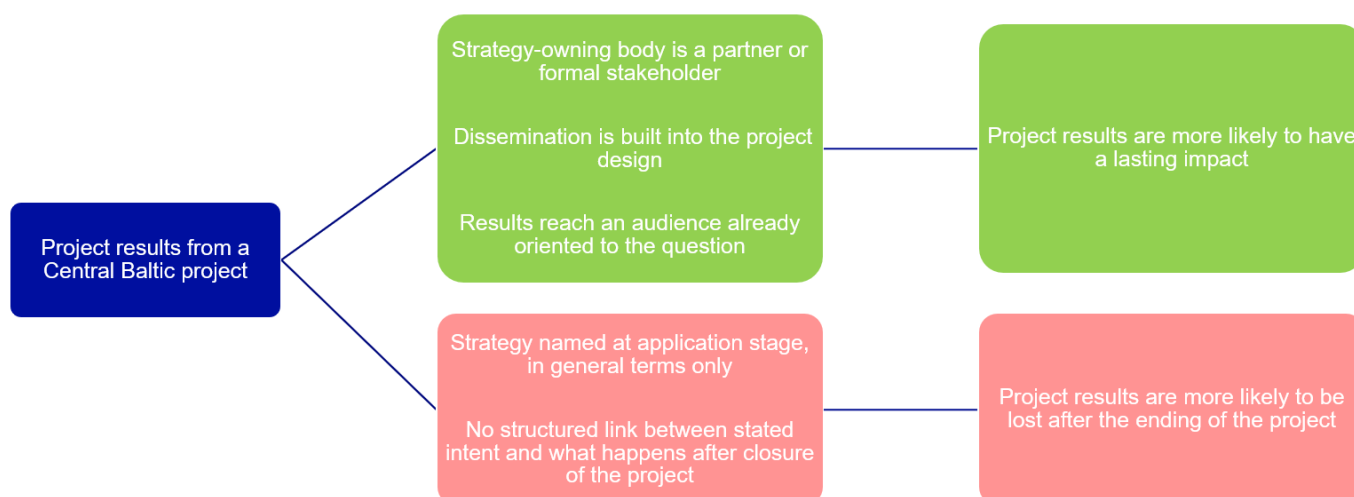
For public services and employment, the picture is weaker. Programme staff responsible for these objectives are not aware of concrete national or local strategy contributions from the current period, and the evidence from completed projects is limited. Projects are expected to name strategies they intend to contribute to at application stage, and many do, but the link between these stated intentions and documented post-project uptake is not tracked. The structural explanation is consistent with the broader pattern: in objectives where the organisations most capable of driving policy uptake (national ministries, sector agencies, public employment services) are rarely project partners, the pathway from project result to policy contribution is long and largely unstructured. Contribution happens in some cases, but it relies on individual initiative rather than programme design.

Programme-level capitalisation is insufficiently developed to systematically harvest strategic contributions

A function that should connect project-level results to programme-level policy communication is capitalisation, that is, the active work of synthesising, translating and presenting results in formats that are accessible and useful to policy audiences. Central Baltic established a dedicated capitalisation role approximately one year ago (i.e. in Spring 2025), a development welcomed as a step in the right direction. However, the role has operated under significant competing demands, limiting what it has been able to achieve in its first year. The practical consequence is that strategic contributions that do occur at project level are not consistently aggregated or communicated at programme level in a way that makes them visible to external audiences or replicable by future projects.

The figure below traces what happens to a Central Baltic project's results after the project ends, drawing on the evidence behind Impact Question 4. When a strategy-owning body is a partner from the outset and dissemination is built in rather than added afterward,

results travel intact to a documented policy outcome. When a strategy is only named in general terms at application stage and nothing is tracked after closure, the same kind of contribution can still happen, but it leaks away before becoming visible at programme level. This might explain an otherwise puzzling finding: 85% of Monitoring Committee and Member State representatives believe results contribute to relevant strategies, yet almost no one can point to a concrete example. It could be that contribution is happening; the programme just is not built to catch it.



Conclusions and recommendations

The programme has demonstrated that it can produce strategic contributions, including documented cases of national policy influence and international methodological transfer. These contributions are not accidental; they arise from conditions that can be identified and promoted. They are most reliably produced when projects are strategically embedded from the design stage, when the partnership includes organisations that have a direct stake in the strategic outcome, and when dissemination pathways to policy-relevant audiences are built into the project from the outset rather than added at the end. The programme has not yet developed a systematic approach to creating or communicating these contributions across its portfolio, and the capitalisation function is not sufficiently resourced to fulfil this role. For the next programming period, the evaluators recommend the following:

- The programme could move from general strategy alignment to specific action plan alignment, requiring projects to identify which specific measure or sectoral target within a relevant strategy or action plan their project contributes to, rather than citing the strategy in general, abstract terms. For e.g. environmental objectives, the updated Baltic Sea Strategy action plan provides the appropriate framework for this more specific alignment.
- The programme should make strategic embeddedness a substantive assessment dimension rather than a formal reference requirement. Applications where the

project is designed to serve a specific identified strategic need, and where a strategy-owning body is either a partner or a formal stakeholder in the dissemination plan, should be assessed more favourably than applications that construct strategy references for compliance purposes.

- The capitalisation function should be formalised and adequately resourced from the outset of the next period, with a clear mandate and a programme-level capitalisation plan. A dedicated capitalisation call, i.e., a specific funding mechanism allowing projects or consortia to systematically build on and transfer results from the broader portfolio into policy-relevant formats, is worth exploring as a concrete instrument that other Interreg programmes have used.

3.5 Impact question 5: Complementarity is present but takes a sequential rather than simultaneous form; structural barriers limit its depth

This section addresses the fifth impact question, concerning complementarity with other funding instruments. It examines what forms of complementarity are present in the portfolio, why simultaneous co-financing is rare in practice, and what structural barriers limit the depth of complementarity that the programme can realistically achieve.

The headline figures reveal a consistent pattern across project types

Among granted regular projects, 46% report having combined Central Baltic funding with other sources of financing. Among small projects, the corresponding figure is only 11%. This difference is not primarily a reflection of different attitudes toward complementarity or different levels of ambition between regular and small projects. Rather, it reflects a straightforward capacity difference: regular projects are typically led by larger and more institutionally experienced organisations that have the administrative capacity to manage multiple funding streams simultaneously, while small project lead partners are often smaller NGOs and community actors for whom managing even a single EU funding stream represents a significant administrative commitment. The gap in complementarity rates between the two project types is therefore an indirect indicator of an access and capacity issue rather than a difference in willingness or strategic orientation.

Complementarity in practice is predominantly sequential rather than simultaneous

When examining qualitative evaluation evidence alongside the survey figures above, a consistent picture emerges: the dominant form of complementarity in the Central Baltic portfolio is not the simultaneous combination of funding streams for the same project, but rather seems to be a sequential model in which a completed or ongoing Central Baltic project enables access to other funding instruments at a later stage. This pattern is most visible in the business development and innovation strand, where projects that have built institutional capacity, developed partnership networks and established a track record of cross-border cooperation have subsequently been able to access Horizon funding and other competitive European programmes. The Central Baltic project thus functions as a preparatory investment that creates the conditions for larger-scale funding rather than as a co-financier within a jointly structured programme.

This steppingstone represents a contribution of the programme to the broader European funding landscape, particularly for organisations in the Baltic states where institutional capacity for accessing competitive EU programmes has historically been less developed. Building that capacity through a more accessible and more intensively supported cooperation programme, and then using it to access larger instruments, can be considered a rational and reasonably effective use of EU resources. The programme has not, however, systematically tracked or communicated this function, which means it is at least to some degree undervalued in the programme's own account of its contribution.

Combining funding streams simultaneously is administratively difficult and perceived as risky

The reasons why simultaneous co-financing is rare are well-grounded and consistently described across interviews conducted in this evaluation. The primary concern is double financing: EU regulations prohibit the same cost from being charged to two programmes, which means that projects combining funding streams must maintain meticulous cost separation and documentation to demonstrate that each expenditure is attributed to only one source. The administrative burden of doing this correctly is substantial, and the consequences of errors, such as cost deductions or, in serious cases, recovery of funds, are serious enough that many organisations prefer to keep their funding sources separate. This is a rational response to real regulatory risk, not a failure of ambition or capacity, and it means that the barriers to simultaneous complementarity are largely structural rather than for example behavioural.

Complementarity with other programmes has been considered during the programming phase through coordination with other managing authorities and through a double-financing check database that is used to verify that projects are not duplicating funded

activities elsewhere. At project level, however, the secretariat has limited capacity to actively support and guide projects toward complementary funding opportunities, and this is acknowledged as a gap. For the employment objective, potential complementarity with ESF and national labour market programmes is theoretically relevant but practically limited by the capacity constraints described above.

The exclusion of for-profit private actors constrains complementarity in specific thematic areas

A structural barrier that affects complementarity specifically in the business development and innovation strand, and to a lesser extent in the circular economy strand, is the ineligibility of for-profit private companies as formal project partners. The rationale for this exclusion is well-established: funding for-profit companies as formal partners raises state aid concerns that are difficult to manage within an Interreg framework. Programme staff are explicit that this is a regulatory constraint rather than a programme design choice, and that they have explored the boundaries of what is permissible. Private companies can participate as service providers, associated partners or target group members, but not as formal partners with access to co-financing.

The practical consequence for complementarity is however significant. In business development and innovation projects specifically, the organisations most naturally positioned to connect Central Baltic work to private innovation funding streams (companies themselves, or organisations representing them) cannot be formal partners in the way that would make those connections structurally embedded in the project. The connection between Central Baltic cooperation and private or commercial innovation investment therefore depends on voluntary engagement from companies that are not formally committed to the project, rather than on a structured partnership arrangement that creates ongoing incentives for both parties. This reduces the reliability and depth of complementarity in precisely the thematic areas where it probably would be most commercially valuable.

Inter-programme complementarity is addressed at the programme level but underdeveloped at the project level

Complementarity between Central Baltic and other Interreg programmes operating in the same geographic area, particularly the Baltic Sea Region programme and the programmes covering the national borders between Finland, Estonia and Latvia, is addressed primarily through programme-level coordination rather than project-level practice. Programme management acknowledges that for most objectives the risk of thematic overlap with other programmes is low, both because priorities differ and because the coordination mechanisms in place during programming reduce the likelihood of direct duplication.

A concern that emerges from multiple interviews, however, is that this situation may be changing. If security, resilience and preparedness become priority themes for the next period across several programmes simultaneously, which they probably should, the risk of thematic crowding increases. Several Interreg programmes operating in the Baltic Sea region might plausibly identify similar security-adjacent priorities for 2028 to 2034, producing a situation in which multiple programmes fund broadly similar activities without coordinated complementarity. Avoiding this outcome requires deliberate and substantial inter-programme dialogue before priorities are finalised, not only after.

Central Baltic's capitalisation function could play a stronger role in documenting and communicating complementarity pathways

One practical consequence of complementarity being sequential rather than simultaneous is that it is invisible in standard programme reporting: a project that serves as a steppingstone to Horizon funding does not appear in any project report as a case of complementarity, because the Horizon application comes after project closure. Tracking these pathways requires active follow-up with lead organisations after project completion, which the programme currently does not do systematically. The now established capitalisation function could in principle take on this tracking role, but it would require a clear mandate, adequate resourcing and a relationship with the organisations involved that extends beyond the formal project period.

Conclusions and recommendations

Complementarity with other funding instruments features in the Central Baltic portfolio but seem to predominantly be sequential rather than simultaneous. Further, it is not well-documented or communicated as a programme achievement. The steppingstone function that Central Baltic projects serve for organisations seeking to access Horizon and other competitive instruments is valuable, and the programme has not yet developed a systematic way of tracking or documenting it. Structural barriers, including the administrative complexity of simultaneous co-financing, the exclusion of for-profit private actors, and the limited secretariat capacity to actively guide projects toward complementary funding, constrain the depth of complementarity that is achievable in practice. For the next programming period, the evaluators recommend the following:

- That the programme explicitly document and communicate its steppingstone function. This should include active follow-up with lead organisations of completed projects to track subsequent access to Horizon and other competitive instruments, with findings reported as part of the programme's overall contribution narrative. The programme's value is currently undersold to potential applicants in this respect, and making the steppingstone function visible would

strengthen both the programme’s policy case and its ability to attract the right type of applicants.

- The secretariat’s capacity to guide projects toward complementary funding should be strengthened, for example through coordination between project contact persons and national innovation agencies at the time of project approval, or through a structured check at the mid-term project review stage that identifies which complementary funding opportunities a project’s results might open. This is a modest investment that could produce disproportionate returns by connecting Central Baltic results to larger-scale funding instruments.
- On inter-programme complementarity, the programme should initiate structured dialogue with other Interreg programmes operating in the Baltic Sea region before finalising priorities for the next period. If resilience and security are on the agenda for multiple programmes simultaneously, this dialogue is not optional: it is a necessary condition for ensuring that the overall portfolio of Baltic Sea region programmes remains coherent and complementary rather than duplicative.
- On private sector eligibility, the programme should explore whether the state aid framework permits more flexible forms of private sector involvement, for example through an associated partner status with formal recognition in the application and reporting process. Even if full formal partnership is not possible, clearer and more ambitious guidance on how to structure meaningful private sector engagement within existing eligibility rules would help projects in business development and circular economy objectives to build the commercial connections that complementarity with private innovation funding requires.

4. Operational component

This chapter addresses the nine operational questions defined in the evaluation's Implementation plan and Terms of reference. Where the impact chapter asks whether the Central Baltic programme is doing the right things, this chapter asks whether it is doing them well: whether it reaches the right applicants, whether it selects and supports projects effectively, whether its administrative procedures are proportionate, and whether it communicates and capitalises on what it achieves. These are questions about programme function and answering them requires attending to the experience of the people who interact with the programme most directly: applicants, project teams, national contact points and monitoring committee members as well as to the internal logic of the programme's own administrative arrangements.

The nine questions are addressed in sequence, each in a dedicated section following the same structure as the Impact chapter: a substantive findings and analysis section organised around the analytical observations that the evidence supports, followed by an overview of the conclusions and a set of recommendations that translate those observations into actionable directions for the programme to consider when designing the next programming period.

Several of the operational questions are closely related and their findings reinforce each other across sections. The relationship between application support and selection transparency, for example, runs through multiple sections, as does the structural problem of unequal access created by the programme's financing model. Where these cross-cutting themes appear in multiple sections, they are treated in full where they are most analytically central and referenced briefly where they recur in adjacent contexts.

A cross-cutting observation that frames the chapter as a whole concerns the relationship between structural problems and programme-level problems. Several of the most consequential operational findings documented in this chapter, such as the low NGO participation, the liquidity problem created by the reimbursement model, the flat rate's deterrent effect on Swedish participation, the timesheet requirement's burden on project teams, are not as such primarily attributable to poor programme management choices. Rather, they at least to some degree appear to be structural conditions embedded in the regulatory framework, the financing architecture and the governance arrangements within which the programme operates. Understanding this distinction is important both for interpreting the findings fairly and for identifying what kinds of changes can de facto be made: some require regulatory advocacy, some require structural reform of governance arrangements, and only some are resolvable through adjustments to programme-level procedures and guidance.

4.1 Operational question 1: The programme reaches its established audience well; structural barriers rather than communication failures seem explain why it systematically under-reaches others

This section addresses the first operational question, concerning the programme's visibility to potential applicants and the effectiveness of its communication channels. It examines which channels reach which audiences, why the programme systematically under-reaches certain actor types, and what the evidence suggests about the limits of communication as a tool for widening participation.

The programme communicates effectively with its established constituency

Survey data consistently shows that the programme reaches its established target groups well: returning applicants, universities, regional authorities and larger NGOs navigate the programme's information landscape with relative ease. They know where to find what they need, they understand the programme's logic well enough to interpret the documentation independently, and they tend to engage with digital channels the programme website, LinkedIn, newsletters, in ways that keep them informed between calls. The programme's investment in these channels has produced results: LinkedIn has shown rapid and sustained growth in both reach and followers, and event satisfaction consistently exceeds four out of five in ratings. These are achievements, and they reflect a communication function that operates professionally within the constraints it faces.

The project webspace, introduced in the current period as a response to the regulatory requirement that project outputs remain publicly accessible after project closure, stands out as the most significant communication innovation of the period. Previous programming periods required projects to build and maintain their own websites, which are typically repurposed or closed when the project ended, leaving outputs inaccessible. The integrated webspace model solves this problem by hosting all project communication within the programme's own platform, ensuring continuity of access. Projects have engaged with it well, and the technical solution has worked more smoothly than anticipated. The main unresolved risk is sustainability: the webspace depends on an external service provider for its technical maintenance, and the programme has not yet secured the long-term support arrangements that would guarantee its continued functioning in the next period.

The communication gap for NGOs, civil society and private companies reflects a financing problem, not an information problem

A consistent finding across all data sources is that the programme systematically under-reaches non-governmental organisations, smaller civil society actors and private companies. This finding is familiar, as it has been observed in previous evaluations of similar programmes, but it is important to interpret it correctly.

The programme staff and NCPs are consistent on this point: the difficulty in reaching NGOs and civil society actors is not primarily that these groups are unaware of the programme. In many cases, organisations operating in relevant fields can be assumed to have encountered information about the programme through their professional networks, through contact with regional authorities, or through NCP outreach activities. The more fundamental reason why these actors do not apply is that the programme's financing model creates a structural barrier that information provision cannot overcome. Organisations that cannot pre-finance their activities and wait up to ten to twelve months for reimbursement are effectively excluded from participation regardless of how well-designed the communication strategy is. For many NGOs, particularly those operating with limited reserves and no access to bridge financing, applying to Central Baltic is simply not financially viable, and no amount of awareness-raising will change that.

This has a direct implication for how Central Baltic should understand and respond to the under-representation of these actor types. Investing more heavily in communication directed at NGOs and civil society actors will not yield results as long as the underlying financing conditions remain unchanged. What is needed is a combination of financial model adjustments, which could include measures such as modest pre-financing, shorter reimbursement cycles, lump-sum arrangements for smaller cost categories, and targeted outreach, in the understanding that outreach becomes effective only when the financial barrier has been sufficiently reduced.

NCPs are the programme's most important communication channel, and their role is qualitatively different from what digital channels can achieve

Across all data sources and all country contexts, NCPs emerge as the single most important factor in connecting potential applicants to the programme. For many organisations, particularly those applying for the first time, and particularly smaller NGOs and community actors, it is personal contact with an NCP that converts general awareness of the programme into a concrete decision to apply. Digital channels provide information; NCP contact provides confidence, interpretation and guidance specific to the

applicant's situation. These are qualitatively different functions and conflating them leads to an overestimation of what digital communication can achieve, and an underestimation of what NCP contact does.

The practical implications of this finding go beyond simply maintaining NCP capacity. NCPs in several participating countries have developed their own supplementary communication tools such as project catalogues in national languages, dedicated social media pages, and targeted newsletters, that substantially extend the programme's reach into national and regional contexts. These initiatives are valuable and should be supported or at least recognized, but they also highlight something of a governance ambiguity in the current arrangement. NCPs are employed by national or regional authorities that have their own mandates, priorities and line management structures, which means that the Central Baltic's central communication function has limited formal authority over how NCPs communicate on its behalf. The result is an informal ecosystem of NCP-provided communication that is an asset when it works well but is also unevenly developed across countries and not systematically coordinated with the programme's central strategy.

This structural ambiguity deserves attention in the next period's design. NCPs are doing work that is essential to the programme's reach and that the central communication function cannot replicate, but they are doing it within an institutional arrangement that does not clearly define expectations, does not provide shared tools, and does not establish a regular coordination mechanism between national and central levels. Making this arrangement more deliberate and better supported should improve consistency without compromising the local adaptability that makes NCPs effective.

Low Swedish participation pinpoints the limits of what communication can achieve

The lower-than-desirable level of Swedish participation in the programme is a topic on which a clear and consistent picture emerges from multiple NCP and programme staff interviews. That said, Swedish actors are generally aware of the programme, and awareness hence does not seem to be the issue. What deters them is a combination of structural financing conditions that makes participation financially disadvantageous in ways that communication strategy cannot address.

The first and most consistently cited factor is the staff cost hourly unit rate, which varies across the programme area but is set at a level that does not adequately reflect Swedish labour costs. The programme defines country-specific hourly rates, and while Sweden has the highest nominal rate, the rate does not keep pace with actual Swedish salary levels, which means Swedish partners absorb a larger share of their real costs without reimbursement than partners in other countries. This makes the programme less attractive to Swedish organisations than it would be if the rate more closely reflected actual cost

structures. In small projects, where total budgets are modest, this disadvantage is material enough that lead partners from other countries sometimes avoid including Swedish partners in order to preserve their budget for substantive activities.

The second factor is the absence of dedicated national co-financing in Sweden. Swedish regional authorities' co-financing budgets are in most cases already fully committed to ERDF and ESF programmes, leaving no available resources for Interreg participation. Finnish organisations benefit from national co-financing arrangements that make their effective cost of participation substantially lower than for Swedish counterparts, which goes some way toward explaining why Finnish institutions (particularly universities and universities of applied sciences) are disproportionately represented as lead partners relative to Swedish ones. A third likely contributing factor is that Swedish NCPs were not involved in the programming process from the outset of the current period, which reduced their ability to shape the programme's thematic priorities toward areas where Swedish actors have distinctive capacity and motivation. Had Swedish NCPs been engaged earlier, the programme's call design might have been better calibrated to attract Swedish participation from the beginning.

The conclusion that emerges from this analysis is significant: Swedish participation is a programme design problem, not a communication problem, and it requires a structural response. Communication investments directed specifically at Swedish actors are unlikely to produce meaningful improvements in participation rates as long as the financing conditions remain as they are.

Information is broadly clear once found, but difficult to interpret for first-time applicants

A final observation on programme visibility concerns the accessibility of written information for applicants who have not previously worked with EU programmes. Survey data from both regular and small projects indicates that information is generally considered clear and sufficient once applicants have located the relevant materials, but that navigating those materials, and particularly interpreting what they mean for a specific project idea, is considerably more difficult for first-time applicants. The programme manual is comprehensive, but comprehensiveness is not the same as accessibility: a document designed to cover all possible scenarios and provide complete regulatory guidance is structurally different from a document designed to help a first-time applicant understand what they need to do and why.

The gap between these two functions is currently bridged almost entirely by consultation; with nCPs for initial orientation and with the Joint Secretariat's thematic project managers for substantive questions about programme objectives, indicator logic and project design. This works well when applicants seek it.. The problem is that not all

applicants do, and those who most need guidance are also those least likely to know that they need it or how to access it. Practical, example-based communication materials (such as short guides structured around specific applicant types and project ideas, rather than around the programme's own administrative logic) would reduce the interpretation burden that currently falls on consultations and would lower the threshold for first-time applicants who may not yet have a relationship with their NCP.

The table below maps the programme's reach across four actor types, drawing on the evidence behind Operational Question 1. The central finding is that the programme's communication gap is not uniform: Central Baltic reaches its established constituency well, and the barriers facing first-time applicants are at least partly addressable through better guidance. For NGOs, small civil society organisations and Swedish actors, however, the barriers are structural and financial rather than informational, and they cannot be resolved through communication investments alone. The table distinguishes between these two types of barriers for each actor group.

Actor type	Current reach	Barrier type	Specific barriers
Established constituency: returning applicants, universities, regional authorities, larger NGOs	Strong	Communicative	None significant. Digital channels, nCP contact and programme events reach this group effectively. Returning applicants navigate documentation independently.
First-time applicants of all types	Partial	Communicative	Information is broadly clear once found but difficult to interpret without prior Interreg experience. The programme manual is comprehensive but not accessible. Gap is currently bridged by nCP and secretariat consultation.
NGOs, small civil society organisations, private companies	Systematically low	Structural/financial	Pre-financing requirement and 10–12-month reimbursement wait makes participation financially unviable for organisations without reserves. The barrier is financial, not informational: awareness is not the issue.
Swedish actors	Structurally low	Structural/financial	Staff cost flat rate does not reflect Swedish costs. National co-financing for Interreg is unavailable - Swedish regional co-financing budgets are more committed to ERDF and ESF. Swedish nCPs were not involved enough in the programming process from the outset, limiting their ability to shape priorities toward Swedish strengths.

Conclusions and recommendations

The programme communicates effectively with its established constituency, but the limits of its reach are determined by structural factors such as the financing model, the flat rate, the absence of national co-financing in Sweden, that communication investments cannot overcome. Recognising this distinction is the necessary starting point for any improvement effort: investing more heavily in the channels and messages that have already reached the people who are already applying will not expand the programme's reach to the actor types that are currently absent. Reaching those actor types requires addressing the structural conditions that make participation inaccessible and doing so with a realistic expectation that communication can only be effective after those conditions have been changed. For the next programming period, the evaluators recommend the following:

- That the programme develops a clear and explicit distinction in its communication strategy between on the one hand, the established actor base which can be served through digital channels and standard NCP support, and on the other hand, the underrepresented actor types that require proactive outreach, financial model adjustments and relationship-based engagement. These require different approaches and different resources. Conflating them in a single communication strategy serves neither well.
- The governance relationship between the programme's central communication function and NCPs should be formalised, including clear expectations for national-level communication activities, shared tools and templates, and a regular coordination mechanism. The current informal arrangement is an asset, but it is also something of an unmanaged risk: its effectiveness depends on individual NCP initiative, and it does not provide the consistency or strategic alignment that a more deliberate structure would deliver.
- The sustainability of the project webspace should be planned explicitly before the next period begins. The webspace has become core programme infrastructure and its continuation should not be contingent on the availability of external technical support on an ad hoc basis. A long-term service agreement or the development of in-house technical capacity are both viable options, and the choice between them should be made as part of the next period's programme preparation rather than deferred to implementation.
- The Swedish participation problem should be addressed through advocacy at the national level for dedicated Interreg co-financing and through a formal assessment of whether the flat-rate provision can be adjusted to better reflect Swedish cost structures. Swedish NCPs should be engaged from the earliest stages of the next programming process, and the design of future calls should

explicitly consider where Swedish institutional expertise is most relevant and most likely to attract genuine applications.

4.2 Operational question 2: The application process is workable and well-supported, comprehension gaps and inconsistent guidance are barriers for less experienced applicants

This section addresses the second operational question, concerning the clarity and accessibility of the application procedure. It examines how the process is experienced by different applicant types, what the most persistent comprehension challenges are, and what the evidence from the one-step and two-step formats reveals about how application design affects both quality and equity.

The application process works well for experienced applicants, less well for those encountering it for the first time

The overall picture concerning the application process from the regular project survey is broadly positive: the application procedure is considered clear and manageable by most granted projects. Returning applicants, that is, organisations that have applied to Central Baltic in previous calls or previous periods, navigate the process with relative ease. They understand the programme's logic, know what to expect from the indicator framework, and have established relationships with their NCPs that allow them to seek targeted guidance when specific questions arise. For this constituency, the process functions well, and the programme's investment in improving its portal, streamlining documentation and providing consultation support has produced tangible improvements over successive periods.

The picture is considerably more mixed when the evidence from first-time applicants and denied projects is examined. Among denied projects, 91% consider the process easy to follow in technical terms, indicating that the procedural mechanics of submitting an application are well understood. However, 59% consider the selection criteria unclear, and a significant share feels that the support they received during the application process did not improve their application quality. This divergence between technical accessibility and substantive comprehension is analytically important. Put harshly, it means that applicants can complete the application form without understanding what the programme

actually is looking for, and that this gap between form completion and alignment with programme expectations is not being systematically identified and corrected before applications are submitted.

The application portal is a strength that deserves recognition

One specific element of the application process that attracts consistently positive feedback across data sources is the online application portal. Respondents describe it as logical, integrated and user-friendly relative to comparable EU funding instruments. The fact that reporting takes place in the same system as the application and that applicants can therefore maintain a consistent overview of their budget, progress and compliance obligations throughout the project lifecycle, is specifically appreciated. For organisations managing their first EU project, the integrated design reduces the risk of losing track of what was committed at application and what is required in reporting. This is a design achievement that other programmes could learn from, and it should be maintained.

The indicator framework is the most persistent and consequential comprehension challenge

Cutting across the entire application experience is the challenge of the indicator framework, which is consistently identified across data sources as the most difficult element for first-time applicants to understand and apply. The distinction between programme objectives, output indicators and result indicators, and the practical question of how to translate a specific project idea into a commitment expressed in indicator terms, presupposes a familiarity with EU evaluation logic that most organisations applying for the first time cannot reasonably be expected to have. Applicants describe the indicator system using terms like “blurry” and “abstract”, and report that they struggled to translate their project ideas into the programme's formal framework without direct assistance from nCPs or the Joint Secretariat's thematic project managers. The latter play a specific role in explaining programme objective logic and the indicator framework to potential applicants during the application phase.

The consequence of this comprehension gap is not simply confusion or frustration. In some cases, it leads to substantive misalignment: applicants commit to indicator values that do not accurately reflect their project's ambitions or realistic capacity, or they design their project activities around what they believe the indicators require rather than around the genuine cross-border need they set out to address. Both outcomes are costly: the former leads to reporting difficulties and in some cases project modifications mid-implementation, the latter to a form of strategic drift in which indicator compliance displaces actual purpose. A small project respondent provides a particularly clear illustration of this dynamic: the project had defined its own key performance indicators

from the outset based on genuine outcome ambitions, including positive placement rates as an indicator of employment success, but found that these could not be accommodated within the programme's available result indicator options. The programme measured something adjacent but not identical to what the project was actually trying to achieve, creating a persistent disconnect between reported results and actual project value.

Frequent manual updates during implementation creates confusion that could be avoided

A separate and more procedural finding concerns the stability of the programme manual over the project lifecycle. Several respondents note that the manual was updated multiple times during the current period, and that these updates sometimes required them to reinterpret their obligations or recalculate their approach mid-implementation. For experienced organisations with dedicated project management staff, adapting to updated guidance is manageable if inconvenient. For smaller organisations and first-time applicants whose understanding of the programme is anchored in the documentation they read at the application stage, changes to that documentation during implementation create genuine uncertainty about what is now required of them. The issue is not simply one of communication, it is one of programme management practice: the frequency and timing of manual updates should be planned with active projects' needs in mind, and changes that affect ongoing obligations should be minimised and, where unavoidable, communicated with clear explanations of what has changed and why.

The one-step and two-step formats serve different purposes and different applicant types

The current period has seen both one-step and two-step application formats used across different calls. The two-step format was the standard for regular projects throughout calls 1–4, including the targeted call for border regions. The one-step format was introduced for small projects and applied to the fifth and most recent call for regular projects. Respondents' assessments of the two formats reveal a nuanced picture that resists simple conclusions about which one is better.

The one-step format is broadly preferred for its simplicity and lower upfront burden. Experienced applicants find it efficient, and for organisations with limited administrative capacity the prospect of preparing a full application in a single stage rather than investing time and effort in a first step that may not lead anywhere is often decisive in whether they apply at all. The one-step format therefore has an important inclusion function: it is less intimidating for first-time applicants and reduces the perceived risk of investing in an application.

The two-step format, used in the targeted call, showed that structured first-step feedback and associated workshop support can substantially improve application quality: a finding consistent with what has been observed in other Interreg programmes that have adopted two-step procedures. The step-one approval rate in the targeted call was higher than in comparable general calls, which could be attributable to the intensive pre-application support that the two-step structure created space for. However, the step-two rejection rate was notably high by historical programme standards, with nine of twenty-four step-one approved applications ultimately being denied funding. The primary explanations that emerge are that applicants did not act on the substantive feedback given at step one, treating it as “informational” rather than directive, and that applicants underestimated the centrality of result orientation in the programme’s assessment, approaching the results section as a formal requirement rather than the evaluative centrepiece.

This pattern reveals a design implication that goes beyond the choice between formats: the value of the two-step approach depends critically on how step-one feedback is framed, delivered and followed up. If applicants understand step-one feedback as a polite advisory input rather than a substantive set of changes that are necessary for a successful step-two application, the additional investment in the two-step process produces limited returns. Making the directive nature of step-one feedback explicit and providing structured support to help applicants act on it is a precondition for the two-step format to function as intended.

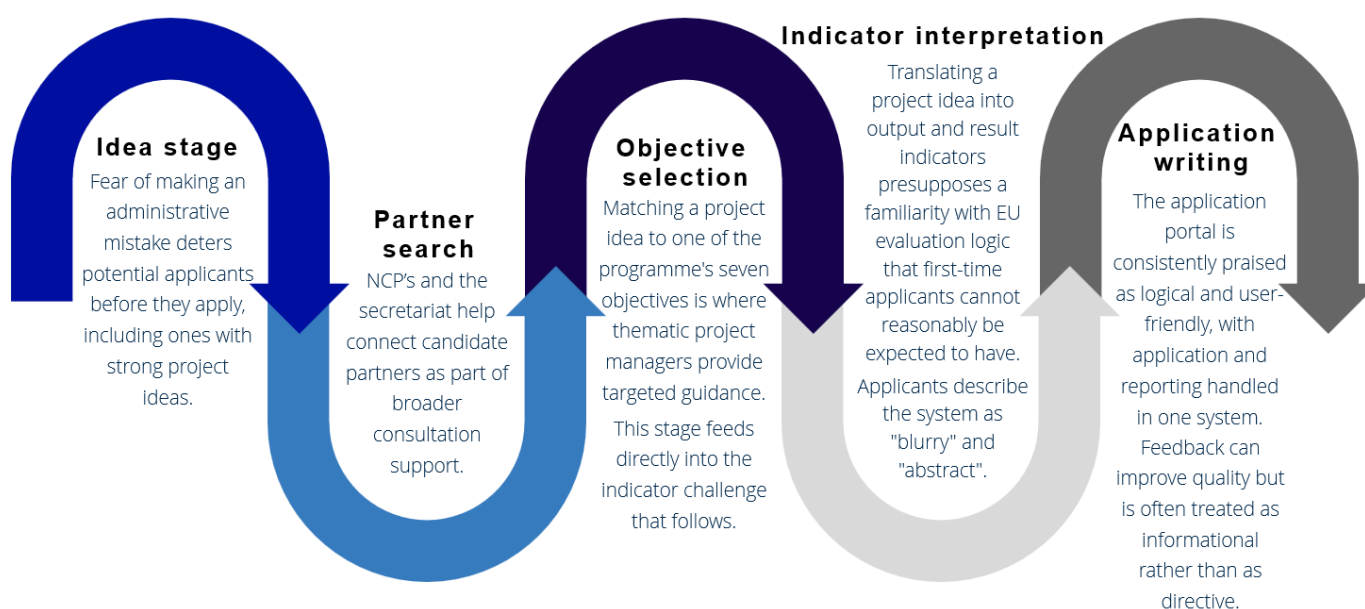
Mandatory pre-application consultation is the most consistently recommended improvement across nCP and programme staff interviews

Across all nCP interviews, independently, a consistent recommendation emerges: pre-application consultation should be made mandatory for first-time applicants. The logic behind this recommendation is straightforward and rational. Consultation is currently strongly recommended but not required, which means that applicants who most need it (i.e. those who have no prior experience of the programme and are most likely to misunderstand indicator requirements, partnership obligations or result commitments) are precisely the ones most likely to skip it. These applicants may not know what they do not know, and the consequence of that gap between what they assume and what the programme requires is often not discovered until the assessment stage, at which point it is too late to correct.

Making consultation mandatory for first-time applicants would directly address this problem by creating a structured opportunity to identify and correct misalignments before they are locked into a submitted application. In practice, mandatory pre-application consultation would involve both nCPs and the Joint Secretariat’s thematic project managers, who together cover two complementary dimensions: nCPs provide initial

orientation, national-language guidance and encouragement, while thematic project managers provide substantive consultation on programme objective logic, the indicator framework and project design. Experienced applicants who have previously received funding would reasonably be exempted, reducing the burden on all parties while targeting the requirement where it would have the most impact. This is not a radical change, but a targeted one, and it is the single improvement that is most consistently identified across the evaluation's qualitative evidence base as likely to make a substantial practical difference to application quality and equity.

The figure below maps the applicant's experience across the stages of engaging with Central Baltic, from initial project idea through to a funding decision, using evidence drawn from Operational Questions 2 and 3.⁴



Conclusions and recommendations

The application process is technically accessible and well-supported, but it contains systematic comprehension gaps that are not being adequately addressed at the point where they matter most before applications are submitted. The divergence between technical accessibility and substantive alignment with programme expectations is the core

⁴ It shows that the programme's strengths and its gaps are not evenly distributed across this journey but concentrated at opposite ends of it: the application portal and the pre-application support function perform well once an applicant engages with them, while the heaviest friction sits earlier, in translating a project idea into the indicator framework, and later, in understanding why an application was or was not selected. Read together with the surrounding analysis, the figure illustrates the report's central finding for this question: that the problem is less the quality of support available than its timing, since most of it arrives after applicants have already committed to a project design and an indicator set that may not align with what the programme actually requires.

analytical finding for this question, and it has direct implications for how the programme designs and delivers its pre-application support in the next period. For the next programming period, the evaluators recommend the following:

- That mandatory pre-application consultation be introduced for first-time applicants. The case for this change is strong, consistent across data sources and operationally straightforward. It would reduce the asymmetry between granted and denied projects' experiences of the programme and target support resources toward the applicants who most need them.
- The programme manual's update cycle should be managed more deliberately, with a clear policy on when updates are issued, what triggers them, and how active projects are informed of changes that affect their obligations. Changes that affect ongoing project implementation should be minimised to the extent possible, and where unavoidable should be accompanied by explicit guidance on what has changed and what it means in practical terms for projects already in implementation.
- On the choice between one-step and two-step formats, the evaluators recommend that the programme continue to treat this as a call-by-call decision calibrated to the target applicant group. For calls aimed at established actor types with prior Interreg experience, the one-step format seems appropriate and efficient. For calls targeting less experienced actor types (that is, new border region actors, first-time NGO applicants) a two-step format is better suited, but only if the step-one feedback is explicitly framed as directive and is accompanied by structured support to help applicants act on it before the step-two deadline.
- Practical, example-based guidance materials should be developed as a complement to the comprehensive manual, specifically targeting the indicator framework and designed for first-time applicants. These materials should be structured around the practical question of how a specific type of project idea translates into the programme's formal structure, rather than around the programme's administrative logic. This is a different document to the manual, serving a different purpose, and should be developed and maintained as a standalone resource rather than integrated into existing documentation.

4.3 Operational question 3: Pre-application support is one of the programme's strengths, but its reach is uneven

This section addresses the third operational question, concerning the quality and reach of support provided to applicants during the application process. It examines why granted and denied projects assess the support they received so differently, what role NCPs play

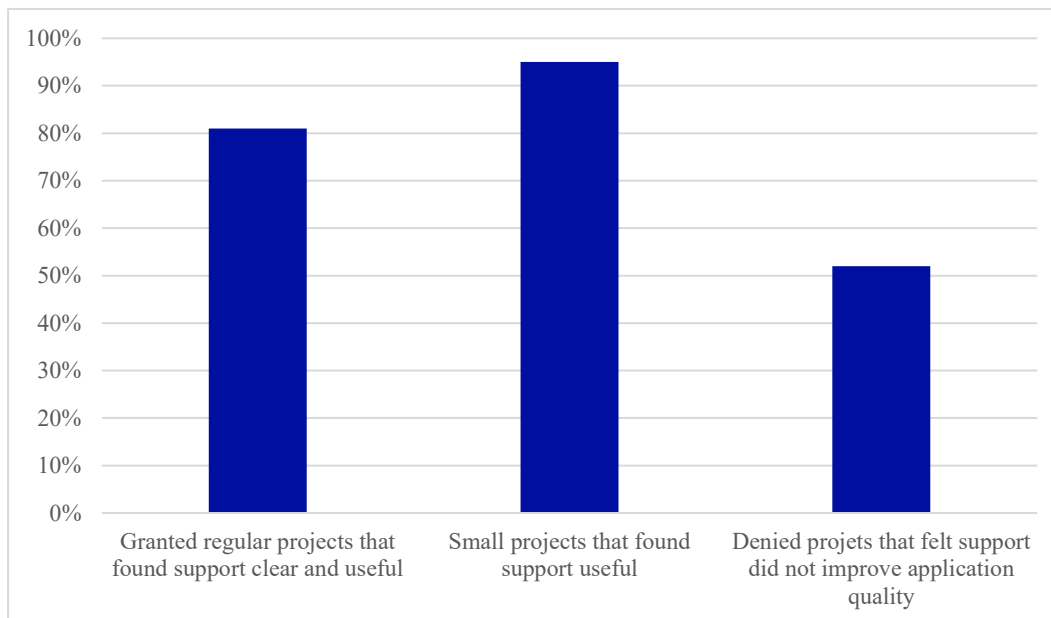
in enabling participation, and what changes to the timing and targeting of support would most improve application quality.

Support during the application process is a recognised and valued programme asset

Among granted regular projects, 81% consider the support provided during the application process clear and useful, a figure that is strong by the standards of comparable EU programme evaluations. Among small project respondents, the figure is even higher: 95% rate the support they received as useful to a large or very large extent. These are not numbers that suggest a support system in need of fundamental redesign. The consultation infrastructure, the NCP function and the availability of secretariat guidance combine to produce a pre-application support offer that applicants who engage with it value highly and credit with meaningful influence on their ability to submit a strong application.

The small projects data is particularly instructive here, because the small projects instrument attracts precisely the kinds of actors (smaller NGOs, community organisations, first-time EU project participants) for whom pre-application support is most consequential. The fact that these actors rate the support so positively is evidence that the programme's investment in accessible NCP support and responsive consultation has reached the people it was designed to reach. In several cases, small project respondents describe NCP engagement as decisive, not simply helpful, but the difference between applying and not applying at all. This is a qualitatively important distinction: the support function is not only improving application quality at the margin but enabling participation that would not otherwise have occurred.

The chart below illustrates the share of respondents in three respondent groups in this evaluation that found support useful during the application process:



The gap between granted and denied projects' experiences is the central analytical challenge

Against this positive background, a finding that demands interpretation is the striking divergence in how granted and denied projects assess the support they received. Among denied projects, 48% feel that the support they received did not improve their application quality. This figure represents a consistent and substantial share of unsuccessful applicants who engaged with the programme's support offer and came away feeling that it had not made a meaningful difference to the outcome.

The instinctive interpretation of this finding is that the support is better for some applicants than for others, but this interpretation is likely wrong, or at least incomplete. The support system is not designed differently for granted and denied applicants: it is the same system, operating the same way, staffed by the same people. The more plausible explanation is thus that the support is not reaching denied applicants at the moment when it would be most consequential, which is before they have committed to a specific application design that may not align with programme expectations. Support that is provided after an applicant has already developed a detailed project idea, selected partners and drafted a budget is support that must work around a set of design choices that may already be off. In those circumstances, even high-quality support cannot fully compensate for misalignments that should have been identified earlier in the process.

This understanding is consistent with the recommendation for mandatory consultation discussed in the preceding chapter: the problem is not the quality of the support but rather

its timing and reach. Applicants who engage with nCPs and thematic project managers at the earliest stages of project development, before their idea has hardened into a design, receive support that can shape that design in ways that align it with programme expectations. Applicants who engage late, or not at all, receive support that can only refine what is already there. The gap between granted and denied projects' perceptions of support value is therefore, at least in part, a gap in the timing and sequencing of engagement rather than a gap in the support itself.

The NCP function carries a structural dependency that is both an asset and a risk

The central role of NCPs in the programme's support ecosystem is by now well-established across this evaluation's evidence base, but it warrants specific analytical attention in the context of this question. NCPs do not simply provide information: they provide interpretation, translation, encouragement and in some cases active co-construction of project ideas in ways that go substantially beyond what any written guidance document could replicate. This is not a peripheral contribution to the programme's support offer; rather, it is the core of it, and many applicants' ability to engage with the programme depends on it.

This creates a structural dependency that has both productive and problematic dimensions. On the productive side, the NCP function's closeness to local actors, its ability to communicate in national languages and its familiarity with the specific organisational cultures and capacity levels of applicants in its country make it a qualitatively different and in many ways more effective support mechanism than anything the central programme administration could provide at scale. On the problematic side, the support quality that applicants receive is partly contingent on the capacity, initiative and resources of their specific NCP, which varies across countries. An NCP that proactively organises local events, develops language-specific guidance materials and maintains close contact with a wide network of potential applicants delivers a substantially different support experience to applicants in its country than one that responds reactively to inbound queries. Neither is wrong: both are operating within their mandate, but the difference in outcomes for applicants is real and reflects an equity issue that the programme has not fully addressed.

A related observation concerns the governance of the NCP function. NCPs are employed by national or regional host authorities and are formally accountable to those authorities, not to the programme's Joint Secretariat. This means that the programme's central support function has limited formal leverage over how NCPs perform their role, what training they receive, what tools they use and how they coordinate with each other across countries. The informal coordination that does occur through NCP meetings, shared templates and bilateral contact works reasonably well, but it is not a substitute for a clear,

programme-level framework that defines what consistent, high-quality NCP support looks like and how it is resourced and evaluated.

Fear of making mistakes is a consequential barrier that support has not fully addressed

An observation emerging from the Estonian context but has broader relevance concerns the deterrent effect of perceived administrative risk. In Estonia in particular, a significant number of potential applicants (particularly smaller organisations considering their first EU project) are deterred not by lack of awareness or lack of a good project idea but by fear of making administrative errors and experiencing negative consequences as a result. This fear is described as pervasive and persistent, and it is not simply a misperception that better information can correct. It is grounded in a genuine understanding that EU funding comes with accountability obligations, that errors can have financial consequences, and that organisations with limited administrative capacity are at greater risk of making errors that they cannot afford. The fear is, in other words, rational, even if the actual risk for most applicants is lower than they perceive.

The implication for the support function is that reaching deterred applicants requires more than providing information about procedures. It requires actively demystifying the experience of being an EU project participant: showing, through concrete examples and peer learning, what the experience is actually like, what the most common difficulties are and how they are typically resolved, and what the realistic consequences of common errors are. This is a different communicative register from standard programme guidance, and it probably requires a different approach: not documentation, but testimony. Events where successful project participants from similar organisations share their experience, peer learning forums, and informal conversations at community-level outreach events could be more likely to address the fear barrier than any written guidance document.

Support during implementation is valued but less systematically provided than pre-application support

A lot of the findings made concern the pre-application phase, likely as it is where Central Baltic has invested most heavily and where impact is to be found. Implementation-phase support, that is, the guidance and assistance that project teams receive during the often-demanding period of running a funded project, is however not unimportant either. Project teams that maintain active contact with their project contact persons during implementation report navigating the administrative requirements more effectively and encountering fewer costly surprises in reporting and financial management. It should be noted that the programme does assign a dedicated contact person to every approved project, offers a meeting at the contract fulfilment stage, and organises mandatory kick-off, annual and mid-term meetings as standing elements of its implementation support

structure. The challenge need hence not be an absence of support, but probably a question of engagement: the projects most in need of implementation support (that is, those with less administrative experience and less confident project management) are also those least likely to proactively make use of the contact and structures available to them. The programme recognises this and attempts to be proactive toward projects that are less forthcoming but currently lacks systematic mechanisms for identifying at-risk projects early enough for that proactivity to be most effective.

Conclusions and recommendations

The programme's pre-application support is a strength that produces value for applicants who engage with it. The central analytical challenge this question raises is not the quality of the support but the conditions under which it reaches the applicants who most need it, at the moment when it would be most consequential. The gap between granted and denied projects' perceptions of support value is most plausibly explained by a timing and sequencing problem rather than a quality problem, which means the appropriate response is to change when and how support is delivered rather than to redesign what is delivered. For the next programming period, the evaluators recommend the following:

- That mandatory pre-application consultation be introduced for first-time applicants, with the explicit purpose of ensuring that substantive engagement with programme expectations occurs before project designs have hardened into configurations that may be difficult to correct. The case for this change is fully developed in the recommendations for Operational Question 2 and applies equally here.
- The programme should develop a more formal and structured approach to the NCP function, including a clear definition of what consistent, high-quality NCP support looks like, shared tools and guidance materials that NCPs can use across countries, and a regular coordination mechanism between NCPs and secretariat project managers. This does not mean reducing NCPs' local adaptability, which is one of their most valuable characteristics, but providing a more deliberate common foundation on which that local adaptability can build.
- To address the fear of administrative error that deters potential applicants, the programme should invest in peer-learning and testimony-based communication activities that show what the experience of being a project participant is like. This is distinct from procedural guidance and is best delivered through events, informal networks and direct contact between potential applicants and successful participants from comparable organisations, facilitated and supported by NCPs with appropriate resources.
- A more proactive approach to implementation support could be developed, including e.g. structured mid-project check-ins for projects identified as higher-risk at the time of approval, on the basis of lead partner experience level,

partnership complexity or thematic ambition, and clear pathways for project teams to seek guidance without waiting until a problem has escalated to the point of requiring a formal project modification.

4.4 Operational question 4: The targeted call activated border region actors and distributed funding, but is a geographic instrument rather than a thematic solution

This section addresses the fourth operational question, concerning the targeted call for EU external border regions and the patterns of applicant success across the programme area. It examines what the targeted call achieved, why it functioned as a geographic instrument rather than a thematic solution, and what lessons the step-two rejection rate provides for the design of border region support in the next period.

The targeted call was an improvised response to an unforeseen geopolitical disruption and should be understood as such

Understanding the targeted call requires first understanding the circumstances in which it was conceived. The decision to suspend the Russia cross-border cooperation programmes following Russia's full-scale invasion of Ukraine in 2022 was made at short notice, and it resulted in around 30 million EUR of funding that had been allocated to those programmes being transferred to the Interreg Central Baltic programme. The decision to design a targeted call using those funds was therefore reactive rather than strategic or planned: the programme had to absorb additional money quickly and direct it toward the regions most affected by the loss of the Russia programmes, without the benefit of a planning process specifically designed for that purpose. The targeted call was, in the words of programme staff directly involved in its design, a one-time ad hoc decision made under unusual circumstances.

This context matters because it sets the appropriate standard against which the call should be evaluated. A call designed reactively to absorb unexpected funding and activate previously excluded regions within an existing programme framework should not be expected to function as a fully designed strategic instrument. Judged by what it was designed to do, i.e., to bring new actors into the programme, direct funding toward border regions, and distribute the transferred money effectively, the call can be considered broadly successful. Judged by the standard of whether it addressed the underlying needs

of border regions in a lasting and thematically appropriate way, it was not, and the evaluators' assessment is that it neither was designed to be.

The call generated applications and distributed funding, but with a notable quality gap at step two

The call generated 15 additional applications beyond the parallel general call, and the step-one approval rate was higher than in the general call. This is a result that programme staff attribute to the intensive outreach and workshop activities that the dedicated EU external border project manager organised in the border regions before and during the call. This is an important observation, as it demonstrates that intensive, in-person, relationship-based engagement with potential applicants produces measurably better application quality at step one than standard programme communication, and that the investment in this kind of outreach seems to pay off in terms of the quality of what gets submitted.

The step-two picture seem to be somewhat less positive, as, according to programme staff, nine of the twenty-four applications that passed step one were ultimately rejected at step two, which by programme staff is considered an unusually high failure rate by programme standards. Programme staff who analysed these rejections identify two primary explanations. The first is that many applicants treated the step-one feedback as informational rather than directive: put briefly, they read the suggestions, noted them, and then submitted their step-two application without making the changes that the feedback implied were necessary. The second is that these applicants consistently seem to have underestimated the weight that assessors place on the project results section, approaching it as a “formal requirement” to be completed rather than the substantive evaluative centrepiece that determines whether a project is fundable. The result was applications that were geographically eligible and thematically plausible but that could not demonstrate, in the specific terms the programme requires, what concrete results a given project would deliver and how.

These two explanations are related. Both point to a gap between what applicants understood the programme to be looking for and what the programme in fact requires: a gap that the step-one consultation and feedback process failed in closing for a significant share of applicants. The question this raises is not whether the step-two rejections were fair (NB: there is no suggestion that they were not) but why the support invested in step one did not prevent the rejections. The most plausible answer is that the support, however intensive, was not sufficient to overcome the fundamental unfamiliarity with Interreg's evaluation logic that characterises first-time applicants from regions that had no prior experience with the Central Baltic programme.

The call addressed where projects came from, not what they were for

The targeted call applied a geographic eligibility criterion, requiring the lead partner or at least 50% of partners coming from the designated border regions, however without any corresponding adjustment to the programme's thematic priorities or result requirements. This was a deliberate decision: the monitoring committee chose not to introduce special quality criteria for the targeted call, on the grounds that border region projects should meet the same quality standards as all other projects. The reasoning is principled and defensible, as lowering quality thresholds for a specific geographic group would create an equity problem across the programme's applicant base and would further risk funding projects that do not meet the programme's result-orientation requirements.

The consequence, however, is that border region actors who applied to the targeted call were expected to demonstrate relevance, quality and result-orientation within thematic objectives that were designed without their specific situation in mind. The circular economy, CO2 reduction, scale-up companies and coastal environment objectives were designed for a programme whose established constituency consists primarily of universities, regional authorities and experienced NGOs from the programme's core geographies. Expecting first-time applicants from regions that had previously operated within an entirely different cooperation framework, one that funded infrastructure, buildings and direct community investments, to compete within that framework on equal terms is a design choice with predictable consequences: those who succeed are those who most closely resemble the programme's existing participant base, and those who do not are those whose needs are most distinctive.

This should not be read as an argument for lowering quality standards. It is an argument that geographic eligibility criteria, without corresponding thematic adjustment, cannot on their own deliver the geographic inclusion and equity the programme intends. The fundamental mismatch between what border regions need and what the programme's existing objectives can fund is not a problem that a targeted call per se resolves. It requires thematic design; objectives that are specifically calibrated to what border region actors can do and what border regions need, which is a task for the next programming period rather than for call design within the current period.

The thematic concentration of border region projects reveals an implicit alignment problem

The thematic distribution of small project respondents who applied via the targeted call is prominent: 55% applied under PO6 (employment) and 40% under PO7 (public services). Business development, environmental and CO2 reduction objectives seem to be virtually absent from the border region portfolio. This concentration is likely not random, but

reflects a rational alignment between what border region actors are capable of delivering and what the available objectives require. PO6 and PO7 are the objectives with the most accessible entry points for first-time applicants, relatively clear result requirements in practice, and relevance to the kinds of activities that community organisations and local authorities in border regions can credibly lead.

The concentration also reveals what is lacking: business development or innovation are underrepresented, even though economic reorientation and SME development are among the most urgent needs of border regions losing Russian market access. Projects in circular economy or environmental management are also underrepresented, even though some border regions have significant industrial legacies and environmental challenges that cross-border cooperation could address. The call brought border region actors into the programme, but into a slice of it, and that slice seem to reflect what is accessible to them within the current framework, not what is most relevant to their needs.

East-west integration, an explicit ambition of the border region strategy, has not materialised at scale

One of the aims in the programme and of the targeted call was to support the integration of eastern border region actors into western-facing cooperation networks, replacing the eastward orientation that the Russia programmes had provided. In practice, this east-west integration has not occurred at scale. Swedish actors have not partnered with border region organisations to the hoped-for degree, and the structural reasons for this seem to be the same as those that suppress Swedish participation generally: the staff cost hourly unit rate, the absence of specific national co-financing in Sweden, and the limited strategic motivation of Swedish actors to seek partnerships in contexts that are geographically and institutionally distant from their own networks.

This means that an added value that the programme was intended to provide for border regions, to access to more developed Nordic actors whose institutional capacity and knowledge could strengthen their projects and their integration into wider cooperation structures, has in practice been limited. Many border region partnerships have formed within the programme's Baltic-Finnish area, replicating patterns of cooperation that are already established rather than building the new east-west connections that could help border regions reorient after the loss of Russia cooperation.

Conclusions and recommendations

The targeted call was a reasonable response to an unforeseen situation, and by the standard of what it was designed to do (to activate new actors, distribute transferred funding, and bring border regions into the programme), it performed broadly adequately. By the more demanding standard of whether it addressed the underlying needs of border

regions in a thematically appropriate and lasting way, it did not, and it was not designed to. The evaluation's central recommendation for this question is therefore not about how to design better targeted calls, but about why a different instrument - a permanent, thematically differentiated border region measure, seem to be needed for the next period. Thus, for the next programming period, the evaluators recommend the following:

- A dedicated border region measure should be designed from the outset with its own thematic content, its own dedicated funding and an adequate support infrastructure. This measure should not simply impose geographic eligibility criteria on existing objectives, but should develop thematic priorities that reflect what border region actors can realistically deliver and what border regions actually need: economic reorientation, entrepreneurship, employment and skills development, people-to-people cooperation, and, perhaps most importantly, the resilience, security and preparedness themes that have emerged consistently as the most urgent future priorities. The EC's forthcoming ERDF regulation's provision for sustainable and resilient border regions and the Commission's communication on eastern border regions provide regulatory framework within which this measure can be designed.
- The step-two rejection experience from the targeted call provides a clear lesson about what intensive pre-application support can and cannot achieve. It can improve step-one quality markedly, as the higher step-one approval rate in the targeted call demonstrates this, but it cannot fully compensate for the gap between first-time applicants' understanding of what is required and the programme's actual evaluation logic when that gap is wide. For a dedicated border region measure in the next period, this means that the support infrastructure needs to be sustained throughout the application process, not concentrated at step one, and that the result-orientation expectations of the programme need to be communicated more directly and more specifically to border region applicants before they commit to an application design.
- The east-west integration ambition should probably first be pursued through targeted partnership development support rather than through geographic eligibility requirements. This since the latter cannot substitute for the structural financing changes that would make Swedish participation in border region partnerships genuinely attractive. Until those structural changes are made, expecting east-west partnerships to form spontaneously through call design does not seem to be a plausible strategy.

4.5 Operational question 5: The selection process is professionally managed and internally coherent, but perceived somewhat opaque

This section addresses the fifth operational question, concerning the transparency and effectiveness of the programme’s assessment and selection procedure. It examines why the selection process is experienced very differently from inside and outside the programme, what the most common substantive reason for rejection is, and what governance dimensions of the monitoring committee’s decision-making culture merit attention in the next period.

A negative finding in the evaluation concerns selection transparency

Across all data sources consulted in this evaluation, the finding that recurs most consistently is that the selection process is experienced as opaque and difficult to understand by applicants who are not funded. Among denied projects, 57% report finding the selection criteria only limitedly clear, and a substantial share describe the decision as having arrived without adequate explanation of what was wrong with their application or what would need to change for them to succeed in a future call. The language used in open responses, including characterisations of the process as “decided in a cabinet” reflects a level of frustration that goes beyond disappointment at the outcome and suggests a more fundamental sense that the process has not always been seen as legible from the outside.

The survey allows this finding to be examined across objectives and applicant types, and the picture that emerges is one of breadth rather than concentration. It should however be noted upfront that the number of respondents per objective is small, ranging from one to eight, which means that the breakdowns below are indicative rather than conclusive, and that far-reaching conclusions should not be drawn from individual objective-level figures. With that caveat in mind, the transparency concern does not appear to be confined to a single objective or applicant profile. It is most acute in the decreased CO2 emissions objective, where all three denied respondents rated the process as only limitedly transparent or not transparent at all, and none found the criteria clear. Denied applicants under Joint circular economy solutions and Improved public services show a similar pattern, with the majority rating transparency as limited. By contrast, denied applicants under Improved employment opportunities on labour market were more positive, with all three rating the process as transparent to a large extent and 67% finding the criteria clear, suggesting, tentatively, that the transparency gap may be more pronounced in objectives

where the result requirements are more technically demanding or less intuitive for first-time applicants. There is no meaningful difference between denied applicants from the targeted border region call and those from regular calls, which indicates that the transparency concern is a programme-wide issue rather than one specific to the border region context.

This finding ought to be situated carefully, as the picture from inside the programme is different. The process as programme staff and monitoring committee members describe it is professionally managed, politically neutral and well-grounded in published criteria. The secretariat prepares thorough assessments, monitoring committee members review and discuss them, and decisions have consistently followed the secretariat's recommendations. There is hence no suggestion of political interference or improper influence in the selection process. In this sense, programme management's own characterisation of the process as transparent is internally coherent and sincerely held.

The evaluators' assessment is that the opacity experienced by denied applicants is therefore best understood not as a deficit in the process itself but as a deficit in the communication of the process and specifically in the communication of negative decisions. Until approximately a year before this evaluation was conducted, denied applicants received no written explanation for their rejection if not specifically and explicitly requesting it. The absence of a feedback mechanism meant that applicants who had invested significant time and resource in their application were left with no information about what the programme had found wanting, no basis for understanding whether reapplication was realistic, and no actionable guidance on what would need to change. This was a serious gap not only because it is frustrating for applicants but because it is inconsistent with a process that programme management describes as transparent and well-grounded: transparency requires that the reasoning behind decisions be communicated to those they affect, not only documented internally.

Communication improvements have been progressively developed across the period, with the most significant changes now fully in place

Central Baltic has made significant improvements to how selection decisions are communicated across the current period. It should be noted that only call 1 applicants received the shorter version of rejection feedback; from call 2 onwards, denied applicants received a more detailed written explanation of the reasons for rejection, developed in response to user feedback. The possibility to contact the Joint Secretariat for further discussion of their application was available to denied applicants throughout, including in call 1. Selection results are now published immediately after monitoring committee meetings, together with statistics on success rates and the competitive level of the call. These changes represent a substantive and progressive improvement to the transparency

of the process, and the evidence that they are already producing effects is encouraging: programme staff report a measurable increase in returning applicants - organisations that received a rejection, understood from the written rationale what had been insufficient, and later returned with a stronger application.

However, the earlier and less communicative approach in call 1 means that a share of applicants who experienced the process in that first call did so before the improvements were fully in place. The survey data therefore partly reflects an experience that no longer describes current practice. The implication is that the full benefit of the improvements made will likely be most visible over successive calls in the next period, as the improved approach becomes the only experience applicants have known.

The monitoring committee's decision-making culture limits substantive deliberation

A finding that goes somewhat deeper than the communication of decisions concerns the internal dynamics of the monitoring committee and the distribution of effective decision-making influence within the selection process. The consensus requirement (all monitoring committee decisions must be unanimous) can be argued to create a culture in which individual members are structurally unlikely to challenge the secretariat's assessment proposals on specific applications, even if and when they have doubts. When one member among thirty must reach unanimous agreement with all others, the "path of least resistance" is to go along with a well-prepared secretariat recommendation rather than to articulate a dissenting view and argue for it.

This could have a practical consequence for the quality of deliberation: the monitoring committee is most effective as a legitimisation body for decisions that the secretariat has effectively already made, rather than as a forum for genuine debate about which projects are most strategically valuable, why they are most strategically valuable, and what the monitoring committee would like to see funded differently. Hence, one could question whether the committee has real decision-making influence. The possibility that individual project decisions should be subject to a voting mechanism rather than requiring consensus could be considered as a remedy. A consensus requirement is appropriate for some types of decisions concerning e.g. programme design, strategic direction, or major procedural changes, but for individual project funding decisions, where legitimate differences of view should be expressible and reconcilable, it seems to tend to suppress deliberation rather than improve it.

The regional concentration of funded projects is a trust problem that has not been adequately addressed

A finding that operates at a different level but contributes to the perception of opacity is a perceived concentration of funded projects in the Turku region. This observation does not derive from a systematic analysis of programme monitoring or survey data, but rather from a pattern that emerged across multiple interviews: several respondents raised the perception that Turku-based organisations are somewhat overrepresented in the funded portfolio, and this perception was acknowledged by programme staff as having some basis in reality. The evaluation has not been able to disaggregate this further by programme objective, call or region, and it is not possible to say from the available evidence whether the pattern is specific to certain parts of the portfolio or more general. There is no suggestion of geographic favouritism in the selection process. A plausible explanation is that larger and more institutionally experienced organisations, several of which are based in Turku, have learned over time how to write strong applications, and that smaller and newer organisations actively seek them out as lead partners because of that learned advantage. The perception nonetheless has something of a trust cost that is worth acknowledging, particularly for applicants from regions that feel less well represented in the funded portfolio.

However, the absence of wrongdoing does not make the pattern unimportant. When a programme that is explicitly designed to promote cooperation across an entire multi-country region produces a portfolio in which a disproportionate share of funded projects is concentrated in a single city region, this concentration requires active and available explanation. The programme has not, to the evaluators' knowledge, proactively addressed this pattern in its communication with potential applicants or in its guidance on application development. This is, however, acknowledged as an issue and indicates intent to address it in the next period's guidance and call design: the evaluators support this intention.

The most common substantive reason for rejection is inadequate result orientation

Looking beyond the communication of decisions to the substance of what determines whether an application succeeds or fails, the picture that emerges from programme staff interviews is consistent: the most common reason for rejection is that the project results section does not convincingly demonstrate what the project will achieve and how it will achieve what it aspires to achieve. Applicants seem to systematically underestimate the weight that assessors place on this section, treating it as a formality to be completed rather than the evaluative centrepiece that the programme's result-orientation philosophy makes it. The consequence is that otherwise promising applications with relevant themes, credible partnerships and appropriate budgets, fail because they cannot articulate the

specific, measurable result they commit to delivering with sufficient clarity and conviction.

This observation is linked to the comprehension challenges documented in the preceding chapters. Applicants who do not fully understand what the programme means by a result and specifically what distinguishes a credible result commitment from a generic ambition, cannot write results sections that meet the programme's expectations regardless of how strong the underlying project idea is. Better guidance on what a strong results section looks like, supported by the mandatory pre-application consultation recommended in earlier chapters, would likely address the most common source of avoidable rejection.

Conclusions and recommendations

The selection process is professionally managed and internally well-grounded, but the perception of opacity among denied applicants is consistent and consequential enough to constitute a programme performance problem regardless of whether the opacity reflects actual process failings or primarily a communication deficit. The improvements introduced in the latter part of the current period are the right response, and they should be retained and further embedded as standard practice in the next period. The monitoring committee's deliberation culture and the regional concentration pattern are issues of a different order: they concern not how decisions are communicated but how they are made, and they require more structural attention. For the next programming period, the evaluators recommend the following:

- That the communication improvements introduced in the current period be explicitly codified as programme standards: written rejection rationale, access to follow-up consultation, and immediate publication of results including success rate statistics should be minimum requirements, not discretionary practices. These should be communicated proactively to all applicants before and during each call, so that the standards are known in advance rather than discovered after the fact.
- The monitoring committee should review whether the consensus requirement is appropriate for individual project funding decisions, or whether a qualified majority mechanism or a structured means of registering minority views would produce more well deliberated decisions. This is a governance question that is properly resolved by the monitoring committee and member states themselves, but the evaluation provides a basis for raising it as an agenda item at an appropriate governance forum.
- The regional concentration pattern could be addressed through a combination of proactive communication, for example, by explaining clearly why the pattern exists, where it exists (i.e. in which programme objectives) and what the programme is doing about it, and consider a call design that creates more

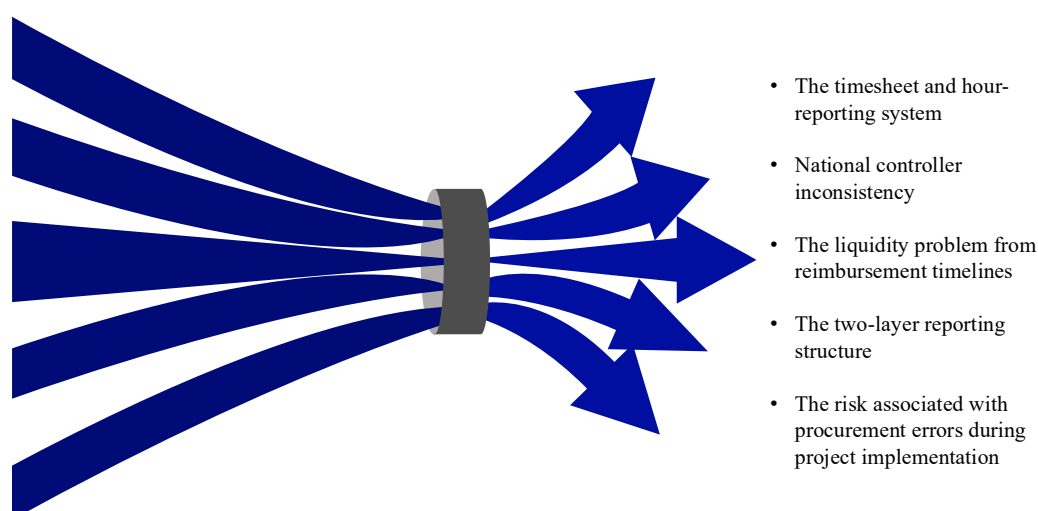
accessible entry points for less experienced organisations. The stated intention to address this in the next period's manual and call design is hence the right direction.

- The results section of the application should receive specific attention in the next period's guidance development, including the production of plain-language explanations of what a credible result commitment looks like, supported by examples from previously successful applications across each programme objective. This is the most directly actionable change available to improve both application quality and the equity of the selection process.

4.6 Operational question 6: Implementation procedures are broadly functional but generate disproportionate administrative burden

This section addresses the sixth operational question, concerning the ease and efficiency of programme implementation, monitoring and reporting. It examines the most consistently documented administrative burdens, why national controller inconsistency is a structural problem that guidance alone cannot resolve, and what the liquidity problem created by the reimbursement model means for the programme's inclusiveness ambitions.

The visual below illustrates the main burdens and bottlenecks in the implementation, as identified in this evaluation:



The overall picture is positive, but systemic problems lie beneath the surface

Among granted regular projects, 83% consider that programme procedures allow for easy and efficient implementation to a large or very large extent, and a third report having encountered specific reporting challenges. Taken at face value, these survey figures suggest a broadly functional system with some room for improvement. The qualitative evidence, however, suggests a more complex story. The challenges experienced are not random or evenly distributed: they form a cluster of systemic problems that affect specific actor types with particular consistency and severity. Smaller organisations, first-time participants and projects with complex multi-country partnerships are disproportionately affected in ways that the aggregate figure does not capture.

Addressing this requires distinguishing between two different ways that an implementation procedure can be burdensome for project partners. The first is that implementation is genuinely complex or technically demanding in ways that require substantial effort from any participant. The second is that it is disproportionate: that it demands a level of administrative effort that is not commensurate with the scale, duration or nature of the project involved. The data collected in this evaluation points strongly toward the second type. The procedures that generate the most consistent criticism are not experienced as technically difficult by experienced organisations with dedicated administrative capacity, but rather as unreasonably burdensome in proportion to what projects are trying to achieve, particularly in the small projects instrument where the ratio of administrative work to project activity is most acute.

The timesheet and hour-reporting system is the most widely and consistently criticised specific procedure in the evaluation

Across all data sources, the timesheet and hour-reporting system is identified as outdated, disproportionately burdensome and poorly suited to how project work is organised in modern organisations. The core criticism is not that the system is complicated to use, though it is, but that it is structured around a model of work that does not reflect reality. People in project organisations currently do not work in the precisely delineated hourly blocks that the timesheet format assumes; they work flexibly, across tasks and contexts, in ways that cannot be captured by manually entering hours worked on specific activities. The consequence is that the reporting format incentivises compliance rather than accuracy: project teams often might fill in the form in ways that produce plausible-looking numbers rather than accurate records of how their time was spent.

Programme staff are frank about this, and there is broad internal support for moving toward output-based reporting linked to project deliverables rather than to time records.

The direction of travel is clear and supported across data sources. What has prevented the change is that the timesheet requirement derives from EU regulations that the programme cannot unilaterally modify. Central Baltic is therefore in the position of administering a requirement that its own staff consider inappropriate, for regulatory reasons that are beyond its control. This is an important nuance: the persistence of the timesheet system is not a programme management failure but a regulatory constraint, and the appropriate response is advocacy at the regulatory level rather than criticism at the programme level.

National controller inconsistency is a structural problem that has not been resolved and requires a structural solution

National controllers act inconsistently across countries, varying significantly in speed, in the interpretation of cost eligibility rules, and in the number of rounds of clarification they require before approving partner reports. This is not a novel finding for this evaluation. It is a recurring finding from previous evaluations and from the programme's own internal monitoring. What is notable about the current period's evidence is that programme management's own diagnosis of the problem has sharpened to the point of identifying a specific structural solution: centralising the national control function to the Joint Secretariat.

The logic behind the centralisation argument is straightforward. The current system distributes control responsibility across national bodies in each participating country, each of which interprets cost eligibility rules through the lens of their national experience, handles multiple EU programmes with different rules, and operates with varying levels of dedicated resources. The result is that project partners in different countries face different standards of scrutiny, different turnaround times and different levels of interpretive rigidity. These are conditions that are materially unequal and that produce delays and uncertainty for partnerships that require all partner reports to be approved before a claim can be submitted to the programme. Centralisation would replace this distributed, nationally variable system with a single, programme-informed interpretation of eligibility rules applied consistently to all projects across all countries.

The practical implementation of centralisation is however not as straightforward. It requires negotiation with member states, changes to the regulatory framework governing national control, and potentially significant changes to staffing arrangements within the secretariat. Programme staff acknowledge all of this. The evaluators' assessment is that the scale of the problem justifies pursuing this change as a elementary structural ambition for the next programming period, even if it requires sustained advocacy and negotiation over the programming preparation phase. Guidance documents issued to controllers during the current period have helped at the margins, but have not resolved the underlying

inconsistency, and there is no evidence that incremental measures short of structural reform will produce a different result in the next period.

Reimbursement timelines create a liquidity problem that excludes the actors Central Baltic most wants to attract

The combination of the reimbursement model (i.e., projects spend first and claim later), national control delays and the requirement for project partners to contribute their own co-financing produces a cash-flow gap that is manageable for large organisations with financial reserves but deeply problematic for small NGOs and community actors. In documented cases from the small projects survey, reimbursement delays have reached ten to twelve months, a timeframe that is unsustainable for organisations without bridge financing and that has in some cases required projects to draw down their entire organisational reserves to stay solvent during the reimbursement wait.

This is not an edge case or an exceptional circumstance. It is a predictable structural consequence of the reimbursement model when applied to organisations without financial reserves. The programme is aware of it, and it is one of the primary explanations offered for why NGOs and smaller civil society organisations are structurally underrepresented in the portfolio. The irony is acute: the actor types whose exclusion the programme most consistently identifies as a problem are excluded in significant part by a reimbursement model that the programme administers but did not design, and that produces its most severe consequences for precisely the actors that the programme’s outreach and the small projects instrument are designed to include.

Resolving this probably requires a direct financial intervention. Modest pre-financing for smaller organisations, covering one to two months of expected costs before the first reimbursement cycle, should reduce the liquidity pressure without creating unacceptable financial risk for the programme. Shorter reporting periods with faster reimbursement cycles should produce similar effects. Lump-sum arrangements for smaller cost categories, which are already permitted under the current regulatory framework and which the programme has already introduced for some cost types, reduce the documentation burden without addressing the timing issue but can be combined with other measures. None of these is a complete solution on its own, but together they assemble a toolbox that could reduce the “equity-of-access”-problem that the current financing model creates.

The two-layer reporting structure generates duplication that serves no clear purpose particularly for smaller projects

Project partners are required to report to their national controller, after which the lead partner submits a consolidated report to the programme. This two-stage process is experienced as disproportionately burdensome, particularly for small projects and partnerships with simple cost structures. The purpose of the structure is legitimate: it ensures financial oversight at both national and programme level. In practice, however, the national controller's approval of partner-level costs already performs the substantive verification function for many projects, making the second layer largely redundant. Requiring a separate and largely parallel programme-level report adds administrative work without adding commensurate assurance value.

Several programme staff members independently identify this as an area for simplification. For smaller projects and those with primarily staff cost structures, where the risk of eligibility errors is lower, the national controller's approval could serve as sufficient financial verification at the partner level. A lighter project-level report submitted at defined milestone points would then be sufficient at programme level. This would reduce the duplication without compromising the programme's fiduciary obligations.

Procurement is the most common source of serious financial risk during implementation

A finding that emerges across multiple interviews concerns the risk associated with procurement errors during project implementation. Procurement procedures (i.e. the rules governing how projects contract external services and goods) are complex, vary in detail across countries and EU programme interpretations, and are an area where even well-intentioned mistakes can result in the full cost of a procurement being declared ineligible and deducted from the project's eligible costs. For projects with significant external service budgets, this represents a material financial risk. Programme staff note that the secretariat has limited in-house procurement expertise, which means that project teams with complex procurement questions are often directed to their national controllers who themselves may have limited familiarity with the specific application of procurement rules in a cross-border Interreg context.

This is an area where a modest investment in dedicated expertise either in-house or through a structured relationship with a procurement advisory body could prevent a disproportionate amount of financial loss for projects and administrative burden for the secretariat.

Conclusions and recommendations

The implementation procedures function adequately for experienced organisations with dedicated administrative capacity, but they generate a level of burden that is disproportionate for smaller actors, structurally excludes organisations without financial reserves, and produces unequal conditions across the programme area through controller inconsistency. These are not peripheral problems or matters of convenience. They directly affect who can realistically participate in the programme and on what terms, and they have been identified as problems across multiple programming periods without structural resolution. For the next programming period, the evaluators recommend the following:

- The centralising of the national control function to the Joint Secretariat as a primary structural ambition. The evaluation provides clear evidence for this direction and recommends that the Managing Authority pursue it through the programme preparation and negotiation process, with member states, the Commission and other relevant stakeholders. The consistency problem is real, consequential and unlikely to be resolved by any approach short of structural reform.
- The two-layer reporting structure should be reviewed for smaller projects as an interim measure, pending any structural reform of the national control function. If centralisation is not achieved from the outset of the next period, allowing national controller approval to serve as sufficient financial verification at the partner level, combined with a lighter milestone-based project-level report, would directly address a consistent proportionality concern without compromising the programme's financial oversight obligations.
- The programme should consider advocating at the regulatory level for the replacement of the timesheet requirement with output-based reporting linked to project deliverables. There is broad internal support for this direction, and the programme is well-positioned to make a well-evidenced case to the Commission based on the accumulated evidence from this and previous evaluations.
- The liquidity problem should be addressed through a combination of financial model adjustments explored at the next period's design stage. Pre-financing for organisations below a defined financial capacity threshold, shorter reporting periods with faster reimbursement cycles, and expanded use of lump-sum arrangements for smaller cost categories are all worth modelling and costing as a package of complementary measures. The specific aim is reducing the cash-flow gap to a level that organisations without financial reserves can manage.
- Dedicated procurement support capacity could be developed within or accessible to the secretariat, either through in-house expertise or through a structured relationship with a procurement advisory body. Given the documented frequency and financial significance of procurement errors, this ought to be a high-return investment relative to its cost.

4.7 Operational question 7: The programme's communication function is well-managed but constrained by limited staffing, governance ambiguity

This section addresses the seventh operational question, concerning the effectiveness of the programme's communication activities and tools. It examines what the programme's communication function has achieved in the current period, what constraints limit its performance, and what the most significant communication innovation of the period, that is, the project webspace, requires to be sustained in the next.

The programme communicates professionally and its key performance indicators show a consistently positive trend

Across the measurable dimensions of the programme's communication performance, the picture is positive. Event satisfaction has consistently exceeded four out of five throughout the current period. Feedback on applicant communication is broadly positive, and the channels that the programme has invested in most heavily, including the website, LinkedIn, newsletters and programme-organised events, are functioning well and growing. LinkedIn has shown growth in both reach and followers and is identified as the most efficient digital channel currently in use. Facebook and Instagram serve different audience segments and are managed accordingly, though the latter is underutilised relative to its potential. X, formerly Twitter, is maintained primarily because of the Commission's presence on the platform, despite declining global usage making it an ineffective channel for the programme's actual communication purposes.

These are achievements produced by a communication function operating with resource constraints. The programme's central communication work is managed by a single person, which means that the capacity to develop new channels, produce new content formats, pursue new audiences and maintain existing platforms simultaneously is limited. Several things identified as valuable, such as more active Instagram use, short-form video content, and more developed infographic-based result communication, are not underutilised because they have been assessed as low-priority, but because a single-person function cannot prioritise everything simultaneously. This is not a criticism of individual performance but a structural observation about what the programme's communication investment can realistically support.

The project webspace is the most significant communication innovation of the period and has solved a persistent problem

The introduction of a dedicated programme-hosted webspace for each funded project is the most substantive communication development of the 2021 to 2027 programming period. It addresses a problem that previous periods had not resolved: under the previous model, projects were required to create and maintain their own websites, which were typically repurposed or closed when the project ended, making project outputs inaccessible and regulatory compliance with post-closure visibility requirements difficult to ensure. The webspace model replaces individual project websites with an integrated platform hosted and maintained by the programme, ensuring that outcomes remain publicly accessible after project closure and that the programme can maintain an overview of the full portfolio's communication activity in one place.

The uptake has been notably smooth. Projects have engaged with the webspace with few difficulties, and reported requests for technical assistance have been few. The additional benefit, that the programme can monitor news and events across the full project portfolio through a single platform and use that visibility to amplify project communication through its own channels, has added value that was not fully anticipated at the design stage. This is a well-designed solution that should be retained and built upon in the next period.

The unresolved question concerns technical sustainability. The webspace is maintained with the support of an external service provider, and the programme's capacity to keep it functional over the longer term depends on that relationship continuing to be resourced. This is a concern: the webspace has become core programme infrastructure, and its continuation should not depend on discretionary decisions about whether to renew a service contract. Planning explicitly for the technical sustainability of the webspace either through a long-term contractual commitment to an external provider or through the development of in-house technical capacity is thus a necessary step before the next programming period begins.

Thematic events are the most effective programme-organised communication mechanism, and they are underresourced relative to demand

Among the programme's communication activities, thematic events receive the most consistently positive feedback across data sources. Here, projects working in the same area are brought together to share experience, discuss obstacles and learn from each other. The value of these events goes beyond information exchange. They build relationships

within the project community, provide a forum for the programme to understand what is happening across the portfolio, and generate content and human interest that the programme's digital channels then can amplify. This format was initially introduced in response to project requests, which is itself a significant signal: applicants are actively asking for it, rather than being passive recipients of a programmatic decision.

Three years of experience with these events has produced a clear finding and recommendation: they should happen at least once per year, per programme objective. The evaluation also finds support for organising separate events for small projects and regular projects, though this recommendation should be qualified: the relevant differentiator is not project type as such, but the experience level and practical needs of the people involved. First-time applicants and organisations unfamiliar with Interreg logic benefit from a different kind of event than experienced project managers returning for a second or third project, and that distinction tends to correlate with, though is not exclusively determined by, project format. On the resource question, it is worth noting that the communication function's role in these events is primarily one of support rather than lead organisation, which means that increasing their frequency is more feasible than a simple capacity calculation might suggest, provided that the thematic project managers who lead the events are appropriately resourced to do so.

The challenge of visually communicating results in some thematic areas is a genuine and underaddressed problem

An observation that deserves attention because it affects how the programme's contribution is understood by external audiences concerns the inherent difficulty of communicating results in certain programme objectives. Employment and social projects lend themselves naturally to communication: they involve participants, training events, interactions between people, and outcomes that can be photographed, filmed or quoted. Business development and environmental projects present a different challenge. Their results often require an additional layer of interpretation, selection and creative framing before they can be communicated effectively: a CO₂ reduction measured in tonnes, a supply chain improved at a specific stage, or a company's first sale in a distant market are not self-explanatory to a general audience in the way that a training event or a community initiative is. The difficulty lies not primarily in resource constraints but in the nature of the results themselves: the data is less immediately tangible and translating it into formats that engage a non-specialist audience requires editorial judgement that cannot be automated or templated away entirely.

The consequence is that the programme's communication portfolio is implicitly biased toward the more communicatively accessible objectives, not because of any deliberate strategic choice but as an artefact of this structural difference. This creates a risk of distortion in how the programme's overall contribution is perceived. Developing a library

of reusable communication formats for less tangible results including infographic templates for visual presentation, structured case study formats, and model result narratives that show how abstract outcomes can be framed for different audiences would be a cost-effective way to address this imbalance. The value of such a library lies in reducing the interpretive burden each time a result needs to be communicated, not in eliminating the need for creative framing altogether.

Governance of the nCP communication function creates a structural ambiguity, limiting coordination and consistency

NCPs play a particularly important role in reaching and supporting actual and potential applicants in national and regional contexts. Their use of local languages, knowledge of national actor networks and presence at regional events allow them to provide contextualised communication that the central function cannot fully replicate. At the same time, nCP communication is most effective when aligned with the central function, which provides programme-wide messaging, common tools, visibility and consistency. The value of the nCP model therefore lies not in replacing central communication but in extending and contextualising it and the two functions are stronger in combination than either is alone.

The structural challenge is the following. NCPs are employed by national or regional host authorities, are accountable to those authorities, and have their own managers whose expectations may differ from the programme's communication priorities. This creates a situation in which the people who are most important to the programme's communication reach are not formally accountable to the programme's communication function and cannot simply be directed to implement a centrally designed communication plan. In practice, the relationship works reasonably well: nCPs share information, attend coordination meetings and generally align their local communication with the programme's overall messaging. That said, it is an informal arrangement rather than a formally structured one, and the quality of coordination varies across countries and across individual nCP working styles and priorities.

Formalising this arrangement could improve consistency without eliminating the local adaptability that makes nCPs effective, through clearer expectations, shared content standards, a regular structured coordination mechanism and a more explicit division of communication responsibilities between central and national levels. nCPs that have developed their own national-language social media channels, project catalogues and newsletters are doing work that the programme should actively support and coordinate, not simply acknowledge after the fact.

The communication strategy will need significant updating if the programme's thematic priorities change

A forward-looking observation concerns the relationship between communication strategy and programme design. The current communication strategy is designed around the existing seven objectives and their associated result types. If the next programming period introduces significant thematic changes, as the evidence suggests it should, the communication strategy will need to be revised accordingly. The possible introduction of resilience and preparedness as a priority area, for example, would bring new result types, new target audiences and potentially new communication channels that the current strategy is not designed to address. Planning for this revision from the outset of the next period, rather than adapting reactively once the programme is already in implementation, would prevent the kind of strategic drift that can occur when communication continues to reflect an older programme logic after the thematic design has moved on.

The table below summarises the key identified strengths and weaknesses in the communications of the programme:

Area	Assessment	Evidence and detail
LinkedIn	Strength	Sustained growth in reach and followers; identified as the most efficient digital channel currently in use
Website, newsletters, events	Strength	Performing well; event satisfaction consistently exceeds four out of five; established constituency is well served
Instagram	Underutilised	Serves a different audience segment from LinkedIn but is not fully exploited relative to its potential; capacity rather than strategy is the constraint
X (Twitter)	Ineffective	Maintained only because of the European Commission's presence on the platform; declining global usage makes it an ineffective channel for the programme's actual communication purposes
Webspace model	Strength	Most significant communication innovation of the period; solves the persistent problem of project outputs becoming inaccessible after closure; uptake has been smooth and technical issues few; the programme can now monitor

		and amplify the full portfolio through one platform
Thematic events	Strength	Most consistently praised communication format across all data sources; brings project communities together, builds relationships, generates content for digital channels; introduced in response to project requests: demand-driven rather than programme-initiated

Conclusions and recommendations

Central Baltic's communication function is professionally managed and has achieved progress across its key performance indicators during the current period. The project webspace stands out as an innovative and effective solution to a persistent problem. The main constraints on the function's performance are structural rather than operational: limited staffing means that valuable communication approaches are underutilised not because they are deprioritised but because there is insufficient capacity to pursue them. Further, the governance ambiguity in the relationship with NCPs limits the consistency and strategic alignment of the programme's most important communication channel. For the next programming period, the evaluators recommend the following:

- The programme should plan explicitly for the technical sustainability of the project webspace before the new period begins. The decision about whether to secure this through a long-term external service contract or through in-house technical capacity development should be made as part of programme preparation, not deferred to implementation.
- Thematic events could be formalised as a regular programme commitment at minimum once per programme objective per period with separate formats for small and regular project audiences. The resource requirement for these events should then be explicitly budgeted from the outset of the next period, rather than drawn from a general communication allocation that competes with other priorities.
- A central library of reusable communication formats including infographic templates, case study structures and model result story examples could be developed and made available to nCPs and project teams. This is a modest investment that could meaningfully reduce the interpretive burden involved in communicating less tangible results and support more consistent result communication across objectives. It should be noted, however, that a format library alone is unlikely to resolve the thematic imbalance in programme communication. That balance also depends on editorial prioritisation, the

availability of strong project examples across all objectives, data quality, project teams' willingness to contribute material, and nCP uptake. The library is best understood as one enabling measure among several, creating the conditions for more balanced communication rather than delivering it by itself.

- The governance of the NCP communication function could be formalised, including clear expectations for national-level communication activities, shared content standards and a regular structured coordination mechanism that provides both central direction and space for local adaptation. NCPs that have developed their own national-language communication tools should be actively supported in this work and coordinated with the central communication strategy, rather than managing their activities independently.
- If and when the programme's thematic priorities change significantly in the next period, the communication strategy should be updated from the outset of that period to reflect the new design. This including the identification of new target audiences, new result types requiring new communication formats, and any new channels or partnerships that the changed thematic scope would make relevant.

4.8 Operational question 8: Project visibility is broadly adequate, but capitalisation is a weakness

This section addresses the eighth operational question, concerning the visibility of project results and the programme's capacity to ensure their reuse and capitalisation. It examines the distinction between making results accessible and making them used, why capitalisation has been a systematic weakness throughout the current period, and what structural changes are needed for the next period.

Project-level visibility is largely competent and pragmatically designed

Among granted regular projects, 81% actively disseminate results to their target group. This figure reflects a broad commitment to result communication across the portfolio. The picture from small projects is broadly consistent: projects combine social media outreach for initial reach, trusted community intermediaries for engagement with specific target groups, and the programme webspace for durable public access to outputs. This layered approach is well-suited to the scale and target groups of both regular and small projects, and it reflects a level of communication sophistication that is not a given for organisations operating at the modest budget and short timeframe of Central Baltic projects.

The most effective project-level communication, across both regular and small projects, shares a common feature. It is integrated into partners' existing channels and routines rather than treated as a standalone project obligation. Projects whose communication outputs are embedded in partner organisations' regular newsletters, recurring events and teaching platforms achieve broader and more durable reach than projects that manage communication as a separate workstream. This observation has implications for how the programme designs its dissemination requirements: requiring standalone communication activities creates more administrative burden and less communication impact than requiring that outputs be made available in formats that partners can embed into what they already do.

Programme-level support for dissemination is experienced as insufficient by a substantial share of projects

Despite broadly positive project-level practice, 43% of regular projects rate programme support for dissemination as insufficient. Among Monitoring Committee and Member State representatives, 38% consider the programme adequately ensures the visibility of results, while 38% consider it does so only to a limited extent. This near-even split reflects a possible divide in how the programme's dissemination support is experienced.

The programme's approach to supporting dissemination is to amplify what projects themselves produce and communicate: sharing project news through programme channels, featuring projects in thematic campaigns, and organising events that bring projects together around shared themes. This is a legitimate approach and one that produces value, but it is structurally dependent on projects proactively informing the programme about their activities and making materials available in formats that the programme can use. Projects that do this receive significantly more support than those that do not, and the difference in experience between active and passive projects is likely a major driver of the 43% insufficiency rating. The programme's support is not weak in absolute terms, but it is unevenly distributed in ways that reflect project initiative rather than programme-level strategy.

Capitalisation has received limited resourcing and institutional attention in the current period

The distinction between visibility and capitalisation is central to understanding what the programme has and has not achieved in this area. Visibility means making results accessible. Capitalisation means actively working to ensure results are taken up, built upon and connected to policy processes. It should be noted that capitalisation is not a legal requirement for Interreg programmes, and programmes have discretion over whether and how they pursue it. The observation is therefore not that the programme has failed to meet a mandatory standard, but that the potential value of more structured

capitalisation activity, given the portfolio of results the programme has accumulated, would justify treating it as a more explicit priority in the next period, even in the absence of a formal obligation to do so.

Capitalisation as a function came into focus as an internal priority for several years before any concrete action was taken to address it. A dedicated capitalisation role was created only approximately one year before this evaluation was conducted, which is rather late in a seven-year programming period. The person appointed to this role entered with a clear plan and ambition but immediately found themselves competing for time with ongoing project management responsibilities that created structural pressure on the capitalisation mandate from the outset. The result is that capitalisation has functioned as a side activity rather than a core function: something that has happened where individual initiative and available time have permitted, rather than something the programme has systematically planned and resourced.

This is a significant gap, and its consequences are visible e.g. in the pattern of results documented in the legacy project case studies. Results that have achieved horizontal impact, reaching beyond the original partnership to influence policy or practice in the wider region, consistently share a characteristic that is not primarily about what the programme did to support them, but about what the projects themselves did in terms of strategic positioning and active engagement with policy processes. Where the programme could have played a more active role, aggregating results across the portfolio, connecting project teams to relevant policy stakeholders, producing synthetic accounts of what clusters of related projects have collectively achieved, it has largely not done so. This because the capacity and mandate to perform this function have not been in place.

The application process does not ask whether the project is strategically important to the lead partner

A specific gap that has been identified across multiple data sources concerns the absence of a strategic alignment question in the application process. The programme asks applicants to describe their project's objectives, their partnership's qualifications and their plans for sustainability, but it does not ask whether the project is strategically important to the lead partner organisation. That is, whether the project advances the organisation's own mission, builds on its existing work, and serves a purpose that the organisation will continue to pursue after the project period ends.

This absence matters for capitalisation because the organisations most likely to actively pursue the reuse and policy uptake of project results are those for whom the project represents a strategic investment rather than a funding opportunity. When a project is peripheral to a lead partner's core mission, there is limited institutional incentive to invest effort in ensuring that results are taken up after closure. Conversely, when a project is

central to what the lead partner is doing and intends to continue doing, the result communication and capitalisation activities tend to happen naturally because they serve the organisation's own interests, not only its reporting obligations.

The practice of integrated project websites points toward what systematic capitalisation could look like

A specific example of effective capitalisation practice that emerged from the evaluation data concerns the integration by three related projects of their individual websites into a single unified resource hub. The three projects, working in overlapping thematic areas over successive programming periods, recognised that their individual outputs were more valuable collectively than separately and designed a shared digital infrastructure that allows users to navigate across the portfolio without encountering the fragmentation and dead links that typically characterise project-by-project result communication. In practical terms, this means that a user arriving at any one of the three project sites can move seamlessly between them, access outputs from all three in a single interface, and understand the collective contribution of the work without having to locate each project separately. This emerged entirely from project initiative rather than programme design, and it required a level of cross-project coordination and sustained engagement that the programme's structures do not routinely facilitate or incentivise. The programme was aware of this practice and acknowledged it as a model worth replicating, but no systematic mechanism exists to encourage or resource similar approaches across the wider portfolio.

The programme webspace provides the foundation for aggregated result communication at scale. The website has developed significantly in this respect: a dedicated Results section, introduced in April, allows users to browse and filter content by theme and presents aggregated data, categorised outcomes and result stories. This represents a meaningful step toward the kind of synthesis layer that policy audiences need. What remains to be developed is the deeper organising logic that groups projects by policy question and presents their collective contribution in terms that move beyond individual project summaries toward a coherent narrative of what the programme has achieved as a whole. Developing that layer is a capitalisation function rather than a technical one, and it requires human capacity with a clear mandate and adequate time.

The figure below maps the programme's result communication function as a five-step progression, from producing results through to actively connecting them to policy processes and ensuring their reuse.⁵



Conclusions and recommendations

The programme has performed adequately on project-level visibility, making results and outcomes accessible, supporting project communication through its own channels, and providing a stable digital infrastructure through the project webspace. It has performed less well on capitalisation, i.e., the active, programme-level work of connecting results to policy processes, ensuring their reuse, and producing synthetic accounts of collective

⁵ It draws on the evidence which distinguishes between visibility (making results accessible) and capitalisation (making results used). The programme has performed well on the first two steps, and the dedicated Results section has moved it into the third. The gap sits between steps three and four: what currently exists is a categorised, browsable collection of results, and what is still missing is the synthesis layer that would group those results by policy question and present the portfolio's collective contribution in terms that policy audiences can engage with directly.

programme contribution. The gap between these two dimensions of result communication is well documented, acknowledged by programme staff, and attributable to the failure to resource capitalisation as a core function rather than a peripheral activity. For the next programming period, the evaluators recommend the following:

- That the capitalisation function must be established with dedicated staffing, a clear mandate and adequate resourcing from the very beginning. The experience of the current period, in which a capitalisation role was created late, immediately competed with project management responsibilities, and could not fulfil its mandate despite individual commitment, should be treated as a direct design input into how the next period's secretariat structure is organised. The capitalisation role ought to be insulated from project management responsibilities and provided with enough capacity to do the sustained analytical and relational work that effective capitalisation requires.
- A capitalisation call should be explored for the next period. That is, a dedicated funding mechanism allowing projects or consortia to systematically build on and synthesise results from the broader portfolio and present them in policy-relevant formats. Other Interreg programmes have implemented this model, and it addresses the specific problem that capitalisation work requires resources that individual projects cannot be expected to provide from their own budgets after the project period ends.
- The application framework should be updated to include an explicit question about whether and how the project relates to the lead partner's organisational strategy, and this should be treated as an assessed dimension of the application rather than a compliance checkbox. Treating strategic alignment as an evaluation criterion would create a systematic incentive for applicants to develop projects that serve their organisations' ongoing priorities, which in turn would improve the probability that results are actively promoted after project closure.
- For objectives where results take a long time to materialise after project completion, particularly the circular economy and CO2 reduction objectives, the programme could require a programme-organised closing event as a standard project obligation. This event, organised jointly by the programme and the project and targeted at a broader audience than the project partnership, would institutionalise a capitalisation moment that currently only some projects pursue voluntarily.
- Building on the Results section introduced in April, the programme webspace could be further developed to include a deeper synthesis layer: a programme-level interface that aggregates results by theme, sector or policy question and presents the programme's collective contribution in terms that policy audiences can engage with directly. The April update represents an important foundation; the next step is moving from categorised results and result stories toward a

coherent programme-level narrative of what the portfolio has achieved as a whole. This is a function of programme-level knowledge management rather than project-level communication, and it is the natural home for the capitalisation capacity that the next period's staffing should make possible.

4.9 Operational question 9: Sustainability planning varies significantly across the portfolio, not consistently treated as a substantive evaluation criterion

This section addresses the ninth operational question, concerning how projects plan for the sustainability of results and ensure positive impact on horizontal principles. It examines what conditions produce durable results, why the 18-month small project format creates a specific sustainability challenge, and where horizontal principle integration is substantive and where it functions primarily as a compliance exercise.

Sustainability planning exists across the portfolio but varies substantially in depth and sincerity

Among regular projects, 43% identify concrete sustainability risks, most commonly post-project funding gaps, staff turnover and political uncertainty. This indicates a degree of reflective awareness about the conditions that threaten result durability. However, awareness of risks is not the same as serious sustainability planning, and the qualitative evidence across programme staff interviews and legacy project case studies reveals a consistent pattern. Some project partnerships think actively about what happens after the project from the application stage onwards, designing activities and outputs with post-closure use in mind, while others treat sustainability as a compliance section to be completed rather than a sincere organisational question to be answered.

The distinction between these two orientations is consequential. It is often possible to identify in an application whether the lead partner has genuinely thought through sustainability. The indicators are specific. They include whether the activities proposed are embedded in an ongoing organisational mission, whether the outputs planned are things the organisation will want to use after the project ends, and whether the assembled partners share a strategic motivation that will outlast the funding. When these characteristics are present, result durability tends to follow. When a project idea has instead been constructed primarily around the available funding rather than around the lead partner's strategic direction, durability is much harder to achieve regardless of what the sustainability section of the application formally states.

The conditions for durable results are identifiable and consistent

Drawing together the evidence from legacy project case studies and current period programme staff interviews, a clear and consistent picture emerges of what produces sustainable results. Results survive when they are embedded in the core operations of the lead partner organisation, when the project has developed or improved something the organisation was already committed to and will continue to use. Results disappear when they exist primarily within the project structure, maintained by project-funded staff and activities that end when the project ends. This is one of the clearest and most consistent lessons across the entire legacy project evidence base, and it points directly to how partner selection criteria should be designed in the next period.

A second enabling condition concerns institutional or commercial motivation within the partnership. That is, the sense that partners are participating because the cooperation serves their actual strategic interests, not because they were recruited at short notice primarily to meet the geographic eligibility requirements of a targeted call. The projects that showed the greatest resilience when faced with major external disruptions, including the closure of Russian markets and the COVID pandemic, were precisely those whose partnerships were built on real institutional or commercial interests rather than on programme-structured cooperation that had no independent reason to persist.

A third condition, documented most clearly in the legacy project evidence, concerns the relationship between the project and a broader organisational or institutional trajectory. Projects that are part of a sequence, where a completed project is explicitly built upon by a follow-on project (whether through Central Baltic or through another instrument), seem to produce more durable contributions than projects that stand alone. The sequential cooperation model, in which related projects build cumulatively on the same institutional capacity and partner networks, seem to be the most reliable predictor of long-term programme impact, and it emerges from intentional design rather than from chance.

Staff turnover is the most embedded and least addressed sustainability risk

Of the sustainability risks that project teams identify, staff turnover is the most significant because it is structurally embedded and relatively independent of the other factors that determine sustainability. A project whose activities are well-designed, whose lead partner is strategically committed and whose results are relevant can still lose much of its institutional memory and momentum if the key individuals who drove the work move to other organisations during or shortly after implementation. This is not a rare event. It is a predictable feature of the labour market in which project-funded organisations operate, and it affects projects across all objectives and partner types.

Central Baltic currently does not address staff turnover risk systematically, either in its application requirements or in its implementation support. Applications are not required to describe how project knowledge will be maintained at an organisational level if key individuals leave, and implementation support does not include mechanisms for identifying when staff changes are creating risks for result continuity. Legacy project evidence confirms that this gap is consequential. In several cases, the durability of results was specifically shaped by whether the individuals who led the project remained in their organisations long enough to embed what they had developed into institutional routines.

The 18-month small project format creates a structural sustainability challenge

For small projects, the 18-month duration creates a specific tension between the programme’s sustainability expectations and what is realistically achievable within the time available. A significant portion of an 18-month project might be consumed by mobilisation, partnership coordination and initial implementation. These activities are sometimes necessary. However, they do not directly produce the outputs that sustainability planning is designed to preserve, and the time available for institutional embedding, capacity building, and the development of third-party adoption relationships is correspondingly compressed.

The small projects data shows that projects have developed practical strategies to manage this constraint. Open-access and modular output formats, “train-the-trainer” models and alumni networks are the most consistently effective mechanisms, precisely because they extend the reach and lifetime of outputs without requiring continued organisational investment from the project team. Cross-border transferability, i.e., the ability of outputs to be adopted by organisations outside the original partnership, is also identified as an asset that multiplies sustainability impact without multiplying resource requirements. These are appropriate adaptations to the 18-month constraint and could be promoted and rewarded in programme guidance and assessment. They do not, however, fully resolve the underlying tension between short duration and institutional embedding, particularly for projects working with e.g. vulnerable or hard-to-reach groups where sustained engagement requires personal relationships and dedicated resources that cannot be transferred through a handbook or an online platform.

Horizontal principles are integrated in some objectives, treated as compliance requirements in others

The programme promotes three horizontal principles across its portfolio: sustainable development (which includes climate considerations), equal opportunities and non-discrimination, and equality between men and women. The integration of these principles varies significantly across objectives in ways that are predictable. Where a principle is

intrinsic to the thematic content of the objective, it is integrated substantively, and the evidence of integration is concrete and verifiable. Where a principle is peripheral to the objective's core content, it tends to be addressed through generic language in applications and reporting that satisfies the formal requirement without producing change.

The most substantive horizontal principle integration in the current period is found in the employment and social objectives, where equal opportunities, anti-discrimination and gender equality are directly relevant to the target groups, the activities, and the intended results. Projects working with vulnerable groups, migrants, people with disabilities and long-term unemployed participants demonstrate a level of horizontal principle integration that is embedded in project design rather than added retrospectively. The environmental objectives show similarly substantive integration of sustainable development and climate principles, where these align naturally with the thematic content.

In business development and public services objectives, horizontal principle integration is more variable. The most observed pattern is that applications address horizontal principles through general statements about gender balance in participant recruitment or carbon footprint reduction through online meetings. These statements satisfy reporting requirements but rarely represent genuine design choices. Programme staff acknowledge that they do not currently have effective tools to distinguish between projects that sincerely integrate horizontal principles and those that address them through formulaic language.

The anti-discrimination component within the employment objective deserves particular attention because it represents an aspiration that is difficult to achieve within the timeframe and scope of a typical Interreg project. Changing how employers hire, accommodate and retain workers from underrepresented groups requires sustained engagement, organisational development processes and often legislative or regulatory pressure that individual projects cannot provide. The results attributable to this component are frequently limited relative to what the objective envisions, and more realistic and measurable targets could produce better evidence and more credible impact claims than the current approach.

Conclusions and recommendations

Sustainability planning across the Central Baltic portfolio reflects genuine engagement in some projects and compliance behaviour in others, and the programme currently lacks the assessment tools to consistently distinguish between the two. The conditions for durable results are well understood from the evidence: strategic alignment between the project and the lead partner's core mission, genuine institutional motivation across the partnership, and embeddedness in a sequence of related projects where possible. These conditions are not adequately reflected in how applications are currently assessed or how

implementation is supported, and addressing this gap is the central task for the next period in relation to this evaluation question. For the next programming period, the evaluators recommend the following:

- Sustainability planning should be treated as an assessed dimension of the application rather than a “compliance section”. Applications that specify how results will be institutionalised at an organisational level, who will be responsible for maintaining them, and what mechanism will ensure their continued use should score more highly than applications that offer generic assurances about result durability. The development of specific assessment criteria for sustainability, drawing on the conditions identified in this evaluation and in the legacy project case studies, would give assessors the tools to make this distinction reliably.
- The staff turnover risk should be addressed explicitly in sustainability planning requirements. Applications should be required to describe how project knowledge will be maintained at an organisational level if and when key individuals leave, and this should be treated as an implementation-stage obligation rather than only an application-stage aspiration. For lead partners in regular projects, the formal adoption of project results at the organisational level, rather than their maintenance by individual project staff, should be encouraged and in some cases required as a condition of continued funding.
- The sequential cooperation model should be recognised and supported in programme design, including through assessment criteria that reward demonstrated connection to prior programme investment and through communication that presents Central Baltic’s long-term value in terms of accumulated cooperation trajectories rather than individual project outcomes.
- For small projects, the sustainability expectations embedded in reporting requirements could be calibrated to better accommodate the 18-month format and the organisational capacity of typical small project lead partners. The promotion of open-access output design, modular formats and train-the-trainer models as acknowledged good practice could help projects make the most of the time available for institutional embedding without imposing expectations that the format cannot realistically support.
- The integration of horizontal principles should be made more proportionate and more credible. In objectives where a particular principle is genuinely central to the thematic content, the current level of substantive integration is appropriate and should be maintained. In objectives where principles are more peripheral, lighter-touch compliance requirements focused on design choices rather than generic commitments should produce more honest reporting. For the anti-discrimination component within the employment objective specifically, the programme should set targets that reflect what is realistically achievable within

the project timeframe, using these more realistic targets as the basis for impact claims rather than continuing to aspire to an ambition level that the evidence shows is beyond what individual projects can deliver.

5. Case study: Border regions

This chapter presents the border regions case study, i.e., programme regions that share a border with Russia. It examines the experience of the external border regions in the enlarged Central Baltic programme territory following the suspension of the Russia cross-border cooperation programmes in 2022. The case study is structured in two parts. The first part focuses on the Finnish border regions, with particular depth on Kymenlaakso as the primary case through which the broader pattern is examined. The second part addresses the Estonian and Latvian border regions, with particular depth on Lõuna-Eesti and Latgale as the primary cases through which the broader pattern is examined.

5.1 Finnish border regions

Introduction and scope

This case study examines the experience of Finland's eastern border regions as participants in the enlarged Central Baltic programme territory, with depth on Kymenlaakso as the primary case through which the broader pattern is examined. The Finnish eastern border regions included in the programme are Kymenlaakso, Etelä-Savo and Etelä-Karjala, each undergoing what the OECD characterises as one of the most profound transformations in their modern history following Russia's full-scale invasion of Ukraine and the subsequent closure of the Finnish Russian border.

The case study draws on survey data, two in-depth interviews with the regional coordinator and monitoring committee member representing Kymenlaakso, who played an active activation role toward regional actors during the targeted call, as well as interviews with the lead partner project managers of two projects funded in the current period: ReSolutions, a circular economy project led by XAMK with partners from Finland, Sweden and Latvia, and DIGIMARIS, a digital maritime services project. Three strategic planning documents provide context: the Finnish Government's Programme for Eastern Finland (January 2025), the OECD's Transition Strategies for Finland's Eastern and South-Eastern Border Regions (2025), and a regional thematic priorities document from an Implementation of the Programmes for Eastern and Northern Finland, AKKE Development Project Call (Finnish: Itäisen ja Pohjoisen Suomen ohjelmien toimeenpano, AKKE-kehittämishankehaku (AKKE – Alueiden kestävän kasvun ja elinvoiman tukemisen määräraha)) (2026). Together these sources provide a perspective that spans the strategic and the operational, and that connects the programme-level evidence to a documented external assessment of what the regions need.

The eastern border regions are undergoing a structural transformation without precedent

The starting point for understanding Finland's eastern border regions' relationship with the Central Baltic programme is the geopolitical disruption they have experienced since 2022. Prior to the closure of the border, these regions were deeply integrated with Russia through bilateral cross-border cooperation programmes, commercial trade, tourism and institutional relationships built over decades. The OECD report documents the scale of this integration and its sudden collapse: Finnish exports to Russia fell from 5% of national total in 2021 to under 1% in 2023. Tourism and logistics connected to Russia have effectively disappeared. In Kymenlaakso, which is Finland's largest border crossing point with Russia, these losses have been compounded by major industrial plant closures, the closure of the Saimaa Canal, and the loss of Russian purchasing power from the regional economy.

The Finnish Government's Programme for Eastern Finland, adopted in January 2025, frames the vitality of the eastern regions as a strategic national security question, noting that the strengthening of eastern Finland serves Finland's economic interests and its security simultaneously. This framing is significant: it positions the border regions not as peripheral development recipients but as strategically important territories whose resilience is a European as well as a Finnish concern. The OECD report reinforces this, noting that Finland's eastern border constitutes the EU's longest external land border with Russia, and that measures to strengthen security and resilience in these regions should be understood as contributing to European security as a whole.

The transition away from Russia cooperation requires a different kind of instrument than the current programme provides

The bilateral cross-border cooperation programmes that the eastern border regions in Finland previously participated in were fundamentally different from Central Baltic in their design, their scope and their relationship to the regions. These programmes could fund infrastructure investments, building restoration and direct community-level projects. They operated with regional secretariats that gave border regions direct programme ownership. The Central Baltic programme has none of these features: it does not fund infrastructure, it does not have regional programme ownership structures, and its seven objectives were designed for a programme area and a geopolitical context that predates the current situation.

When 30 million EUR was transferred from the suspended Russia programmes to Central Baltic, this transfer was viewed by border regions as carrying an implicit mandate: money associated with addressing the border region situation should reach the border regions in

ways that address their situation. The programme's response, retaining the same thematic objectives and adding a geographic eligibility criterion for the targeted call, is experienced by regional representatives as a mismatch. A formal statement was subsequently addressed to the national authorities of the Central Baltic programme member states specifically on this question. This is a political signal, not only an evaluation finding, and it requires a programme-level political response in the next period's programming process, not only operational adjustments.

The OECD report is explicit about what the transition requires: economic diversification into defence manufacturing, cybersecurity, bioeconomy, clean energy and sustainable tourism; infrastructure investment in transport and digital connectivity; workforce development and talent attraction; and, importantly, security and crisis preparedness. These are not soft cooperation activities and often require investment-type instruments and structural policy support that goes beyond what an Interreg cross-border cooperation programme of Central Baltic's budget and nature can deliver. Recognising this is a precondition for designing a programme measure that is genuinely useful to border regions rather than one that oversells what it can deliver.

Kymenlaakso has specific assets and vulnerabilities that create a distinctive development trajectory

Within the broader eastern Finland context, Kymenlaakso has a specific economic profile that shapes what kind of cross-border cooperation is most relevant for it. The region's identity is built around logistics: the Kotka-Hamina port complex and the Kouvola rail and road terminal are central to Finnish export logistics, and their importance has only grown as Russia-linked trade routes have been severed and the region has been forced to reorient toward Nordic, European and Asian markets. The region has growing strengths in data centre investments, battery industry, an emerging food industry cluster in Kouvola, and a higher education institution, XAMK (South-Eastern Finland University of Applied Sciences), that is Finland's most internationally active university of applied sciences in its category.

At the same time, Kymenlaakso faces significant structural challenges. The OECD documents high unemployment and youth unemployment rates, weak innovation indicators, limited higher education density, and significant dependence on a small number of large employers. The maritime sector, which previously operated in a regional context shaped by proximity to Russian trade, now faces the challenge of reorienting its networks, skills and market relationships toward western-facing partners. The Kotka-Hamina port's position as a green logistics and circular economy hub is a realistic and strategically coherent development trajectory and one that is explicitly reflected in the ReSolutions project's focus on circular economy solutions. Realising it requires the kind of innovation ecosystem development, public-private partnership and cross-border

network building that Central Baltic is well-placed to support if its objectives are appropriately designed.

An additional and specific concern is the maritime security situation in the eastern Gulf of Finland. The activity of the shadow fleet in the Gulf (i.e., tankers carrying Russian oil in violation of international sanctions, operating without adequate safety standards) represents both an environmental risk and a security risk for the coastline of Kymenlaakso and the surrounding region. The DIGIMARIS project, which focused on digital maritime services and monitoring, reflects an urgent need for cross-border authority cooperation on maritime surveillance and risk management that the current programme cannot fully accommodate because the available indicator framework does not fit this type of activity. Cross-border maritime safety cooperation, oil spill response preparedness and digital monitoring systems are among the most directly relevant cross-border cooperation activities for this region, and their absence from the programme's current specific thematic scope is a gap with practical consequences.

Participation is concentrated in established institutional actors; reaching other actor types requires a different approach

Within the programme, participation from Kymenlaakso has been heavily concentrated in XAMK, which participates across multiple programme objectives and in multiple countries. Beyond this institution, the pool of active applicants is thinner than desired. The interview evidence in this evaluation is specific about what activating other actor types requires: going directly to individual organisations, showing them concrete examples of what comparable organisations have done, helping them identify which programme objective is relevant to their work, and building personal relationships that sustain engagement through the application process and beyond. This is a qualitatively different function from providing information or running events, and it is not achievable through digital channels or written documentation.

The dedicated EU external border project manager role, which involved visits to border regions and direct conversations with potential applicants, is credited with effect on step-one application quality in the targeted call. This model, being intensive, presence-based, interpersonally driven activation, is the only approach documented in this evaluation as reliably reaching actor types that are new to the programme. It could hence if possible be treated as a standard programme function in the next period, resourced accordingly and extended to cover all border region geographies rather than concentrated in a specific call period.

A specific structural barrier concerns the PO1 objective's third-country export focus. Several Kymenlaakso organisations in the tourism and maritime sectors have found that

their most natural market orientation, which is strengthening connections with Nordic, Baltic and other European partners, and developing tourism products for markets that do not require targeting outside the EU, is not fundable under PO1. The Finnish Government's Programme for Eastern Finland explicitly identifies sustainable tourism and international profile-building as priorities for the region, particularly given that the "Järvi-Suomi ("Lakeland")" brand and eastern Finland's natural assets represent one of the most realistic economic recovery pathways for tourism businesses that have lost Russian visitors. A programme objective that excludes intra-EU tourism cooperation is therefore defectively aligned with this strategic priority.

The targeted call functioned as geographic activation but not as thematic solution

The targeted call is assessed as broadly positive in its immediate effect: it generated applications, distributed funding and brought border region participation into operational focus. The activation work accompanying the call is considered more valuable than the call mechanism itself. But the structural design is identified as a fundamental limitation. By applying a geographic eligibility criterion to existing thematic objectives without modifying those objectives, the call activated border region actors into a programme not designed for their situation.

The DIGIMARIS experience illustrates this concretely. The project's concept concerned maritime safety and digital monitoring in the eastern Gulf of Finland. This is a relevant border region priority. However, it could not be accommodated under PO4 because the available indicators required a quantifiable environmental quality improvement, which a risk monitoring and early warning system cannot produce. The project was repositioned under PO7 digital public services, which accommodated the indicator requirements but represented an imperfect thematic fit. The project's natural home, which would be a maritime security and cross-border authority cooperation objective, does not exist in the programme.

The interview evidence also raises a concern about how the targeted call was used by some applicants from outside the border regions. Several organisations contacted the regional coordinator not because they had substantive interest in border region cooperation, but because they needed a border region partner to satisfy the geographic eligibility requirement. This is precisely the kind of eligibility-driven partnership formation that the programme's design should discourage, and it reflects the fundamental weakness of a geographic criterion that is not accompanied by thematic differentiation. When border region partners are recruited as eligibility vehicles rather than as substantive contributors to a project's content, no one benefits from the arrangement.

The thematic priorities of eastern Finland's regions are well-documented and coherent, and point clearly toward what a future programme measure should fund

The Finnish Government's Programme for Eastern Finland and the OECD transition strategy together provide a well-grounded and externally validated account of what the eastern border regions need. These documents did not emerge from programme requirements: they were developed through extensive regional and national consultation specifically to address the transition challenge facing eastern Finland. Their alignment with what the evaluation's interview evidence identifies as priorities is not coincidental but reflects a convergence in how the regions and their institutional supporters understand the situation.

The six priority themes identified in these documents, which overlap directly with the thematic priorities articulated in the evaluation interviews, are: sustainable growth, regenerative investment and regional vitality, including SME development, ownership transitions and international investment attraction; clean energy and digital clean growth, including renewable energy infrastructure and digital innovation; sustainable tourism, including the international profiling of the "Lakeland brand" and the recovery of tourism after the loss of Russian visitors; skills, talent and workforce development; comprehensive security, supply security and preparedness; and physical and digital connectivity and accessibility. Of these, the programme's current design can in principle accommodate elements of the first, second, third and fourth. It cannot accommodate the fifth in a substantive way, and the sixth is outside Interreg's scope by design.

The ReSolutions project illustrates the potential and limits of the current framework

The ReSolutions project, funded through the targeted call with nine partners from Finland, Sweden and Latvia, is a well-designed and coherently structured circular economy project that builds on genuine regional assets. Kymenlaakso's new sorting facility in Kouvola provides a physical infrastructure foundation for "library-of-things" pilot activities, and the project's work packages are integrated toward a coherent set of knowledge products and policy recommendations. The partnership functions effectively across the cultural differences in how trust is extended to shared goods: a difference between Nordic and Baltic contexts that is itself a cross-border finding with practical implications for how circular economy models can be adapted across the programme area.

At the same time, the project illustrates the structural finding of this case study clearly: it is a circular economy project that happens to be led from Kymenlaakso, not a project designed to address Kymenlaakso's situation as a border region. This is not a criticism of

the project's quality, which is not in question. It is an observation about what the programme currently funds: good projects from border regions but not projects specifically designed for border regions.

Conclusions and recommendations

The Finnish eastern border regions are navigating a structurally difficult transition, one that is recognised at national level in dedicated government programmes and at European level in the OECD's work and the European Commission's regulatory proposals for the next cohesion period. Central Baltic has a role to play in this transition, but the nature of that role deserves careful framing. The programme is a cross-border cooperation instrument whose design is determined by the Member States and regions that participate in it: the border regions are not recipients of a centrally designed programme but actors in its governance. What follows should therefore be read not as recommendations directed at a programme administration, but as inputs to the programming process that the participating regions and Member States will conduct together. A further consideration for that process is whether responses to specific sub-regional needs, however legitimate, can be designed in ways that serve the cross-border area as a whole, rather than through separate measures that would fragment a programme whose strength lies in its shared geography and governance.

With that framing in mind, the evaluators recommend the following as inputs to the programming process:

- That the programme engages with the Finnish Government's Programme for Eastern Finland and the OECD transition strategy as substantive inputs to the next period's programming process. These documents represent an authoritative and externally validated account of what the regions need, developed through extensive consultation, and should not be treated as background documents. The programming process should demonstrate how the next period's design addresses the priorities they identify.
- That the programming process explicitly considers whether a permanent border region measure could be designed from the outset of the 2028–2034 period with its own dedicated thematic content and funding. If pursued, this measure should not replicate the targeted call model of applying geographic eligibility criteria to existing objectives, but should instead develop objectives specifically calibrated to what border regions can deliver and what they most need. The six thematic priority clusters identified in eastern Finland's own transition planning (sustainable growth and investment, clean energy and digital growth, sustainable tourism, skills and talent, comprehensive security and preparedness, and connectivity) provide a relevant starting point, though the programming process should assess how these translate into objectives that serve the cross-border area

rather than a single national context. The European Commission's communication on eastern border regions and the forthcoming ERDF regulation's provision for sustainable and resilient border regions provide the regulatory basis for such a measure.

- That comprehensive security, supply security and civil preparedness are considered as an explicitly addressable thematic area, given their direct cross-border character and relevance across multiple parts of the programme area. This includes cross-border maritime safety cooperation, oil spill response, chemical accident prevention, and digital monitoring systems for the eastern Gulf of Finland. These activities are realistic for Interreg to pilot and develop, and they represent a direct and urgent need for the regions concerned.
- That sustainable tourism and the international profiling of eastern Finland's Lakeland brand are considered as eligible activity types, addressing the gap created by the loss of Russian visitors and the absence of any current programme objective that accommodates intra-European tourism development cooperation.
- That the SME export objective's third-country focus is reviewed for any border region measure, allowing market development cooperation within the European context for organisations in sectors, particularly tourism and maritime services, where the most urgent market reorientation need is toward Nordic, Baltic and other European partners rather than distant non-EU markets.
- That secretariat in-person presence in border regions is treated as a standing programme function, resourced from the outset of the next period and extended across all border region geographies. The activation model demonstrated during the targeted call including direct visits, individual conversations and concrete examples of comparable organisations' experience, is the approach documented as reliably reaching actor types new to the programme.
- That an eastern border regions task force is considered within the programme's governance structure, meeting regularly alongside the monitoring committee, with a mandate to discuss thematic priorities and implementation experience in a forum where substantive deliberation is possible. This could be accompanied by explicit mechanisms for direct, low-threshold contact between regional representatives and the secretariat, outside formal committee processes.

5.2 Baltic border regions

Regional context and evaluation approach

The Baltic border regions covered in this case study, Latgale in Latvia and Lõuna-Eesti in Estonia, share a geographic position at the EU's eastern external border and a set of structural challenges that distinguish them from the programme's more established

participant base. The evaluation draws on four semi-structured interviews conducted in April–May 2026 with project beneficiaries from the Central Baltic Programme and with relevant monitoring committee members. The case study’s primary depth is on Lõuna-Eesti and Latgale, with further interview evidence extending to Kirde-Eesti and Vidzeme, the other two regions within the programme’s Estonian and Latvian border region scope. The projects interviewed were at different stages of implementation at the time of the interviews, which affected respondents’ ability to assess results; most were, however, able to assess the application process, the relevance of the targeted call, and the implementation experience.

The two Latvian regions entered the programme from different starting points. Vidzeme had been part of the Central Baltic programme area from the outset and was included in the programming process for the current period; Latgale was added later as an EU external border region and was not part of that process, meaning its specific needs were not represented when the programme’s current objectives were designed. Both regions had previously been covered by the EU’s external cross-border cooperation programmes with Russia and Belarus, which combined infrastructure investment and local entrepreneurship support with a lower own-contribution requirement (10%, against 20% in Central Baltic) and more extensive consultancy support for applicants. Interview evidence describes Central Baltic, by comparison, as a more mature, competitive and more administratively demanding instrument, harder to enter than the programmes it replaced, since first-time applicants must now compete with a broader and more experienced partner pool without the support structures the earlier programmes provided.

Depopulation and economic reorientation are the defining challenges for both regions

Rural depopulation is the central challenge for both Latgale and Lõuna-Eesti, though the dynamics differ. In Latgale, depopulation is compounded by the geopolitical situation: the proximity to Russia and Belarus, heightened by the ongoing war in Ukraine, has increased the sense of insecurity among the population, made it harder to attract investment, and reduced the willingness of people and organizations to commit to long-term initiatives in the region. The scale of this insecurity was brought into sharp relief during one interview, which took place shortly after Ukrainian drones fell into Latgale territory: an event that intensified already existing concerns about population retention and regional viability. The economic consequences are already visible: the regional tourism sector has reported cancellations and shortened stays directly linked to the deteriorating security perception, and interview evidence further identifies disinformation as a further and growing concern for the region.

In Lõuna-Eesti, the picture is more differentiated. The closure of the Russian border has had a less direct economic impact on the region than on Latgale or the Finnish border

regions, but the region faces a pronounced internal development gap: Tartu city functions as a growth engine while the surrounding rural areas of Lõuna-Eesti experience significantly weaker economic development, lower investment confidence and ongoing outmigration. The observations in this section relating to Lõuna-Eesti are primarily grounded in evidence from Tartu-anchored partnerships; the extent to which they apply equally to the broader Lõuna-Eesti geography is not fully established by the available interview data and should be read with that caveat in mind.

Despite these differences, both regions share a common set of challenges: a shortage of skilled workers, insufficient entrepreneurial activity and limited local innovation capacity. Cross-border cooperation is viewed by regional actors as a meaningful instrument for addressing these challenges, particularly where cooperation takes place with closer neighbors who share similar structural conditions.

Engagement with the programme is markedly uneven within Estonia, concentrated in Lõuna-Eesti rather than Kirde-Eesti

The interviews conducted surface a further dimension of differentiation that sits within, rather than between, the two countries' border regions. Lõuna-Eesti has participated actively in Central Baltic over an extended period, predating its formal inclusion as an EU external border region, and has built a substantial track record of applications and a broadly positive attitude toward the programme, helped by the regional anchoring of higher education institutions in Tartu. Kirde-Eesti (the Ida-Viru area), by contrast, has produced fewer applications, and the attitude there is described as considerably more negative: organizations in the region are reported to view Central Baltic as offering little of relevance to them, a perception reinforced by limited local leadership willing to advocate for engagement with the programme and by a predominantly Russian-speaking population that the secretariat's outreach has not yet effectively reached.

A specific source of disappointment is that Kirde-Eesti's most pressing want, direct investment, for example in Narva, is not something Central Baltic is designed to provide. Regional representatives consequently feel positioned as outsiders to a programme whose value proposition they feel has not been sufficiently clearly or honestly communicated to them: the secretariat hence needs to make sure to in the future be sufficiently explicit with these regions about what Interreg can and cannot fund, rather than allowing expectations formed around the loss of investment-type Russia cooperation programmes to persist. The secretariat's existing practice of holding seminars in the local language and being physically present in the regions is recognized as a step in the right direction, but is assessed as insufficiently sustained to have shifted Kirde-Eesti's engagement pattern so far.

The targeted call was valued but does not resolve the thematic mismatch

The targeted call was the primary reason many organizations from Latgale and Lõuna-Eesti applied to Central Baltic in the current period. For many of the organizations interviewed, it represented their first engagement with the programme, and the direct outreach including targeted invitations sent to potential applicants was explicitly credited with enabling participation that would not otherwise have occurred. The small projects instrument was specifically highlighted as a valuable low-threshold entry point for this kind of first-time engagement, combining lower administrative burden and a faster pace with topics that, while less strategically ambitious than those of regular projects, are relevant to a broad range of local actors. The programme's accessible application process and the support provided by the secretariat and nCPs were consistently rated positively.

Interview evidence adds important context for why the call's geographic targeting was not matched by thematic differentiation. The secretariat initially proposed addressing border region inclusion through an extra-points mechanism within the general call rather than a dedicated targeted call; some monitoring committee members seem to have objected to this as unfair preferential treatment and pushed instead for a formally targeted call. In practice, however, this targeted call was not constructed with criteria substantially different from a general call; one respondent describes it, in effect, as a renamed general call. This sequence indicates that the call's character as a geographic rather than thematic instrument was not simply an oversight in programme design but the outcome of a negotiated compromise among Member State representatives, with implications for how readily a more differentiated measure can be agreed in the next period.

However, several interview respondents identified a structural tension between what the programme's objectives require and what organizations in peripheral border regions can realistically deliver. Specific concerns raised include the following: The entrepreneurship objective covers only companies up to seven years old, excluding established small businesses that face the same challenges and could benefit from the same cooperation. The export objective requires targeting distant markets such as Japan or the United States, which is irrelevant for rural tourism SMEs whose natural and most urgent market reorientation need is toward Nordic, Baltic and other European neighbors. Environmental and circular economy objectives carry expectations better suited to larger urban organizations than to regional associations and municipalities. A related but distinct concern raised in the interviews is that the indicator framework itself is difficult for first-time applicants to navigate: selecting from the Commission's prescribed indicator list and combining it with programme-specific indicators leaves many applicants uncertain about exactly what their project is expected to deliver, independently of whether the underlying thematic objective is a good fit for their organization.

These observations are consistent with a broader finding documented across the evaluation: the programme's thematic objectives (for natural and obvious reasons) were designed for a different context and a different participant profile than the border region organizations the targeted call was intended to activate. This misalignment is however as it currently stands not only an operational inconvenience but a structural constraint on what the programme has been able to do for these regions during the current programme period.

The partnership experience is broadly positive; Swedish participation remains limited

Partnership formation was not experienced as a significant obstacle by any of the interviewed organizations. Both existing partnerships and new ones formed through direct outreach worked well, with proximity, shared challenges and common interests identified as the key conditions for productive cooperation. Regular communication, including weekly project meetings, was described as an effective mechanism for maintaining momentum during implementation.

Swedish participation came up as a notable absence. One respondent observed that Swedish partners tend to join projects only when there is near-perfect alignment between the call priorities and their own current activities and strategic plans. The general resource level of Swedish organizations was also mentioned as a factor that reduces the incentive to partner with organizations from Estonia and Latvia, where project budgets feel less proportionate to the effort involved. Specific examples illustrate how narrow the pool of interested Swedish organizations can be even where applicants are motivated to look for them: attempts to find a Swedish partner for a proposed museum cooperation project and for an SME acceleration project were both unsuccessful despite active search. Interview evidence also points to a complementary explanation grounded in timing rather than willingness: building the kind of durable partnership that survives beyond a single call takes time and requires genuinely shared topics, and the period since the 2022 disruption has been too short for most border region actors to have identified and consolidated such common ground with Finnish and Swedish partners. Taken together, these observations suggest a similar implication: rather than expecting the targeted call mechanism to generate mature east-west partnerships directly, smaller, lower-stakes projects focused on capacity-building, networking and people-to-people contact may be a more realistic way to lay the groundwork for larger partnerships later on. This is consistent with the structural analysis of Swedish participation presented elsewhere in this evaluation.

Implementation is broadly smooth, while financial administration remains the most significant practical barrier

Implementation experience across the interviewed projects was generally positive. Prior cooperation experience between Estonian, Latvian and Finnish partners, combined with existing EU project management competence among the lead partners, contributed to effective and professional implementation. The reporting system was described as manageable, and the secretariat was consistently praised for its professional, non-intrusive and results-oriented approach.

The geopolitical situation has not directly disrupted project implementation, though it has created an indirect atmosphere of uncertainty, most acutely in Latgale, where the proximity to the Russian and Belarusian border and recent security incidents have increased the sense of risk for the local population.

The most consistently cited practical barrier is pre-financing and reimbursement delays. All interviewed organizations, regardless of country or project type, identified this as the most acute implementation problem; pre-financing is consistently described as preferable to post-financing arrangements. For smaller organizations without significant financial reserves, the need to front-load project costs and wait months for reimbursement creates genuine financial stress and deters potential partners from joining. Additional cost eligibility issues, including reimbursement rules for catering calculated on actual rather than projected participation, and the treatment of full travel days with no other activities, were raised as disproportionate burdens for organizations in remote regions where travel to partners in Finland or Sweden can consume an entire day.

A national government needs analysis converges with the evaluation's own findings

Separate from the Central Baltic process, an internal government analysis of development challenges in the border regions, including a workshop with regional representatives on what they need from Interreg-type cooperation has been ongoing. This analysis is reported to have found that the Russian aggression war's economic effects extend across nearly all of the country concerned, with only the largest cities in a relatively stronger position, and that the resulting investment needs are substantial and not something Interreg is positioned to meet. Within what cross-border cooperation could realistically support, the workshop identified two clusters of priorities that closely mirror the evaluation's own findings: economic reorientation, including new business opportunities, joint promotion of the cross-border area, entry into new export markets to replace lost Russian trade, and industrial symbiosis between businesses; and resilience, including cultural exchange and people-to-people integration, support to Ukraine's reconstruction,

and rebuilding a positive and secure image of the border regions for tourism purposes. The convergence between this independently generated needs assessment and the evaluation's own interview evidence strengthens confidence that these thematic priorities reflect a genuine and well-recognized regional need.

Regional actors have formally called for structural recognition of eastern border regions in the next period

The most significant contextual development for understanding this case study's implications for the next programming period is the formal statement addressed by regional authorities to the national authorities of the Central Baltic Programme in May 2026. The statement, signed by the Regional Council of South Karelia, the Regional Council of Kymenlaakso, the Association of Local Authorities of Ida-Viru County and the Latgale Planning Region, calls directly for the programme to better acknowledge the specific development needs of EU eastern border regions in the 2028–2034 period.

The statement notes that efforts to compensate regional disparities through the current programme have at best been only partially successful, that the thematic scope of calls and the complexity of partnership requirements have hindered effective participation from border regions, and that the regions most disadvantaged by the changed geopolitical situation should not be left to compete for Interreg funding with more established and better-resourced regions. It calls for differentiated conditions and targeted measures addressing security-related perceptions, lower investment confidence and structural disadvantages, and specifically invokes the Commission's proposed new Interreg-specific objective for more resilient regions bordering Russia, Belarus and Ukraine (COM(2025) 552, Article 7) as the regulatory basis for a dedicated sub-programme in the next period.

The statement identifies the following thematic areas as carrying significant added value for cross-border cooperation in the eastern border regions: industrial renewal and SME support; interregional cohesion and competence development; civil society strengthening and preparedness; youth participation and the right to stay; and improved accessibility and digital connectivity. It also notes that the Russia-related cooperation programmes that previously served these regions (which funded infrastructure, research, SME development and civil society initiatives at a scale that Central Baltic does not) played a particularly important role in southeast Finland and Latgale, and that no comparable replacement has yet been established.

This statement should be read as a substantive signal, not merely as background context. Its signatories are the regional authorities who are simultaneously the programme's intended beneficiaries and participants in its governance. Their assessment that the current programme does not sufficiently recognize or respond to their needs, addressed

directly to the programme's national authorities, constitutes a claim that the next period's programming process will need to address.

Conclusions and recommendations

The Latgale and Lõuna-Eesti case study reinforces and sharpens findings documented elsewhere in this evaluation. The targeted call activated organizations that had not previously participated in Central Baltic, and the programme's operational strengths, including accessible application process, responsive secretariat, flexible activity design, are genuinely valued by regional actors. At the same time, the case study makes clear that a geographic eligibility mechanism applied to existing objectives is not a substitute for objectives designed for border region realities. It also shows that this structural mismatch is compounded by significant variation within and between the two countries, evident in the divide between Lõuna-Eesti's longstanding active engagement and Kirde-Eesti's persistent passivity, and in the asymmetric starting positions of Vidzeme and Latgale within the programme's history. A geographic eligibility mechanism applied uniformly across such varied starting positions is unlikely on its own to close these gaps.

The table below summarizes the structural mismatch: what was, what replaced it, and what is still missing from the perspective of border regions:

Russia cooperation programmes - Until 2022	Central Baltic targeted call – The programme's response	Remaining gap – not yet addressed
✓ Infrastructure investments and building restoration ✓ Direct community-level projects and investment ✓ Regional secretariats giving border regions direct programme ownership ✓ 10% own-contribution requirement ✓ People-to-people cooperation and cultural exchange	✓ Geographic eligibility criterion ✓ Dedicated EU external border project manager and intensive outreach ✓ ~€22 million directed toward border regions ✓ New actors brought into the programme - Same seven objectives, no thematic adjustment - 20% own-contribution requirement retained	- No infrastructure or investment-type support - People-to-people cooperation and sustainable tourism are not fundable under current objectives - No thematic differentiation for first-time entrants from the established constituency - East-west integration has not materialized at scale; Swedish participation structurally low - Resilience, civil preparedness and economic reorientation not covered by current objectives

For the next programming period, and in light of both the evaluation evidence and the statement from regional authorities, the evaluators recommend the following:

- That the formal statement from regional authorities is treated as a substantive political input to the next programming process. The programming process should demonstrate how the next period's design addresses the priorities identified in the statement.
- That the next period is considered to include a dedicated measure for eastern border regions with its own thematic content and funding, designed around what these regions can realistically deliver and what they most urgently need - including economic reorientation, SME support, sustainable tourism oriented toward European neighbours, civil preparedness, and people-to-people cooperation. This direction is independently supported by interview evidence from both Estonia and Latvia, including a specific call for a fenced funding envelope for border regions, separate from the general programme budget, so that first-time and less experienced applicants are not required to compete head-to-head with the programme's established constituency.
- That the programme's avoidance of infrastructure-type financing is re-examined for the next period rather than assumed to be permanently out of scope. Data suggests that even a modest and carefully scoped capacity to support infrastructure-adjacent activity could meaningfully widen the applicant pool in regions where this is consistently identified as the most significant unmet need.
- That the eligibility rules most burdensome for peripheral organizations, including pre-financing requirements and cost eligibility rules for travel and variable-attendance activities, are reviewed with the specific situation of remote and resource-constrained organizations in mind.
- That the secretariat's in-person activation model, which demonstrably reached new actor types during the targeted call, is resourced as a standing function from the outset of the next period across all eastern border region geographies, and is extended in two specific ways supported by the interview evidence: organizing direct match-making events between border region organizations and potential partners, rather than relying on applicants to find partners through their own networks, and communicating explicitly and honestly, including in local languages, about what the programme can and cannot fund, so as to manage expectations in regions where engagement has so far been limited.
- That the small projects budget ceiling is reviewed for the next period. The current ceiling of 200,000 EUR is considered too low by interviewed organizations from peripheral regions, where project ambitions are constrained by the budget rather than by the availability of relevant activities or willing partners; at the same time, the instrument's accessibility for first-time border region applicants should be preserved as the ceiling is reconsidered.

- That simplified cost option rules, particularly for activities with variable participation rates and for travel days where no other activities are possible due to geographic distance, are reviewed with the specific circumstances of remote border region organizations in mind. For organizations in Latgale travelling to partners in Finland or Sweden, a full travel day with no other billable activity is not exceptional but routine and the current rules do not adequately reflect this.
- That a governance mechanism, such as an eastern border regions task force meeting alongside the monitoring committee, is established from the outset of the next period, providing a regular and structured forum for substantive deliberation on thematic priorities and implementation experience. This could be complemented by direct, low-threshold contact mechanisms between regional representatives and the secretariat outside formal committee processes.
- That information and awareness activities targeting potential new applicants in border regions actively foreground the experiences of current project partners, to counter persistent perceptions that EU-funded projects are excessively bureaucratic to implement. The interview evidence suggests that peer experience (that is, hearing from an organization similar to your own that the process was manageable) is more persuasive than programme-level communication about simplification.

6. Case study: Small projects

This case study assesses the functioning of the small projects instrument within the Central Baltic Programme during the 2021 to 2027 period. The analysis draws on survey responses from 20 of the 30 funded small projects, representing a response rate of 66%, which provides a solid empirical foundation for assessing how the instrument has been experienced by participating organisations. The survey was complemented by in-depth interviews with lead partners from five small projects covering a range of thematic areas and country contexts, including a digital skills and employment project targeting women in Estonia and Latvia, a museum services and inclusion project from Finland and Estonia, a project working with Roma communities in Finland and Latvia, and a project on accessible public services and disability inclusion from Åland and Sweden. Together, these interviews provide a qualitative depth that the survey data alone cannot offer, and they surface dimensions of the instrument's functioning that aggregate figures might obscure.

The small projects instrument is designed to widen participation in cross-border cooperation by reducing administrative and financial barriers, particularly for NGOs, small municipalities, educational institutions and organisations with limited EU project experience. These are actor types that the regular Interreg project format tends to under-serve: the combination of longer timelines, larger partnership requirements, more demanding indicator frameworks and higher financial pre-commitment creates barriers that are too high for many organisations with cross-border ambitions but limited institutional capacity to navigate.

The comparison table below illustrates the main differences between small projects and regular projects as well as key comparative findings made in the evaluation:

Category	Small Projects	Regular Projects
Purpose and ambition	Practical, small-scale solutions and quick results	Broader, strategic impact and significant change
Scope	For improving existing initiatives	For larger and more complex initiatives
Project budget	Projects up to 200 000 EUR	From 213 551 EUR to 4 000 000 EUR
Duration	Up to 18 months	Typically, longer
Application process	One-step	Two-step
Administration and reporting	Less paperwork, lighter reporting	More extensive
Financial management	Simplified cost management	Combination of real and simplified cost management
Typical applicant	First-time EU participants, NGOs, small municipalities	Established universities, regional authorities, experienced NGOs
Role of nCP's	Often decisive, sometimes the only route to discovering the programme	Valuable, but applicants more often already aware of the programme
Indicator framework	More acute difficulty, no prior familiarity to draw on	Easier for returning applicants familiar with the framework

6.1 Findings and analysis of the Small projects

The instrument succeeds in its core inclusiveness purpose, and this is most visible at the organisational level

The most fundamental finding from the small projects evidence is that the instrument works as intended at the most basic level: it attracts and enables participation from

organisations that would not engage with Central Baltic through any other route. This finding is not simply asserted in aggregate survey data but documented concretely in the interview evidence. Across the in-depth interviews, a consistent picture emerges of organisations for whom the small project format was not a convenient alternative but a necessary precondition for participation. An organisation working with Roma communities, with no recent EU project experience, states directly that it would not have applied had only the regular project format been available: limited liquidity, limited administrative capacity and the risk of working with a mobile and hard-to-reach target group made a smaller, lower-commitment instrument the only realistic option. A disability inclusion organisation from Åland similarly describes designing its project specifically around the small project format's constraints, rather than scaling up to a regular project, because the scope of the work they wanted to do was genuinely small and making it larger would not have made it better.

What these cases illustrate is not that small projects are a compromise but that they are the right instrument for certain types of cross-border cooperation. Modest, concrete, targeted cooperation between organisations that share a specific challenge, or approach, does not need to be scaled up to be valuable. The small projects instrument is Central Baltic's recognition of this, and the interview evidence confirms that this recognition reaches the organisations it is designed for.

NCP outreach is decisive for first-time applicants; programme reach is in significant part a function of nCP capacity

Across both the survey and interview evidence, the role of National Contact Points in enabling small project participation is consistently described as decisive in a way that goes beyond what is true for the regular project format. Several respondents describe the nCPs as the starting point of their engagement with the programme: not a support mechanism they accessed after finding the programme themselves, but the actor through which they discovered that the programme exists and that it was relevant to them. An Åland-based organisation describes being proactively contacted by an nCP before they had any awareness of the programme, which triggered the application process. Without that contact, the project would not exist.

The nCP's further play a role in partnership formation, which is a specific challenge for first-time applicants who have no pre-existing international networks. They are described to actively helping identify and connect with suitable partner organisations in another country, which is a function that goes substantially beyond information provision. This kind of active partnership facilitation is not formally part of the NCP mandate as typically described, but the evidence suggests it is one of the most valuable things NCPs do for

small project applicants, and that it makes the difference between a viable partnership and an intractable barrier.

The implication of this is that the programme's reach into the actor types the small projects instrument is designed for is not primarily a function of how well the programme communicates through digital channels but of how actively and resourcefully NCPs engage with communities of potential applicants. This is both an asset and a structural dependency, and its implications for how NCP functions are resourced and coordinated deserve attention in the next period's design.

The application process is manageable, but the indicator framework creates comprehension difficulties

The one-step application format is broadly appreciated and consistently described as more accessible than the procedures for regular Interreg projects. Most applicants were able to complete the application successfully, particularly with support from nCPs and thematic project managers from the Joint Secretariat. However, the indicator framework creates persistent comprehension difficulties that are more acute for small project applicants than for experienced Interreg participants, and the interview evidence surfaces a specific dimension of this problem that the survey data does not fully capture.

Several respondents describe not simply failing to understand what the indicators require but discovering that what the programme's indicator framework can accommodate does not fully match what their project was trying to achieve. One employment-focused project had defined its own outcome measure (the rate of participants achieving a positive placement in employment, training or further education) from the outset and considered this the most meaningful evidence of its work's impact. The available result indicators in the programme's framework did not accommodate this measure at the application stage, forcing the project to commit formally to something different from what it considered its most important outcome. The positive placement rate was eventually reported in the final report, but the disconnect between the project's own performance logic and the programme's formal measurement structure persisted throughout. This is a specific and concrete manifestation of the broader indicator framework problem identified across multiple evaluation questions: the framework measures something, but not always what matters most to the projects working within it.

A further observation concerns the quality and format of guidance on the indicator framework. At least one respondent notes that guidance videos, when they could be found at all, focused on explaining the programme's objectives rather than on helping applicants navigate the application procedure. This distinction is important. Understanding what circular economy or employment objectives are about is useful background knowledge, but it does not help an applicant understand how to formulate a result indicator

commitment or what the difference between an output and a result is in practice. Procedural guidance, designed around the specific questions that arise when completing the application form, is a different need from thematic guidance, and the current provision does not adequately serve it.

Flexibility constraints during implementation create disproportionate difficulties for small project teams

The interviews display a dimension of the implementation experience that does not emerge clearly from the survey data: the difficulty of making adjustments to activities or budgets during implementation, even when those adjustments are in the project's interests and do not affect the commitment to deliver the agreed results. An Åland-based organisation describes identifying mid-project that adding a physical meeting at the end of the project, as they had at the beginning, would improve their results, but finding it practically difficult to shift budget between categories to accommodate this. A disability inclusion project describes the unpredictability of working with participants whose life circumstances are more variable than anticipated, and the difficulty of adjusting the work plan when circumstances change without triggering a formal modification process.

It should be noted that the programme does provide flexibility rules that allow for certain adjustments within defined thresholds without requiring a formal modification process. The experiences described above may therefore reflect a gap in awareness of what is permitted rather than a genuine rigidity in the rules themselves or, in some cases, a situation where the desired adjustment fell outside what the flexibility rules cover. Clarifying the scope and limits of the flexibility provisions and ensuring that project teams are actively informed of them at the kick-off stage, would reduce the friction these cases illustrate without requiring any change to the underlying rules.

The underlying concern in both cases is about the relationship between compliance and outcomes. Projects describe feeling that the compliance mechanism is oriented toward ensuring that activities happen as planned rather than toward ensuring that results are achieved. When a project modifies its approach mid-implementation because it has learned something that makes its original plan less effective, this should in principle be welcomed: it reflects good project management and commitment to the objectives. In practice, the procedural constraints around budget modifications and work plan changes make this kind of responsive adaptation difficult, creating an incentive to stick with an agreed plan even when experience suggests an alternative would be better. One respondent articulates this directly: the goal should be the outcome, and the pathway to it should be flexible within reason.

The liquidity problem is acute for small NGOs, described in concrete terms that go beyond general complaint

The financial challenge created by the programme's reimbursement model is documented throughout this evaluation, but the small projects interview evidence gives it a specificity and concreteness that the survey data cannot. An employment-focused project describes how the combination of the reimbursement model, the 20% own co-financing requirement and the absence of pre-financing creates conditions under which small organisations are effectively financing public goods from their own reserves. The project in question worked with a target group for whom participation in training requires active facilitation and in some cases direct financial support, covering expenses that beneficiaries cannot meet from their own resources, which meant that the project was spending money that it would not recover for months, on activities whose very purpose was to benefit people without financial resources. The organisation was not profiting from this, was not building any organisational asset, and was not performing any function that a public body with a co-financing budget would not also need to perform. The question of why an NGO in this position should be required to carry a 20% financial risk for six to twelve months is, from the perspective of the organisation, difficult to answer.

A separate and specific observation concerns the private sector exclusion (except for non-profits) from partnerships. An employment project that would have benefited significantly from a private training provider as a formal partner was prevented from including one by the programme's eligibility rules and was forced instead to engage the provider as an external service contractor. This created cash flow problems of its own as the project had to pay invoices before receiving reimbursement and reduced the depth and flexibility of the cooperation compared to what a formal partnership would have allowed. The state aid rationale is understood, but in the small projects context, where the amounts are modest and the activities are clearly non-commercial in nature, the rule's consequences might be disproportionate to its regulatory justification.

The 18-month duration is appropriate for some project types and too short for others, and the instrument would benefit from greater flexibility

The interview evidence presents a nuanced picture of the 18-month constraint. For projects with clearly defined, time-limited activities such as a training programme delivered over a specific period, a workshop series, a pilot study, 18 months is generally adequate and, in some cases, the appropriate length for the type of work involved. For a digital skills training programme, for example, a longer duration might mean that the skills being taught become outdated before the training is completed. For a project working with communities whose circumstances are inherently unpredictable, such as

mobile populations, individuals with disabilities, groups facing multiple disadvantages, 18 months creates a tight and unforgiving timeline in which unexpected events, including illness among project staff, can create serious implementation difficulties.

A consistent observation across the interview data is not that 18 months is the wrong duration in absolute terms, but that the instrument could benefit from more flexibility in duration, allowing projects to be designed within a range (perhaps 12 to 24 months) based on what their specific objectives require. This is a modest and operationally straightforward change that could improve the instrument's fit for the diverse range of project types and target groups it serves.

Sustainability is driven by purposeful design rather than formal requirements, and the most durable results are those embedded in ongoing organisational work

The sustainability evidence from the small projects case study is consistent with the broader pattern documented across the evaluation. Results survive when they are embedded in the continuing work of the organisations that produced them, and when outputs are designed in formats that third parties can adopt without direct involvement of the original project team. An accessibility-focused project from Åland describes its results as having been built into a follow-on Erasmus project, which represents the strongest documented sustainability pathway: the outputs and networks developed through the Central Baltic project provided the foundation for a subsequent and larger cooperation effort. A Roma inclusion project describes its sustainability not primarily in terms of the specific training materials produced but in terms of what the project raised and clarified for the organisation itself: questions about its approach to work in Latvia, relationships with partner organisations, and the viability of certain activities with a mobile target group. The project's most durable contribution is the organisational learning it generated, which shapes the organisation's future work regardless of whether it applies for further Interreg funding.

What is also observed is the limitation of formal sustainability planning as a driver of actual sustainability. Several respondents note that they wrote sustainability sections in their applications because they were required, but that the practical sustainability of results depends on conditions that formal planning cannot control. These include whether partner organisations continue to prioritise the cooperation, whether the target group remains accessible, whether institutional leadership in partner organisations remains committed to the approach. Requiring more detailed formal sustainability plans would not change these conditions; it would rather only generate more paperwork. What could help is programme-level support for the conditions that enable sustainability, including post-project networking opportunities, active promotion of sequential cooperation, and

communication that connects potential follow-on applicants with the outputs of completed projects.

6.2 Conclusions and recommendations

The small projects instrument is performing its core function reasonably effectively. It attracts first-time participants, produces results, and facilitates the kind of cross-border learning and network development that the programme's objectives require. These are achievements that justify retaining the instrument in the next period. At the same time, a set of structural problems are identified, such as disproportionate administrative burden, acute liquidity constraints, inflexible duration and private sector exclusion (to a great degree), that reduce the instrument's effectiveness and, more significantly, undermine its inclusiveness. These are not peripheral inconveniences, as they determine who can realistically participate and on what terms. For the next programming period, the evaluators recommend the following:

- The small projects instrument should be explicitly protected and its budget maintained or expanded. Its value is distinct from the regular project format, and its target audience is different. It should not be treated as a scaled-down version of the regular project but as a qualitatively different instrument serving a qualitatively different purpose.
- The administrative requirements could be reviewed specifically for small projects, with a view to reducing duplication and proportioning expectations to the scale of the work. Allowing national controller approval to serve as sufficient financial verification at the partner level and reducing the frequency and complexity of programme-level reporting for smaller projects should reduce the administrative burden.
- The liquidity problem requires a direct financial response. Modest pre-financing for lead organisations below a defined financial capacity threshold, combined with shorter reporting cycles and faster reimbursement, would reduce the cash-flow gap to a level that small NGOs without reserves can manage. The 20% co-financing requirement should perhaps be reviewed in the context of projects working with non-commercial target groups, where the rationale for requiring the organisation to carry financial risk is weakest.
- The duration of small projects could be made more flexible, allowing projects to be designed within a range based on what their specific objectives require rather than fixed at 18 months across all project types.
- Private sector eligibility should be reviewed, if possible, in the small projects context. If the state aid framework permits more flexible arrangements for modest-budget projects with clearly non-commercial activities, these should probably be introduced. If not, clearer guidance on how to structure private sector

engagement within existing eligibility rules could reduce the operational friction that the current restriction creates.

- Guidance on the indicator framework should be substantially improved for first-time applicants, with practical, procedure-focused materials that address the specific questions that arise when completing the application rather than the thematic content of the programme objectives. This guidance should include clear examples of how different types of project idea translate into result indicator commitments, including cases where a project's outcomes do not map directly onto the programme's available indicators.

7. Case study: Legacy projects

This chapter and case study presents a qualitative case study examining the net impact of selected legacy projects funded under the Interreg Central Baltic Programme during the programming periods 2007–2013 and 2014–2020. The purpose of the case study is to assess what remains of earlier programme investments and how these investments have contributed to lasting economic and regional development outcomes in the Central Baltic area.

The analysis focuses on projects implemented under the programme priority related to a competitive economy. This priority was selected because it is present across both programming periods, accounts for a substantial share of programme funding, and is directly aligned with the evaluation’s emphasis on economic sectors, competitiveness, and regional development.⁶

The assessment of net impact is structured around two complementary analytical dimensions. The first concerns the sustainability and durability of results, examining whether project outputs, methods, organisational capacities, partnerships, and institutional arrangements have been maintained, adapted, or institutionalised beyond the funding period. The second concerns the spreading and scaling of results, analysing whether and how project results have been transferred horizontally to other actors, regions, or sectors, and/or scaled vertically within organisations, value chains, or policy frameworks.

The case study draws on a combination of document review and qualitative interviews. Eight projects have been selected for in-depth analysis: four from the 2007–2013 programming period and four from the 2014–2020 period. Together, these projects provide insight into how results from different programme phases have been sustained, adapted, or developed over time.

Below is a table that functions as a summary good practices and practices to avoid in order to pinpoint issues that helps projects create long-term value. The points practices are derived from this case study. The individual project cases are presented and discussed in detail in the chapters below.

⁶ In the 2014-2020 programming period, the priority was named “Competitive economy” (Priority 1), while the corresponding priority in the 2007-2013 period was named “Economically competitive and innovative region” (Priority 2).

Aspect	Identified good practices	What to avoid
Strategic alignment	Strong strategic alignment from the start	Lack of ownership after project end
Capacity vs activities	Focus on capacity building, not just outputs	Overfocus on activities instead of implementation
Embedding results	Embed results into core operations	No viable post-project model
Partnerships	Build well-balanced partnerships	Poor partner alignment
Benchmarking	Meaningful cross-border collaboration and benchmarking	Benchmarking against irrelevant actors
Adaptation	Stay close to market and end-users	Failure to adapt to external constraints
Continuity	Design projects as part of a longer trajectory	Dependence on individuals or shifting priorities
Scaling and dissemination	Develop concrete, user-oriented service models	Limited dissemination and scaling

7.1 Legacy projects from the 2007–2013 programming period

BTP – Baltic Training Programme

The Baltic Training Programme (BTP) was implemented from October 2009 to June 2012 and was developed within the broader context of the EU Strategy for the Baltic Sea Region (EUSBSR). According to the project sources, the initiative was closely linked to the strategy and did not arise opportunistically from a call for proposals, but was instead developed in response to priorities identified at macro-regional level. In this sense, the project can be understood as a practical implementation of strategy objectives within the field of vocational education and training.

The project addressed a gap in vocational education and training (VET), namely the comparatively limited degree of international mobility compared to higher education. The source material highlights that mobility has historically played a role in vocational training (e.g. apprenticeship traditions), but that such mobility is less common in modern VET systems. This situation was associated with constraints on skills development, labour mobility, and opportunities for cross-border learning.

A key feature of BTP was its design as part of a sequence of related initiatives. The project was not intended as a stand-alone intervention, but as an initial step in a chain of projects, where experiences and working models could be developed and subsequently

applied in other programmes and geographical contexts. The implementation included work on enabling conditions for mobility, such as the use of European frameworks for qualification comparability (notably ECVET), as well as the development of modular training approaches across countries. Activities included practical work with education providers to define learning outcomes and align training content across national systems.

During implementation, participating organisations gained practical experience in organising cross-border vocational mobility. This included defining learning objectives, structuring training modules, and applying European frameworks for qualification recognition. The project also involved cooperation with employers, including raising awareness among companies of the possibility to recruit from other countries – something that, according to the sources, was not always widely recognised prior to the project. At the same time, some challenges were identified, including concerns among employers about losing employees when they participated in international mobility, highlighting the importance of building trust and demonstrating mutual benefits.

A central outcome of the project was therefore the development of organisational competence rather than the establishment of permanent operational structures. Participating education providers and other organisations increased their capacity to implement international vocational projects and gained familiarity with European frameworks and methods for cross-border cooperation.

This capacity-building effect was reflected in subsequent initiatives. The project sources explicitly mentions follow-up projects in Interreg South Baltic and Interreg Nord, which built on and adapted the BTP approach in new territorial contexts. These initiatives indicate that elements of the model were reused and further developed beyond the original project. The findings also show that the project attracted attention at programme and EU level, including interest from the European Commission.

In terms of sustainability, the project's effects are primarily linked to continued competence, practices, and relationships. Participants maintained contact and, in some cases, continued cooperation beyond the project period. The project is also described as contributing to increased “international maturity” among organisations involved in vocational education and training, as well as among employers engaged in mobility activities. In addition, approaches developed during the project, including the use of European qualification frameworks, continued to inform practices after the project's conclusion.

At the same time, the findings highlight structural constraints that limited further development. In particular, vocational education policy is not a fully harmonised policy area at EU level, which restricts the extent to which fully integrated transnational education programmes can be developed. Financing structures and regulatory differences were also noted as limiting factors. Furthermore, the continuation of activities depended on organisational priorities. After several follow-up projects, the lead organisation chose to discontinue work in this thematic area due to changes in strategic direction.

From a net impact perspective, the main effects of BTP are associated with the continued use and adaptation of its approaches in subsequent projects, rather than with the long-term continuation of a specific project structure. The project contributed to developing working methods, organisational capacity, and collaborative relationships that were used in later initiatives, illustrating how project-based interventions can support longer-term developments through learning and reuse of models.

INNOREG – Development of Innovative Business Models for Ensuring Competitiveness

INNOREG was implemented from June 2010 to May 2013 under the Southern Finland–Estonia Sub-programme, with the objective of strengthening regional competitiveness and supporting the development of innovative environments. The project addressed challenges related to globalisation and increasing competition in the mechanical engineering and mechatronics sectors, which are important to regional manufacturing and exports. At the same time, it responded to the lack of sustainable operational models for business support organisations and the fragmented nature of engineering disciplines, particularly the need to transition towards a multidisciplinary mechatronics approach.

The core focus of the project was to build institutional capacity by developing self-sustainable business models for science parks and incubators. This included work on service provision for startups and scaling companies, as well as organisational development and long-term planning. In addition, the project contributed to the development of a “Region of Knowledge” technology platform and a long-term development plan based on expert analysis, surveys, and pilot training activities.

Cross-border cooperation formed a central component of the project. Through collaboration between Estonian and Finnish partners, institutions were able to exchange practices and benchmark their service delivery systems against established Nordic approaches. This process supported organisational learning and helped align services and manufacturing support capacities with international standards.

During implementation, INNOREG delivered several concrete outputs. A key result was the comprehensive study *“The capability and competitiveness of the mechatronics field in the North-Estonia and South-Finland region”*, which mapped technological capabilities, research and development potential, and market conditions. The project also produced communication materials, including a promotional film illustrating cooperation between public actors, research institutions, and private companies.

In parallel to these analytical and developmental activities, the project contributed to the preparation of a mechatronics laboratory by providing technical specifications, identifying infrastructure gaps, and facilitating industry validation. While the construction of the laboratory itself was carried out through separate investments, the project provided essential groundwork that supported its realisation.

An implementation-related observation highlighted in the source material is that internal systems and practices were developed and optimised relatively quickly. As a result, parts of the later project stages were perceived as less intensive once key organisational improvements had already been achieved.

In terms of sustainability, the project's results have been retained and integrated into the operations of the participating science park organisation. The service models and engagement methodologies developed during the project period are described as forming a permanent foundation for how services are delivered to startups and scaling companies. These approaches were directly applicable to the organisation's core activities and therefore continued beyond the project period.

More broadly, the project contributed to the development of a comprehensive service model that supports a sizeable operational structure, serving both startups and scaling companies on an ongoing basis. This reflects a transition from initial development and learning towards a stable operational model embedded within the organisation.

The project also generated lasting collaborative relationships. While some partners have since changed focus or ceased operations, the core network of organisations, particularly among science parks, incubators, and accelerators, remains active. Over time, cooperation has evolved from institutional knowledge exchange towards more practical collaboration aimed at supporting companies' market access and internationalisation.

In terms of spreading and scaling, the project contributed to the development of practices that have been shared through international networks of science parks and innovation intermediaries. The participating organisation has engaged in knowledge transfer and peer-to-peer learning, supporting the development of similar service models and operational practices in other regions. Examples include the transfer of approaches to a range of countries, as well as the uptake of specific operational elements such as programme structures and service models.

The project also contributed to the development of collaboration models with universities, supporting the transition of research activities into business incubation through structured processes. These forms of cooperation have become part of ongoing operations and illustrate how project-developed practices can be integrated into broader innovation support systems.

Overall, INNOREG represents a case where project results have been sustained primarily through their integration into organisational structures and service provision. The project contributed to strengthening institutional capacity, developing service models, and supporting cross-border cooperation that has continued in adapted forms after the project period. Its longer-term effects are therefore reflected in the continued use of developed approaches, the evolution of collaborative networks, and the application of project-generated practices in both local and wider contexts.

SERVICED – Service Design for Competitive Economy

SERVICED was implemented during the period September 2009 to December 2012 within the Southern Finland–Estonia sub-programme and aimed to strengthen the position of the Central Baltic region in the field of service design through a Finnish Estonian partnership. Service design in this context refers to activities aimed at improving service quality, customer experience, and the interaction between service providers and customers.

At the time of implementation, the project focused on exploring and clarifying the concept of service design, particularly in relation to immaterial services and customer experience. A key objective was to better understand what service design competence entails and how education systems could respond to this emerging area. The project also aimed to anticipate the future development of design competence by applying methods from futures research.

The project was carried out through a partnership between Lahti University of Applied Sciences (lead partner) and Tallinn University's Institute of Futures Studies. The collaboration combined expertise in applied design education and futures research. Through this cooperation, the project sought to develop a multidimensional understanding of service design and its potential role in education and practice.

During implementation, SERVICED combined analytical work, experimentation, and dissemination. Key activities included testing different methods and tools, organising cross-border events, and producing publications. Events and training activities were organised in Lahti, while in Tallinn the project supported the organisation of Estonia's first service design conference. According to the interview material, the project had a particularly strong impact on the Estonian side, where new ideas could be more directly reflected in decision-making processes.

In terms of outputs, the project delivered pilot education activities and developed the basis for future curricula, particularly within applied higher education. A central result was the creation of a 30 ECTS specialisation module in service design at Lahti University of Applied Sciences. In addition, the project produced a research publication on service design competence and an article collection in *Service Design Magazine*. Benchmarking activities extended beyond the Central Baltic region, including exchanges with actors such as Stanford's D-school in the United States.

An important observation from the project was the significant impact of conferences and events. These activities attracted a wide range of participants, including practitioners, educators, and decision-makers interested in updating their understanding of service design and customer experience. The timing of the project was perceived as favourable, as interest in these topics was increasing, and the project contributed to introducing and discussing emerging concepts in the region.

In terms of sustainability, the project's legacy is primarily reflected in competence development, education, and professional practice rather than in the continuation of a formal project structure. The results influenced curricula, particularly in Lahti, where the project served as a source for the development of course content and specialisation studies. Individuals involved in the project continued to develop courses and apply service design approaches in educational and professional contexts.

More broadly, the project contributed to strengthening the role of customer experience and service thinking within education. According to the interview material, these perspectives have become increasingly integrated into multiple fields, including engineering and nursing education. This indicates that the project contributed to wider awareness and use of service-oriented approaches, although it is difficult to identify specific organisations beyond the immediate partners where these practices were systematically adopted.

The project also generated lasting networks and relationships. While the field of service design has evolved significantly over time and its terminology has changed, contacts established during the project have remained relevant. Follow-up initiatives were considered and some project ideas were further developed, although not all plans materialised in continued formal cooperation. At the same time, elements of the SERVICED approach were applied in other contexts, particularly in the public sector, for example in urban and city design activities in Lahti.

In addition, the project contributed to further development beyond its original scope, including the establishment of a spin-off company that sought to commercialise and productise methods developed within the project.

Overall, SERVICED represents a project where long-term effects are primarily linked to learning, competence development, and the dissemination of concepts rather than to the continuation of specific project structures. Its legacy is reflected in continued use of service design approaches in education and practice, the persistence of professional networks, and the adaptation of its ideas in selected contexts.

SMEDGE – Supporting SME Growth and Market Entry in the Central Baltic

SMEDGE was implemented from March 2009 to October 2011 and was established to stimulate the growth of small and medium-sized enterprises (SMEs) in the Central Baltic region by addressing the low rate of successful market entries into neighbouring countries. The project addressed several key barriers faced by companies expanding abroad, including language and cultural differences, lack of local knowledge regarding taxation and law, and difficulties in finding reliable partners.

The project's core idea was to develop a "soft landing" service model, that is, a structured combination of market research, training, brokerage events, and consultation services intended to help SMEs enter foreign markets more cost-effectively and to minimise capital risks during expansion. As part of developing and distributing this model, SMEDGE also organised workshops with business incubators and technology/science parks.

Beyond direct company support, SMEDGE placed emphasis on capacity building within business support organisations. The source notes that many science parks and incubators were at an early stage in providing value-added services, and cross-border cooperation was used to build relationships, benchmark services, exchange best practices, and learn from established Nordic systems - ultimately aiming to align service methodologies across the region. The cooperation platform included partners such as the Latvian Technological Center, Mjärdevi Science Park (Sweden), HUMAK University of Applied Sciences and Aalto University School of Economics Small Business Center (Finland), and business support and credit management foundations in Estonia.

During the project period, SMEDGE delivered a comprehensive "soft landing" support package targeted at technology and creative companies entering Central Baltic markets. The package included initial market research, business consultations and mentoring, flexible conditions for business accommodation, and support with legal procedures and recruitment.

A major reported result was a fundamental transformation of the Science Park's operational model. Drawing on Nordic best practices, the project enabled a transition from a limited understanding of incubation toward a more systematic approach to business support. This included launching the park's first acceleration programs and establishing a mentor pool consisting of 100–150 external experts, described as a system that remains integral to the organisation's value proposition.

In sustainability terms, the project results are described as having served as the foundation for the Science Park's core service portfolio and business model, with the methodology developed during SMEDGE remaining a core framework for current operations. The source further states that the Science Park's full-service model has been developed and built upon outcomes from the first programming periods, enabling a team of 50 staff members to serve approximately 100 startups and 80–100 scaling companies annually; these outcomes are described as institutionalised and forming a permanent foundation for service design and delivery. While the original models have been maintained, they are also described as having evolved into a higher-capacity system where much of the team is dedicated to service development and delivery, and the external mentorship structure continues as a vital component.

The project sources identify partnership composition as a critical enabling factor: specifically, a balance between "strong innovators" providing best practices and organisations capable of executing those practices. It also notes a hindering factor:

occasional lack of alignment in partners' operational models. In addition, the source observes that benchmarking against organisations with very different goals (for example research universities) was less effective than collaborating with peers focused on company success.

SMEDGE is also described as having generated relational and institutional legacy through sustained cross-border relationships, particularly among science parks, incubators, and accelerators. The cooperation reportedly evolved from peer-to-peer learning among institutions toward a more company-centric collaboration, facilitating market access (including directing companies to investment opportunities or specialised incubation programmes in partnering countries). This relational legacy is also described as being maintained through joint development of new project concepts, including follow-up initiatives under frameworks like Horizon.

Regarding spreading and scaling, the source states that the Science Park evolved from learner to mentor through international networks such as the International Association of Science Parks, engaging in systematic knowledge transfer and peer-to-peer learning. It reports replication of service models and operational practices in various regions, including Montenegro, Serbia, Turkey, Poland, and the Baltic states. The source also states that other science parks frequently copied entry/exit criteria, focusing on prototypes and scalability at the start, and fundraising or revenue generation at the conclusion. In addition, it describes a business model benchmark involving a holding company where the park takes micro-equity in exchange for services, with exit proceeds reinvested into service provision.

The project sources further note integration of results into regular operations through a structured collaboration model with a university, described as creating a systematic process for research commercialisation and a consistent flow of research teams into business incubation, including regular screening and transition through mutual monthly evaluations and a defined servicing model.

At a broader level, the source frames early Central Baltic projects (including SMEDGE) as catalysts for accelerated service portfolio development. It states that Central Baltic project funding provided financial means and personnel capacity to launch comprehensive services approximately seven to eight years sooner than would have been possible otherwise, and that this support enabled a move beyond a technology-agnostic approach toward defining specific strategic verticals and sectors. The project source also presents indicative economic figures linked to the performance of approximately 190 supported startup and scaling-phase companies, stating that in the "last years" these businesses fundraised 34 million euros in private capital and generated approximately 780 million euros in export revenues. Finally, it characterises a lasting impact as the creation of a unique cash-flow-positive operational model that supports sustainability as a publicly owned business support entity.

From a net impact perspective, SMEDGE's vertical impact is described through the embedding of the soft-landing methodology, acceleration practices, and mentorship structure into the Science Park's core service portfolio and operational model. Its horizontal impact is described through knowledge transfer and uptake of operational frameworks by other organisations and regions via international networks

7.2 Legacy projects from the 2014-2020 programming period

SPRINGBOARD – Cross-border Startup Acceleration in the Central Baltic

Springboard was implemented from November 2015 to January 2018 as a cross-border startup acceleration project aimed at increasing the capacity to create internationally oriented startups in the Central Baltic region. According to the project material, startup ecosystems in the participating regions were not clearly structured or easily accessible to potential entrepreneurs. There was limited information available and no single programme that combined the different stages of startup development, such as ideation support, structured acceleration, mentoring, and matchmaking.

The project brought together six partners from Riga, Turku, and Tallinn, with each city represented by a university and a business development organisation. This configuration combined education and business support functions and enabled collaboration between actors with different roles within local entrepreneurship ecosystems. The project leadership was responsible for coordinating activities across the six partners and ensuring that the programme functioned as a coherent whole.

Springboard was structured as a ten-week acceleration programme, implemented in three consecutive rounds. During each round, the programme ran approximately three times per week and included both local and joint cross-border activities such as mentoring, training, team-building, and common events across participating cities. Despite technical limitations at the time, including relatively slow internet connections, the project succeeded in engaging many participants and organising cross-border interaction.

In total, 81 teams and 214 participants took part in the programme, exceeding the original targets. The project also resulted in the establishment of 18 companies, including four joint cross-border startups, indicating that international team formation was achieved in practice.

A central result of the project was the development of a structured approach to early-stage startup acceleration. The programme included elements such as application and selection procedures, interviews, planning discussions with teams, mentoring, and pitch events. According to the source material, this structure helped participants who initially lacked

knowledge about how to develop a business idea into a startup. Cross-border mentoring and access to international networks were also key components, allowing teams to draw on expertise from different countries and to establish contacts that could support business development.

In addition to supporting startups, the project contributed to organisational learning and network building among participating institutions. Staff developed competence in running acceleration programmes, and partnerships between organisations were strengthened through joint implementation and continued collaboration. The project also attracted engagement from experienced entrepreneurs and business leaders, many of whom contributed on a voluntary basis as mentors and in some cases became investors or partners to participating startups.

In terms of sustainability, the project's results have not been preserved as a single, unchanged programme. The data indicates that acceleration activities have continued across the region, but in adapted forms and under changing conditions. Organisational restructuring and reduced funding availability, particularly in some regions, have influenced how such programmes are implemented. At the same time, key elements introduced by the project, such as structured acceleration, cross-border mentoring, and B2B matchmaking, are still being used.

The durability of results has also been affected by broader trends, including a reduction in startup activity in some contexts and constraints on funding for this type of support. Nevertheless, the project is described as having provided a model that is considered effective and result-oriented, and feedback from participants has contributed to its ongoing development. A further round of similar activities has been initiated, indicating continued relevance of the underlying approach.

The project also generated continued networks and partnerships. The sources describes how collaboration evolved into both follow-up initiatives and new forms of cooperation, rather than a single continued project. Networks among entrepreneurs, mentors, and support organisations persisted and were used in later activities, and the number of connections between actors increased over time.

Regarding spreading and scaling, the source indicates that similar approaches have been adopted in several cities, including Turku, Gävle, Västerås, and Tampere, and that comparable acceleration programmes exist in other locations. At the same time, the data shows that it is difficult to attribute these developments directly to the project alone, given the time that has passed and the broader evolution of startup ecosystems.

From a broader perspective, the project is described as having contributed to increased cooperation between different types of actors (often referred to as “triple helix” collaboration) and to the development of regional entrepreneurial ecosystems. The sources also state that supported companies have contributed to economic activity,

including employment and tax revenues, although these outcomes are described in general terms rather than attributed to specific measurable effects.

Overall, Springboard represents a project where the main long-term effects are linked to the development of working methods, networks, and organisational capacity rather than to the continuation of a specific programme structure. Its legacy lies in the continued use and adaptation of structured acceleration approaches, cross-border collaboration practices, and the experience gained by participating organisations in supporting early-stage startups in an international context.

BreedExpo – Meta-cluster for Exporting Breeding Animals to New Markets

BreedExpo was implemented from April 2019 to January 2022 with the objective of supporting agricultural producers in Estonia, Finland, and Latvia in exporting breeding animals to new markets. The project was based on the recognition that these countries possess strong expertise in cattle breeding, particularly in larger farms, and that expanding exports to new markets could contribute to sector development by generating additional income and enhancing livestock quality. The project aimed to facilitate access to target markets such as Kazakhstan, Georgia, and Ukraine through coordinated cross-border cooperation.

The project brought together sector-specific organisations representing large networks of farmers and producers in each participating country. Each partner was responsible for mobilising companies and farmers nationally, while export-related activities were planned and implemented jointly. This included marketing, participation in exhibitions, trade delegations to target markets, and hosting potential clients from these regions. In addition, the project included capacity-building activities such as joint cross-border visits and national seminars aimed at increasing farmers' knowledge of export processes, requirements, and market conditions.

During the project period, BreedExpo engaged approximately 600 farmers through seminars, exchange visits, exhibitions, and related activities. Around 100 farmers became directly involved in export activities, resulting in confirmed sales of breeding animals with a total value of approximately 2.7 million euros. While these outcomes were in line with expectations, the level of participation was described as a positive outcome, as engagement exceeded initial plans.

A distinguishing feature of the project was its focus on concrete business activities. Export processes required compliance with veterinary, safety, and certification standards, and the project supported participants in navigating these requirements through cooperation with relevant national authorities. This practical orientation contributed to the development of routines for managing regulatory procedures and enabled farmers to gain direct experience with international trade conditions.

In terms of sustainability, the project's results are described as durable within the sector. Established networks and market contacts have remained active, and business relations between farmers in the participating countries and buyers in the target markets have continued beyond the project period. At the same time, external factors have required adaptations. For example, geopolitical developments have affected logistics, including the closure of transit routes through Russia, which has made exports to Kazakhstan more difficult, and adjustments to transport methods for deliveries to Georgia. Despite these challenges, cooperation has continued, although activity levels in some markets have changed.

The project also contributed to continued collaboration among partner organisations. While cooperation existed prior to the project, BreedExpo expanded and strengthened these relationships, and partners have continued working together in follow-up initiatives such as BreedExpo 2. This subsequent project broadened cooperation to include additional products and services, such as breeding materials, technical expertise, professional consultations, and feed additives, indicating further development of the initial approach.

In terms of spreading and scaling, the project's impact has largely remained within the cattle breeding sector. The sources note that the highly specialised and regulated nature of livestock export limits diffusion into other sectors. However, scaling has occurred within the sector itself through follow-up projects and the continued use of the cooperation model and export practices.

At a broader level, the project contributed to changes in how participating farmers view their business opportunities. The findings indicate that farmers increasingly recognise the value of exporting high-quality breeding animals, rather than relying solely on domestic markets or lower-value sales channels. This shift in perspective is described as supporting enhanced competitiveness and a more developed approach to livestock commercialisation.

From a net impact perspective, the main effects of BreedExpo are reflected in continued business cooperation, established export practices, and the development of cross-border networks among sector organisations. The project contributed to the creation of working methods and partnerships that remain in use and have been further developed in subsequent initiatives, demonstrating how coordinated cross-border cooperation can support export activities in specialised agricultural sectors.

CB Health Access – Access to Distant Markets in Health and Wellness

CB Health Access was implemented from September 2015 to December 2018 with the objective of supporting innovative health technology companies in accessing distant international markets. The project responded to a need to create a structured pathway for

companies seeking to enter complex non-European markets, characterised by demanding regulatory environments, high entry costs, and specific customer requirements. In this context, the project aimed to move beyond general capacity building toward direct commercial outcomes by preparing companies for market entry and supporting export activities.

The project was built around a cross-border meta-cluster approach, bringing together specialised organisations from Estonia, Finland, Sweden, and Latvia. Partners included science parks, cluster organisations, and export-focused actors such as Tartu Biotechnology Park, Turku Science Park, Swedish Medtech, Enixus Baltics, and Swecare. Through this cooperation, the project facilitated the sharing of business models, alignment of thematic focus areas (e.g. life sciences and digital health), and joint responses to international market entry challenges. The initiative focused on a limited number of target markets, specifically South Korea, the United States, India, and Uganda.

During implementation, CB Health Access provided a structured support framework for participating companies. This included market intelligence gathering, adaptation of products and services to local conditions, and the organisation of business missions. Expert market consultants were actively involved in preparing companies for entry into these markets. In total, 58 SMEs from the participating countries were engaged in the project.

The project resulted in several concrete commercial outcomes. According to project sources, participating companies achieved five confirmed sales, four investments, and one signed business partnership agreement. In addition, indirect outcomes included preliminary cooperation agreements, test marketing initiatives, hospital studies, and new collaboration projects, with several companies remaining in negotiation or regulatory processes at the end of the project period.

The project also contributed to organisational development. The data describes how participation in CB Health Access supported the establishment of health technology as a strategic focus area within the involved science park organisation. During and after the project, a health technology cluster developed from approximately ten companies into a broader network of around sixty companies, providing a basis for continued service delivery and business development activities.

In terms of sustainability, the project's results are described as being integrated into ongoing operations. Health technology has remained a core focus area, supported by dedicated staff and a network of external mentors. The service models and working methods developed during the project continue to inform how companies are supported, including acceleration and scaling activities.

The findings also highlight enabling and hindering factors affecting sustainability. A key enabling factor was the early decision to treat health technology as a long-term strategic

focus. At the same time, challenges included differences in organisational maturity among partners and varying levels of export readiness among participating companies.

The project generated continued cross-border cooperation and networks. While some partner organisations changed or ceased operations, collaboration has persisted among active partners and through follow-up initiatives. These networks continue to support activities such as business missions, company exchange, and access to international markets, as well as the joint development of new project ideas under programmes such as Horizon.

In terms of spreading and scaling, the project's methods and practices have been integrated into the science park's core service model and shared through international networks. The organisation has engaged in knowledge transfer and peer-to-peer learning with other science parks and incubation centres, supporting the uptake of similar approaches in several countries.

The data also indicates broader influence beyond the immediate project. Experiences from CB Health Access are described as having contributed to the initiation of a national cluster organisation strategy, leading to the establishment of field-specific clusters in areas such as health technology, information technology, electronics, and mechatronics. This reflects a more structured approach to supporting sector-specific innovation and export readiness.

From a broader perspective, the project's long-term effects are linked to the continued operation of health technology support structures, the development of a cross-border meta-cluster, and the integration of international market access into business support activities. The project contributed to strengthening cooperation, building organisational capacity, and developing working methods that remain in use and have been further developed in subsequent initiatives.

CAITO – Meta cluster for Attracting the Japanese Tourism Market

CAITO was implemented from July 2016 to March 2020 with the objective of supporting rural tourism actors in Estonia, Latvia, and Finland in accessing the Japanese tourism market. The project aimed to create a cross-border meta-cluster that would enable the participating countries to jointly develop and present rural tourism products for Japanese travellers. The initiative was based on previous research indicating that Japanese tourists often visit several countries during a single trip, making multi-country cooperation a relevant approach for improving competitiveness in long-distance markets.

The project also addressed low utilisation of rural tourism capacity (estimated at around 33%) as well as strong competition in established European markets. By working jointly, the participating countries aimed to better match the expectations of long-distance travellers and strengthen their position in international tourism.

CAITO was implemented through a partnership of seven organisations, combining four higher education institutions and three destination-level tourism organisations. Universities contributed analytical and strategic expertise, while destination-level actors were responsible for engaging rural tourism providers and coordinating implementation at the local level. This structure enabled the project to combine research-based planning with practical outreach and implementation.

During the project period, CAITO focused on developing both visibility and market readiness. Key outputs included the creation of a project website, a social media presence, and thematic promotional materials. The project also supported participation in tourism fairs in Japan, including seminars and business meetings, and implemented a familiarisation trip programme that brought Japanese media representatives and tour operators to the region.

These activities resulted in the creation of new tour packages and media visibility in Japan. In addition, an important outcome was the improvement of participating tourism providers' skills, particularly in product development, destination management, and working with international markets. According to the findings, participants gained practical knowledge on how to develop tailored tourism products and better respond to the expectations of long-distance visitors.

In terms of sustainability, the project's results have been maintained through continued cooperation and integration into subsequent initiatives. Nearly all partners have continued working together in follow-up projects such as *Rural Lifestyle* and *Light in the Dark*, and regularly collaborate on new project applications. Digital outputs from CAITO and follow-up initiatives have been integrated into a shared resource, providing a single access point for market information and reducing fragmentation across project websites. Some outputs, such as printed brochures, have lost relevance over time, while remaining accessible online.

Project results have also been integrated into education and practice. At the Estonian University of Life Sciences, project findings are used in Bachelor's and Master's level curricula, where the Japanese market serves as a case study for long-distance tourism. At the same time, local tourism providers have applied the knowledge gained, particularly regarding cultural differences and market requirements, contributing to a more market-oriented approach to service provision.

Several enabling factors supported the continuation of results. These included the involvement of destination-level organisations, the ongoing engagement of a Japanese market expert, and support from the programme coordinator during implementation. At the same time, external factors such as the COVID-19 pandemic and the war in Ukraine reduced tourism flows from Japan, even though the cooperation structures and networks remained in place.

The project also led to continued and evolving partnerships. While most partner organisations have maintained cooperation, in some cases collaboration with individual partners has become more limited due to varying levels of engagement. Overall, the project network remains active and continues to support joint activities and knowledge exchange.

In terms of spreading and scaling, the CAITO approach has been applied in subsequent projects and extended geographically. Project results and methods have been transferred to initiatives involving additional regions such as Sweden, the Åland Islands, and Lithuania. The participation of national tourism boards also facilitated dissemination of results into broader strategic discussions.

The project further contributed to policy-related discussions by identifying practical barriers to tourism development, particularly in relation to cross-border transport and booking systems. Findings on issues such as misaligned public transport schedules and language barriers in booking systems were presented to national authorities, and in Latvia this led to formal engagement with authorities to address these challenges.

From a broader perspective, the project contributed to improving the competitiveness of rural tourism by developing products tailored to international markets and enhancing service standards. During the implementation period, an increase in Japanese tourists visiting rural areas was observed and attributed to project activities by national tourism boards.

Overall, CAITO represents a project where long-term effects are primarily linked to the establishment of a cross-border cooperation model, the continued use of networks and practices, and the integration of project knowledge into education and tourism services. Its legacy lies in the ongoing collaboration among partners, the development and application of market-oriented approaches, and the continued use of working methods in subsequent projects and initiatives.

7.3 Conclusions and recommendations

The case study of eight legacy projects from the Interreg Central Baltic Programme demonstrates overall positive long-term impact. In all eight cases there is evidence that concrete project results remain in use or influence practices years after project closure. While the nature of what endures differs between projects, none of the projects can be characterised as having left no lasting trace. This finding is notable given the long-time horizon covered by the case study and the diversity of sectors and intervention logics involved.

Across the projects, the clearest and most durable form of sustainability is observed where project results have been integrated into the core operations of the lead partner or a key partner organisation. INNOREG, SMEDGE, and CB Health Access represent

particularly strong examples of this pattern. In these projects, service models and operational practices, together with elements of the organisations’ longer-term business models, became embedded in everyday operations and continued to shape strategic direction long after project closure. Where results were institutionalised in this way, durability proved high even in the face of organisational change and external shocks.

Several projects demonstrate significant horizontal impact, although the form and scale of this impact vary. CB Health Access stands out as the clearest example of national-level policy influence, having contributed to the initiation of a national cluster organisation strategy in Estonia. CAITO generated horizontal impact through a more diffuse but nonetheless powerful mechanism, namely a changed mindset and professionalisation across the rural tourism ecosystem, influencing practices well beyond the original partnership. INNOREG and SMEDGE show how organisational models and service concepts can be replicated internationally, particularly through professional networks such as science park and innovation intermediary networks, allowing project results to travel beyond the Central Baltic region.

The projects also illustrate how external shocks function as stress tests for sustainability. The COVID-19 pandemic and, in some cases, the loss of access to the Russian market or disruptions to transport routes exposed differences in resilience across projects. Projects that had embedded results in core organisational routines, commercial cooperation, or long-term strategies tended to be more resilient than those relying primarily on continued project funding or individual champions. In several cases, commercial cooperation based on genuine mutual interest showed notable resilience even under adverse external conditions.

A recurring success factor across the legacy cases is the “strong innovator–receiving partner” model: Projects where more advanced organisations deliberately transferred tested practices to partners with strong execution capacity appear to have produced deeper vertical impact and more meaningful knowledge transfer than partnerships composed mainly of broadly similar actors. This pattern is evident in INNOREG, SMEDGE, and CB Health Access, where benchmarking against more mature systems was a deliberate design feature rather than a by-product of cooperation.

Overall, the case studies highlight sequential cooperation as a major source of long-term value. Several of the most durable impacts emerged not from single projects in isolation, but from chains of projects where learning, networks, and institutional capacity accumulated over time. This sequential logic is visible in different forms across the portfolio, from BTP’s deliberately staged replication across programmes to the follow-up projects building on BreedExpo, CAITO, and SMEDGE.

At the same time, the analysis consistently identifies staff turnover and organisational change as a recurring risk factor. In many cases, project momentum was closely tied to specific individuals. When these individuals left their organisations, institutional memory and commitment were sometimes weakened. Projects that managed to translate individual competence into organisational routines and strategic anchoring were far better positioned to withstand such changes.

Recommendations

Based on the findings from the eight case studies, the evaluators make the following recommendations to strengthen the long-term impact of future Interreg Central Baltic investments:

- First, partner selection should place greater emphasis on strategic alignment. During application assessment, more weight could be given to whether proposed project activities clearly enhance the lead partner’s existing core business or long-term strategic direction. Projects where results aligned with what organisations were already committed to developing proved far more durable than those relying on parallel or peripheral activities.
- Second, the programme should explicitly encourage the “strong innovator–receiving partner” model. This cooperation logic could be communicated as a recognised best practice and reflected in assessment criteria, particularly in fields such as business development and innovation where capacity asymmetries are pronounced. Rewarding projects that demonstrate intentional and well-designed knowledge transfer would likely strengthen vertical impact.
- Third, the introduction of systematic but lightweight post-project monitoring would significantly improve learning and accountability. A short annual survey of lead partners at 12 and 36 months after project closure, applied consistently across objectives, could provide valuable insights into which results endure, which fade, and why.
- Fourth, sustainability planning should be treated as a substantive assessment criterion rather than a formal requirement. Applications that clearly specify who will carry results forward, in what organisational context, and through which concrete mechanisms should score more highly than those offering generic assurances of continuation.
- Finally, the programme should actively support sequential cooperation. Follow-on projects that demonstrably build on earlier programme investments could be recognised through assessment criteria, communication positioning, or priority access to national contact point support. Explicitly valuing continuity and accumulation would help the programme maximise the return on earlier investments and reinforce long-term impact.

Conclusions and recommendations

This chapter brings together the evaluation's overarching conclusions and then proceeds to present a consolidated set of recommendations. Where the preceding chapters address each evaluation question in sequence, this chapter steps back to identify the cross-cutting themes and structural patterns that run through the evidence. The chapter is followed by a full list of all recommendations made throughout the report, organised by theme.

7.4 Overall assessment

The Central Baltic Programme 2021–2027 performs well across a broad front. Its thematic design is broadly coherent, its pre-application support is consistently valued, its communication function has made measurable progress, and its legacy projects demonstrate that cross-border cooperation in this region can produce results that endure long after project closure. These are genuine achievements that reflect sustained institutional commitment and a programme management culture that takes quality seriously.

At the same time, the evaluation identifies a set of structural problems whose persistence across multiple programming periods indicates that incremental adjustment is no longer a sufficient response. Several of the most consequential findings documented in this report, including low Swedish participation, excluded NGOs, liquidity-constrained small organisations, and border regions served by a geographic instrument rather than a thematic solution, are not primarily consequences of poor management choices. They are structural conditions embedded in the regulatory framework, the financing architecture, and the governance arrangements within which the programme operates. Addressing them requires structural reform, and the next programming period presents the clearest available opportunity to pursue it.

The evaluation's conclusions are organised below around five cross-cutting themes, each of which draws together findings from multiple evaluation questions. A consolidated set of recommendations follows.

7.5 Cross-cutting conclusions

The 2028–2034 period calls for substantive thematic renewal, with resilience, economic development and sustainable tourism as priorities

The programme's seven objectives were designed for a geopolitical and economic context that has changed significantly since their conception. The most consequential change is the closure of the Russian border, and the suspension of the Russia cooperation programmes, which have transformed the eastern border regions' situation and created needs, that is, economic reorientation, civil preparedness, people-to-people cooperation, that the current objectives cannot address. Further, the programme is as it currently stands not optimally well-positioned for upcoming challenges, while it broadly is relevant to current needs in the region. This divergence is a clear strategic signal: the programme is well-designed for where the region has been, and less well-designed for where it is going.

The forward-looking themes that emerge most consistently from across the evaluation's evidence base are resilience and civil preparedness, economic development, environment/nature restoration, and sustainable tourism. These are not peripheral additions but thematic directions with solid regional grounding and, in the case of resilience, an emerging regulatory framework in the forthcoming ERDF regulation that actively encourages their inclusion. Central Baltic should also note that the thematic coherence of the portfolio depends on what other Interreg programmes in the Baltic Sea region prioritise: if security and resilience are simultaneously adopted across multiple programmes without coordination, the region risks thematic crowding rather than thematic complementarity.

The indicator framework requires redesign, not just better guidance

The indicator framework is the source of the most consistently documented tension in the entire evaluation. Projects describe indicators as distorting their design; programme management describes the same indicators as necessary instruments for ensuring measurable results. Both positions are coherent. What however is not coherent is a framework that fails to capture the cross-border cooperation dimension that justifies Interreg's existence, excludes qualified applicants whose realistic impact horizon exceeds the project period, and creates comprehension burdens for first-time applicants that pre-application consultations with the Joint Secretariat's thematic project managers currently resolve at significant cost to their capacity for more complex guidance tasks.

These are design problems, not communication problems, and they require design solutions. Better guidance will reduce the comprehension burden at the margins, but it will not address the more fundamental issue that the framework measures what projects produce without asking whether cross-border cooperation was necessary to produce it. Introducing a cooperation quality dimension into the framework (not as a replacement for quantitative indicators but as a complement), would be the most impactful single improvement available for the next period.

Access and inclusion require structural financing changes, not more outreach

The programme's ambition to reach NGOs, small civil society organisations and first-time applicants is sincere, which the small projects instrument demonstrates, and the small projects instrument also demonstrates that it is achievable. But the evaluation is unambiguous on that the barriers that exclude these actor types are financial, not informational. Organisations that cannot pre-finance their activities and wait ten to twelve months for reimbursement are excluded by the financing model, not by lack of awareness. Communication investments directed at these actors will not yield meaningful results as long as the underlying financing conditions remain unchanged.

The same logic applies to Swedish participation. Swedish actors are not absent from the programme because they are unaware of it. They are absent largely because the flat-rate hourly cost provision does not reflect Swedish labour costs and because national co-financing for Interreg is not available in Sweden. These are structural problems that require structural solutions: advocacy for a higher flat-rate provision, national-level engagement on co-financing, and early NCP involvement in next period programming.

Capitalisation has been treated as a side activity and should become a core function

The gap between the programme's investment in project visibility and its investment in capitalisation, the active work of connecting results to policy processes and securing their reuse, is one of the clearest structural weaknesses documented in the evaluation. Making results accessible and making results used are two different functions, and the programme has performed adequately on the former and less well on the latter. A capitalisation role was created approximately one year before the evaluation was completed: too late and too under-resourced to address the gap in the current period. For the next period, capitalisation should be established as a core function from the outset, with dedicated staffing, a clear mandate and adequate resourcing insulated from project management responsibilities.

The programme's long-term value is most visible in cooperation sequences, and this should be reflected in how it designs and communicates its ambitions

The legacy project case study documents a clear and consistent pattern: the programme's most durable contributions come not from individual projects but from sequences of related projects that build institutional capacity, partner networks and thematic knowledge cumulatively over time. This sequential cooperation model is the programme's most reliable mechanism for long-term impact, and it is currently neither recognised nor incentivised in the programme's design. Partner selection criteria that reward strategic alignment, assessment criteria that value demonstrated connection to prior programme investment, and communication that presents the programme's contribution in terms of accumulated cooperation trajectories rather than individual project outcomes would collectively strengthen this dimension of the programme's performance.

7.6 Consolidated list of recommendations

The following recommendations are addressed to the Managing Authority and, where relevant, to member states and other programme governance actors. They are organised by category theme and draw together the recommendations made throughout this report. Recommendations addressing the current programme period are noted as such; all others are directed at the 2028–2034 programme period.

Recommendations relating to programme design and thematic priorities

R1. Resilience and civil preparedness should be introduced as a thematic priority in the next period, calibrated to what is realistically deliverable through cross-border cooperation: piloting, planning, civil society engagement and cross-border authority coordination. Before this priority is formalised, structured dialogue with other Interreg programmes in the Baltic Sea region should be initiated to map thematic coverage and agree a division of labour that prevents simultaneous pivots toward security crowding out established environmental and social priorities.

R2. Nature restoration should be developed as a continuation of the existing environmental strand, anchored in the Nature Restoration Law and the updated EU Baltic Sea Strategy action plan.

R3. People-to-people cooperation and sustainable tourism should be introduced as eligible activity types, specifically to address the gap left by the suspension of Russia cooperation programmes for border region civil society and community actors.

R4. A two-step funding model should be explored for PO2, involving an initial partnership and planning phase followed by an implementation phase, to reduce the risk of partnerships forming primarily to access funding rather than to pursue a genuine common objective.

R5. For PO5, the communication of the objective should be substantially improved, with explicit and concrete guidance on what qualifying activities look like and what they do not. The programme should also explore whether baseline measurement support can be made available to applicants at the application or inception stage.

R6. For PO3, the indicator framework and post-project reporting arrangements should be reviewed to accommodate results that materialise after project closure. Follow-up reporting at defined intervals post-closure, or the acceptance of interim milestones as evidence, would reduce the systematic understatement of this objective's contribution.

R7. For PO7, the next period's design should more explicitly differentiate the ambition level between small projects and regular projects, and require more substantive pre-application engagement with legislative and administrative barriers for regular projects with transformative ambitions.

Recommendations relating to border regions

R8. The formal statement addressed to national authorities on the recognition of border regions should be treated as a substantive political input to the next programming process, not as a background document. The programming process should demonstrate directly how next period's design addresses the priorities identified in eastern Finland's own transition planning, including the Finnish Government's Programme for Eastern Finland and the OECD's transition strategy.

R9. A permanent border region measure should be designed from the outset of the next period with its own thematic content, dedicated funding and adequate support infrastructure. This measure should not replicate the targeted call model but should develop thematic priorities reflecting the realistic scope of what Interreg can deliver for regions in transition, including economic reorientation, employment and skills development, people-to-people cooperation, sustainable tourism and civil preparedness. The EC's forthcoming ERDF regulation's provision for sustainable and resilient border regions and the Commission's communication on eastern border regions provide the regulatory basis.

R10. Comprehensive security, supply security and civil preparedness should be explicitly addressable within a border region measure, including cross-border maritime safety cooperation, oil spill response, chemical accident prevention and digital monitoring systems for the eastern Gulf of Finland.

R11. Sustainable tourism and the international profiling of eastern Finland's Lakeland brand should be included as eligible activity types in a border region measure.

R12. The SME export objective's third-country focus should be reviewed for the border region measure, allowing market development cooperation within the European context for organisations whose most urgent reorientation need is toward Nordic, Baltic and other European partners rather than distant non-EU markets.

R13. Secretariat in-person presence in border regions should be treated as a standing programme function, resourced from the outset. The activation model demonstrated during the targeted call (including direct visits, individual conversations, concrete examples of comparable organisations' experience), is the only approach documented as reliably reaching actor types new to the programme.

R14. An eastern border regions task force could be established within the programme's governance structure, meeting regularly alongside the monitoring committee and providing a forum for substantive thematic dialogue on border region priorities.

R15. East-west integration should be pursued through targeted partnership development support rather than through geographic eligibility requirements, which cannot substitute for the structural financing changes needed to make Swedish participation genuinely attractive.

Recommendations relating to the indicator framework

R16. A cooperation quality dimension should be introduced into the indicator framework, taking the form of a narrative requirement in applications and reports that specifically addresses why cross-border cooperation was necessary to achieve the project's results and what it produced that a national approach could not have.

R17. Result definitions for objectives where the realistic impact horizon exceeds the project period, particularly circular economy and CO2 reduction, could be broadened. Follow-up reporting at defined intervals post-closure, or the acceptance of interim milestones as result evidence, would reduce the systematic understatement of these objectives' contributions.

R18. Practical, example-based guidance on the indicator framework should be developed as a standalone resource for first-time applicants, targeting the distinction between programme objectives, output indicators and result indicators.

Recommendations relating to strategic contribution and capitalisation

R19. The programme should move from general strategy alignment to specific action plan alignment, requiring projects to identify which specific measure or sectoral target within a relevant strategy their project contributes to.

R20. For environmental objectives, the updated Baltic Sea Strategy action plan could be used actively in next period calls to structure calls and assess applications, aligning specific calls or priority areas with specific action plan entries.

R21. The capitalisation function must be established with dedicated staffing, a clear mandate and adequate resourcing from the very beginning of the next period, insulated from project management responsibilities.

R22. A capitalisation call should be explored as a concrete instrument (i.e. a dedicated funding mechanism allowing projects or consortia to build on and synthesise results from the broader portfolio in policy-relevant formats).

R23. The application framework should be updated to include an explicit question about how the proposed project relates to the lead partner's organisational strategy, treated as an assessed dimension of the application.

R24. The programme webspace should be developed to include a results synthesis layer aggregating results by theme, sector or policy question, enabling policy audiences to understand the programme's collective contribution without navigating individual project pages.

R25. The programme should explicitly document and communicate its steppingstone function, tracking cases where Central Baltic projects have enabled subsequent access to Horizon or other competitive instruments.

Recommendations relating to access, financing and inclusion

R26. Mandatory pre-application consultation should be introduced for first-time applicants. Experienced applicants who have previously received funding may be exempted.

R27. The liquidity problem caused by the reimbursement model should be addressed through a combination of financial model adjustments: modest pre-financing for organisations below a defined financial capacity threshold, shorter reporting periods with

faster reimbursement cycles, and expanded use of lump-sum arrangements for smaller cost categories.

R28. Swedish participation requires advocacy at the national level for dedicated Interreg co-financing, exploration of a higher flat-rate provision that better reflects Swedish labour costs, and call design that explicitly seeks Swedish institutional expertise in areas of comparative advantage. Swedish NCPs should be engaged from the earliest stages of the next programming process.

R29. The small projects instrument should be retained and explicitly protected as a core component of the programme's inclusiveness strategy. Administrative requirements should be reviewed specifically for small projects with a view to proportioning expectations to the scale of the work.

R30. The duration of small projects could be made more flexible, allowing projects to be designed within a range based on what their specific objectives require rather than fixed at 18 months.

R31. Private sector eligibility in the small projects context should be reviewed. If the state aid framework permits more flexible arrangements for modest-budget projects with clearly non-commercial activities, these could be introduced.

Recommendations relating to application process and support

R32. Practical, application-focused guidance materials should be developed as a complement to the comprehensive manual, including concrete examples of how different types of project ideas translate into programme objectives and indicator commitments.

R33. The programme manual's update cycle should be managed more deliberately, with a clear policy on when updates are issued and how active projects are informed of changes that affect their obligations.

R34. The one-step versus two-step application format should continue to be treated as a call-by-call decision calibrated to the target applicant group. For calls targeting less experienced actor types, a two-step format is better suited, provided step-one feedback is framed as directive and applicants are supported in acting on it before step two.

R35. The programme should develop a more formal and structured approach to NCP support, including clearer guidance on what consistent high-quality NCP support looks like, shared tools and materials across countries, and a regular coordination mechanism between NCPs and secretariat project managers.

Recommendations relating to selection and transparency

R36. The improvements to selection transparency introduced in the current period, including written rejection rationale, access to follow-up consultation, immediate publication of results including success rate statistics, should be retained and treated as minimum standards for the next period. These should be communicated proactively to all applicants before and during each call.

R37. The regional concentration of funded projects could be addressed through a combination of proactive communication and call design that creates more accessible entry points for less experienced organisations.

R38. The consensus requirement in the monitoring committee could be reviewed in the context of next period governance design. A qualified majority mechanism or structured means of registering dissenting views could enable more substantive deliberation without undermining collegial working.

R39. Assessment criteria should give more explicit weight to cross-border added value as a substantive dimension, moving beyond a formal eligibility check toward a substantive assessment of why cross-border cooperation is necessary for the specific challenge proposed.

Recommendations relating to administration and implementation

R40. Centralisation of the national control function to the Joint Secretariat should be a structural ambition for the 2028–2034 period. The consistency problem is consequential and is unlikely to be resolved by any approach short of structural reform.

R41. The timesheet requirement could be replaced with output-based reporting linked to project deliverables. The programme should then advocate actively for this change at the regulatory level.

R42. As an interim measure, pending structural reform of the national control function, the two-layer reporting structure could be reviewed for smaller projects, allowing national controller approval to serve as sufficient financial verification at the partner level combined with a lighter milestone-based project-level report.

R43. Dedicated procurement support capacity should be developed within or accessible to the secretariat, either through in-house expertise or through a structured relationship with a procurement advisory body.

Recommendations relating to communication

R44. The technical sustainability of the project webspace should be planned explicitly before the next period begins, either through a long-term service contract or in-house technical capacity development.

R45. Thematic events should be formalised as a regular programme commitment, at minimum once per programme objective per period, with separate formats for small and regular project audiences, and budgeted explicitly from the outset.

R46. A central library of reusable communication assets for less visually accessible objectives, including infographic templates, case study formats, model result stories, could be developed and made available to NCPs and project teams.

R47. The governance relationship between the programme's central communication function and NCPs should be formalised, including clear expectations, shared content standards and a regular coordination mechanism.

R48. If the programme's thematic priorities change significantly in the next period, the communication strategy should be updated from the outset to reflect the new design, including new target audiences, new result types and any new channels the changed thematic scope would make relevant.

Recommendations relating to long-term impact and sustainability

R49. Partner selection criteria should give substantially greater weight to strategic alignment - specifically whether proposed project activities enhance the lead partner's existing core business and strategic direction.

R50. The sequential cooperation model should be actively recognised and supported in programme design, including through assessment criteria that reward demonstrated connection to prior programme investment and communication that presents the programme's long-term value in terms of accumulated cooperation trajectories.

R51. Sustainability planning should be treated as a openly assessed dimension of the application rather than a compliance section, with specific criteria developed for what a credible sustainability plan looks like across different project types and objectives.

R52. Staff turnover risk should be addressed explicitly in sustainability planning requirements. Applications should be required to describe how project knowledge will be maintained at an organisational level if key individuals leave.

R53. A systematic post-project monitoring mechanism should be established; at minimum a lightweight survey of lead partners at 12 and 36 months after project closure. This to track result durability across all objectives.

R54. Horizontal principle requirements could be made more proportionate. In objectives where a principle is central to the thematic content, the current level of integration is appropriate. Where principles are more peripheral, lighter-touch compliance requirements focused on genuine design choices could produce more honest reporting.

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