



Marshal of the Lubelskie  
Voivodeship



Marshal of the Mazowieckie  
Voivodeship



Marshal of the Podlaskie  
Voivodeship

Warsaw, 18 March 2016

**Mr  
JOHANNES HAHN  
Commissioner for European Neighbourhood Policy  
and Enlargement Negotiations  
European Commission**

Subject: The ENI Cross-Border Cooperation Programme Poland-Belarus-Ukraine 2014-2020

*Dear Commissioner,*

In connection with works carried out by the Managing Authority/Ministry of Economic Development concerning institutional preparation to implementation of The ENI Cross-Border Cooperation Programme Poland-Belarus-Ukraine 2014-2020, we would like to express our concerns connected with plans of Intermediate Body/Secretariat of the Programme from Centre of European Projects in Warsaw relocation to Rzeszow in Podkarpackie Voivodeship.

The document of the ENI Cross-Border Cooperation Programme Poland-Belarus-Ukraine 2014-2020 – prepared by the Joint Programming Committee, consisting of representatives of central and regional authorities of three countries and then approved by the European Commission (Decision number C(2015) 9138 dated 17 December 2015) – provides that Intermediate Body will function within the framework of a state-owned body - Centre of European Projects (CEP) (chapter 4.4). Such formula proved its capacity in 2007-2013 financial perspective in case of CCP ENPI Poland-Belarus-Ukraine and other programs for which CEP was functioning as Joint Technical Secretariat (JTS). Therefore, we would like to present to you our argumentation for leaving the IB/Secretariat of the Program in the Centre of European Projects in Warsaw.

First of all, cross-border programme in which Polish, Ukrainian and Belarussian authorities from several regions participate but also strongly compete for financial resources should be managed and serviced by the unit, which would be free of any suspicion of lack of objectivity and impartiality. Joint Technical Secretariat located in Warsaw, outside of the Programme's support area, have never been accused of following or favouring particular interests. If the secretariat/IB will be relocated to one of the Programme's region, this situation might change. All basic procedures of the Programme, beginning with acceptance of application and their assessment through projects' realization and ending with settlement of the projects will be burdened with the suspicion of favouring institutions of the region which hosts IB. Undoubtedly it will not foster reaching compromise and cooperation spirit between representatives of national and particular regions' authorities of the Programme. How hard

negotiations between Programme's participants can be and how long it can take to work out compromise can be confirmed by the representatives of European Commission who took part in the meetings of Joint Monitoring Committee as observers.

Secondly, current JTS developed certain brand and trust of institutions taking part in the realization of the Programme and its beneficiaries. This trust is necessary for efficient and sustainable development of cooperation between subjects involved in the Programme, especially within the context of working on the border of three countries with different legal orders, different way of functioning in many areas of activities, with societies of different mentalities, culture. JTS team consists of competent and involved personnel who was working only on this particular Programme. Introducing new people to its specificity takes time and will involve necessity of working out some practices and solutions from scratch and once again they will have to come through the same particular challenges/problems. It would be irreparable waste if we lose such potential and institutional memory, experience of employees, who went through the whole realization cycle of previous Programme and systematically increased their abilities by taking part in different trainings and courses. It is impossible to assume, that the whole JTS team will make the decision to move out from Warsaw to work in Rzeszów.

Thirdly, relocation of IB from Warsaw to Rzeszów in Podkarpackie Voivodeship will cause many problems resulting from limited accessibility of a new office. Rzeszów is not a convenient place to commute for most of other Programme's areas, as well as it is on the periphery of this area. To get to Rzeszów for the applicants/partners from other Polish voivodeships will be a huge expedition and in case of institutions from Minsk and Grodno Oblasts, Rzeszów location of IB means practically lack of possibility to personally visit the Secretariat. During the realization of the project but also during the projects' application stage, direct consultations with employees of the secretariat are crucial and should be preserved. For the Programme with such vast supported area, IB location in Warsaw (despite the fact that it is outside of Programme's area) is optimal from the point of view of communication network and ability to travel to it from all parts of the Programme's area. For the representatives who co-realize the Programme, institutions from Belarus and Ukraine, Warsaw is the most convenient place in Poland (Kiev, Lviv and Minsk have direct flight connection with Warsaw). Representatives of those institutions as well as applicants/beneficiaries from outside of Warsaw connect the visit in IB with the visits at Programme's Managing Authority if needed. Offices of both units in one city allows them to get support, interpretations or decisions in particular cases much faster and more efficient. With IB/secretariat located in Rzeszów connecting such visits will be impossible.

Numerous meetings, workshops, sessions of evaluation committees, working groups etc., thus far took place in JTS office from the financial and logistics reasons. If IB will be located in Rzeszów they will have to be organized outside this office to ease efficient access to the place of the event. If they will be organized in Rzeszów it will probably mean that many decisive persons from Ukraine and Belarus will be absent (necessity to spend two whole days for traveling). Relocation will also mean worse cooperation between MA and IB. Lack of possibility to have frequent meetings to work out hard questions will definitely have negative reflection in Programme's realization.

Fourthly, relocation of IP/Secretariat office will result in additional costs which will be born from technical assistance budget of the programme, including covering costs of:

- Flights between Rzeszów and Warsaw, mostly of MA and IB employees, but also all authorities, who will take part in the events organized in the IB office;

- Additional accommodations in hotels connected with delegations;
- Organization of Programme's events outside of the IB office's location;
- Additional office maintenance (opposite to Warsaw office of Centre of European Projects).

Moreover, technical assistance budget will be burdened with the costs of trainings of the future IB personnel and resources spent for education and substantive preparation of current JTS team will have to be considered wasted.

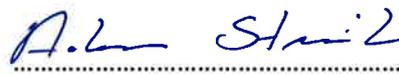
Fifthly and most importantly, applicants of the Programme insist on efficient and as quick as possible start of its new edition. It mainly depends of one of main authorities' functioning. Unplanned and unprepared relocation of the secretariat/IB during the Programme's start stage creates threat, that analogically as in 2007-2013 period, also in this financial perspective organization of applications' acceptance will be postponed with all its negative consequences for the Programme and authorities who will realize projects.

On behalf of Lubelskie, Mazowieckie and Podlaskie Voivodeships we would like to address to you, Mr Commissioner, to consider presented arguments and make best decision having in mind most efficient realization of the ENI Cross-Border Cooperation Programme Poland-Belarus-Ukraine 2014-2020. Leaving Intermediate Body/Secretariat in its current registered office - Centre of European Projects in Warsaw will certainly serve the efficiency and effectiveness of the Programme's realization and achievement of designated aims.

*Yours sincerely,*



Sławomir Sosnowski  
Marshal of the Lubelskie  
Voivodeship



Adam Struzik  
Marshal of the Mazowieckie  
Voivodeship



Jerzy Leszczyński  
Marshal of the Podlaskie  
Voivodeship

