



Cohesion policy communication rules – Questions and answers

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Disclaimer: This document provides a collection of questions that have been submitted to the Commission on the application of the rules for information and communication as contained in Regulations 1303/2013 and 821/2014. The respective answers have been provided in relation to each specific case and do not constitute a generalised guidance by the Commission. They can rather be seen as suggestions as to what could be a reasonable interpretation of the rules in a given context. The responsibility for correctly applying above Regulations remains with the competent national bodies.

Logos/ European Union emblem / Reference to the Fund(s)

- [Who in the Commission approves our logo?](#)
- [For the reference to the Union, is it sufficient to write "Europe"?](#)
- [Should this reference to the ESIF funds be in the form of a logo or can it simply be a statement?](#)
- [What are the rules or procedures if we want to display the ESF logos on our web-site and on our marketing material \(brochures\)? Can you to send me a high resolution logo, possibly on a transparent background?](#)
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- [Is it wrong to spread the words "European Social Fund" over two lines?](#)
- [Does the MA, in its role as the MA, have to display the EU emblem on its website? Does the MA become a beneficiary when in receipt of TA and therefore subject to all the requirements on beneficiaries including the need to display the EU emblem on its website?](#)
- **UPDATED:** [I have a question concerning annex XII section 2.2.1 of Regulation No 1303/2013. We are not sure how to interpret these provisions and which fund we should make reference to.](#)
- [Please advise us how we should mark radio/audio spots to indicate that they are co-financed by the European Union.](#)
- [Can logo of an action, network, or let's say object of culture – which is promoted itself, be larger than the UE emblem?](#)
- [How to interpret the requirements of minimum size of the EU emblem?](#)
- [What about the visibility of the emblem on mobile devices without scrolling – this can be costly to implement?](#)
- [For example on a roll-up banner, can't we use the logo of Ministry of Finance bigger than the EU emblem even if it is not on the same line as the EU emblem?](#)
- [Could we use a white flag \(rectangle\) with black stars while the entire background around the flag is black, without putting a white border around the black outline of the rectangle?](#)
- [Monochrome version of the Union emblem: could we use black version on eco-paper?](#)
- [The Regulation does not mention using white, where the rectangle is in white and print of the stars is also in white on a black background.](#)
- [Could we also admit usage of EU emblem in black or white version on a colour background?](#)
- **NEW:** [Documents or promotional activities related to multi-fund programmes: can we use "ESI Funds" label in all of the communication, no matter if they relate to ERDF- or ESF- supported operations, no matter if it is a beneficiary or an authority?](#)

Web sites and list of operations

- [On a website, is it sufficient to just display the European flag, without any text?](#)
- [Does the emblem always have to be on the home page of a beneficiary?](#)
- [In the list of operations, how to include operations of beneficiaries who are natural persons?](#)
- [Until when do we have the obligation to keep the website of the previous programme?](#)
- [Until when do we have the obligation to keep the website of the current programme \(2007-2013\)?](#)
- [What is the meaning of the following sentence in Article 115.2 - "the website may clearly indicate the applicable licensing rules under which data are published"?](#)
- [The list of data fields includes "the beneficiary name \(only legal entities; no natural persons shall be named\). What happens in the case of a natural person who receives a grant or loan in order to create a business?](#)
- [Who has to maintain the list of operations: the MA or the ministry?](#)
- [Are lists per OP and per Fund possible/allowed or do we have to keep a unified list?](#)
- [Does the Commission see an obligation to keep the list in xml format?](#)
- [What about the visibility of the emblem on mobile devices without scrolling – this can be costly to implement?](#)
- [List of operations: Is there a minimum length for the description of the operation?](#)
- [Axis of intervention: Is it simply the number of the axis is expected, the title of the axis, or both?](#)
- [Start date of the operation: It is not the date of programming but of project start \(which may be earlier than the scheduled time\)?](#)
- [Total eligible expenditure allocated to the operation: In the case of France-Switzerland border projects, is it the eligible total of the project as a whole \(thus encompassing the Swiss total cost as well\) or only the total expenditure eligible for the ERDF \(so that on the French side\)?](#)
- [Total eligible expenditure allocated to the operation: in the list of operations published on the websites of the programmes, should we keep the total amounts initially programmed, or can we base ourselves on a "real" state of the amounts of the operations at the time the list is extracted?](#)
- [Postcode of the operation; or any other suitable location indicator: there are many transactions in diffuse areas, or across multiple locations in the France-Switzerland program. Does it meet the requirement to indicate department\(s\) and township\(s\) in which the operation occurs?](#)
- [List of operations / Country: Should we indicate all the countries concerned?](#)
- [How many examples each year must be presented in a second language and what is the level of detail expected?](#)
- [Responsibilities of beneficiaries: reference on the website: Does this obligation only concern the leader or all project partners?](#)
- **NEW:** [Are certain data fields required by Annex III of Regulation \(EU\) No 480/2014 and by Annex XII of Regulation \(EU\) No 1303/2013 the same or are these different specifications?](#)

Posters

- [Poster: size, inside/outside, on door, replaced by sticker?](#)
- [Financial support from the Union: how to mention it?](#)
- [Can the posters be paper posters, roll ups, banners, boards of all kinds or even a TV screen?](#)
- [On historic buildings: can we use better material than paper posters or even TV screens?](#)
- [Does the poster have to name the individual operation in question or would a generic poster be sufficient?](#)
- [The information that will have to be included in the poster will be \(a\) the name of the project, \(b\) aim of the project, \(c\) total budget, \(d\) EU Fund contribution \(e\) if supported by YEI, a statement about that, and \(f\) logos. Also it is suggested that contact details and website \(if any\) will also be included. You think this information is enough? Or is too much?](#)
- [Location of a poster: should these be headquarters of beneficiary or rather a place where the project is implemented on permanent basis? Does this provision concern also locations of training courses, conferences or supported job places under the ESF?](#)

- [What if one organization executes several projects from different funds?](#)
- **NEW:** [Information about several projects can be combined on one poster. Does this mean that the title of each project should be included on the poster? OR would it be right to put just one title including the common purpose of the projects, for example "Technical assistance operations for supporting the implementation of ESF actions"?](#)
- **NEW:** [We are seeking confirmation that the amount of ESF included at OP level is sufficient for a generic ESF publicity poster or at a minimum the priority axis or investment priority levels to be consistent with OP level reporting and allocation of funding.](#)

Plaques / billboards

- [Should a permanent plaque or billboard only be put up when both conditions of ANNEX XII point 2.2.5 are met?](#)
- [Is there a need for putting up a permanent plaque or billboard for projects financed by ESF?](#)
- [Considering progress in technology would the EC admit electronic billboards or posters?](#)
- [Temporary billboard: Can the MA on its own initiative lower the threshold to EUR 200 000 for the installation of temporary billboards and permanent plaques?](#)
- [For France-Switzerland Interreg projects, what is meant by "public assistance"?](#)

Major annual activity

- [Would an e-book qualify as "major annual activity"?](#)
- [Can a series of at least 40 information events to publicise the OP be considered a "major annual activity"?](#)

Display of emblem at premises

- [If some responsibilities are delegated to the intermediary body, will it be obliged to display the Union emblem as well?](#)

Miscellaneous

- [Does an Intermediate Body have to follow same communication requirements as a beneficiary?](#)
- [What is the indicative budget for implementation of the communication strategy?](#)
- **NEW:** [Do beneficiaries have to comply with information and communication obligations set out in ANNEX XII CPR before approval of the operation by the Managing Authority, in case this operation has started to be implemented before its approval?](#)

1. Who in the Commission approves our logo?

First, there is no requirement for having any national or regional logo. MAs can perfectly comply with the communication obligations without having one. If a MA chooses to have an additional logo, there is no process of validation with the Commission.

2. For the reference to the Union, is it sufficient to write "Europe"?

The European emblem must be displayed together with a reference to the Union. And Art.4 of the Implementing Act clearly stipulates that "The name 'European Union' shall always be spelled out in full."

3. With regards to Annex XII of the CPR's 2.2 (1b) "Where an information or communication measure relates to an operation or to several operations co-financed by more than one Fund, the reference provided for in point (b) may be replaced by a reference to the ESIF funds." Should this reference to the ESIF funds be in the form of a logo or can it simply be a statement?

As far as the CPR is concerned, there is only one "logo" – the European emblem. "Reference" refers to mentioning the financial support, either from a specific Fund (e.g. "This xyz is supported by the European Social Fund") or several Funds, or alternatively the ESIF.

4. I am wondering whether there are rules or procedures to be followed if we want to display the ESF logos on our web-site and on our marketing material (brochures), as we obtained funding from ESF. Also I would like to know if it would be possible for you to send me a high resolution logo, possibly on a transparent background.

The rules to respect when communicating the European Social Fund are laid down in two regulations. In Regulation 1303/2013 you can consult Articles 115-117 and Annex XII to find out about the overall communication responsibilities of Member States and of beneficiaries.

In the Regulation 821/2014 (Implementing Act), Articles 3 and 4 hold the technical characteristics for displaying the Union emblem and the reference to the Fund or Funds supporting the operation as well as the instructions for creating the emblem and a definition of the standard colours.

There might be additional rules set for a particular Operational Programme – to know these, you would need to be in touch with the corresponding Managing Authority.

In any case, please note that there is no "ESF-logo". Instead, the European Union emblem is always to be used when acknowledging the support from the Fund. It can be downloaded here:

http://europa.eu/about-eu/basic-information/symbols/flag/index_en.htm

- 5. I have a question concerning annex XII section 2.2.1 of Regulation No 1303/2013. We are not sure how to interpret these provisions and which fund we should make reference to. For example: regional operational programme is financed by ERDF and ESF. Axis concerning Technical Assistance is financed by ESF. Does this mean that all promotional materials and activities shall be marked by making reference to the European Social Fund? Even in the case they concern a grant scheme for entrepreneurs financed by ERDF? Generally speaking should the reference be made to the fund which is financing a given promotional activity ? I would be very grateful for your guidance!**

As activities financed under Technical Assistance also have to be regarded as "operations", reference has to be made both to the Fund that supports the activity that is described, as well as to the Fund (if it's different) that supports the promotional activity. So, in this case – brochure that promotes a grant scheme for entrepreneurs financed by the ERDF and the brochure itself is financed from ESF TA – the brochure should refer that the grant scheme is financed by the ERDF and, in addition, it should also refer that the preparation of brochure itself received funding from the ESF.

- 6. On a website, is it sufficient to just display the European flag, without any text?**

The European emblem must be displayed together with a reference to the Union. And Art.4 of the Implementing Act clearly stipulates that "The name 'European Union' shall always be spelled out in full."

- 7. Does the emblem always have to be on the home page of a beneficiary?**

No. Especially for large organisations or companies that have a co-funded operation as one of their many activities, it is just important that the specific page about that operation has the required references and logos. On the other hand, a website entirely dedicated to one or more operations clearly needs to have the logo and references already on its home page

- 8. In the regulation it says, the beneficiary shall place "at least one poster with information about the project (minimum size A3), including the financial support from the Union, at a location readily visible to the public, such as the entrance area of a building." Is it ok to interpret this as a poster within the office space of the project? (Then the size A3 will be no problem) Is that visible enough to the public? Or does it have to be on the entrance door? (then A3 is rather big and would cover most of the door) And if it should be on the entrance door, then a sticker would be more practical we feel since it has more resistance to wind and rain.**

Of course there are different practical considerations to take into account at different places and whatever we would try to use as a general definition, it would cause difficulties somewhere. The key is "readily visible to the public" – this needs to be applied in a reasonable manner. This means that a normal visitor of a location where co-financed activities take place or are managed would have a high probability of seeing the poster (which should be of at least size A3).

9. The regulations also say that the poster should contain information about the financial support from the union. Does this mean that the economic contribution of the union should be mentioned in a sentence, or does it mean that the exact amount should be included (in numbers)?

There is no obligation for Member States to mention on the poster the amount of the financial support from the Union. Member States can of course do so when the amount of Union support is included in the document setting out the conditions for support (see for instance the tool developed by HU: <http://dev.cmg.hu/tablagenerator/#nogo>).

In order to comply with the regulatory requirements, the poster has to display the Union emblem and include a reference to the Union and the Fund or Funds supporting the operation (in accordance with point 2.2.1 of Annex XII CPR). In addition, when providing information about the project (in accordance with point 2.2.2 of Annex XII CPR) the beneficiary has to mention the aim /objective of the project (i.e. what does this project want to achieve to contribute to the objectives of the OP under which it is supported and indicate that this project is financially supported by the Union.

10. We are constantly being asked by both Managing Authorities and beneficiaries about the A3 posters. What they should look like, whether or not a TV screen in a reception hall is sufficient or not etc. So I just wanted to verify my answer to them with you: The information should be WRITTEN and PERMANENT. It means paper posters, roll ups, banners, boards of all kinds are ok as long as they have minimum size of A3 format. Regarding the TV screen I am not sure. It is neither written nor permanent. I understand that if they have a large plasma TV in the reception hall, it could be a solution too. What do you think?

A poster is a poster and displaying something on a screen, roll-up or banner would be a nice bonus, but no replacement for the poster as required by the Regulation.

11. Why I am asking about the poster, is that in the old historical buildings, universities, ministries etc. or even in modern design interiors it is not so easy or good looking to just stick a piece of paper on the walls. In some buildings the information could fulfil its purpose even if it was not just on a paper, but something even better. It could be on glass, or behind glass, on a board or banner, something like those on the photographs. If we agree that it will be WRITTEN and PERMANENT, is it possible to use other materials than a paper (better materials) for aesthetical purposes? (We agree that TV screen is too much, it is not permanent, so we do not insist on that one).

If the information is displayed on an at least A3 format in the way suggested, this can be considered equivalent to a poster. TV screens only in addition, not instead of paper (or equivalent).

12. Does the poster have to name the individual operation in question and funds given to it or would it be sufficient if we as MA made a generic poster stating that the project is supported by the ESF or ERDF, that the operation could put up?

On the one hand, we encourage the MAs to provide beneficiaries with templates, toolkits etc. to make their communication job easier. A poster template is a good idea. On the other hand, the

Regulation demands that the poster has "information about the project..., including the financial support from the Union...". This is clearly project-related information and I do not think you can cover this with a one-fits-all poster for a whole OP.

Otherwise you would end up with a situation that is not much different from the past: you simply acknowledge an EU financial contribution, with the novelty that it's visible on a poster. The real idea goes further: you should be able to see what the project is about (and how much support it receives).

13. I am in the process of developing an e-book for the division which includes achievements from 2007-2013 Programmes, with case study examples and individuals personal stories, there is also a section dedicated to the 2014-2020 Programmes with info graphs etc. The intention was for the e-book to be our annual activity for 2014, however we are struggling to have this completed and published by 31 December 2014. If we decided to use the e-book to promote the 2014-2020 Programmes early next year instead of making it the 2014 annual activity, what would the minimum requirements be to complete this year's annual activity?

We can unfortunately not provide you with a catalogue of possible scenarios. What is clear from the Regulation is that it has to be "major" and it has to promote "funding opportunities... and... strategies" and "present... achievements...". We have no exhaustive list of additional criteria to decide on what qualifies as annual activity – in the end, you'll need to be able to justify this in the Monitoring Committee and with regard to any potential audits, be it European or national ones.

14. The regulation (EU) no 1303/2013 says that the Member State and the managing authority is responsible for displaying the Union emblem at the premises of each managing authority. How about intermediary bodies? If some responsibilities are delegated to the intermediary body, will it be obliged to display the Union emblem as well?

Answer: Yes, intermediate bodies which take on functions normally carried out by the Managing Authority have to comply with the same visibility rules.

15. Can a series of at least 40 information events to publicise the OP be considered a "major annual activity"?

Yes

16. In the list of operations, only beneficiaries who are legal entities shall be named, but not natural persons. What are the consequences exactly: a) operations of beneficiaries who are natural persons are not included in the list at all – or b) operations of beneficiaries who are natural persons are included in the list, just the data field "beneficiary name" remains empty

b) - operations of beneficiaries who are natural persons are included in the list, just the data field "beneficiary name" remains empty. The privacy of individuals can be protected, if the publication of the beneficiary data of natural persons is done anonymously, i.e. the name of the beneficiary is withheld.

17. Regarding projects that are Grant Schemes. The beneficiaries of most Grant Schemes are enterprises. Based on the Regulation, each beneficiary (i.e. enterprise), is obliged to place a poster and include a description of the project in their website (if a website exists). The Intermediate Body of the Grant Scheme, which is the body responsible for the issues calls, approval of proposals, monitoring of the implementation, does not have these obligation (regarding the use of the poster and the description of the project in his website)? Or do these obligations apply in this case also for Intermediate Bodies of Grant Schemes?
Does the IB receive funding for its functioning? Then it's a beneficiary and the same rules apply. If not, it would still be good practice that the IB mentions the context of the Funds and the reference to the EU (incl. logo) on its website.

18. Regarding par. 3 of point 2.2 of Annex XII of Reg. 1303/2013 which states: “Any document, relating to the implementation of an operation which is used for the public or for participants, including any attendance or other certificate (this includes also invitations, programmes, attendance lists, presentations and any other leaflets distributed, correct??), shall include a statement to the effect that the operational programme was supported by the Fund or Funds”. We have an Operational Programme called “Employment, Human Resources and Social Cohesion” which is supported by ESF and YEI. Based on the above-mentioned provision of the Regulation, in the case of ESF funded projects under this OP, it will be wrong if this statement mentions only that “the project is supported by the ESF”. It has to mention that “the Operational Programme is supported by ESF and YEI”. Correct? If yes, is it ok if we use the following statement: “The project is implemented in the framework of the Operational Programme “Employment, Human Resources and Social Cohesion”, which is co-financed by the ESF and YEI”? Now in the case of YEI funded projects under the same OP and according to the Regulation 1304/2013 (art.20 par.2), the same kind of statement has to mention that the project is supported by YEI. The obligation about mentioning the Operational Programme does not apply to YEI supported projects? The reason I am asking is because I want to make things as simple they could be, and I was wondering if we could have in our Guide, a uniform obligation for Beneficiaries of ERDF, ESF, CF and YEI funded projects, regarding informing the participants.

We suppose this wording has been overlooked and we think it's acceptable to refer to the operation as being supported, not the OP. The Regulation 1304 had been drafted later and here the wording is chosen correspondingly.

19. The information about the project that will have to be included in the poster will be (a) the name of the project, (b) aim of the project, (c) total budget, (d) EU Fund contribution (e) if supported by YEI, a statement about that, and (f) logos. Also it is suggested that contact details and website (if any) will also be included. You think this information is enough? Or is too much?

Your proposal is very complete. Please note that according to our legal department, the amount does not have to be mentioned, but it certainly is good practice!

20. About the EU Logo together with the Fund. In our previous communication (see below) you suggested that we should try to avoid the text “European Social Fund” over 2 lines. As I was informed by our graphic designer, this will create problems, especially in the case of ERDF logo which is too long. Do you think that having the text of the Fund over 2 lines, will be wrong?

It is not wrong. The comment related just to good practice in communication, but you may have your reasons to choose a different approach.

21. Does the MA, in its role as the MA, have to display the EU emblem on its website? Actually, this is not the case for the 2007-13 OP as the UK Government decided to migrate the contents of the ESF website to the website of the UK Government some months ago and the ESF logo is not displayed in it. Am I right to understand that ESF/ERDF logos have to be displayed anyway on the ESF/ERDF websites, and if so, what are the articles and legal basis supporting this interpretation? Does the MA become a beneficiary when in receipt of TA and therefore subject to all the requirements on beneficiaries including the need to display the EU emblem on its website ?

Article 115(1)(b) CPR requires the Member States and managing authorities to ensure the establishment of a single website or a single website portal providing information on, and access to, all OPs in that Member State, including information about the timing of implementation of programming and any related public consultation processes.

Regarding Member States and managing authorities' duties regarding information and communication: After a combined reading of Article 115(1)(b) and Annex XII, point 2.1.2. of the CPR as well as the Commission Implementing Regulation (EU) No 821/2014, the publicity requirement regarding the Union emblem only refers to "displaying the Union emblem at the premises of each managing authority". This covers the physical display of the EU emblem.

However, the Managing Authority using technical assistance to administer the Funds is a "beneficiary" in the meaning of Article 2(10) CPR, i.e. a public body "initiating and implementing operations". Therefore, in this capacity, the Managing Authority falls under the information and publicity requirements for beneficiaries as stated in Article 115(3) and Annex XII, point 2.2.1. (a) and (b) CPR, as well as Articles 4(1) and 4(3) of the Commission Implementing Regulation (EU) No 821/2014. Hence, the Union emblem is to be displayed on the ESF (ERDF or CF) programme website or Cohesion policy portal, as well as the reference to the relevant Fund.

22. Should a permanent plaque or billboard only be put up when both conditions of ANNEX XII point 2.2.5 are met?

According to ANNEX XII point 2.2.5. REG (EU) 1303/2013 the beneficiary shall put up no later than three months after completion of an operation, "a permanent plaque or billboard of significant size at a location readily visible to the public for each operation that fulfils the following criteria:

(a) the total public support to the operation exceeds EUR 500 000;

(b) the operation consists of the purchase of a physical object or of the financing of infrastructure or of construction operations.

An interpretation of this regulation leads the Managing Authority to the conclusion that points (a) and (b) are cumulative. Is merely one of the two points met, the beneficiary is not required to put up a plaque or billboard.

In the opinion of the MA, this interpretation is supported by the wording of point 2.2.5. Accordingly, "each operation" has to fulfil the "following criteria". Furthermore, there are systematic arguments in support: under the aforementioned point 2.2.4. the beneficiary shall put up "at a location readily visible to the public, a temporary billboard of a significant size" for each operation "consisting of the financing of infrastructure or construction operations for which the total public support to the operation exceeds EUR 500 000." Already for installing a temporary billboard, two conditions have to be met ("financing of infrastructure or construction operations" and "support to the operation exceeds EUR 500 000"). Thus, for installing a permanent plaque or billboard no less strict requirements should apply. Could you confirm this interpretation?

The interpretation of the Managing Authority is correct: A permanent plaque or billboard will have to be installed no later than three months after completion of an operation that fulfils cumulatively the two criteria mentioned in ANNEX XII point 2.2 (5):

- (a) the total public support to the operation exceeds EUR 500,000;
- (b) the operation consists of the purchase of a physical object or of the financing of infrastructure or of construction operations.

As a reminder, point 2.2 (4) of the same Annex, provides that during implementation of an operation, a temporary billboard will have to be installed for each operation consisting of the financing of infrastructure or construction operations for which the total public support exceeds EUR 500,000.

23. What is the indicative budget for implementation of the communication strategy?

There is no compulsory minimum amount, but the average budget for communication amounted to approx. 0.3% of the OP budget during the 2007-2013 funding period. If it is significantly higher or lower, the strategy should explain how the proposed budget is justified in the light of the communication objectives.

**24. Annex XII, 2.2.5 of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 stipulates that: “No later than three months after completion of an operation, the beneficiary shall put up a permanent plaque or billboard of significant size at a location readily visible to the public for each operation that fulfils the following criteria:
(a) the total public support to the operation exceeds EUR 500 000;
(b) the operation consists of the purchase of a physical object or of the financing of infrastructure or of construction operations.”**

How can it be interpreted? The present meaning is that all operations, also these supported by ESF, need a permanent plaque or billboard if the operation consists of the purchase of a physical object or of the financing of infrastructure or of construction operations.

We suppose that it has not been an intention of the legislator. If the core element of a given operation consist in the purchase of a physical object or in the financing of infrastructure or in construction operations then a permanent plaque or billboard should be put up. For example, if there is a training project supported under the ESF and some notebooks have been purchased to manage the operation there would not be a necessity to place a plaque or a billboard. Is there a need for putting up a permanent plaque or billboard for projects financed by ESF?

We agree with your interpretation and approach of looking at the "core element" or principal purpose of the operation.

25. The Commission Implementing Regulation (EU) No 821/2014 of 28 July 2014 does not specify how to proceed with audio information. Please advise us how we should mark radio/audio spots to indicate that they are co-financed by the European Union. Please consider the following formats: 8” brief announcement (so called radio billboard just to indicate an institution financing a given programme, right before or after a given programme), and 15’, 30” up to 60” radio spots.

We have a proposal to treat radio spots as short forms (small promotional objects accordingly to art. 4 point 2 of the above mentioned regulation). Thus the message would be “Programme co-financed by the European Union”. In case of longer forms, like radio programmes, the message would be “Programme co-financed by the European Union from the European Regional Development Fund” (or other fund as appropriate).

The suggested interpretation seems acceptable. Ideally, any spot should mention a website where more info is available. However, above a length of 30 seconds, both the reference to the European Union and the Fund shall be mentioned.

26. Annex XII, 2.2.2 b, 2.2.4 and 2.2.5 of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 require beneficiaries respectively to place either a poster (at least one poster with information about the project of minimum size A3) or temporary billboard, and for some projects also a permanent plaque or billboard. There are beneficiaries that run numerous projects at one location – mostly such situation concerns public institutions, cities, local counties, universities etc.

Considering progress in technology would the EC admit electronic billboards or posters? Billboards can have a form of full colour electronic display screens/panels. There is a wide variety of this kind of outdoor display devices, which have a modern, attractive look and at the same time are less burdensome for public space than a row of billboards.

“Billboards clustering” is a problem especially at historic sites where the revitalisation effort consists of several projects (often one investment is implemented under several subsequent operations).

Entities are asking also about possibility to have one electronic poster for several projects in public utility buildings where there would be a number of projects run at the same time.

Electronic devices have an advantage that they can display more information about a particular operation, in a more interesting form.

No, electronic displays can only be an addition to the poster or billboard. It would appear that billboard cluttering can be avoided by closer coordination and better planning: it is allowed to group information about multiple projects on one billboard. Similarly, one poster could contain information about several operations carried out in the same location.

27. The Commission Implementing Regulation (EU) No 821/2014 of 28 July 2014 in article 4 point 5 stipulates that “If other logos are displayed in addition to the Union emblem, the Union emblem shall have at least the same size, measured in height or width, as the biggest of the other logos.”

How this can be interpreted in cases when we carry on with a promotional action which is for example supported under technical assistance. Can logo of an action, network, or let’s say object of culture – which is promoted itself, be larger than the UE emblem?

The intention of this rule was to ensure that the European Union involvement in an operation or communication activity is clearly visible: its intention is that the European Union's contribution is not diminished by a much reduced EU emblem next to logos of other institutions or regions involved in an operation.

A logo with no clear institutional, political or economic link, which is merely a design element as part of a communication action, may be bigger than the EU emblem, provided the European Union involvement remains clearly visible and that the size of other institutional/administrative logos etc. respect the rules of Art. 4 of Implementing Regulation 821/2014.

28. Annex XII, 2.2.2 b of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 stipulates among responsibilities of the beneficiaries: “placing, for operations not falling under points 4 and 5, at least one poster with information about the project (minimum size A3), including the financial support from the Union, at a location readily visible to the public, such as the entrance area of a building”.

There is a discussion how this should be understood in terms of a location of a poster. Should these be headquarters of beneficiary or rather a place where the project is implemented on permanent basis? Does this provision concern also locations of training courses, conferences or supported job places under the ESF? Could you please elaborate what the legislator intention was in this respect.

The posters should be displayed (at least) at the location of the operation. It therefore also includes training centres, etc.

29. Until when do we have the obligation to keep the website of the previous programme (2007-2013)?

Websites of the 2007-2013 period have been set up following Art. 69 of Regulation 1083/2006 (Information and publicity). While that Regulation has been repealed by the Common provisions regulation 1303/2013, the transitional provisions (Art. 152 (1)) foresee that "That Regulation or such other applicable legislation shall consequently continue to apply after 31 December 2013 to that assistance or the operations concerned until their closure".

30. Regarding the rule set forth in the Commission Implementing Regulation (EU), No 821/2014 (article 4, point 5): “5. If other logos are displayed in addition to the Union emblem, the Union emblem shall have at least the same size, measured in height or width, as the biggest of the other logos.” 1) Does this requirement mean that any logo used together with the EU flag cannot be higher or wider than the flag? In other words, once it is not higher it can be wider? 2) When measuring the maximum height, do we understand correctly that only the height of the flag is taken into account, not the height of the flag + text “European Union”?

The suggested interpretation is correct.

31. Until when do we have the obligation to keep the website of the current programme (2007-2013)? Is there any prevision on the regulations on this particular issue?

Websites for the 2007-13 period have been published to respect Art. 69 of Regulation 1083/2006. While that Regulation has been repealed by Regulation 1303/2014, that same Regulation also stipulates in Art. 152 (Transitional provisions) that 1083/2006 "shall <...> continue to apply after 31 December 2013 to that assistance or the operations concerned until their closure". This also applies to programme website: they need to be kept online at least until closure

32. What is the meaning of the following sentence in Article 115.2 - "the website may clearly indicate the applicable licensing rules under which data are published"?

Since the objective is to increase transparency, the data should be available as freely as possible. Some Member States (eg Italy) have chosen to use the "creative commons" license. Colleagues may wish to take a look at the EU Directive on the re-use of public sector information (the so-called PSI Directive) <http://ec.europa.eu/digital-agenda/en/european-legislation-reuse-public-sector-information>

33. In Annex XII.1, the list of data fields includes "the beneficiary name (only legal entities; no natural persons shall be named). What happens in the case of a natural person who receives a grant or loan in order to create a business?"

In order to respect rules on the protection of personal data, Managing Authorities should avoid publishing the names of natural persons. We think it would be best to encourage the beneficiary to provide a company name and inform him/her that this information will be published. NB have a look also at the definitions of "operation" and "beneficiary" in Article 2.9 and 2.10 of the CPR respectively.

34. Who has to maintain the list of operations: the MA or the ministry?

One of the two – the Regulation leaves both possibilities

35. Are lists per OP and per Fund possible/allowed or do we have to keep a unified list?

Lists per OP and per Fund are not only possible or allowed, they are required. However, this can probably also be fulfilled by keeping a single list that allows filtering per OP and Fund.

36. Does the Commission see an obligation to keep the list in xml format so that it can be accessed in a user-friendly way?

The xml format is one possible option suggested by the Regulation. The csv format is mentioned as well and other table/data formats could be envisaged.

37. ERDF-project partners have the obligations to hang out a poster of their project on a well visible spot in their office. This obligation also counts for ESF projects. What if one organization executes several projects from different funds? In such case their office will be full of posters. Do you see a creative solution to this problem and have you received this question also from other member states ERDF MA's?

You can combine the information about several projects on one poster as long as the general rules about the information on the poster are complied with (incl. what the projects' purposes are and how much funding is involved).

38. EU No 821/2014 Article 4 point 3a that says „the Union emblem and the reference to the Union shall be visible, when landing on the website, inside the viewing area of a digital device, without requiring a user to scroll down the page“.

What about beneficiaries, that have websites and everything is ok on PCs (RIA_veeb_arvutis), but it is not technically possible to cover that requirement on mobile devices without developing the mobile website, because adaptive website on mobile takes first menu on the left and then content? (RIA_veeb_mobiilis.jpg) Do they have to reorganize their websites because of the emblem? And is the cost eligible?

The requirement to improve the visibility of the EU emblem and reference to the European Union on websites "inside the viewing area of a digital device without requiring the user to scroll down the page" was introduced in the implementing regulation to avoid situations where, in the past, this information was "hidden" at the very bottom of a website. It is not, however, the intention of the legislator to cause disproportionate costs for a beneficiary in order to comply with this requirement on all digital devices. Managing Authorities should ensure that beneficiaries comply with this regulation on at least one digital device (e.g. a desktop PC computer screen). Beneficiaries who set up a new website should be encouraged to design it so that it respects this legislation also on mobile devices.

39. Chapter II, Article 4 (5) of Regulation 821/2014 says “If other logos are displayed in addition to the Union emblem, the Union emblem shall have at least the same size, measured in height or width, as the biggest of the other logos.” Does that mean that for example on a roll-up banner we can not use the logo of Ministry of Finance bigger than the EU emblem even if it is not on the same line as the EU emblem? I think that this is a question whether this rule means that we can not use a bigger logo in the same line with EU emblem or in the same material? If in the same material then it would be quite hard to do because for example in a project yearbook (which counts as a one material) we would put EU emblem on the cover page and logos for implemented project throughout the whole book.

The logic of the Regulation is that there has to be a reference to the Fund(s) and the EU to acknowledge the support; together with that reference, you have to display the EU emblem; if then you display other logos with it, the size rule applies. So this does not mean that anywhere, everywhere nothing may be bigger than the EU emblem, but only in the case of reference to the Funds.

40. List of operations: Is there a minimum length for the description of the operation? Typically in INTERREG, we might as operation name "memoart" and as the description "Reflections on common historical relations between Geneva and Haute-Savoie" - does that answer the requirement, or is the description is not detailed enough?

The level of detail is not defined. However, the description should help the uninitiated readers to at least have an idea about the ultimate goal of the operation.

41. List of operations/ Axis of intervention: Is it simply the number of the axis is expected, the title of the axis, or both?

In the interest of readability, the title of the axis should be displayed.

42. List of operations / Start date of the operation: It is not the date of programming but of project start (which may be earlier than the scheduled time)?

Date of project start.

43. List of operations / Total eligible expenditure allocated to the operation: In the case of France-Switzerland border projects, is it the eligible total of the project as a whole (thus encompassing the Swiss total cost as well) or only the total expenditure eligible for the ERDF (so that on the French side)?

The eligible total of the project as a whole.

44. Total eligible expenditure allocated to the operation: in the list of operations published on the websites of the programmes, should we keep the total amounts initially programmed, or can we base ourselves on a "real" state of the amounts of the operations at the time the list is extracted? For us, the second option is the simplest, because our tables are extracted from the tracking systems operations, which are updated as and adjustments.

It is preferable that the actual amount is displayed, taking into account possible later adjustments.

45. Postcode of the operation; or any other suitable location indicator: there are many transactions in diffuse areas, or across multiple locations in the France-Switzerland program. Does it meet the requirement to indicate department(s) and township(s) in which the operation occurs?

In the case of implementation at several localities, choose a central location, such as the address of the principal manager.

46. List of operations / Country: Should we indicate all the countries concerned (in this case, France and Switzerland for the Interreg program)?

Yes

47. How many examples each year must be presented in a second language and what is the level of detail expected (listing or single brief description)?

This is not defined in the Regulation.

48. Responsibilities of beneficiaries: reference on the website: Does this obligation only concern the leader or all project partners?

At least the lead partner, who is the beneficiary as defined in Article 2 of the CPR. It would be a good practice if all the partners did likewise.

49. Temporary billboard: Can the MA on its own initiative lower the threshold to EUR 200 000 for the installation of temporary billboards and permanent plaques? Should this decision be agreed in the Monitoring Committee?

Yes it's possible and it would be recommended to involve the Monitoring Committee.

50. For France-Switzerland Interreg projects, what is meant by "public assistance"? Total public funds on the French side or the project's total public funds (thus encompassing the Swiss subsidies)?

The project's total public funds.

51. Monochrome version of the Union emblem: Could we use a white flag (rectangle) with black stars while the entire background around the flag is black, without putting a white border around the black outline of the rectangle. Please compare the attached example. We do want to infringe the provision of the above mentioned Regulation which says that "If there is no alternative to a coloured background, put a white border around the rectangle, the width of the border being 1/25th of the height of the rectangle.", but in this particular case a white border would not look proper. We believe that this version of emblem is acceptable.



Your suggested approach is not in conformity with the Regulation. The two only options are explained in Annex II to Regulation 821/2014.

52. Monochrome version of the Union emblem: could we use black version on eco-paper?



This example seems totally acceptable.

53. The Regulation does not mention using white, where the rectangle is in white and print of the stars is also in white on a black background. Our understanding is that it was a version acceptable under the previous period 2007-2013. I saw other countries also used it. And it would be very useful to if we could apply it also during the 2014-2020 period. Moreover it was a frequent practice to have pens and bags for training or conference participants. Attached is an example of such use of the EU emblem on a linen bag.



While this approach again is not in entire conformity with the Regulation, it presents some clear advantages when you absolutely have to use monochrome on a very dark background and for that reason seems acceptable.

54. Could we also admit usage of EU emblem in black or white version on a colour background (for example in the case of pens, bags etc.) where for technical (and financial) reasons only one colour of print is used?



See answer above.

55. We need a clarification on the poster hanging obligation, in the case where the beneficiary implements many projects.

For example, technical assistance beneficiaries are implementing operations such as events, travelling, payroll, communication, etc. In the Communication Q & A document, it has already been answered that information about several projects can be combined on one poster.

Does this mean that

-the title of each project should be included on the poster? OR

-would it be right to put just one title including the common purpose of the projects, for example "Technical assistance operations for supporting the implementation of ESF actions"

The Regulation requires that the poster holds "information about the project". This is not specified in any more detail. We have seen though that MAs obviously look for solutions that allow covering more than one project with a single poster. It is important to make sure that the purpose of the project can be understood from the description, so it shouldn't be too general.

56. Clarification is sought on what level information on the Union support to the operation need to be included in ESF publicity posters under point 2.2.2(b) of Annex XII of Regulation (EU) No 1303/14 (CPR) ?

We are seeking confirmation that the amount of ESF included at OP level is sufficient for a generic ESF publicity poster or at a minimum the priority axis or investment priority levels to be consistent with OP level reporting and allocation of funding. We would see major practical difficulties in including amounts below the suggested levels as such amounts will only be profiled estimates at operations level in the IE system and would be subject to constant change throughout the programming period due to actual spend against profile and the annual (not 7 yearly) allocation system at operation/project level.

Point 2.2.2(b) of Annex XII CPR stipulates the following:

'During implementation of an operation, the beneficiary shall inform the public about the support obtained from the Funds by:

(b) placing, for operations not falling under points 4 and 5, at least one poster with information about the project (minimum size A3), including the financial support from the Union, at a location readily visible to the public, such as the entrance area of a building.'

Based on the above and other questions on this provision from Member States, the conclusion can be drawn that this provision can be interpreted in different ways;

- It can be understood that the obligation to provide information on the project¹ includes the requirement to mention on the poster the amount of financial support from the Union; or
- it can be interpreted that this obligation is limited to indicating that the project is financially supported by the Union without mentioning the amount of financial support from the Union.

It is therefore useful to enquire what the intention was of the Commission (when it presented its proposal) and the co-legislators taking into account that the modification by the co-legislators in comparison to the Commission's proposal is that this poster obligation now only applies to 'operations not falling under points 4 and 5'. The latter are infrastructure or construction operations (point 4 and 5) or operations that consist of the purchase of a physical object (point 5) which are supported by the ERDF or the Cohesion Fund and for which the total public support to the operation exceeds EUR 500 000.

The Commission's objective was to ensure that the public is informed that at this location an operation is being implemented that is supported by the Funds by placing at least one poster with information about the project at a location readily visible for the public. When assessing whether the wording 'the financial support from the Union' aimed at requiring beneficiaries to mention the amount of Union support on the poster, it has to be borne in mind that there is no regulatory obligation to have the amount granted by an ESI Fund to an operation specified in the document setting out the conditions for support (Article 125(3)(c) CPR, e.g. grant agreement between a managing authority and a beneficiary).

¹ Although this provision refers to 'project' it is understood that the co-legislators wanted to refer to 'operation'.

Therefore, the conclusion has to be drawn that it was not the intention of the Commission (neither of the co-legislators as their modifications did not relate to this) that the poster should mention the amount of Union support to the project.

This conclusion is confirmed by the fact that for operations where the public support is at least EUR 500 000 there is no such obligation to mention the amount of support on the temporary billboard that is to be put up during the implementation of the operation.

On the basis of the above, it is to be concluded that there is no obligation for Member States to mention on the poster the amount of the financial support from the Union. Member States can of course do so when the amount of Union support is included in the document setting out the conditions for support (see for instance the tool developed by HU: <http://dev.cmg.hu/tablagenerator/#nogo>).

In order to comply with the regulatory requirements, the poster has to display the Union emblem and include a reference to the Union and the Fund or Funds supporting the operation (in accordance with point 2.2.1 of Annex XII CPR). In addition, when providing information about the project (in accordance with point 2.2.2 of Annex XII CPR) the beneficiary has to mention the aim²/objective of the project (i.e. what does this project want to achieve to contribute to the objectives of the OP under which it is supported and indicate that this project is financially supported by the Union.

57. The Delegated Regulation (EU) No 480/2014 includes the Annex III comprising the list of data to be recorded.

Field 5 states “Name or unique identifier of the operation”

Field 6 states “Short description of the operation”

At the same time, the “list of operations” according to Annex XII of Regulation (EU) No 1303/2013 demands the same content:

Operation name;

Operation summary

Question:

What information shall be provided in the fields?

1) Are these four different specifications?

Or:

2) Is the “Name or unique identifier of the operation” identical with “Operation name” and the “Short description of the operation” with “Operation summary”?

3) For instance, does field 5 refer to rather abstract information, e.g. „expansion of facilities”, “construction of a warehouse”? The MA could then work with a drop down menu to ensure a uniform presentation.

For “Operation summary”, there is an additional issue of business secrets.

Therefore, the Monitoring Committee has agreed to include a free-text field in the project application, which is filled in by the applicant and for which he/she will receive a clear indication that this information will be published in the list of beneficiaries.

The referred fields should not be considered four different specifications, only two:

² See also the requirement under point 2.2.2.(a) of Annex XII CPR.

- 1) **Operation name** should correspond to the content in **Field 5 – Name or unique identifier**;
- 2) **Operation summary** should correspond to the content in **Field 6 - Short description of the operation**.

Article 115 and Annex XII CPR set out the requirements that need to be respected by Member States with regard to information and communication. In this context, paragraph 1 of Annex XII CPR sets out the minimum information to be included in the lists of operations referred to in Article 115(2) – list of operations by programme and Fund. In accordance with Article 115(2) this list shall be made accessible through a single website portal providing a list and summary of all operational programmes in that Member State. **Operation name** and **operation summary** are among the data fields to be presented.

Annex III CDR contains the list of data to be recorded and stored by the managing authority necessary for monitoring, financial management, verification and audit, as referred to in Article 24 CDR. Among the data requested at the level of the operation appears **Field 5 – Name or unique identifier of the operation** and **Field 6 - Short description of the operation**.

Both Regulations refer to the same content related to the operations but the degree of detail and its form may be different, taking into account the different purposes of the presentation of data (expectedly more detailed and technical as regards information to be stored by the MA than content presented to the public).

Therefore, as the data to be presented in Annex XII CPR are to be published on the website for transparency and communication purposes this information should be simpler and always indicate the meaningful name of the operation (i.e. not only a code or a reference number).

As regards the information referred to in Annex III CDR the Member State may use the unique identifier as stated in the specific field (i.e. only reference numbers or codes) as the purpose of the information is different, i.e. it concerns data to be recorded and stored in computerised form in the monitoring system and therefore the information is expectedly more technical.

**58. Do beneficiaries have to comply with information and communication obligations set out in ANNEX XII CPR before approval of the operation by the Managing Authority, in case this operation has started to be implemented before its approval? Or do they have to comply with these obligations only from the moment there is a decision of approval of the operation by the Managing Authority?
And how to ensure that expectations by participants are adequately safeguarded in case the project, promoted as being funded by the ESI Funds, is in the end not approved by the Managing Authority?**

According to Article 65 (2) CPR, expenditure shall be eligible as from the date of submission of the Operational Programme or 1 January 2014, whichever is earlier, or, in the case of operations funded by the Youth Employment Initiative, as from 1 September 2013.

This means that operations may start even before the submission (and approval) of the Operational Programme, under which they will be funded, to the Commission.

The CPR, however, sets out specific provisions in order to ensure that these operations are fully compliant with applicable law under the 2014-2020 programming period.

First, according to Article 65 (6) CPR, operations may not be selected for support in case they are physically completed or fully implemented before the application for funding is submitted by the (potential) beneficiary to the Managing Authority.

Second, in accordance with Article 125 (3)(e) CPR) the Managing Authority has to satisfy itself that where the operation has started before submission of an application for funding to the Managing Authority, **applicable law relevant for the operation has been complied with** (i.e. since the start of implementation).

Applicable law, according to Article 6 CPR, means applicable Union law and the national law relating to its application. This includes, inter alia, all the provisions set out in the EU Regulations applicable to the European Structural and Investment Funds and national law relating to its application (for instance, national rules on eligibility) that are relevant for the operation. With regard to the rules on information and communication measures, these rules have to be complied **from the moment they become applicable to the operation** (i.e. when the operation is selected for support and the beneficiary is provided with the document setting out the conditions for support) - as, before the selection and approval of the operation, they are not considered yet as 'applicable'. Indeed, unlike other rules as rules on public procurement and State aid, which are applicable irrespective of the approval of the operation, and the rules on eligibility, which pre-determine the selection of the operation, the rules on information and communication can only apply to operations that have already been selected and approved for support (as their objective is to provide information on and give visibility to operations that are being funded by the ESI funds, and not to "potential" ESI funded operations). This is also implied by the wording in Annex XII CPR which refers either to 'operations supported' or 'operations selected'.

It should be noted, however, that as from when the operation is selected and approved for support the beneficiaries have to ensure full compliance with information and communication rules, including the rules set out in Annex XII CPR and Commission Implementing Regulation (EU) No 821/2014.

59. In Poland there are 17 two-fund programmes:

- 16 Regional Operation programmes – each one is constructed in the same way: several priority axes are co-financed by the ERDF and the others by the ESF. Each programme has a priority axis "Technical Assistance". In all ROPs the "Technical Assistance" axis is co-financed solely by the ESF.

- Infrastructure and Environment Operational programme – in this case several priority axes are co-financed by ERDF and others by Cohesion Fund. The priority axis "Technical Assistance" is co-financed solely by Cohesion Fund.

For the sake of simplicity and consistency in communicating the source of funding the above mentioned two-fund programmes, Polish authorities suggest managing institutions and intermediate bodies benefiting from technical assistance use in their information and communication activities the general reference to the European Structural and Investment Funds.

After further follow up information, it has been clarified that the question from PL authorities concerns all documents or promotional activities related to the multi-fund programmes used by the managing authorities or by beneficiaries. They would like to know if they can use "ESI Funds" label in all of the communication, no matter if they relate to ERDF- or ESF- supported operations, no matter if it is a beneficiary or an authority.

PL authorities listed the following practical examples (multi-fund ERDF+ESF programme, where all TA is financed by ESF only):

1. If the salaries of employees of the OP managing authority are financed from a purely ESF TA priority axis, can their contracts be labelled "co-financed by the ESI Funds" or should they use "co-financed by the ESF" tag?
2. If there is a promotional material about an ESF co-financed priority axis (on vocational training or social inclusion) and that material is financed from the ESF TA priority axis, can they use "co-financed by the ESI Funds" or should they use "co-financed by the ESF"?
3. Let's have an ERDF co-financed research centre and we have a promotional article in the press about it which is financed from the TA priority financed from the ESF only. In such a case, can all documents related to ERDF support for that research centre as well as such a promotional article be tagged with "co-financed by the ESI Funds" or do they have to tag the ERDF-related operations with the "ERDF" tag?

As mentioned in the reply 2015/REGIO/066 - 30_EMPL the Managing Authority implementing technical assistance operations is a "beneficiary" in the meaning of Article 2(10) CPR, i.e. a public body "initiating and implementing operations".

In this capacity, the Managing Authority falls under the information and publicity requirements for beneficiaries as stated in Article 115(3) and Annex XII, point 2.2.1. (a) and (b) CPR, as well as Articles 4(1) and 4(3) of the Commission Implementing Regulation (EU) No 821/2014.

Annex XII, point 2.2.1.(b), requires that *all information and communication measures provided by the beneficiary shall acknowledge support from the Funds **to the operation** by displaying a reference to the Fund or Funds **supporting the operation**.*

Where an information or communication measure relates to an **operation** or to several operations **co-financed** by more than one Fund, the reference provided for in point (b) may be replaced by a reference to the ESI Funds.

In addition, in line with point 3.1.1 of Annex XII, the MA is obliged to include *details of the financial support from the Funds concerned* when implementing its communication strategy in order to disseminate information on the programme's strategy and objectives as well as on the funding opportunities to potential beneficiaries and all interested parties.

On the basis of the above we can conclude in the relevant Polish case that:

- As regards practical example 1 - the reference in any communication and information measures or documents should be made to the Fund supporting the operation – which, in the example is the ESF. The reference to the ESI Funds cannot be applied, as in this case the TA operations are not co-financed by more than one Fund but only by the ESF;

- Similarly, as regards practical example 2 the co-financed communication and information measures should only make reference to the ESF since the promotional activities are co-financed by the ESF only. In addition, in line with point 3.1.1 of Annex XII CPR, the MA should also ensure dissemination of the funding opportunities provided by the priority axis, including by providing details of the "financial support from the Fund or the Funds concerned", which, in the case, is the ESF, as the priority axis is co-financed by the ESF only..

-Finally, with regard to example 3, a distinction should be made between the (1) the content of the information, i.e. communication and information measures that disseminate the Union support provided by the ERDF to the research centre and (2) the carrier of that information, i.e. the article in the press.

With regard to the first element (1), the information and communication measures should refer only to the ERDF – as the research centre is only supported by the ERDF. Therefore, the content of the article in the press should refer that the research centre is supported by the ERDF. With regard to second element, the article, being supported only by the ESF, should also refer that it is supported by the ESF since it draws support only from the ESF.

If, however, the communication and information measure concerns operations supported by more than one Fund (for instance, non-TA priority axes which are co-financed by more than one Fund), it is possible to make a reference to the ESI Funds instead of the individual Funds concerned.

This reply is different than the one initially provided to Question 5 in this document, which has been adapted accordingly. The new interpretation will only be applied in the future and not retroactively.