

**EUROPEAN ECONOMIC AREA**  
**STANDING COMMITTEE**  
**OF THE EFTA STATES**

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**SUBCOMMITTEE IV ON FLANKING AND HORIZONTAL POLICIES**

**EEA EFTA COMMENTS ON THE PROPOSAL FOR AN INTEGRATED ACTION  
PROGRAMME IN THE FIELD OF LIFELONG LEARNING (COM(2004) 474 final)**

**I INTRODUCTION**

1. Under the EEA Agreement, Iceland, Liechtenstein and Norway participate fully in all Community education and training programmes. The present programmes expire at the end of 2006. On 14 July 2004, the Commission adopted a proposal for a new action programme in the field of lifelong learning from 2007 (COM (2004) 474). The proposal merges nearly all the current activities into one integrated programme. It is the intention of the EEA EFTA States to also take part in the new programme. Thus, in accordance with provisions in the EEA Agreement, the Working Group on Education, Training and Youth hereby presents comments on the Commission's proposal.

**II GENERAL REMARKS**

2. The EEA EFTA States welcome the proposal for the integrated programme for the education and training sector. They subscribe fully to the general objectives expressed in the preamble, as well as to the specific objectives set out in Article 1 of the proposal. In the EEA EFTA States' view, one of the best ways to realize the goals of the Lisbon Agenda is to invest in human resources and ensure competence building in all parts of the European Economic Area.

3. The EEA EFTA States also appreciate the Commission's preparatory work on the proposal, which has been conducted in a highly transparent way and in close collaboration with the participating countries and the programme stakeholders. Through this wide-reaching process, several institutions and organisations in the EEA EFTA States have been able to give input at various stages in the shaping of the new programme.

4. The Commission's proposal is soundly based on current concerns and priorities, as well as on experiences and evaluations of past and present programmes. The planned three-fold or more increase in Community support to education and training activities reflects the importance attached to these areas for continued growth and high levels of employment. The EEA EFTA States support this increased focus on education as an important instrument to reach the Lisbon goals. However, as the proposed budget would lead to a substantial net increase of the financial contributions of the EEA EFTA States to the EU

budget in a period of tight national fiscal budgets, the EEA EFTA States would like to express their concerns as to the budget implications for them.

5. The EEA EFTA States endorse the Commission's decision to give up the strict distinction between education and training that has so far been made in the design of Community education and training programmes, i.e., specific programmes for specific fields. To emphasize the overall lifelong learning focus of the programme, it could be helpful to coin a special name for it, especially as many of the components that make up the new programme will keep their well-known names (Erasmus, Comenius, Leonardo da Vinci, etc.). The EEA EFTA States would therefore suggest a name contest, for example on the Internet, which could also be a useful source of publicity to the new programme.

6. The EEA EFTA States are in agreement with the philosophy that seems to lie behind the proposal, namely that implementing details are kept to a strict minimum, leaving much room for flexibility and development as one goes along. This will, however, put an even higher responsibility than before on the participating countries and, in particular on the Commission, to co-ordinate in the best way possible, further elaborations of the actual activities to be supported and their implementation.

### III SPECIFIC ISSUES

7. The proposed *four sectoral programmes* (Comenius, Erasmus, Leonardo da Vinci and Grundvig) are designed in a way that should make them useful instruments for safeguarding continuity of the good work already taking place, while at the same time adding new and welcome features.

8. The *transversal programme* will be instrumental to counteracting fragmentation of the general programme. All the actions foreseen within the transversal programme will be equally important in this respect. In particular the EEA EFTA States see a great benefit in integrating into this part of the programme support to *policy development at European level in lifelong learning*.

9. As regards the *Jean Monnet programme*, one may consider including the Jean Monnet Action in the Erasmus sectoral programme, while the operating grants to European institutions could possibly be part of the transversal programme, thereby simplifying the programme structure even more.

10. Given the simplified and coherent structure of the integrated programme and of the Community programmes proposed in the fields of youth and culture, there is all reason to believe that *joint actions* could be realised more successfully than has been the case under the present generation of programmes. However, in light of past experience, it should be pointed out that in order for these actions to have an impact, they will have to be better funded than they have been until now and also to be followed up more systematically than has been the case in the past.

11. Concerning the budgetary breakdown, there could be reasons for giving more room for flexibility as regards the reallocation of funds between the different actions and sub-programmes, depending on where the actual demand will be. In line with the general philosophy behind the proposal mentioned above, the programme decision should not fix a minimum percentage that must be allocated to a certain type of activity.

12. The EEA EFTA States welcome the simplification of the programme structure, its legal basis as well as of its administration. The concrete proposals made by the Commission in this regard are sound and should be in the interest of all parties concerned, be it the Commission, participating countries, national agencies or the beneficiaries. However, in order for this to materialise, it is essential that amendments to the financial regulations of the Commission be made, thus adapting them to the needs and nature of Community programmes and actions. The principle of 'proportionality' has therefore the full support of the EEA EFTA States.

13. In Article 3 on definitions, it should be made clear that the term "Member State" in the decision refers to all participating countries of the programme.

14. Article 9 and 10 on implementing measures provides for two procedures (advisory and management), depending on the issue tabled for discussion for the programme committee. In the EEA EFTA States' view, the Commission, when implementing Community programmes, should be assisted by management committees, in accordance with the general principle of the 'comitology' decision 1999/468/EC. Although the EEA EFTA States could agree with the Commission that the committee's role in the selection process should focus on the process, criteria and budget, the committee must be free to discuss all aspects of the implementation of the programme.

15. In Article 15 on funding, the EEA EFTA States would furthermore like to see a reference to the additional funds that may arise from the participation of the EEA EFTA States and countries associated to the programme, in particular as such references are made in the General budget of the European Union for budget titles, where participation in the programme by non-EU Member States is foreseen.

16. Finally, the EEA EFTA States would like to recall that the formal decision-making process that will ensure EEA EFTA participation in the new programme can only start once the programme has been adopted by the Council and the European Parliament. As Article 1.6 in the Commission's proposal opens up for preparatory measures to be implemented from the entry into force of the programme decision, and thus possibly before the start of the programme in 2007, it is important that flexible and pragmatic solutions be found, if necessary, to ensure the continued participation of the EEA EFTA States in the Community education and training activities in this intermediate period. The EEA EFTA States are pleased to note that such pragmatism was shown towards them in the transition from the first to the second generation of the present education and training programmes.

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