EEA EFTA Comment

on the Commission proposal for a Regulation of the European Parliament and of the Council establishing 'Erasmus': the Union programme for education, training, youth and sport and repealing Regulation (EU) No 1288/2013

I. EXECUTIVE SUMMARY

1. The EEA EFTA States – Iceland, Liechtenstein and Norway – welcome the Commission’s proposal for the Union programme for education, training, youth and sport (Erasmus), and the stability and continuity that characterises the proposal. The current Erasmus+ programme has been instrumental in achieving the objectives of growth, jobs, equity and social inclusion at European level through international cooperation. We support the continued emphasis on the overall objectives and for enhancing a culture for quality. We also welcome the objective to simplify the programme, and underline the need for cutting red tape in all actions in the programme.

2. As committed partners in the current Erasmus+ programme, the EEA EFTA States emphasize the importance of continued participation in the new Erasmus programme. Such participation should be based on the relevant articles of the EEA Agreement. These provide inter alia for equal access to all parts of the programme, the same rights and obligations to partner institutions, undertakings, organizations and nationals, as well as the same rights and obligations regarding dissemination, evaluation and exploitation of results for EEA EFTA States as those applicable to the EU Member States.

3. The EEA EFTA States question the need for a distinction between cooperation and innovation partnerships.

4. Iceland and Norway currently participate in both Erasmus+ and Horizon 2020 and see a potential for improving the links between the two programmes, in order to allow participants to exploit the synergies between them in the future.

5. We would welcome a clear commitment to more transparency and involvement of National Agencies in the implementation of centralised actions. This is key to
ensuring the inclusiveness and accessibility of the programme to its applicants, irrespective of sector, discipline or the location of potential applicants.

II. INTRODUCTION

6. The EEA EFTA States welcome the Commission’s proposal for the next EU Programme on education, training, youth and sport – Erasmus.

7. We have participated in the predecessor programmes to the proposed Erasmus for more than two decades. The current Erasmus+ programme has been particularly successful in achieving its objectives, as confirmed by the recent interim evaluation to which the EEA EFTA States contributed.

8. The EEA EFTA States want to continue to play an active part in the next Erasmus programme. They would hereby like to highlight the relevant provisions of the EEA Agreement and present some comments on the priorities and the shaping of the future programme.

III. THE EEA AGREEMENT AND EU PROGRAMMES

9. Programme participation in the EEA Agreement is regulated as follows:

   • Where cooperation takes the form of participation by EEA EFTA States in an EU framework programme, specific programme, project or other action, the EEA EFTA States shall have access to all parts of the programme.1

   • At the project level, institutions, undertakings, organisations and nationals of EEA EFTA States shall have the same rights and obligations in the EU programme or other action in question as those applicable to partner institutions, undertakings, organisations and nationals of EU Member States.2 The EEA EFTA States, their institutions, undertakings, organisations and nationals shall also have the same rights regarding dissemination, evaluation and exploitation of results as those applicable to EU Member States, their institutions, undertakings, organisations and nationals.3

   • The EEA EFTA States, when a decision to participate in an EU programme has been taken, contribute financially to the programme through annual payments towards the relevant budget lines of the Commission budget as determined by the EEA EFTA proportionality factor (EEA EFTA GDP as a proportion of EU EEA GDP). The EEA EFTA financial contribution is added onto the EU budget of the programme.

10. For participation in the Erasmus programme, this means that once a decision to participate has been taken, the EEA EFTA States shall have access to all parts of the programme and participate on equal footing as the EU Member States.

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1 Article 81(a) of the EEA Agreement.
2 Article 81 (d) of the EEA Agreement.
3 Article 81(e) of the EEA Agreement.
IV. STRUCTURE AND MANAGEMENT

11. In line with the conclusions of the interim evaluation of the current Erasmus+ programme, the EEA EFTA States support the approach taken by the European Commission of ‘evolution not revolution’ and welcome the stability in the overall architecture of the proposed programme. The continuity of an integrated programme with three key actions and maintaining the existing division between sectors is welcomed. This will also facilitate smooth transition between programme periods and ensure continuous participation of key beneficiaries. Furthermore, the approach to foster the accessibility for organisations with little or no experience or with smaller operational capacity is highly appreciated.

12. At the same time, the EEA EFTA States are critical towards separating the field of youth into two different programmes. This goes against the integrated programme approach that has proven successful for Erasmus+. The EEA EFTA States have previously voiced their concerns over the division of the youth field in an EEA EFTA comment on the European Solidarity Corps regulation, submitted to the Commission on 8 September 2017. The EEA EFTA States emphasise the need for coordination between the new Erasmus programme and the European Solidarity Corps 2021 – 2027.

13. The EEA EFTA States support the proposed continuity in terms of management structure, in which the National Agencies play a crucial role. This requires that National Agencies take on a certain level of basic tasks, independently of whether they are large or small. Expanding the operations of the National Agencies does hence not pose any problems to the EEA EFTA States, as long as the European Commission ensures that they are adequately resourced - in particular with a view to small countries.

14. The EEA EFTA States believe that increased transparency and better access to information would increase the number of good applicants for Erasmus centralised actions. We therefore suggest that the National Agencies should be more involved in the implementation of the centralised actions and have clear roles and responsibilities, at the same level as the National Contact Points in the Horizon 2020 programme. This will ensure the inclusiveness and accessibility of the programme to all applicants, irrespective of sector, discipline or the location of potential applicants.

15. Iceland and Norway currently participate in both Erasmus+ and Horizon 2020 and have found that it might be a challenge for participants to exploit synergies between the two programmes. For example, beneficiaries of the programmes could be provided with guidance on how to include an educational component in a research project, and vice-versa. Iceland and Norway believe that the objectives and activities in the fields of education and research could benefit from better linkages in future programmes.
V. POLITICAL PRIORITIES AND NEW INITIATIVES

16. The EEA EFTA States support the overall objectives proposed for the new programme and in particular the emphasis on a more inclusive programme that caters to disadvantaged target groups. However, in view of the strong emphasis on multilingualism as an important element of the European Education Area, the language learning benefits of mobility activities and direct support through cooperation projects could figure more prominently in the presentation of the Erasmus programme.

17. Quality early childhood education and care lay the foundation for children's development and learning and for active participation in society. It also contributes to social equity, inclusion and work-life balance. Research clearly shows that for early childhood education and care to genuinely contribute to social equity and good outcomes for children it is a prerequisite that the provision is of high quality. The EEA EFTA States recommend a stronger focus on and targeted actions for early childhood education and care in the programme.

18. There are several new initiatives and adjustments in the current programme that warrant specific comments grouped below under relevant key actions:

- **Key Action 1 – Learning mobility in education, training, youth and sport**

  The EEA EFTA States support that mobility, based on institutional cooperation, should remain the core activity of the programme. Mobility for pupils is an important tool for internationalisation of the school sector. Moving mobility of pupils to Key Action 1 and increasing the mobility will likely result in better and more inclusive schools, increased student mobility in higher education and improved language skills.

  The EEA EFTA States support the widening of the format of mobility to include more Virtual and blended mobility where physical and virtual mobility are combined. This will extend the reach of the programme. To further increase flexibility of and access to mobility activities, the EEA EFTA States are in favour of decreasing the minimum duration of mobility periods abroad where relevant.

  **Mobility of sport coaches and staff**: The EEA EFTA States welcome this new target group for mobility, which will make the sports part of the programme much more visible, as well as its decentralised management mode. In view of the limited funding for the sports sector proposed, it is necessary to ensure a minimum level of funding for each call and country to make it viable, as it is likely that there will be significant demand for participation.

  **International credit mobility**: The EEA EFTA States strongly support simplification. We appreciate the proposal of the Commission that actions under the international dimension of Erasmus funded by the Neighbourhood, Development and International Cooperation Instrument (NDICI) should be done in accordance with the Erasmus regulation. We also welcome the expansion of international mobility opportunities to the vocational education and training (VET) sector.
• Key Action 2 – Cooperation among organisations and institutions in education and training, youth and sport

Strategic partnerships: The EEA EFTA States question the need for a distinction between cooperation and innovation partnerships. We underline the need for decentralised actions at the same scale in terms of expectations and funding as for the current strategic partnerships.

Strategic partnerships have been a great success in the current Erasmus+ programme, despite limited funding in certain sectors. The decentralised actions should maintain the level and ambitions of the current strategic partnerships and should continue to support innovation and the development of new practices and methods in a European context, in addition to sharing practices and methods between organisations. When it comes to higher education, the EEA EFTA States question the added value of cooperation partnerships that do not provide funding for innovation and development.

Small-scale partnerships: The EEA EFTA States recognize the importance of lowering entry barriers to participation in the programme and therefore welcome the proposed expansion of small-scale partnerships. Being able to combine transnational and national activities will allow grassroot organisations to reach out to people with fewer opportunities.

European universities: The EEA EFTA States support the approach for this initiative which will cover education, research and the ‘third missions’ of higher education institutions and be based on the principles of excellence, as well as inclusiveness, diversity, and regional balance. The focus on innovation will be crucial in ensuring that the action is adequately open to new alliances and not only to the existing ones. It is essential to consult students in the design of this new action.

Centres of Vocational Excellence: The EEA EFTA States support this initiative which will enhance the link between education and the world of work and may increase the visibility and status of vocational education and training (VET), and contribute to quality and innovation.

Forward-looking projects and Erasmus Mundus Joint Degrees: The EEA EFTA States support including forward-looking projects and Erasmus Mundus Joint Degrees under Key Action 2, as well as opening up this action to participation from different fields. This will increase the predictability of these calls and may lead to increased impact of these projects.

• Key Action 3 – Support to policy development and cooperation in education, training, youth and sport

The EEA EFTA States have fruitfully participated in various support activities aimed at fostering quality, transparency and recognition of competences, skills and qualifications as listed in article 6 in the proposal. However, the visibility and reinforcement of the Union tools in the Erasmus programme is important and the
EEA EFTA States therefore suggest that policy networks such as Europass, Euroguidance and Youthpass be explicitly mentioned in the Regulation.

The EEA EFTA States welcome measures that contribute to the qualitative and inclusive implementation of the programme listed in the Commission Staff Working Document accompanying the proposed regulation. This includes, in particular, measures to strengthen Transnational Cooperation Activities, stronger connection with policy developments in implementing the programme and the use of former Erasmus participants in raising awareness and disseminating results.

19. The EEA EFTA States emphasize the need for simplification and increased flexibility regarding applications, management and reporting. Rules and guidelines should be more closely in line with the research and innovation programme, and in line with the EU better regulation principles. The emphasis of inclusiveness should be clearly reflected in all relevant programme documents.

20. The EEA EFTA States propose more budget flexibility for the National Agencies, compared to the current programme. A more flexible distribution of funds would make it easier for National Agencies to respond to unequal and shifting demands in the different sectors and needs at the national level. More flexibility would thus improve the use of available funding, by making it more targeted.

VI. FINANCING

21. In general, the EEA EFTA States support the distribution of the budget in article 14. For the future programme we would favour a more predictable and steady increase throughout the programme period.

22. The minimum funding level proposed for each of the education and training sectors should provide for increased flexibility in transferring funds from one sector to the other at the national level. This would make the programme more relevant when addressing different needs in each country.

23. The EEA EFTA States recognize the intention to finance international activities through other instruments as indicated in paragraph 3 of article 14 in the proposal. We are confident that the proposed NDICI regulation will ensure full participation of the EEA EFTA States in these activities.

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