

European Students' Union (ESU)

Fighting for students' rights since
1982



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ESU's contribution to the Mid-Term Review of the Recovery and Resilience Facility

I. General remarks about the Recovery and Resilience Facility (RRF)

The European Students' Union (ESU) was one of the first European non-governmental organisations that, at the outbreak of the pandemic and when the discussions about the economic and social recovery after the COVID-19 pandemic started, [called](#) for a shared investment tool at European level to support the Member States in creating and implementing policies that would boost the investment in and reforms of higher education. This was crucial both because the pandemic showed the lack of resilience and the underfunding of the higher education sector and since the urgency of investments couldn't be matched with the capacities of the Member States.

Therefore, the creation of the Recovery and Resilience Facility was a cornerstone in the coordination and support mechanisms at the level of the European Union that ESU highly welcomed and appreciated.

ESU believes RRF is of utmost importance in building up European convergence and spreading the perceived costs of the investments and reforms, which will reap the benefits in both short-term and long-term. It also creates a sense of common commitment in our shared future and promotes the values and priorities of the European Union. For Member States, RRF creates an essential stimulus and for the stakeholders it opens a new window of opportunity within which they can advocate for resourcing highly needed

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reforms which were postponed or de-prioritised based on budgetary arguments.

Apart from this, RRF provides a coherent framework for the European coordination and cross-check of reforms, feeding in the developments of the European Semester. In comparison with the cohesion funds, it enhances the accountability of the Member States through the targets and milestones system.

ESU believes RRF is here to stay and should be transformed from a one-time only, crisis-linked instrument to a structural instrument of the European Union.

Despite all the advantages of the RRF, several issues arose in the process of the implementation of RRF in Member States, which will be highlighted below. Some of them are stemming from the design of the RRF Regulations and others are linked with mere mismanagement of the Facility. Both however can be solved through adjusting the Regulation and the action of key decision-makers at European level.

In some cases, the actions of Member States diverged in a relevant manner from the objectives of the RRF, in this way touching upon RRF's core values and affecting its credibility. For the Facility to ensure its benefits and long-term positive effects, we believe these problems should be tackled with priority.

II. Remarks about the engagement of the stakeholders

The public trust in the reforms which are proposed and in the objectives of the investments are key conditions of their sustainability and durability. However, this trust was severely altered by the tokenism or, in some cases, sheer lack of consultation and engagement of stakeholders in the elaboration and implementation phases of the National Recovery and Resilience Plans (NRRPs) by the national governments.

The RRF Regulation and the declarations of the European institutions showcased the importance of building the national plans as not plans of a specific government, but of the whole society, promoting long-term goals for development. Article 18, point 4, letter q) of the RRF Regulation specifically mentions the obligation of the Member States to report on the consultations with the civil society, including youth organisations, for setting up the NRRPs.

The civil society documented the lack of consultation in several papers, and ESU together with our National Unions of Students contributed to the analysis done by Civil Society Europe: [Civil Society & the National Recovery and](#)

[Resilience Plans: A reality check](#). We will extract below the evaluations done by our members:

Spain (CREUP): CREUP reported that they were not involved in the preparation of the plan and their proposals were not included.

Estonia (EÜL): EÜL have been consulted on the whole of the Estonian Plan. They reported that strategic stakeholders and partners received a letter from the Estonian Ministry of Finance on 20 May with a possibility to give written feedback on the draft Plan until 4 June. However, their proposals were not included in the Plan. They are unaware of proposals for involving civil society in implementation and monitoring of the Plan.

Denmark (DSF): The National Union of Students in Denmark (DSF) and the Danish Youth Council (DUF) report no participation nor opportunity to participate in any consultation on the Plans. They have expressed strong dissatisfaction with the consultation process. This despite the emphasis on the importance of consulting youth organisations in relation to the plans.

Germany (fzs): The national union of students was neither made aware of the NRRP nor involved in the preparations of the plan. In an informal meeting as a side note it was argued that there was not much time for preparations. Measures connected to education partly lack reason for prioritisation and do not tackle urgent matters in higher education. Regarding the measure of establishing a national education platform, fzs still has not been contacted nor involved in any way though preparations are ongoing. Regarding the educational centres of excellence, fzs has not been consulted and Annex II of the Council recommendation shows that while HEIs, research institutions and teachers are named as key cooperation stakeholders, student representative bodies such as fzs as national union have been purposefully left out as stakeholders.

Czech Republic (SKRVŠ): The Student Chamber of the Council of the Higher Education Institutions (SKRVŠ) were not consulted on the Plan and were unaware of the process or criteria for involving organisations in the consultation.

Slovakia (ŠRVŠ): Stakeholders had the opportunity to participate only: through a Q&A session, through a general meeting with many stakeholders (to which initially neither rectors nor students were invited, and whose general discussion did not allow to thoroughly discuss the topics), and by sending comments to the published version of the plan, with a two-week deadline. In September 2020, ŠRVŠ reached out to the Ministry of Education and the Ministry of Finance, requesting to be involved in the process, but it has not received a response ever since.

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Italy (UDU): UDU reported that they presented several times their position to improve the Italian Higher Education system. These positions were submitted by the organisation, as well as through the National Student Council (CNSU), the highest university students' representative body in the country. However, since the political crisis in early 2021 that led to the formation of the new government, the drafting of the NRRP (which was the centre of the political crisis) happened behind closed doors without any consultations of the stakeholders.

Romania (ANOSR): ANOSR reported that there was no transparent calendar regarding when the Plan would be published for consultation. They say that, though several proposals were submitted, the Government didn't publish the proposals received (not even the number of proposals), the list of who contributed, or whether they accepted any contribution from the consultation process and in which way. They were 2-hour meetings where several general issues were raised by the public (especially NGOs), without a clear idea of how the comments might impact on the Plan. ANOSR reported that some of their more important proposals in the field of higher education were included in the Plan.

Despite the provision from article 18 of the RRF, in the evaluation phase of the NRRPs the Commission saw the obligation as rather a diligence or guiding one, without actually seeking its enforcement, either in the preparatory technical phase or in the final evaluation phase of approving the NRRPs. For the future, **ESU demands that stakeholder involvement obligations are treated as such, expressly mentioned and enforced with concrete outcomes. This approach could start by applying this standard when countries would initiate processes to modify the NRRPs.**

The lack of consequences for the non-engagement of stakeholders in the preparation phase of NRRPs could also be one of the reasons for having the same low threshold of involvement for the implementation phase. **ESU believes the engagement of stakeholders is crucial for the success of the initiatives and the European Union should foster a systematic, whole-approach engagement.** This is relevant also as civil society offers, in many situations, an alternative point of view on the maturity of reforms, priority of investments etc than the governments. **Therefore, the RRF Regulation should demand the involvement of civil society organisations along the whole cycle – implementation, monitoring, evaluation, review. The Commission should put in place and publicise processes that foster alternative evaluation and reporting from the civil society that should feed in the assessment done at EU level on the progress of implementing NRRPs and its achievements.**

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Furthermore, details that effectively and decisively shape the actions, objectives and especially outcomes of the NRRPs are decided in the implementation phase. NRRPs had to demonstrate how they tackle the issues mentioned in the previous Country Specific Recommendations (CSRs) from the European Semester Cycle. However, in some cases the goals and plans of the NRRPs are so general that one can link the plan with the situation brought forward by CSRs only in principle, without guarantees that NRRPs would in fact improve the situation in the area highlighted by one CSR. In this situation, whether the plans would actually tackle the CSRs in practice is a matter of the specific objectives set in the implementation phase. **Therefore, special attention needs to be put in assessing whether the reforms and initiatives funded by the NRRPs and implemented, as well as their results fulfil a country specific recommendation.** In this regard, ensuring the full transparency of the implemented policies and projects serves as an important tool to assess the contribution to the objectives. On the other hand, it is fundamental that the general objectives and indicators of the European Semester, as well as the adopted CSRs, are ingrained within a rigorous system of stakeholder consultation, at the European and national level.

III. Remarks about the structure of RRF and its governance

One of the novelties of the RRF Facility is the link between investments and reforms, putting the reforms on equal footing and ensuring a more coherent approach that underpins the policy initiatives of the member states, in comparison with Cohesion funds and other EU funding instruments. **ESU believes introducing this systematic overarching design is of great value.**

However, on the reform pillar concerning development is the approach of a handful of member states which used the NRRPs, and the urgency of the adoption of the plan, to push forward unpopular reforms previously refused by stakeholders. We have seen such developments for example in [Croatia](#) or [Spain](#). While the NRRPs prove to contain only general remarks, the approval of the plan by the Commission and the Council is used as a blank check for governments to argue that their reforms (sometimes even against what the European Education Area promotes) are endorsed by the European institutions. **In this regard, apart from the aforementioned requests on the involvement of stakeholders, ESU highlights the need to clarify at European level that the assessment of the Council stands on the objectives of the reforms as indicated in the Council Implementing Decision.** Furthermore, the national reforms funded by the RRF Facility **should both support and not be able to go against policy objectives agreed by the EU**, such in the European Education Area or within the Bologna Process. **ESU believes a clear and transparent assessment check of the reforms against these sectoral policies should be in place.**

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On the governance of the RRF Facility, ESU welcomes the great involvement of the European Parliament in the monitoring of the implementation of the RRF Facility. Despite the initiation of Annual Events on NRRPs in member states, **ESU believes there is much room for improvement both in terms of promotion of the RRF, its objectives and funded actions, as well as engaging stakeholders at European level.** In this regard, we suggest creating a **European Stakeholders' Forum on RRF, with periodic general and thematic debates and mainstreaming ongoing communication** between institutions involved in RRF and civil society organisations. Civil society organisations should have the space to contribute to reporting and assessing the implementation of the RRF. Another way of mainstreaming RRF at national level is through **strengthening the role of European Semester Officers and their engagement with civil society**, including in collecting data on the perceived implementation and assessment from civil society organisations.

As a consequence of the energy transition, and with a sense of urgency after the Russian war in Ukraine, the RePowerEU initiative was created with RePowerEU chapters introduced as part of NRRPs. Based on the ground information, a provisional conclusion can be that the policy of closed doors is still part of the elaboration phase. **ESU believes that while ensuring needed flexibility, the introduction of RePowerEU should not be a context for reshuffling the plan and especially the reforms governments already committed to after consultation with stakeholders.**

However, if member states desire to change the NRRPs, **we believe a set of very clear criteria should be in place and expressly mentioned in the RRF Regulation, such as considering the new CSRs after the approval of the NRRP, the consultation with stakeholders, transparency** regarding the rationales and expected impact of the change etc.

Considering the impact RRF had on the European Semester, a relevant discussion is how the foreseeable link between those two in the future will impact the macroeconomic coordination and the areas included in the European Semester. A pillar of RRF is next generation, including education and skills, which traditionally was not a part of the European Semester as such, even though some Recommendations on education emerged along the way. **ESU believes the areas of the RRF, including education, should be strengthened in the European Semester as well, in this way the two processes reinforce each other.**