

Youth and Sports component

(first version sent by RO on 19 March 2021)

Technical comments and questions from Commission services

Disclaimer: the following document should be seen as part of the informal dialogue at technical level between the services of the Commission and the Romanian government, which aims at supporting the preparation of the final RRP.

We invite you not to reply to this document, to use it as a reference and send an update of the draft RRP and related component document considering these comments and questions.

Youth

- The draft component mentions one reform to create a ‘youth ecosystem’. Please describe the reform, its content and objective in detail. It is unclear what this entails or how this could be considered a reform, rather than an overall objective.
- Please explain in detail how the **the reform and the 5 investments** interact and address the problem you have identified.
- **Please provide more information on the expected impact of the measures** on young people.
- Please **indicate the number of expected beneficiaries** in relative figures for each investment.
- **Investment 4 foresees** different types of grants with an overall envelope of EUR 16 million. Please provide more details on the **types of activities for the youth** that these funds intend to cover and how the grants will be **allocated**.
- **Investment 5:**
 - Please describe the **type of support mobile centres will provide**. If only 2-4 h/per municipality/month, there is a risk that the activities will be ineffective.
 - **Please explain the difference between the different clubs and centers.**
 - For several of these entities the **beneficiaries are NGOs/youth organisations** and not local authorities, although construction work is envisaged, could you provide more information on the **legal status of these organisations**?
 - Could you explain in detail what **type of support** youth centres are supposed to provide?
 - Please provide more details on each **type of activities for youth**. What exactly is the content?
 - Please explain how the infrastructure will be sustained in the long-run, the **sustainability of the measures**. Who takes over the mobile centres and the fixed centres after the RRF money finishes?

General comments (Youth and Sports)

- At this stage, it seems that the component on youth and sports is **not addressing any particular 2019 or 2020 CSR** which has been addressed to Romania. Instead, the component touches upon areas like digitalisation, education, labour market policies and social inclusion, covered already in other components or in Cohesion Funds.
- Against this backdrop and the fact that your draft plan has currently a financial envelope well above the allocated amounts of grants and loans under the RRF, we would strongly encourage streamlining, e.g. moving projects to the ESF+ or to other RRF components.
- **In particular, the ESF+ already proposes youth measures** (establishment of youth centers/clubs at community level, establishment of networks of youth workers, provision of integrated packages for youth activation, training and support for entrepreneurship, and stimulating social insertion enterprises to support young people) **with a significant allocation. Please add information on complementarities to the component, allowing to identify potential overlaps and synergies.**
- Overall, the component is an **early draft**, with **unclear objectives, reforms and investments**, especially for the youth subpart.
- We **welcome the inclusion of costings** in this component however:
 - **a justification would be needed on amounts decided and pricing;**
 - for further clarity **please use the COM template and annexes.**
- At the same time, we note that the component includes the **coverage of salaries for almost every measure**. Since such costs are of **recurrent nature**, they would **not be considered eligible for funding under the RRF**.
- Please revise the **digital and climate tagging in line with the Commission guidance and templates**. In principle, only one intervention field for each reform and investment should be selected and the tagging has to be done at the level of reforms/investments, not at the level of the component.
- Please add a state-aid self-assessment. The current references to 'sport clubs' and 'digitalisation' suggest economic activities, thus, the proposed measures may entail State aid.
- More generally, we invite you to reconsider the inclusion of this component in the RRF plan and instead try to address youth employment and education, as well as digitisation, from a horizontal perspective in other components in these areas.