

EVALUATION REPORT

Network of Regional Hubs for EU Policy Implementation Review



SEPTEMBER 2020

RegHub Secretariat

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1. Introduction

The Network of Regional Hubs for EU Policy Implementation Review (RegHub) originated from the final report and recommendations of the Taskforce for Subsidiarity, Proportionality and “Doing Less More Efficiently”¹ and was established as a two-year pilot project by the Committee of the Regions’ (CoR) Bureau Decision from October 2018.² The decision on the project’s continuation and future arrangement (RegHub 2.0) will be taken at the October 2020 Bureau meeting. In order to be able to take this decision in an informed manner, all network activities, including the general working method and communication strategy of RegHub, have to be evaluated and future challenges that are to be met in a possible mainstreaming phase have to be identified. The goal of this evaluation report is thus twofold. First, it wants to **take stock of all network activities** that have taken place in the past two years and thereby determine whether and how the goals laid down in the October 2018 Bureau Decision have been achieved. Second, based on those findings and recorded experiences of RegHub members, CoR officials, and scientific and institutional partners, it aims at **identifying future areas for action and suggesting procedural improvements** in order to prepare RegHub for its mainstreaming phase post-2020 (RegHub 2.0). This will be done also in light of the European Commission’s (EC) Decision from 11 May 2020, establishing the new Fit for Future Platform (F4F)³, which will be the basis for RegHub’s institutionalisation within the framework of the European Commission’s activities for ex-post legislative review and better law-making.

Evaluation timetable

	November 2019	Third workshop (23.-24.11.2019) and first interactive session on the future of RegHub
	March 2020	Fourth workshop (03.-04.03.2020) and second interactive session
	April/May 2020	Evaluation survey for members of the RegHub network
	June/July 2020	Evaluation interviews and fifth workshop (16.06.2020): presentation of preliminary results
	July/August 2020	Drafting of the final evaluation report and submission to the CoR Bureau
	September 2020	CoR Bureau meeting (10.-11.09.2020) – Presentation of evaluation findings
	October 2020	Bureau Decision on the future of RegHub (RegHub 2.0)

¹ Decision of the President of the European Commission on the Establishment of a Taskforce on Subsidiarity, Proportionality and “Doing Less More Efficiently”, C(2017)7810.

² Item 5 Subsidiarity Task Force Follow-Up: Pilot Project for a Network of Regional Hubs to Assess the implementation of EU Legislation, 186th Meeting of the European Committee of the Regions Bureau, 26 October 2018, COR-2018-03132-05-00-NB-TRA (EN).

³ Commission Decision of 11.5.2020 establishing the Fit for Future Platform, C(2020)2977 final.

Structure of the evaluation report

The evaluation report will be structured as follows. [The second chapter](#), will briefly explain the RegHub network and its standard working method, before it takes stock of the activities carried out between October 2018 and July 2020. This kind of descriptive stock-taking exercise will help to assess whether the network has managed to prepare, realise and follow up all activities as laid down in the October 2018 Bureau Decision. Moreover, it will give further information about additional events and activities that have taken place during the course of the pilot phase, such as presentations for and discussions with EU institutional partners. [The third chapter](#), will then explain the methodological framework, criteria and focus of the different evaluation steps. Furthermore, it will report the data collection and selection processes as well as the analytical framework. [The fourth chapter](#), will analyse the results, which are organised along the 'main motives' found both in the answers to an evaluation survey dedicated to the network members, and in expert interviews conducted between 3 and 19 June 2020 with CoR officials, scientific experts and EC officials. [The fifth and final chapter](#), will then discuss the evaluation results regarding RegHub's performance as compared to its goals and coordination requirements and make recommendations for the project's future configuration, considering in particular the EC Decision on F4F.

2. The RegHub network

Configuration and project coordination

In accordance with the Bureau Decision, the RegHub network consists of the RegHub secretariat, which is organisationally tied to the ECON Commission of the CoR (Directorate C), and the regional hubs themselves.

The **RegHub secretariat** is in charge of the day-to-day coordination of the pilot project. Its tasks encompass:

- Setting up the basic structures of the network (call for expression of interest, initial contact, rules of procedure and initial coordination)
- Drafting of survey questionnaires and implementation reports (in close cooperation with the thematic CoR commissions)
- Coordination within the CoR, in particular with the competent commissions, political groups and the Steering Group of the Subsidiarity Monitoring Platform (SSG)
- Coordination with institutional partners in EC, EP and Council, particularly regarding the future financing of the project (co-financing by the EC post-2020)
- Preparation of the annual working plans
- Coordination of all network activities (consultations, workshops, exchange of information)
- Exchange with scientific experts and other relevant networks
- Dissemination of the project's implementation reports
- Communication and publishing of the project's implementation reports.

The **regional hubs** are regional administrations represented by so-called **contact points** – local or regional officials who are part of a regional administration and work as a connection point between the CoR/EU and the local and regional level. During the pilot phase, 36 regional hubs formed part of the network, of which 20 were listed as members of the RegHub 'core group' and the remaining 16 as members of the 'associates group'. The single difference between the two groups is established by

means of funding: only core group members' travel expenses to participate in RegHub workshops are reimbursed. This arrangement was made in order to allow more than the initially planned 20 local and regional authorities to become network members, while not exceeding the financial resources specified in the Bureau Decision.⁴

The **application procedure** took into account the following criteria:

1. Quality of nomination (political and personal commitment; capacity to take part)
2. Institutional role of the local/regional authority (regions with/without legislative powers)
3. Adequate geographical balance across the EU.

After a careful pre-selection through the RegHub secretariat (including 37 from 55 applications), the final decision was made by the then-President of the CoR, Karl-Heinz Lambertz, and the SSG.⁵

Working method

The **RegHub work programme** is decided by the CoR Bureau on an annual basis. It is based on the annual EC work programme, Annex II of the final report of the Taskforce on Subsidiarity, and input from the RegHub network itself. The consultations are carried out in a three step approach, as determined in the October 2018 Bureau Decision (see [Figure 1](#)).

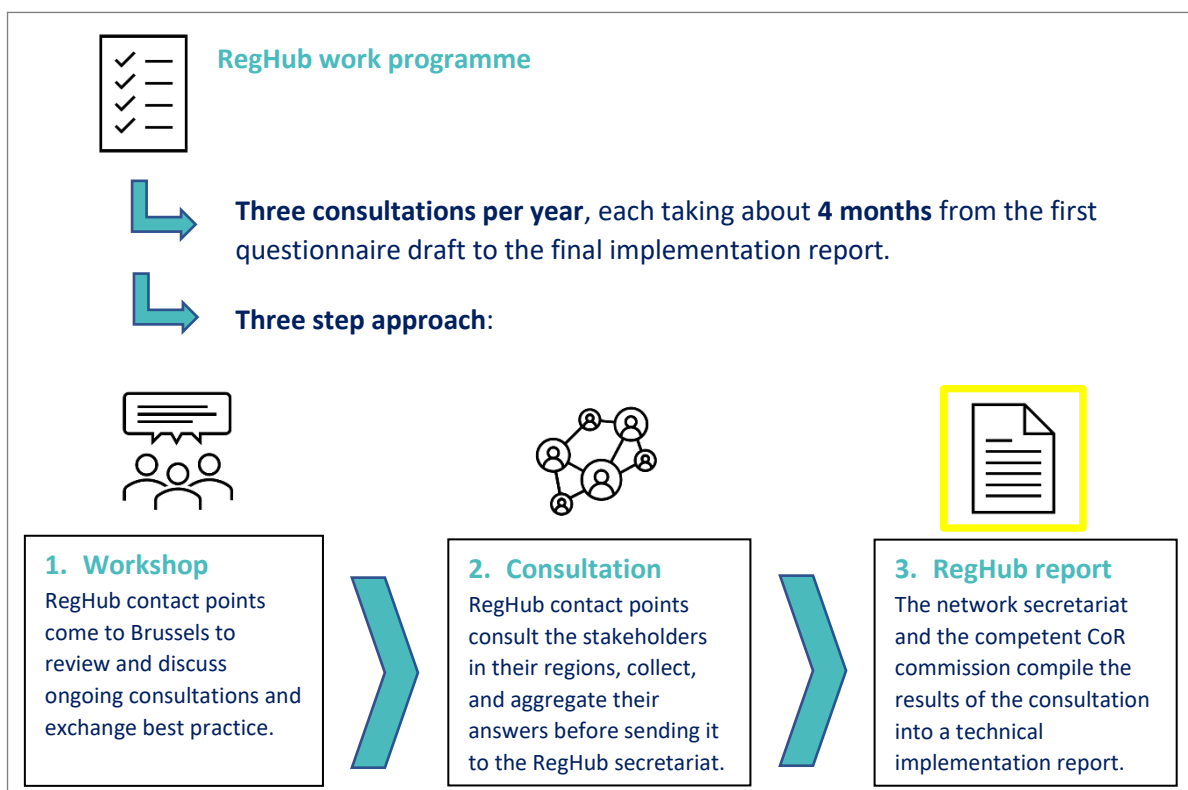


Figure 1 RegHub working method

⁴ During the application phase, 36 out of 55 regions were chosen to participate in the pilot project. A full list of members can be found in [Annex I](#).

⁵ The number of regional hubs was reduced from 37 to 36 early in the process because one region decided to leave the network.

Since the **operational launch of the pilot project in January 2019**, the RegHub network has realised five consultations, of which three have been finalised when concluding this report (July 2020). For both years of the pilot phase, a work programme was set up by the RegHub secretariat in close cooperation with the EC Secretariat-General's (SG) Unit in charge of Evaluation, Impact Assessment and the Regulatory Scrutiny Board Secretariat, the European Parliament Research Service's (EPRS), the CoR commission secretariats and the members of the RegHub network. The **iterative topic selection process** took into account the strategic review list of the EC's Secretariat-General, the EP's rolling review checklist and the thematic planning of CoR opinions and legislative work. In order to confirm the relevance of each short-listed topic, the RegHub secretariat consulted the RegHub members upon their priorities, e.g. the extent to which local and regional levels are impacted by the implementation of EU law and/or have strong legislative competences in a given area.

The **work programme for 2019** included the evaluation of (1) the 2014 Public Procurement Directives, (2) the Ambient Air Quality Directives (AAQ) and the National Emission Ceilings Directives (NECs) and (3) the Directive on the Application of Patients' Rights in Cross-border Healthcare. Respectively, the three corresponding CoR commissions supporting the RegHub secretariat in terms of questionnaire design and report compilation were ECON, ENVE and NAT.

The **work programme for 2020** included another three consultations, namely on (1) the 2012 SGEI Package (ECON), (2) the impact of the Common Agricultural Policy on the territorial development of rural areas (NAT) and a third area, which was not finally determined.

Because of the **Covid-19 crisis**, CoR President Tzitzikostas and the services in charge, decided to launch an **additional 'flash consultation'** on the implementation of the Temporary Framework for State Aid and flexible public procurement guidelines, which became the network's *ad hoc* third consultation for 2020.⁶

What is more, the EC published its **Decision on the Fit for Future Platform** on 11 May 2020, making RegHub an integral part of the platform's working method. Consequently, as of September/October 2020 – after the platform has held its constitutional meeting and laid down its rules of procedure –, the RegHub working method and configuration will likely have to be adapted to the F4F working method and timelines. Therefore, it would be recommendable to suspend any other envisaged consultation for 2020 until the new procedures are in place and a F4F work programme is determined.

Furthermore, RegHub's institutionalisation within the EC's better regulation agenda and consultation regime will include changes to its funding structure and therefore alter resource allocation within the CoR. This has to be taken into account when deciding about the **future financial, administrative and procedural orientation of RegHub**. The final chapter of this report will consider the implications of evaluation findings on RegHub 2.0.

Table 1 (page 5) shows an overview of all completed and ongoing consultations carried out by the RegHub network during its pilot phase (2019-2020).

⁶ The corresponding implementation report will be available by September 2020 and directly feed into the CoR's Annual Regional and Local Barometer to be held in October this year.

Overview 1: Completed and ongoing consultations

	1 st Consultation	2 nd Consultation	3 rd Consultation	4 th Consultation	5 th Consultation	Flash consultation
Policy Area	Public Procurement	Air Quality	Cross-border Healthcare	State Aid	Common Agricultural Policy	State Aid and Public Procurement
Directives/ Regulations	2014/24/EU, 2014/25/EU, 2014/23/EU ⁷	2008/50/EC, 2004/107/EC, 2016/2284/EU ⁸	2011/24/EU ⁹	2012 SGEI Package; Regional Aid Framework 2014-2020 ¹⁰	Regulations (EU) No. 1307/2013, 1305/2013, 1308/2013 ¹¹ (1303/2013, 1301/2013, 1304/2013, 1291/2013)	Temporary Framework, Commission Communication C(2020) 1863 ¹²
Consultation Start	22.03.2019	26.07.2019	15.11.2019	13.03.2020	05.05.2020	18.06.2020
Deadline for Submission	06.05.2019	23.09.2019	13.01.2020	15.05.2020	15.06.2020	10.08.2020
Responding Hubs	34	28	27	21	24	
Consulted Stakeholders	329	184	130	117		
Report pages	80	38	47			
Implementation Report (SSG approval)	17.07.2019	18.12.2019	10.07.2020			

Table 1 Completed and ongoing consultations

Workshops and network activities

In line with the Bureau Decision, during the pilot phase, **three workshops per year** were scheduled and realised. Up to now, 5 out of 6 workshops have taken place and the sixth workshop is planned to accompany the CoR Bureau meeting in Düsseldorf on 10 and 11 September 2020, where the evaluation of the pilot phase will be discussed. This evaluation report forms the basis for the document that

⁷ 2014 Public Procurement Directives: Directive 2014/24/EU on public procurement, Directive 2014/25/EU on procurement by entities operating in the water, energy, transport and postal services sectors and Directive 2014/23/EU on the award of concession contracts.

⁸ Ambient Air Quality (AAQ) Directives (2008/50/EC and 2004/107/EC); National Emission Ceilings (NEC) Directive (2016/2284/EU).

⁹ Directive 2011/24/EU on the Application of Patients' Rights in Cross-border Healthcare.

¹⁰ 2012 SGEI Package: SGEI Communication, SGEI Decision, SGEI Framework, SGEI de minimis Regulation; Regional Aid Framework: Regional Aid Guidelines (RAG) for 2014-2020, Regional Aid Maps a part of the RAG, provisions applicable to regional aid in Commission (EU) No 651/2014 of 17 June 2014, declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (General Block Exemption Regulation, GBER).

¹¹ Rules for Direct payments (No. 1307/2013), support for rural development by the European Agricultural Fund for Rural Development (EAFRD) (No. 1305/2013), Common Organisation of the Markets in Agricultural Products (No. 1308/2013).

¹² https://ec.europa.eu/competition/state_aid/what_is_new/sa_covid19_temporary-framework.pdf.

informs the CoR Bureau. As can be seen from Table 2 below, all workshop meetings have involved CoR rapporteurs and/or representatives from other EU institutions, closely dealing with the reviewed legislation at hand. Whereas the first four workshops could take place at the premises of the CoR, due to the Covid-19 crisis, the fifth workshop was organised virtually. The interest in both kinds of workshops has been relatively constant over time.

Overview 2: RegHub workshops and participation

	1st Workshop	2nd Workshop	3rd Workshop	4th Workshop	5th Workshop
Date	31.01.2019	27./28.06.2019	23./24.10.2019	03./04.03.2020	16.06.2020
Format	Physical	Physical	Physical	Physical	<i>Virtual</i>
CoR Members	Karl-Heinz Lambertz (BE)	Roby Biwer (LU), Olgiard Geblewicz (PL)	Roby Biwer (LU)	-	-
External Speakers	K. Knapton-Vierlich (DG COMP), P. Chavaki (EP)	D. Blanchard (DG COMP), Michael Schmitz (German County Association), Michael Klinkenberg (DG ENV), Antonina Cipollone (SG EC)	V. Jakir (DG ENV), Adriana Bunea (University of Bergen), V. Cenacchi and R. Ferreira (DG REGIO), B. Lengyel (DG SANTE)	S. Pazos-Vidal (COSLA), Antonina Cipollone (SG EC)	D. Blanchard (DG COMP)
Participation (ex RegHub secretariat)	57	38	43	38	45

Table 2 RegHub workshops and participation

Besides the technical workshop meetings held in Brussels, members of the RegHub secretariat were engaged in promoting the network's activities through organising **informal meetings** both internally with CoR colleagues and externally with scientific experts and with representatives of other EU institutions. Those activities included:

- **NEW:NRW expert meeting on strengthening regions:** On 29 April 2019, the North-Rhine Westphalian (DE) Network for European Studies (Netzwerk für Europa-Wissenschaft für NRW) hosted a scientific conference on RegHub's potential for strengthening representation and participation European regions.
- **Better Regulation Network Meeting:** On 14 November 2019, the RegHub secretariat presented the project to the EC's Better Regulation Network, an inter-service working group in which all policy Directorates General of the Commission participate.
- **Cinsedo and Subsidiarity Conference (Rome):** On 21 and 22 November 2019, a Cinsedo workshop (Italian regional centre for documentation and studies), dedicated to RegHub, took place in Rome. RegHub was also prominently mentioned during the CoR's 9th Subsidiarity Conference that took place the day after.

- **Meeting with Baltic regions:** On 2 December 2019, RegHub was presented at a board meeting of the Baltic Sea States' Subregional Cooperation (BSSSC) at the Helsinki Office in Brussels.
- **Vendredi d'automne:** On 13 December 2019, members of the RegHub secretariat presented the work of RegHub to interested colleagues during an information session at the CoR.
- **Competitiveness Council working group meeting:** Recent talks with the German EU Council Presidency have led to the involvement of RegHub in the work of the Competitiveness Council's Better regulation working group this autumn on SME focused burden reduction and the simplification of EU regulation.

On a more regular basis, the RegHub secretariat was in touch with the EC SG's Unit in charge of Evaluation, Impact Assessment and the Regulatory Scrutiny Board Secretariat, the EPRS' Linking the Levels and Ex-post Legislative Review Unit and with different scientific experts, including Prof. Dr. Michael Kaeding (University of Duisburg/Essen), Associate Prof. Adriana Bunea, PhD (University of Bergen) and Dr. Serafín Pazos-Vidal (COSLA).

Political endorsement

Furthermore, on several occasions, the value of the RegHub pilot project and its potential to contribute to better regulation and legislative simplification in the European Union was emphasised in **interventions of high-level politicians**:¹³

- Executive Vice-President of the European Commission, **Frans Timmermans**, responsible for the European Green Deal,¹⁴ promoted RegHub on several occasions.
- Vice-President of the European Commission, **Maroš Šefčovič**, responsible for Interinstitutional Relations and Foresight, confirmed his ambition to strengthen and develop the cooperation with the CoR through RegHub during his confirmation hearing in the European Parliament.
- Former Commissioner, **Elżbieta Bieńkowska**, responsible for the Internal Market, Industry, Entrepreneurship and SMEs, mentioned RegHub as good CoR initiative, which is able to contribute to better regulation by discussing and evaluating the implementation of EU legislation 'on the ground'.

Considering the EC's Decision on the Fit for Future Platform and the fact that RegHub has been prominently mentioned therein, it is justified to recognise that the RegHub secretariat's networking activities and the overall reception of the pilot project by the political principals have been successful. The following chapter will briefly explain RegHub's presumed position in the F4F policy evaluation process and discuss implications for the design and functioning of RegHub 2.0.

RegHub and the F4F Platform

Building on the experience of the REFIT Platform, the [European Commission establishes F4F](#) as an expert and specialist forum, which is bringing together representatives of Member States, regional and local authorities, the Committee of the Regions, the European Economic and Social Committee and

¹³ Video sequences of the interventions are available on the RegHub website: <https://cor.europa.eu/en/our-work/Pages/network-of-regional-hubs.aspx>.

¹⁴ Commissioner Timmermans chaired the Taskforce on Subsidiarity, Proportionality and "Doing Less More Efficiently" during the Juncker Commission (2015-2019) as First Vice-President in charge of Better Regulation, Interinstitutional Relations, the Rule of Law and the Charter of Fundamental Rights.

stakeholders. As has been the case for the REFIT Platform before, its main goal is to **simplify legislation and reduce (administrative) burden and legislative density** in order to create benefits for EU citizens (and in particular for SMEs) and effectively address recently emerging challenges such as the consequences of digitalisation.

Compared to its predecessor, F4F has further extended the representation and participation of local and regional authorities in the legislative review process of the European Union in two ways. First, CoR members of F4F have obtained a different status within the platform's architecture. Before, one CoR member represented the interests of local and regional authorities *in the stakeholder group* of the platform. This has changed with the new Decision: three CoR members represent the local and regional level among national experts *in the government group*. Never before, a CoR expert network has been as directly embedded in an EC policymaking body as RegHub. This marks a significant expansion of the CoR's role beyond the statutory ex post provisions in the Treaties and contributes to the realisation of the principle of active subsidiarity along the entire legislative cycle.¹⁵

Second, the Decision explicitly mentions RegHub as a CoR initiative, contributing to evidence-based policymaking through 'on the ground' consultations. In practical terms, this involves the participation of the network's contact points in the platform's subgroup system consisting of at most four subgroups. In agreement with the EC's SG, RegHub will form one of the four subgroups and contribute with its expertise to the **agenda setting of F4F** and it will inform those platform **opinions, which are in the area of interest of local and regional authorities**. Figure 2 shows a schematic visualisation of the F4F architecture and RegHub's position therein.

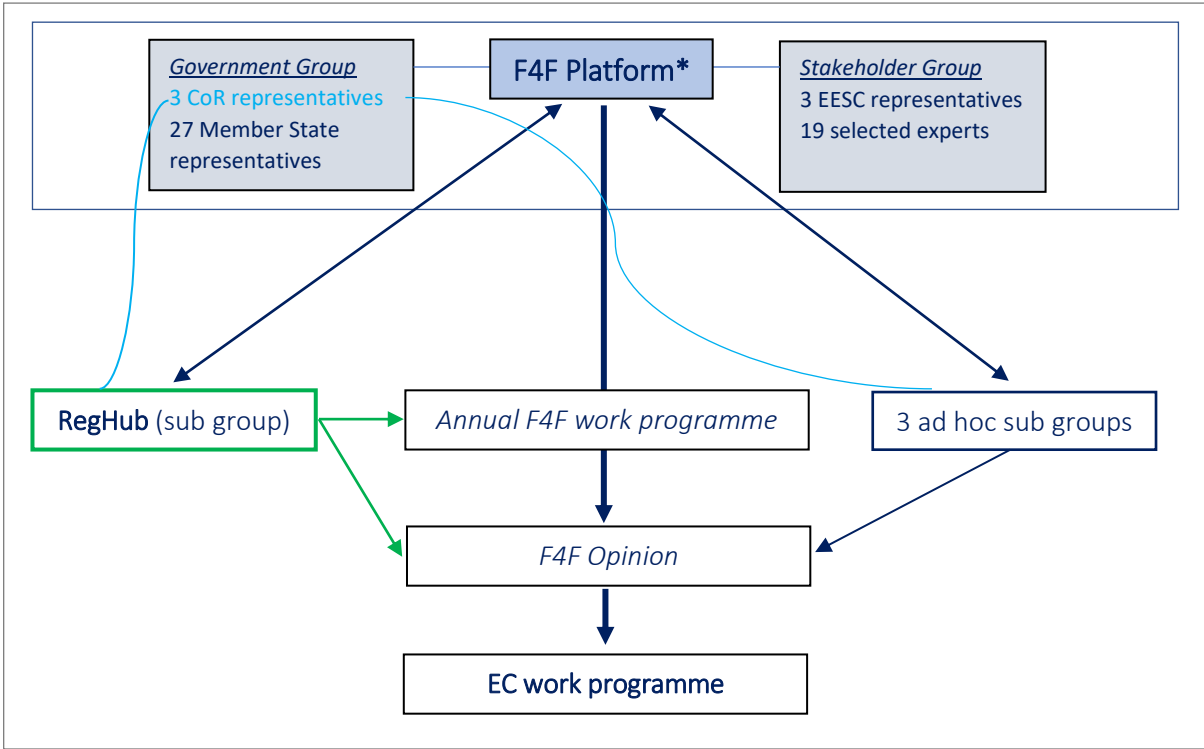


Figure 2 RegHub in the F4F architecture
 *Plenary platform meetings are chaired by the Vice-President of the Commission responsible for Better regulation, preparatory meetings are chaired by a high-level Commission official.

¹⁵ We thank Dr. Serafín Pazos-Vidal for pointing this out.

Evidently, the institutional set up of the new platform will have consequences for RegHub and the CoR. First of all, - as requested by the October 2018 Bureau Decision -, the EC is committed to provide some co-financing for the mainstreaming phase of the project, institutionalising it within the broader EU better regulation framework. What is more, this involves closer institutional cooperation with the Commission and national experts and a credible commitment to fulfil the requirements of technicality and continuous expertise-based contributions to the platform's work programme and its endeavours to simplify EU legislation. Therefore, it is most likely that the existing consultation structure of the RegHub network will need to be adapted to F4F in order to warrant timely feeding-in of RegHub reports into the platform's opinion work. This, however, does not mean that RegHub will not be able to further provide evidence on topics or policy areas other than those mentioned in the F4F work programme.

3. Method and Data

Operationalisation of the October 2018 Bureau Decision

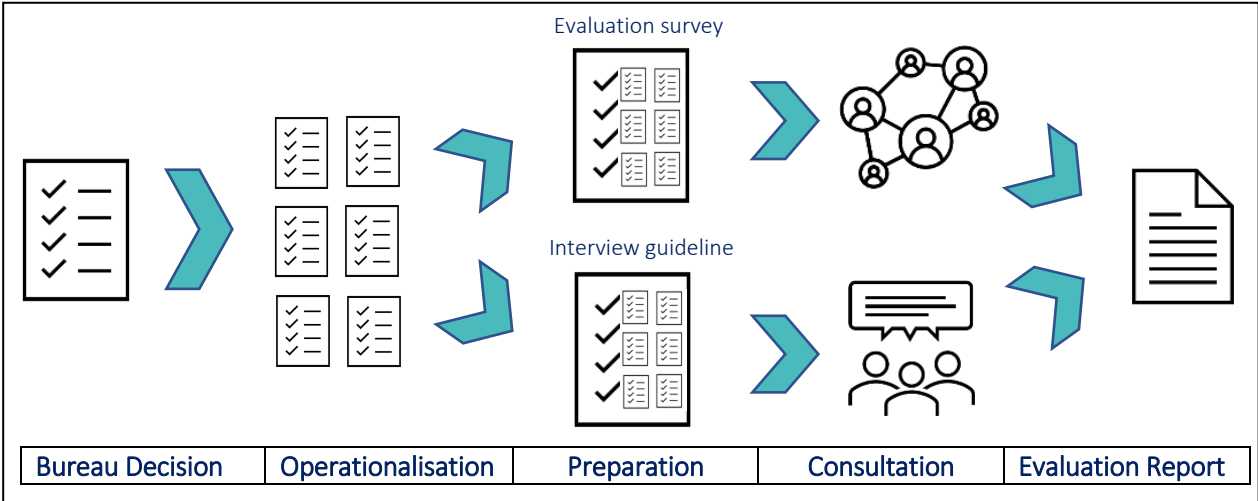


Figure 3 From Bureau Decision to evaluation report

The Bureau Decision marks the **bottom line for the evaluation process** in two ways. First, it determines the timing for the evaluation report and provides it with technical and empirical expectations. Second, it is itself the starting point for any operationalisation of goal attainment, since it lays down the project's aims and objectives, its main administrative elements and working method, as well as the requirements for project governance and impact assessment (Figure 4, page 10).

According to the Bureau Decision, the evaluation phase should take place between September and December 2020.¹⁶ It should further include a consultation of the participating regions and of the CoR staff involved in the work of the pilot project, as well as a consultation with those services of the EU institutions that are directly and intensively involved in the project.

Due to the different natures of involvement with the project, the RegHub secretariat decided to launch **two separate consultation processes** and thereby guarantee the feedback required for a thorough evaluation. The first consultation included group discussions with the network's contact points and a

¹⁶ Due to the early Decision of the European Commission on the Fit For Future Platform and the subsequent necessity to adapt the RegHub network to new challenges, the evaluation has been brought forward already in August 2020 in order to timely feed into the September Bureau meeting and to inform the Decision on the future of RegHub in October 2020.

subsequent **evaluation survey**, tailored to the experiences of the participating regions. This survey was sent to contact points in April 2020. The second consultation consisted of a **series of expert interviews**

1. *"Putting the experiences at local and regional level of implementing EU legislation forward in a systematic, coherent and inclusive manner;*
2. *establishing a new way of working and a new quality of cooperation between the CoR and the EU institutions in providing first-hand experiences of EU implementation as part of a revised EU Better Regulation agenda;*
3. *strengthening the consultative role of the CoR and the political work of the CoR in particular;*
4. *supporting the efforts at local and regional level to feed back the implementation experiences by setting up regional hubs on EU policy implementation with 20 regions during the pilot phase; and*
5. *expanding the network in a mainstreaming phase with financial support from the European Commission."*

Figure 4 Goals for RegHub as defined by the October 2018 Bureau Decision

conducted with both members of CoR staff and external partners from the EC and the scientific community – all of which have been regularly in touch with the RegHub network and are thus familiar with its activities.¹⁷

Both these feedback sources – survey replies and interview transcripts – are used to measure the project's level of goal attainment according to the five main aims and objectives in the Bureau Decision:

Based on the above-listed goals, the RegHub secretariat developed a **system of sub-goals and indicators**, which have been the basis for the questions of both evaluation survey and interview guideline.¹⁸ To this end, all main goals and other criteria established by the October 2018 Decision (e.g. attribution of tasks, main elements of the network and working method), were organised in two groups of indicators (quantitative/descriptive facts and qualitative indicators) and categorised according to their relevance for the **three types of addressees**. (1) Members of the RegHub network, (2) CoR staff working closely with the network and the RegHub secretariat, and (3) external partners from EU institutions – mainly the EC SG's Unit in charge of Evaluation, Impact Assessment and the Regulatory Scrutiny Board Secretariat – and scientific experts. ([evaluation survey Annex V](#)). In order to ensure a certain **reliability and validity** of sub-goals, indicators and operationalised questions, this process included extensive internal discussions of the RegHub secretariat, as well as a simultaneous coding exercise with the experienced support of researchers.¹⁹

The **evaluation survey** ([Annex V](#)) was dedicated to the contact points of the RegHub network and encompassed in the final version 36 questions (and related sub questions), organised along four thematic categories:²⁰

¹⁷ A list of responding hubs and interview partners is available in [Annex II](#) and [Annex III](#).

¹⁸ The related overview of indicators is available found in [Annex IV](#).

¹⁹ Laurin Friedrich, research assistant at the chair of Public Administration and Organization Theory, University of Konstanz, provided his help to carry out a qualitative document analysis based on the Bureau Decision.

²⁰ A detailed overview on data is given in the subsequent chapter.

-
1. Working methods and communication
 2. Interinstitutional/stakeholder relations
 3. Identification and selection of policy areas for assessment
 4. Challenges for the Network of Regional Hubs.

The **interview guideline** was dedicated to partners in the CoR and the European Commission and the scientific experts. It focussed on four questions:

1. Relevance of RegHub in light of the role of local and regional authorities for better regulation
2. Appropriateness of the RegHub working method
3. RegHub's contribution to a new way of working/ political work
4. Future challenges.

In combination, the questions from the survey and guideline cover all relevant aspects required to evaluate RegHub's level of goal attainment and present it to the CoR Bureau.

Practical programme evaluation

Practical programme evaluation was chosen as approach to the evaluation of the RegHub project. It is an **evaluation carried out by practitioners** and can be considered an appropriate way to evaluate programme operations and results at reasonable cost and without extensive involvement of outside experts.²¹ Its major goals are to (1) assess programme implementation and results and (2) to identify ways to improve the programme evaluated. When choosing an evaluation approach, it is important...

"[...] to match it to information needs, identify key contextual elements [...], produce methodological rigor needed to support credible findings, and design responsive and useful evaluations." (ibid. 2010:6).

Information needs. Since the evaluation of the RegHub pilot phase is ought to inform a decision about the project's future (RegHub 2.0), a **utilization-focused evaluation** was chosen, which allows to draw substantial conclusions from the obtained measurements.²²

Key contextual elements. In the context of the RegHub project, there are several aspects inherent to project design and member characteristics that need to be taken into account when analysing evidence from survey and interviews. As it is the case for RegHub consultations, a consultation of contact points is constrained by a limited number of replies and voluntary self-selection of participants. An analysis thus needs to be careful when drawing generalising conclusions and establishing causal links. However, through a **mix of methods** (group discussions, survey, workshop presentations, and interviews) and repetitive interrogation of similar sets of questions across time, a cross-verification of information elements can be achieved.²³ This is because context-dependent statements and perspectives can be validated if they are repeated, reported, reflected and rectified over time, according to the participants' feedback. Another element to consider is the **organisational environment and embedding of evaluation participants**. This holds true for contact points, concerning their administrative and political position in their 'home administrations', and with regard to their

²¹ Newcomer, K.E., Hatry, H.P. & Wholey, J.S. (2010). *Planning and Designing Useful Evaluations*. In Wholey, J.S., Hatry, H.P. & Newcomer, K.E. (2010) (eds.). *Handbook of Practical Program Evaluation*. 3rd edition, San Francisco: Jossey-Bass.

²² Patton, M.Q. (2008). *Utilization-focused Evaluation*. 4th edition, Thousand Oaks: Sage.

²³ We are grateful to *Adriana Bunea, PhD, Associate Professor in the Department of Comparative Politics, University of Bergen*, who made us aware of that.

personal motivation. Likewise, CoR staff, members of political groups and EC officials are embedded in their respective organisational environment, which incorporates political and administrative preferences regarding the project.

Methodological rigour. In order to obtain reliable measures, a systematic and consistent data-collection strategy has to be deployed, enabling comparisons across different data sources. For the RegHub evaluation this entailed the above-described processes of **key evaluation questions, survey and interview design and measures to verify and triangulate data** in order to control its quality. Similarly, for the subsequent content analysis of feedback provided in the form of open text, the intercoder reliability was tested by means of several intercoder tests focusing on the reading and interpretation of the collected text data sources.

Internal and external validity of findings. The evaluation of the RegHub project does not require achieving external validity since it does not aim at producing generalizable findings extendable to other projects or contexts. Internal validity, the ability to determine the project's effectiveness and goal attainment, is thus the focus of interest. It is achieved through the structured and semi-structured interviewing and exploration of key stakeholders' expressed opinions and evaluations on concrete programme effects.

Responsiveness and usefulness. The analysis of performance data gathered through the RegHub evaluation seeks to provide useful recommendations for the continuation and future design of RegHub. Through targeted data gathered from key stakeholders through the RegHub secretariat, the managing board (CoR Bureau) will thus have the opportunity to take an informed decision on RegHub 2.0.

Critical reflection. Since it was not foreseen to contract-out the evaluation of the RegHub project to an external evaluator, the present evaluation is de facto a **self-evaluation**. This comes with both advantages and disadvantages that are briefly described here:

- *Disadvantages:* In terms of credibility, possible positive biases are a potential issue concerning the interpretation of evaluation results and reliability of performance measures. However, they can be minimised through instances of **data triangulation** (different sources of data and mix of qualitative data collection methods)²⁴ and a consistent involvement of a diverse group of evaluators (**investigator triangulation**)²⁵. This has been the case for the RegHub evaluation as the group of evaluators covers actors from different hierarchical and educational background. Moreover, scientists familiar with evaluation practices were regularly consulted.
- *Advantages:* The above-mentioned diversity of evaluators along with their experience of coordinating the network fulfilled an important function for survey and interview design and for data analysis: without their in-depth background knowledge about the network activities and involved actors, an appropriate orientation of questions and interpretation of data would have been difficult, if not impossible.

²⁴ Triangulation in the original forms of qualitative research methods, not the combination of qualitative and quantitative methods: Denzin, N.K. (1970). *The research act*. Chicago: Aldine. And Denzin, N.K. (2012). Triangulation 2.0, *Journal of Mixed Methods Research*, 6(2), 80-88.

²⁵ Denzin, N.K. (2006). *Sociological Methods: A Sourcebook*. 5th edition, Chicago: Aldine Transaction.

Data

Three sets of data, which were collected throughout the pilot phase, are the basis for analysing the level of goal attainment of the RegHub project.

Evaluation data from the 3rd and 4th RegHub workshop

- During the **third RegHub workshop** (November 2019), contact points were informally asked questions about their predictions of and expectations towards the network's continuation and corresponding design. Those questions covered *the number of participating regions, the number of consultations, resource requirements and the possibilities of taking over additional tasks*. Those questions were repeated in the evaluation survey (Q31-34) in order to measure the effect over time.
- Intensive **interactive focus group discussions** were an integral part of the **fourth RegHub workshop** (March 2020). Contact points were "interviewed" by members of the RegHub secretariat based on four thematic questions:²⁶

1. *What are the most pressing challenges for RegHub in the mainstreaming phase (post 2020)?*
2. *How can the RegHub secretariat support you to deal with timelines and procedures?*
3. *What are the most salient topics you want to see in future RegHub consultations? How should those topics be determined?*
4. *How has your participation in RegHub shaped and changed your relations with your stakeholders and EU institutions?*

The focus group discussions aimed at exploring contact points' experiences with and projections for the project. RegHub secretariat members acted as moderators, facilitating rather than controlling the discussion between participants.²⁷ Questions were adapted to the interactive context of a RegHub workshop. Results were compiled and presented by the groups and recorded for analysis by the RegHub secretariat.²⁸

Evaluation survey to RegHub contact points

Based on the October 2018 Bureau Decision and on the questions from the third and fourth workshop, the survey questionnaire for RegHub contact points was designed, discussed and revised in various meetings of the RegHub secretariat. Moreover, the relevance, clarity and validity of the 36 questions and sub questions was tested with some contact points before the survey was sent to network members on 29 April 2020 via EU Survey. The final survey included 36 questions (multiple choice questions, single choice questions and open answer questions) and received responses from 27 contact points of the RegHub network (including 19 out of 20 'core group' members). This survey design approach is also aligned with the European Commission's Better Regulation Guidelines and recommendations regarding the engagement with stakeholders on policy evaluation matters. In terms of length, the combined feedback

²⁶ We are again thankful to Adriana Bunea, who gave us impetus for some of the questions.

²⁷ Johnson, A (1996). It's good to talk: The focus group and the sociological imagination. *The Sociological Review*, 44, 517-538.; Nyumba, T.O., Wilson, K., Derrick, C.J. & Mukherjee, N. (2018). The use of focus group discussion methodology: Insights from two decades of application in conservation. *Methods in Ecology and Evolution*, Special Feature: Qualitative methods for eliciting judgement for decision making, 9 (1), 20-32.

²⁸ The workshop summary is available upon request.

encompasses approximately 450 pages (EU Survey output, including questions). The following assessment of survey results is based on two elements: (1) the statistics for multiple and single choice questions, automatically created by EU Survey, and (2) on the qualitative content analysis of the answers to the open questions. In the case of the survey data, this analysis was mostly based on thematic summaries of answers to the specific questions²⁹

Semi-structured evaluation interviews with RegHub partners

Based on the October 2018 Bureau Decision and the evaluation survey, an interview guideline was drafted (aforementioned questions). The semi-structured interviews were carried out virtually between the 3 and 19 June 2020 via Cisco WebEx. Each of the interviews took approximately 30-40 minutes and included for at least one moderator and one co-moderator from the RegHub secretariat. Adaptations to the questions were made where considered appropriate with regard to the interviewees. The verbatim transcripts of the interviews add up to 61 pages, which were coded via MAXQDA in a collaborative approach.

Content structuring qualitative document analysis

The three different kinds of data sets (official/informal documents, survey data, interview data) require a differentiated analytical approach in order to adequately structure their specific content and draw reliable conclusions about the project's performance with regard to the goals set out in the October 2018 Bureau Decision and regarding predictions about its future. All three data sets were subject to a content-structuring qualitative content analysis (Kuckartz 2018).³⁰ This method allows the investigator to **draw conclusions from qualitative data based on contextualised categories**. For RegHub, this implies **connecting the abstract goals set out in the Bureau Decision with concrete anecdotal evidence**.

Categories or 'codes' are synonymously used terms. They are the result of a reductionist classification of units of analysis (*here*: the network members, CoR staff and external interviewees) and allow the investigator to **systematically describe text quantities in a summarising manner with regard to the research interest**. In order to be fully transparent about the coding of data and its translation into evaluative messages, any category requires an operational definition, i.e. records of what exactly can be understood as a category. The whole of categories or 'codes' merges into a *coding frame*, which is, in most cases, a hierarchically organised system of code names along with their definitions and scope of application (*when* a code is used). These definitions are compiled in a codebook (MacQueen et al-1998),³¹ containing both deductively and inductively generated codes with their respective coding instructions and rules.

The codes for the RegHub evaluation were mostly of deductive nature, since the October 2018 Bureau Decision and the subsequent first evaluation exercises (short survey and group discussions) oriented the questions used in the survey and interview guideline. Nevertheless, some inductive codes were added when exploring the latter two data sets. This holds true also for the coding frame for the evaluation interviews. Moreover, due to the differences in data collection and the diverse

²⁹ The survey to contact points can be found in [Annex V](#), survey statistics in [Annex VI](#).

³⁰ Kuckartz, U. (2018). *Qualitative Inhaltsanalyse. Methoden, Praxis, Computerunterstützung*. 4th edition. Weinheim: Beltz Juventa.

³¹ MacQueen, K., McLellan-Lemal, E., Kay, K., Milstein, B. & Cdc, A. (1998). Codebook Development for Team-Based Qualitative Analysis. *Cultural Anthropology*, 11, 31-36.

organisational contexts, **two complementary codebooks** had to be generated.³² During the category-building process, different members of the RegHub secretariat coded the interview data set repetitively in order to ensure a certain inter-coder reliability. This yielded both for inductive trials and codebook-based codings fairly high levels of reliability.³³

The coding taxonomies can be found in the following [Figures 5 and 6](#). It is important to note that the deduced codes are not fully congruent with the survey questions (in cases of open comment questions) or interview guideline since inductively derived codes were added throughout the coding process.

Analysis I: Evaluation survey

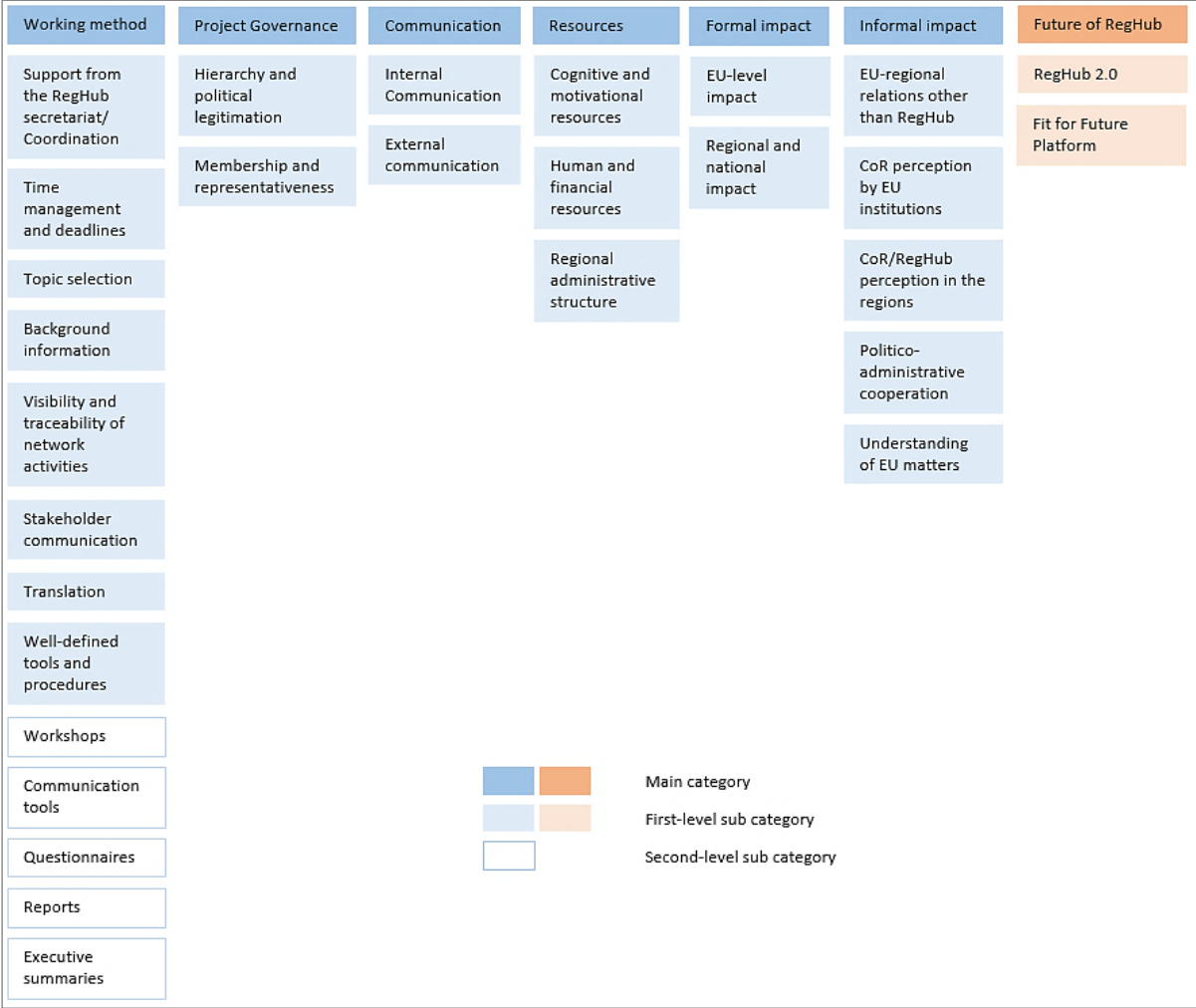


Figure 5 Coding taxonomy evaluation survey

³² The corresponding codebook for the evaluation interviews is available in [Annex VII](#), [Annex VIII](#) a systematic data summary, including the assignment of survey questions to deductive codes.

³³ Three test codings have been carried out for intercoder agreement. For the inductive trials the frequency of occurrence – after an adjustment of codes, which were equal in meaning – yielded 80%. For the codebook-based tests, the frequency of occurrence per transcription yielded in both cases more than 85%.

Analysis II: Evaluation interviews

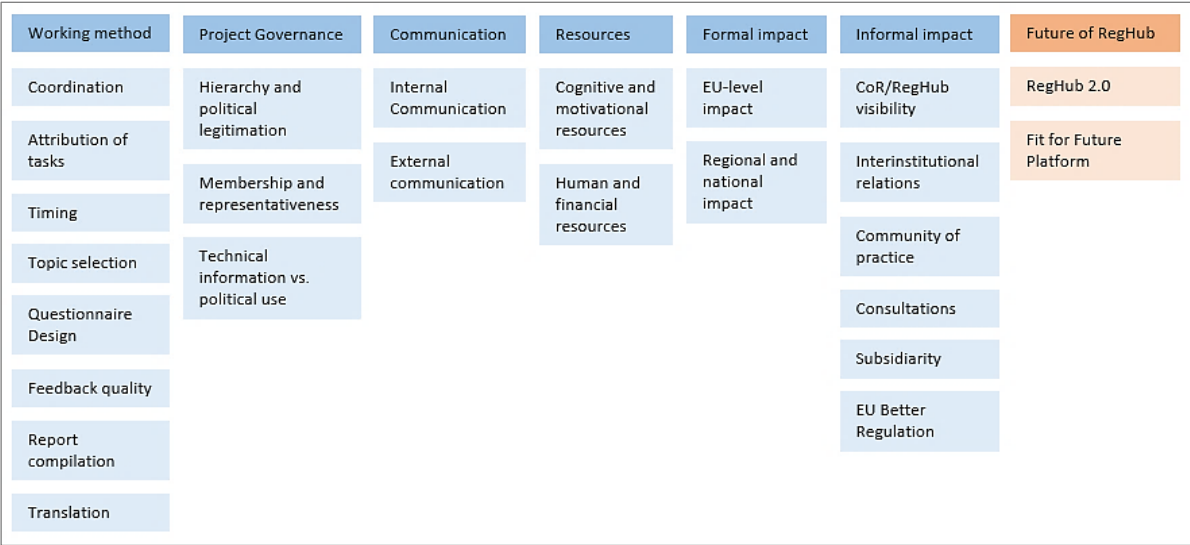


Figure 6 Coding taxonomy evaluation interviews

As can be derived from the figures, there are several **differences between the two taxonomies**. For example, the coding frame for the evaluation survey entails a second level of sub categories ("Well-defined tools and procedures"), whereas the coding frame for the interviews only encompasses one level of sub categories. This is because the evaluation addressees – the network members – are more familiar with the fine-grained tools and procedures of the working method than the CoR staff and external partners. Moreover, they were explicitly asked for their assessment of the respective items in the survey.

Concerning the **units of coding** (text passages related to a certain category), this evaluation understands any unit of coding as a unit of meaning. Such units can overlap and need not to be mutually exclusive as long as their 'meaning' refers to a different dimension of the coding frame (Schreier 2012).³⁴ After the complete data sets had been coded, they were reorganised along their main categories. The following analytical chapters explore and subsume those categories for all three types of stakeholders (CoR staff and externals are summarised under 'RegHub partner perspectives').

³⁴ Schreier, M. (2012). Qualitative Content Analysis in Practice. London: Sage.

4. Analysis

The following analytical chapters are composed of the findings from the content-structuring qualitative document analysis. For matters of clarity, a narrative approach is chosen for the presentation of the results. Annex IX, the systematic data summary, gives detailed overview of the analysed data. Hubs and interview partners will be cited as follows:

- **(ALE:Q1)** referring to the answer of the ADRAL (Alentejo) Hub to question 1.
- **(SG2:9)** referring to the statement of a member of the Commission staff, which appears in item 9 of the corresponding interview transcript in MAXQDA.
- In some cases regional hubs are nominally mentioned

It is important to note that due to the survey and interview design, some topics are more prominently present in the answers from RegHub contact points (e.g. particularities of the working method), while others are mentioned more frequently by RegHub partners (e.g. RegHub's contributions to EU better regulation).

Overall satisfaction with RegHub

RegHub contact point perspectives

Overall, a clear majority of RegHub members (Q3: 77,78%) is satisfied with the general approach and the applied working method. Similarly, the process by which topics and policy areas for assessment are selected is evaluated positively. However, only half of the respondents (Q22: 55,56%) are satisfied, while 40,74%(Q22) report that it is only 'somewhat' appropriate. Room for improvement regarding the overall approach of RegHub consultations, is seen particularly for the following processes:

- **Higher timeline congruence** between RegHub consultations and the EC's better regulation agenda (IBK:Q3; FLA:Q3) and the Fit for Future process in particular (IBK:Q22; FLA:Q22).
- **Clearer communication** of all modalities related to the review process of a given consultation topic (IBK:Q3), particularly regarding the timing (HDF:Q3; BRE:Q3).
- **More voluntary approach to participation** for regions that are less affected by a given legislation (IBK:Q3; MAZO:Q22).
- **More detailed assessment of relevance**, including a hub-specific outlook in order to better identify the most-relevant contributions (IBK:Q3;IALO:Q22).
- **Tighter definition of consultation topics**, focusing on the most relevant challenges for regional stakeholders. To this end, the topic selection process should include discussions with the regional hubs. (IBK:Q3; NWRA:Q22).
- **Better orientation of topics towards their direct practical/technical relevance** for regional authorities (IBK:Q3; NWRA:Q22) and people (DUT:Q22).
- **Higher transparency of the preparatory process**: the feedback made by contact points on questionnaire and report drafts should be implemented more thoroughly and the contact points should become more involved in questionnaire design (IBK:Q3).

Questions 30.1 and 30.2 were explicitly designed to gather contact points' feedback on two main goals identified by the CoR Bureau Decision (Q30.1: *Systematic and coherent collection of LRA's implementation experiences*; Q30.2: *Providing support for the participation of regions*). When asked for their opinion about the extent to which the RegHub project accomplishes those goals, the general

feedback is again overly positive. 62,96% (Q30.1) report that the collection of implementation experiences is indeed systematic and coherent, and 85,19% (Q30.2) confirm that the support provided to regions by the RegHub secretariat is adequate. However, some hubs point to a lack of representativeness of consultation results. They perceive this both in terms of stakeholder feedback, i.e. a possible bias due to different ways of stakeholder selection administered by contact points (UM: Q30.1; IALO: Q30.1) and in terms of capacities and (legislative) competences available to the different regional hubs (BRA: Q30.1; CAT: Q30.1).

A more general trend seems to be a **preference of the status quo regarding the network's 'fundamentals'**: When asked for their opinion on the future size of the network (Q31) and the number of consultations (Q32), in both cases a majority of hubs seems to prefer the status quo or a slight extension. The reason for this is an often expressed concern of quality loss and missing opportunities for exchange (e.g. CAT: Q31; HDF: Q31; IBK: Q31). Moreover, several hubs emphasise that a substantial extension of the network would only be reasonable and feasible if more financial and human resources are provided, in particular to the RegHub secretariat (ESLO: Q31; VEN: Q31; BOZ: Q31; UM: Q31). However, regarding network size, more than one third (37,04%) of the respondents is in favour of an increased number of participating regions for mainly one reason: to increase the representativeness of the sample and to achieve a greater geographical and socio-economic balance. Responding hubs consider this to translate into a greater reliability and quality of consultation results (DUB: Q31; KOS: Q31; FVG: Q31; IALO: Q31). As a complement to an enlarged network, the International Lake Constance Conference (IBK) suggests to set up a "*pool of regions, which can contribute to consultations. This pool should be open to new members and be as representative as the network itself. Representativeness means, in this regard, that all Member States are represented and that all regions are weighted similarly.*" Catalonia (Q31) stresses that a distinction should be made between local and regional authorities and between regions with legislative powers and regions without legislative powers. Concerning the number of consultations, the picture is clearer: almost all comments underline human and financial resources as limiting factor to an increase of consultations per year (NRWA: Q32; HDF: Q32; VEN: Q32; IBK: Q32; FVG: Q32; UM: Q32; BRA: Q32; CAT: Q25). (VAL: Q32) adds that an increase would require constant political support from RegHub CoR members and therefore the visibility of results at the political level (see also BRA: Q7.2).

When asked for their opinion on whether their community or region should **remain a member of the RegHub network**, **92,59%** (Q35) of respondents were in favour.

RegHub partner perspectives

In general terms, **all partners of the RegHub network have testified the project's added value** across several dimensions of interest to the overall evaluation of the project as a novel, tangible and concrete instrument to follow up the recommendation of the Subsidiarity Task Force (SG1:31; COM2:8; PG3:5-6; PV:19), which has "helped [the CoR] getting into the Fit for Future [Platform]" (PG3:16). More concretely, interview partners have highlighted the following positive aspects of RegHub:

- **Production of "*much more granular results*"** as compared to other types of stakeholder consultations (SG1:9)
- **Facilitation of direct contact with stakeholders** (SG1:9; COR1:20)
- **Better representation of issues in European regions** with regard to stakeholder feedback, which is also of a more qualitative nature (COR1:7-8; COR2:8-9), in particular if in cooperation with other LRA networks (SPV:12)

- **Opportunity to improve the quality of CoR opinions and support CoR members** (COR1:27; PG3:12) by "*providing numbers*" to the effects of and experiences with EU policy implementation (COM2:8; COR2:8-9; PG3:12)
- **More praxis-oriented and expert-based workshops** as compared to other networks or forums (PG1:12; COR2:8-9), which enable a "*community of practice*" among the participating regions (SG1:26)
- **Enhanced cooperation with partners in the European Commission** (COR3:23)
- **Better understanding of EU policymaking** by affected stakeholders in the regions (AB:6)
- **RegHub as a vehicle to promote CoR activities** and enhance cooperation with other EU institutions (COM2:10)
- **Enhancing the CoR's capability "*to fit the bill of evidence-based policy making*"** (AB:14).

Working method

RegHub contact point perspectives

Well-defined tools and procedures

Apart from **the generally high level of satisfaction with the overall approach and working method**, the 'bigger picture', entailing regional hubs' satisfaction with particular procedural aspects of RegHub consultations as well as specific communication tools, is mixed and displays a slight negative trend. Such trend could be explained through habituation effects and a consultation fatigue, both of which are inherent to most network structures, but it can also provide points of reference for further improvements regarding the tools and procedures in place. Summarising the results of the evaluation survey, the following trends and perceptions can be identified:

- **Survey questionnaires, implementation reports and executive summaries** have generally been evaluated as satisfactory and the level of technicality as adequate (FVG: Q5.1; WEPO: Q5.1; THE: Q5.1; CAT: Q5.1). However, [Figure 7](#) indicates that over time, satisfaction with survey questionnaires has decreased slightly.³⁵ This could be – as mentioned before – an effect of habituation or consultation fatigue but it could as well depend on consultation topic and/or questionnaire design. Hubs' answers to the open questions suggest that there is a case for the latter option. One hub has coined this "*questionnaire first, consultation second*" during the group discussions at the fourth workshop. Examples of not yet fully satisfactory aspects of the working method were:
 - Insufficient relevance of consultation topics or questions (ESLO: Q 5.1; BOZ: Q5.1; IALO: Q5.1)
 - Range of questions too broad (*here: air quality, state aid*) or too narrow (*here: cross-border healthcare*) (VAL: Q5.1; BOZ: Q5.1; IBK: Q5.1; BRA: Q5.1)
 - Inadequate competence level – local and regional authorities are not in charge of implementation and can therefore not adequately contribute to an evaluation (ESLO: Q5.1; IALO: Q5.1; MAZO: Q5.1)
 - Not enough opportunities for open comments (IBK: Q5.1)
 - Unnecessary and vague 'knowledge questions' (IBK: Q5.1)

³⁵ The satisfaction with survey questionnaires is chosen for matters of completeness and data availability and is not representative for other tools or procedures

- Insufficient distinction between questions dedicated to contact points and questions dedicated to stakeholders (IBK: Q5.1)
- Insufficient time frame or colliding timelines (BRE: Q5.1; VAL: Q5.1)

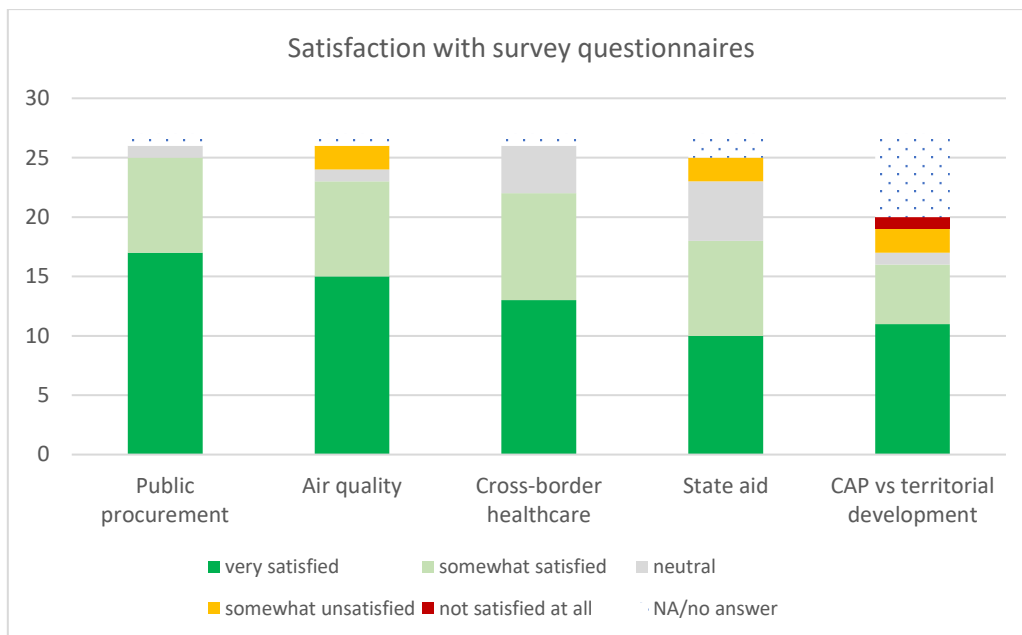


Figure 7 Satisfaction with survey questionnaires

From a more general perspective, it seems to be recommendable to **keep survey questionnaires as short, concrete and technical as possible**, while keeping the opportunities for contact points to specify their answers with regard to their stakeholders as open as possible. In order to make the questionnaires more consistent, Brandenburg (Q36) suggests for multiple choice questions should not contain a "neutral" option because it precludes any distinction between stakeholders' motivation to not indicating an opinion. Hauts-de-France (Q5.1) further emphasises that the actual implementation of a Directive should always remain in the focus of any consultation, not the political impact of a policy.

Regarding the **implementation reports**, most respondents report a 'satisfactory' or 'somewhat satisfactory' quality (*combined*: 88.88% for public procurement; 85,19% for air quality). They highlight that the reports cover all relevant issues in a precise manner; are credible and representative; contain useful recommendations; and are easy to understand (e.g. ESLO: Q5.2; VAL: Q5.2; IBK: Q5.2; FVG: Q5.2; UM: Q5.2; FLA: Q5.2; CAT: Q5.2). The International Lake Constance Conference (IBK) (Q5.2) makes concrete suggestions on how to improve the structure and use of RegHub implementation reports:

- **Discussions about the preliminary results** of the consultation with the RegHub network and about the framework in which the results will be communicated vis-à-vis the EC;
- **Translated implementation reports** as a communication tool between Regional Hubs and stakeholders: *"Implementation reports can be a vehicle to show appreciation, give motivation and provide feedback to stakeholders. (...) However, this is only possible if translations of the reports are available in German language in due time (...)."*

Likewise, the translated **executive summaries** are perceived as useful tools to disseminate information and provide feedback to stakeholders (Q5.3).

- The hubs' positive evaluation of **RegHub workshops**, especially regarding the function they fulfil for RegHub consultations, underlines their request for an intensified communication between the network members and the RegHub secretariat/CoR staff and among the network members themselves. [Figure 8](#) visualises the prioritisation of workshop functions according to the responding hubs.

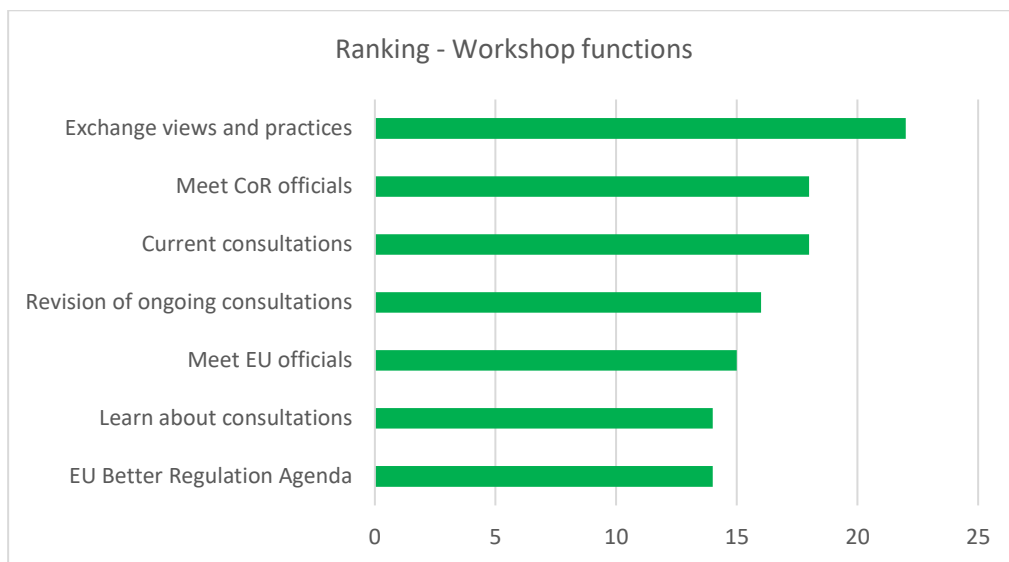


Figure 8 Workshop functions

Comments encompass assessments of the existing workshop set up as well as suggestions for its improvement:

- **Better exchange** of good practice examples (HDF: Q7.2) and **focus on matters of direct exchange**, i.e. coordination of and agreement on common positions, the exchange of good practice, and exchange with CoR and EC officials (IBK: Q7.2; FVG: Q7.2)
- **More information** on stakeholder selection (BOZ: Q7.2)
- **More frequent use of videoconferences** for consultation-specific matters (IBK: Q7.2)
- **Intensification of reporting** by the RegHub secretariat (e.g. provide an overview of political activities of the CoR/RegHub) which can be further be used to signal the political impact to stakeholders and keep them interested (BRA: Q7.2)
- **Focus on horizontal topics** instead of technical consultation content (FLA: Q7.2).

Time management and deadlines

Throughout the hubs' answers, **time management and deadlines** are mentioned in mostly two ways. First, regarding the timely input to the EU legislative review cycle. Second, regarding the timeframe and timing of consultations. Concerning the former, contact points regularly point to the need to better synchronise RegHub reports with the EC's better regulation agenda, which is also mentioned as the most important driver for topic selection (for example, IBK: Q22; FLA: Q22; answers to Q24). Concerning consultation timeframes and timing, several hubs indicate that the time available to prepare and realise their stakeholder consultations is not sufficient (ESLO: Q4; MAD Q4; HDF: Q4; UM: Q4; BRA: Q4). In this regard, Brandenburg (Q4) recommends to guarantee for at least 8 weeks of

consultation for each RegHub survey in order to gather relevant results. Moreover, several hubs signal a lack of transparency and request regularly updated overviews in order to stay informed (e.g. IBK: Q3). Also, they indicate that consultations should preferably not be carried out during holiday seasons (particularly Christmas, Easter and summer holidays) in order to warrant consistent and continuous input from stakeholders (IBK: Q4).

Coordination

In general terms, contact points signal a high level of satisfaction with the coordination of the project by the RegHub secretariat. This has already been reflected in previous chapters since each step in the working method entails coordinative activities carried out by the RegHub secretariat.

Contact points confirm regularly that the activities assigned to the secretariat, as described in chapter 1, are carried out thoroughly and that they appreciate the responsiveness and availability of the secretariat (UM: Q21; DUT: Q21). Moreover, they report that they are largely satisfied with the experts that are invited to RegHub workshops (e.g. HEL: Q36). This is also reflected in their overly positive answers to question 31, which asked whether the support provided to the participating regions was sufficient (85,19%).

Topic selection

Hubs' level of satisfaction with the approach to **topic selection** is overly positive. However, almost half of the respondents (Q22: 40,74%) indicate that this is only 'somewhat' the case. The two most commonly mentioned procedural requirements for topic selection outlined by hubs were a consequent alignment with the EC/F4F agenda (IBK: Q22; FLA: Q22) and a better or more specific consideration of regional characteristics such as legislative competences or political relevance (IBK: Q3; MAZO: Q22).

When asked for their view on what should be the **most important 'driver' for the RegHub work programme**, a majority of hubs again flagged their commitment to align as closely as possible with the EC work programme (Q24: 77,78%). The CoR work programme was placed second most important (37,04%) before the EP implementation review agenda and 'other' sources (both yielding 22,22%). Several hubs mention again the need to choose topics that are relevant for local and regional authorities (MAD: Q24; HDF: Q24) and that there should be possibilities for network members to propose own topics, if deemed necessary (BRA: Q24; MAZO: Q24). Helsinki-Uusimaa (Q24) further suggests to take into account citizen initiatives.

Question 25 was specifically designed to explore hubs' viewpoints on the **feasibility of hub-specific consultations**. Almost all contributions to this question confirm a positive potential for hub-specific consultations, especially because of the different degrees of legislative competences that regional hubs possess (HDF: Q25; VEN: Q25; BOZ: Q25; KOS: Q25; IBK: Q25; UM: Q25; MAZO: Q25; HEL: Q25). At the same time, they emphasise the need to foster a relevant and non-redundant choice of consultation topics (VAL: Q25; HDF: Q25; BOZ: Q25; ALE: Q25; CAT: Q25). Flanders (Q25), for example, points to the risk of producing a "two speed" RegHub, which it deems undesirable at this stage of the project.

Question 26 explored regional hubs' viewpoints on the feasibility of **assessing broad political initiatives or current affairs** that are *not* linked to specific pieces of legislation. Here, hubs seem to be split into two camps. While some consider consultations, which are carried out as early assessments and can help influence the legislative agenda, as potentially useful (ESLO: Q26; NWRA: Q26; MAD: Q26; ALE: Q26; FVG: Q26; DUT: Q26; to some extent BRA: Q26 and HEL: Q26), others warn against the "*risk*

of having too general and not very useful answers" (VEN: Q26; also IBK: Q25; IBK: Q26; BOZ: Q26; UM: Q26; CAT: Q25; CAT: Q26). Two hubs further highlight that such consultations might imply political rather than technical opinions, which they deem running counter the principal objective of the RegHub network to produce technical implementation reports (HDF: Q 26; BRE: Q 26).

Future topics for consultations were explored in question 27. However, the answers to this question were too diverse to be summarised here. Instead, the follow up of the evaluation report, including RegHub's contribution to the Fit for Future Platform, is discussed in [chapter 5](#).

Stakeholder communication

The **communication between contact points of the RegHub network and their stakeholders** is one of the key elements of the pilot project since it determines the quality of consultation feedback and thus the usefulness of RegHub implementation reports. Therefore, the evaluation survey tried to capture the most important aspects thereof and to work out potentials for improvement.

Questions 12 and 13 asked the contact points to describe their **usual approaches for contacting stakeholders and compiling stakeholder replies** into a coherent hub response. According to their answers, the following characteristics are present to different extents for almost every consultation:

1. Preliminary contact/discussion with the competent departments in the local/regional administration
2. Definition of relevant stakeholders
3. First contact via mail or phone; in some cases, via official letters
4. Additional explanations and discussion/interviewing via phone calls, video conferences or personal meetings
5. Compilation of answers in cooperation with competent colleagues in the local/regional administration (first step: compilation of 'average results' (in some cases per focus group), second step: identification and documentation of 'outliers')
6. Sharing of results for validation
7. Compilation into one final contribution and submission to the RegHub secretariat via EU Survey.

There are some remarkable developments and challenges in terms of **process formalisation, political backing and methodological rigour** worth mentioning:

- Umbria (Q12) notes that "The regional government has **adopted official acts concerning the RegHub project**. Then, when a consultation is launched, an official letter signed by the responsible of the project is sent to the Directors of the departments (...) The letter explains RegHub's aim (and) requests the Director to appoint the officials competent to provide feedback to the specific questions (...)."
- Thessaly (Q12) reports that "The biggest help in accessing the interested parties and their timely and effective response was the **intervention of the Regional Governor (...)**."
- Umbria (Q13) indicates that it sets up **different focus groups of stakeholders** and drafts single questionnaires per focus group reporting the specific feedback of each one of them.
- The International Lake Constance Conference (IBK) (Q12), being a hub composed of regions from different Member States (and non-Member States) notes that the **compilation of diverging viewpoints can prove especially difficult** and therefore requires more attention to questionnaire design (see: questionnaire design).

When asked if they are facing **difficulties when contacting stakeholders**, a majority of hubs answered that this is not the case (Q11: 70,37%). Those hubs signalling difficulties (25,93%), reported various reasons:

- **Unpopularity of regional level policy** in the public sector of centrally organised states (ESLO: Q11; KOS: Q11; MAZO: Q11; WEPO: Q 11)
- **Reluctance of (private sector) stakeholders** to engage in a cooperation if they cannot determine an immediate impact (VAL: Q11; VEN: Q11; FVG: Q11; UM: Q11)
- **Lack of visibility and feedback to stakeholders** undermines their motivation (VAL: Q11; FVG: Q11; UM: Q11; BRA: Q11)
- **Lack of relevant background information** about RegHub/CoR and/or a given consultation topic to motivate stakeholders (THE: Q 11; DUT: Q11; IALO: Q11).

Questions 14.1 and 14.2 asked for the **manageability and conciseness of stakeholder replies**. For both questions only a minority of hubs 'strongly agrees' that stakeholders' answers were easy to process and integrate and that they were adequate with regard to their accuracy of fit (11,11%). Thus, a majority of hubs perceives for at least some room for improvement. Difficulties mentioned regularly were contradictory answers made by stakeholders with different interests and a lack of background knowledge and general understanding of EU policymaking, the latter of which results in answers that are missing the topic (DUB: Q14.1; HDF: Q 14.1; IBK: Q 14.1; VAL: Q 14.2;). Another aspect responsible for unconcise answers is the different levels of motivation and involvement among stakeholders (DUB: Q 14.2; KOS: Q 14.2; ALE: Q 14.2). Considering this, several hubs emphasise again the need for careful questionnaire design (HDF: Q 14.2; IBK: Q 14.1; FVG: Q 14.2). The International Lake Constance Conference (Q 14.1) makes again concrete suggestions for improvement: questionnaires should provide additional opportunities to provide explanations for both stakeholders and contact points. Moreover, it suggests that 'divergent answers' should be added as a response option to any multiple-choice question.

RegHub partner perspectives

While contact points' assessment of the individual tools and procedures used in RegHub consultations is generally specific and oriented towards concrete procedural improvements, the **feedback provided by RegHub partners on the RegHub working method is much more diverse in terms of concreteness**. Evidently, the most precise feedback is provided by CoR policy officers, who have been collaborating with the RegHub secretariat on survey questionnaire design and report compilation. Partners from the CoR political groups and the Directorate for Communication as well as from the European Commission and scientific community, assessed the working method in broader terms, often related to aspects of (political) governance and the exploitability of consultation results. While the feedback of the latter was less detailed with regard to technical and procedural aspects, their input is essential to ensure that the deliverables of the network are effectively used.

Coordination and attribution of tasks

In general terms, CoR policy officers indicated that they are satisfied with the collaboration between their commission secretariats and the RegHub secretariat, and the support they received (COR1:35; COR4:6; COR4:14-15). The line out that the exchange with the RegHub secretariat has allowed them to integrate previous experiences with the network into their drafting work. However, one policy officer suggested several coordination aspects that could be improved:

- **More efficient and timely coordination of revisionary work**, in particular with regard to linguistic aspects (COR4:6-10)
- **Enhanced cooperation between the RegHub secretariat and the CoR commissions** with regard to events related to the promotion of the political and technical content of RegHub consultations (e.g. technical platform meetings) (COR4:25-26).

Partners from the EC further suggest to **complement the RegHub secretariats' coordinative activities with the provision of additional information on other EC consultation activities**. This would allow the network *"to create a more systematic link"* between local and regional authorities and the Commission's consultation regime (SG1:26).

(SPV:14) further highlights the **central importance of the RegHub secretariat for the network**: *"[it] is quite critical to ensure that there is now slowing down in cooperation and that the work is relevant." – "the question is to ensure that the input continues to provide added value and that rests, (...) in the intuition and the ability of the secretariat to dynamize that work."* (citations in revised order).

Topic selection and timing

Comments on topic selection mainly focus on the **need to synchronize the RegHub work programme with the EC better regulation agenda** (F4F) on the one hand (SG1:26) and, on the other hand, on **RegHub's potential to provide relevant input to this agenda**, something the EC's SG clearly expects from the network's involvement in F4F (SG1:28).

This is further underlined by (AB:20-22), who considers one of the **main challenges for the secretariat to be part of the agenda-setting process**, more concretely to *"reach a right balance between various cleavages that may arrive (...) building consensus and building coalitions around what should be the mains issues that should be brought on the agenda of the F4F (...)"* which requires *"skill, diplomacy and clear rules and maybe telling people that there are different time frames."*

Considering a **necessary link between the RegHub work programme and the CoR agenda**, (COM1:17) perceives a potential for RegHub to *"think out of the box" – "not only to listen to the CoR and feed into our opinions, but also to steer and to initiate opinions or look at the blind spots that are not in the Commission work programme (...)"* (citations in revised order).

Regarding timing, in particular CoR policy officers signal that there is room for improvement and that **it was not all the time possible to meet the deadlines** for including RegHub consultation results in their political work or to disseminate it to the relevant institutional stakeholders. (COR1:12), for example, notes that only due to the Covid-19-induced postponing of the corresponding CoR opinion, the RegHub implementation report will be able to timely feed into it. Generally, if *"we adopt an opinion very quickly (...) if a rapporteur needs a quick feedback for his report (...) it would be great to have special deadlines for the questionnaire, for the answers to reduce a little bit the whole process of consultation."* In the case of the Ambient Air Quality Fitness Check, (COR4:22) reports that *"it was not possible to include because the Fitness Check was published in November and we published the report in December. It was not doable in time. And even if we had done it a couple of months before most of the source material for the Fitness Check on the Air Quality Directives would have done a bit earlier. (...). So, if in the future there is any chance to coordinate with the calendar of the Fitness Check (...)."*

All in all, it appears that for RegHub partners – as for regional hubs as well – the close alignment with F4F, Fitness checks and opinion work as well as a transparent communication of timeframes and topic selection processes has been and will be pivotal for the success of RegHub consultations.

Questionnaire design

Similar to contact points, whose main concerns regarding questionnaire design are the adherence to a consistently high level of technicality and the design of concrete and consistent questions, CoR officials involved in the drafting process consider **relevance and conciseness** to be important assets (e.g. COR3:17-18). According to several RegHub partners, the requirement for technicality is generally met by RegHub consultations (AB:6; PG3:6; PG3:8).

With regard to the hub's request for an extensive use of open comment questions and opportunities to distinguish between types of stakeholders or diverging responses, one CoR official notes that there is potentially a **trade-off between the openness of questions and the analytical capacities** of policy officers in charge of compiling the implementation report (COR4:17-18), which might eventually make additional resources necessary (COR1:29-30).

Consequently, the right balance between questions that are broad enough to capture a wide range of relevant stakeholder perspective and questions that are narrow and concise enough to draw meaningful aggregate conclusions from the survey answers, needs to be carefully calibrated for each consultation.

Feedback quality

Almost all interview partners perceive the quality of stakeholder feedback received from RegHub consultations as superior to 'normal' consultations. This is for several reasons. First, in line with similar consultation models carried out by the EC, targeted stakeholder consultations that are accompanied with phone calls, workshops and interviews, enable more direct exchange with relevant stakeholders and thus deliver **more tangible and concrete results** (SG1:9; SG1:31; COR1:20; COM2:8; COR2:8-9). Second, by covering a majority of EU Member States, CoR policy officers are provided with **evidence going beyond their usual information channels**, which are sometimes nationally biased due to their own national and professional background (COR1:7-8). This widening of the evidence base seems to be recognised also by the EC's Directorate-Generals (COR1:20) who eventually *"make us partners"* (COR3:23). This enhanced cooperation is perceived as a **pre-condition for the impact of CoR opinions** in the policymaking process of the other institutions (COR1:25-27): *"So for me it will be important to increase this feedback from the local and regional authorities to really have stronger and more focussed opinions on local and regional issues."*

Problems concerning feedback quality are less related to consultation results but rather to their **political exploitability and use, which seem to remain beyond their potential**: (PG1:14), for example, shares his impression that for one of the concerned opinions, the rapporteur only vaguely pointed to the results of the RegHub implementation report, but still used it to back-up concrete political claims. However, *"[t]his is not a problem of the network, it's a problem of the political level."* (own translation). This perception is shared by all partners belonging to the CoR's political groups who participate in the evaluation.

Another issue regarding the quality of feedback is related to its problem-oriented nature, offering a list of problems instead of solutions (COR3:11-12). In connection with the **challenge for CoR policy officers to identify the most relevant experiences given constraint time capacities** (SG1:16; COR4:18), this could potentially reduce the coherence and representativeness of results. In this regard, interview partners provided several ideas on how to increase feedback quality:

- **Analyse the commitment** shown by the different hubs, particularly those *"that are motivated, that are involved and that apply good practices."* (COR2:29). This is considered to improve feedback.
- *"Watch out for consultation fatigue and not to do too many consultations."* (COR3:31)
- Foster further **collaborations between RegHub and other platforms** and instruments like the EU Urban Agenda (SPV:12), EUROCITIES or other subnational level networks that are working on better regulation policy (PG2:27-28), like Europa Decentraal, (SPV:16) in order to contextualise evidence
- **Create a network with the remaining regions** that are not part of RegHub but that can nevertheless contribute to its work and disseminate information about EC consultations (SG1:26).

Report compilation

For RegHub partners, including CoR policy officers in charge of the compilation of RegHub reports, careful **questionnaire design largely determines the quality of a report** (COR1:16; COR2:8; COR3:16; COR4:18), the latter of which they largely perceive at a high technical level. It appears that due to the comparably great extensiveness of survey answers and thus data base for RegHub reports, report compilation requires for some policy officers more resources in terms of time and expertise (COR4:8; COR4:30). Therefore, they suggest to step up both kinds of resources, in terms of shorter translation deadlines (COR1:12) and additional human resources (COR4:28).

In parallel to their comments on feedback quality, however, they find that the **concrete output of reports is not always usable when it comes to harnessing key findings to back up the political work of the CoR** (PG3:8-10; PG3:25-26). In this regard, (COM1:12) suggests to **better frame and embed** the extensive *"phonebooks of the RegHub reports"* by **highlighting their statistical findings** first and afterwards provide the full range of available evidence to the interested audience (see chapter on communication).

Project governance

Project governance relates to **ways and means by which the RegHub project is organisationally embedded** in the CoR's politico-administrative structure, and – more broadly – the EU better regulation policies. This encompasses, for example, all internal decisions on the projects future. Due to the influence that such structural aspects evidently have on a project's rules of procedure and project development, it is likely that we find thematic overlaps between issues of 'project governance' and 'working method'. While contact points have been more involved with all aspects of the working method, it is in particular CoR staff affected by immediate dynamics of project governance. Nevertheless, hubs have expressed their viewpoints especially with regard to **topic selection, technicality of surveys, and network representativeness**.

RegHub contact point perspectives

Concerning topic selection and organisational embedding, there is mainly one recurrent request in the limelight: the **preference of technical consultations over political surveys**. Many hubs perceive this as the 'real' value added of the RegHub network – and thus its legitimation – (e.g. IBK: Q 22) and note that otherwise, the project would be running the risk of duplicating consultations in an already complex consultation regime (e.g. CAT: Q25). However, both technical and political use are perceived as important, placing the European Commission as organisational heart of the EU legislative review

regime centre stage, while recognising the need to be able to 'sell' RegHub in the regional administrations. This is reflected in [Figure 9](#), where – similarly to the 'drivers' for the RegHub work programme – the contribution to EU better regulation activities is favoured over stand-alone implementation reports for the CoR. However, this does not imply any incompatibility between the two. Rather, it points to the need to continuously mesh both processes and synchronize their institutional embedding (e.g. IBK: Q 29 *on the possibility of using RegHub for ex-ante territorial impact assessments, TIAs*).

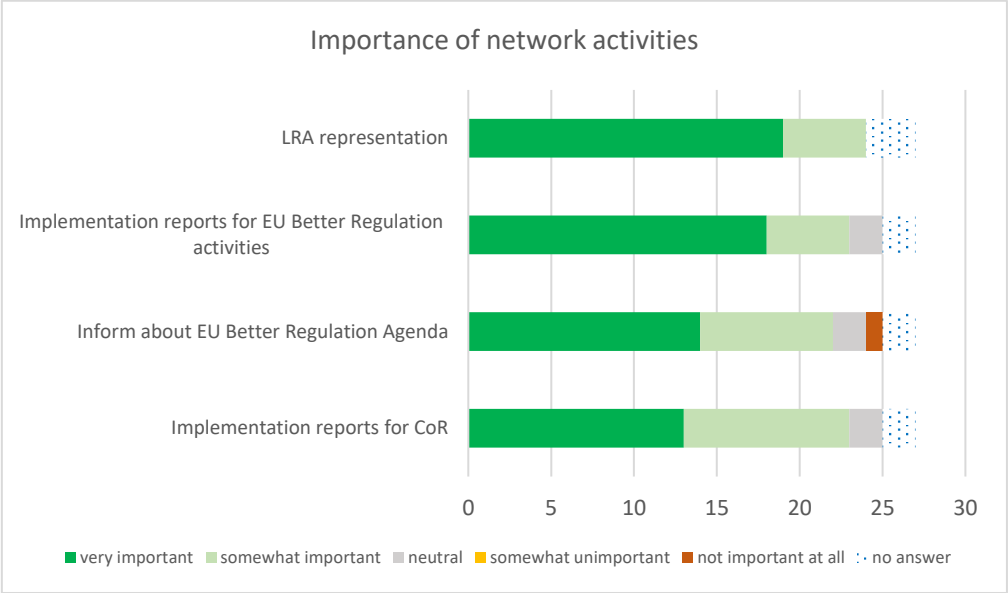


Figure 9 Importance of network activities

In terms of **network size and representativeness**, as mentioned before, a preference of the status quo is prevailing. Some regions see an opportunity in widening the network, which must not necessarily be accomplished via the admission of new network members but via consulting existing associations, networks and initiatives already active in the area of legislative review.

RegHub partner perspectives

As has been mentioned before, internal dynamics of political representation, administrative organisation and usability of RegHub implementation reports for the political work of the CoR has been particularly an issue for interview partners from the CoR than for RegHub contact points.

Regarding **hierarchy and political legitimation**, there seem to be two allegedly counteracting logics: **political use vs. technical information**.

The first logic is reflected in an instrumental view of RegHub as a mean to enhance and back up the CoR's political work – its *"raison d'être"* (PG3:14) – and thus to legitimise and improve CoR members' contribution to and influence on the EU policymaking process. The second claims that RegHub as a technical, expertise-based network, can *potentially* be perceived as *"a source of influence in its own right"* (SPV:19),³⁶ which is – as opposed to previous CoR projects – not running the risk *"(...) of being side-lined and not being mainstreamed anymore."* (COM1:12). However, it becomes very clear that **all**

³⁶ Serafín Pazos-Vidal, however, highlighted to us in his review that RegHub, as a subset of the CoR, will rather enhance the outreach of the latter as an institution towards local and regional authorities and EU institutions: *"RegHub is a knowledge centre, a think tank, a policy community and an advocacy body melted into one."*

interview partners locate RegHub within the CoR political and administrative structure as "(...) one part of the input from LRAs to the Commission review activities, [,which] won't replace the CoR." (SG1:13).

Consequently, it is often proposed to **more systematically link technical potential and political need to ensure better representation and participation of local and regional authorities in EU policymaking** (AB:6): with RegHub, the CoR has another point to say *"we are a political body but (...) regions are actors that are able to do much more than just coordinate politically and engage politically. We can do much more than that."* (AB:26).

In order to assert this widened role of RegHub and the CoR effectively, interview partners point to several areas of action:

- **CoR to act as an effective 'trait d'union' between the RegHub network and the Fit for Future platform**, i.e. CoR representatives' active promotion of RegHub's involvement in platform opinions (SG1:28; SPV:6)
- **Inclusion of concrete RegHub consultation results in CoR opinions** by the respective rapporteurs (COR1:25-27; PG1:14-15) to achieve higher levels of practical relevance (PG2:17)
- In this regard ensuring that the **most relevant findings are extracted** from RegHub reports and made available to rapporteurs (PG3:14)
- **"Making RegHub part of what it is to be a member in the CoR"** (COM2:9-10) and involve politicians of all political groups in terms of the overall governance and with regard to F4F (PG3:5-6)
- **Better involvement of regional politicians** other than CoR members (COM2:10), e.g. by ensuring consequent branding and referencing to the CoR (PG3:20)
- **Quality-based branding of different kinds of CoR 'products'**, depending on their level of technicality or political intention, which would allow to make reports unrelated to CoR opinion better usable for other purposes (PG2:21; SPV:8).

(SPV:7-8) further lines out that, with regard to its involvement in the F4F, it is particularly important not to undermine the opportunities that will be brought up by the Fit for Future by the **internal political dynamics and tensions of the CoR**, which are inherent to its "double nature", being both a political assembly and technical advisor to EU institutions.

Regarding an outlook on the **representativeness and membership** of RegHub, interview partners are generally in favour of opening up the network to more EU regions and stakeholders (COR1:7-10; COM1:6; SG1:26; PG2:27-28). However, when asked if they deem it necessary to extend the network, they recognise that a substantial increase in contact points would come to the detriment of the networks manageability and potentially the quality of consultation results, given constant human and financial resources (AB:11-12; COR1:25). Moreover, (SG1:24) emphasises that the EC does not see consultations as referenda: *"So, our own consultation activities are not representative. (...) [t]hey are just one input into the decision making (...). But we do take specific care of these consultations. (...) **The fact that it is not representative does not mean that it doesn't weight, that it's not important.** (...) it is not a 'yes or no' and it's much more complex than that. But still, the input we get is very valuable."* Furthermore, the partners from the Commission underline that if RegHub wants to be particularly meaningful and ensure its input translates into document references, **close alignment with the Commission's timing rather than the number of regions**, is useful (SG1:26).

Consequently, the question appears less to be about the optimal level of geographical or socio-economic representativeness – it would rather be about the **optimum of participation, which ensures high quality information** (AB:11-12) and the ability to reach consensus between the different kinds of participants and *"make sure that all voices are heard within the RegHub and that then (...) the Commission (...) can be presented coherent, legitimate (...) issues that should be addressed."* (AB:20-22).

Nevertheless, in case of an increased number of network members, **geographical balance and the distribution of competences and powers** of the regions in each member state should be taken into account (COR2:26-28; COR3:31).

Aggregating across the different aspects of project governance, it seems that most adaptations required are related to the exploitability of RegHub implementation reports. Representativeness does not seem to be a pertinent issue either, although both hubs and partners are in favour of complementing the experiences of RegHub stakeholders with experiences from other relevant actors, such as LRA associations.

Resources

RegHub contact point perspectives

There are mainly three forms of resources that can be identified from the hubs' responses to the evaluation survey: First, **human and financial resources**, relating to a lack or an availability thereof, both at the level of local/regional administrations and at the level of the RegHub secretariat/CoR. Since timely contributions are mostly dependent on human resources and capacities, some answers in this regard can be assigned to the availability of such resources. Second, **cognitive and motivational resources**, referring to a lack or an availability of expertise, political support or motivation, both at the local/regional and RegHub/CoR level. And finally, **regional administrative resources**, which might be associated with the aforementioned types but more concretely refer to concrete characteristics, (legislative) competences and structures of a local or regional authority. In general, resources have proven to be a **recurrent and cross-sectional topic** underpinning hubs' answers to questions on (future) consultation capacities, tools, and procedures; their availability to host and attend workshop meetings (Q8 and Q9) or to take over additional functions other than feedback coordination (Q29 on TIAs and Q34).

Questions 31 to 34 were explicitly designed to capture **RegHubs' assessment of a possible extension of the network and the number of consultations in the mainstreaming phase**. As has been mentioned before, the evaluation survey re-opened those questions from the third RegHub workshop in order to avoid getting a merely personal snapshot. When asked for their viewpoint on the challenges, a growing network would face, almost all respondents point towards a lack of time and human and financial resources (ESLO: Q31; VEN: Q31; BOZ: Q31; UM: Q31; DUB: Q32; ESLO: Q32; NWRA: Q32; HDF: Q 32; FVG: Q32; UM: Q32; BRA: Q32). The picture becomes even clearer when looking at the kind of resources required for an increased number of consultations ([Figure 10](#)):

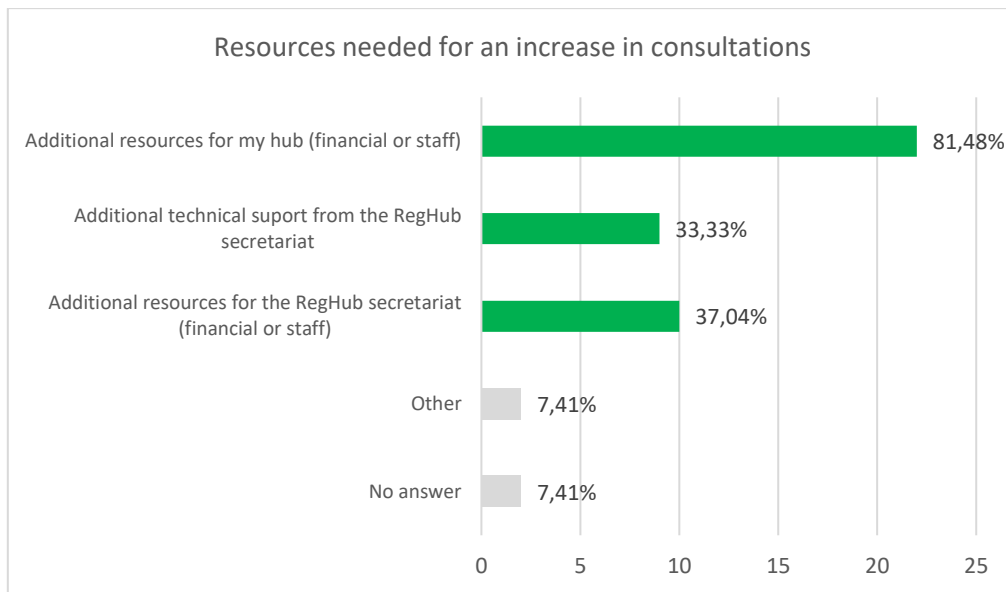


Figure 10 Resources needed for an increase in consultations

It is important to note, however, that **an increase of consultations is not seen as an unconditional improvement to the consultation process**, depending only on the available resources. The International Lake Constance Conference (Q34) points to a possible trade-off between the number of consultations and feedback quality, which it assumes to decrease proportionally. This is further underlined by Hauts-de-France (Q34), who indicates that given the case of constant human resources, the hub would have to make a choice between consultations and could not participate to all of them.

Furthermore, it is worth mentioning one additional aspect, which was not often mentioned in the answers to the survey (e.g. BRE: Q33) but during the group discussions of the fourth RegHub workshop: **the need for a more systematic processing and provision of background information on consultation topics**. By then, several contact points suggested "the dissemination of technical notes and background information on any given consultation and its related pieces of legislation ahead of the Brussels workshops and additional technical trainings for contact points".³⁷ This adds to the potential of developing new cognitive and motivational resources among stakeholders and regional hubs, which is also identified for the reporting stage and political use by Brandenburg (Q7.2): *"We would like to suggest for the CoR to further intensify this reporting on the political processes and to be as concrete as possible in showing the successes. This will enable us to give our stakeholders a clear feedback on the benefit of the time and energy they spend answering the questionnaires."*

RegHub partner perspectives

In terms of **human and financial resources** necessary for a smooth running of the project, there are mainly two angles from which interview partners discuss the issue. First, in terms of resources required by CoR commission secretariats for questionnaire design and report compilation. Second, in terms of resources required by the RegHub secretariat to manage the day-to-day activities in an extended network. Interview partners agree that they would expect the latter to **increase significantly with a substantial extension of network members** (AB:12; COR1:10; COR1:25), particularly because of an increased volume of bilateral communication and the intensified necessity to coordinate a newly established network. This is in general one of the biggest challenges perceived by interview partners

³⁷ Summary of the 4th RegHub workshop, page 7.

inside the CoR. At the same time, this perspective is attenuated if re-allocations of existing resources are considered: *"If we decide to have less opinions and we give some resources and money in RegHub network (...) we could have less opinions, but better ones, with strong arguments."* (COR1:27). In this view, it becomes a **question of prioritisation made by the CoR policy commissions**.

Other measures, implying altered human or financial resources, are the following:

- **Communication activities** in cooperation with the CoR's Secretary General, such as broadcasting an interview about the project (COM2:21)
- **Linguistic and analytical support** for the compilation of RegHub reports (COR4:8)
- **Shorter deadlines for translation** (COR3:12)
- **Additional explanatory documents for CoR members and stakeholders in the regions**, eventually requiring additional resources for translation (AB:10; PG3:20).

(PG3:6), based on his experience, further points to the **resource requirements of RegHub members**, of which particularly smaller regions without legislative competences are often facing difficulties to mobilise resources necessary to participate.

Other than human and financial resources, interview partners extensively point to **cognitive and motivational resources** in two ways. First, with regard to the resources both available to and fostered by the RegHub project. Second, considering potential demands for the project's continuation. In terms of the former, the following aspects are mentioned:

- **RegHub has created an evidence-based "community of practice"** among its member regions (SG1:26), which works constructively and in an expedient manner
- **The RegHub secretariat and the network members are perceived as serious actors**, willing to sustainably engage in the network's activities (COM1:6): *"(...) the energy that I felt among these 30 people was such that I thought 'wow, well done, these people deserve it and they have something to say.'"*
- **RegHub reaches out** to a small but sustainable interested audience (COM1:14)
- **High level of personal motivation** from contact points: "They want to make a difference. They want to make their voice heard. They were really convincing, I am convinced." (COM1:19-20)
- **Positive reception of RegHub activities in the regions** (PG3:6), including regions that have not been very active in the past
- **Network-creating effect of RegHub consultations in the regions**: *"(...) under the brand of the Committee of the Regions [they were] able to consult with other bodies in their own regions. And that is a huge benefit for us."* (PG3:14).

With regard to future requirements, the following suggestions and remarks are made:

- **Consistent ability to be discerning** with regard to consultation topics and procedures, i.e. to make sure that topics are relevant, capable of achieving a majority, and that regional hubs maintain the quality of their stakeholders (AB: 18)
- **Openness and readiness to experiment**, i.e. giving the network some freedom to develop and grow (COM1:16-17) without binding it to strict procedural obligations
- **Greater accessibility to interested audiences** – the creation of a RegHub supporter group through targeted presentations, e.g. for EP assistants (COM1:14)
- **Maintain a political stake for the CoR in RegHub consultations** because otherwise ownership and funding by the CoR could become questioned (PG3:20)

- **Extend the possibilities for virtual participation while keeping physical workshops** (PG1:23-24) in order to keep participants motivated and continuously ensure direct EU-wide cooperation and exchange of good practice
- **Adapt sets of practices to the needs of the network proactively and in anticipation** in order to avoid consultation fatigue and to **communicate the impact of network activities** to motivate participants and keep participation high (SPV:14)
- **Streamline the cooperation between CoR policy officers and the RegHub secretariat** to avoid frustration and create more efficient procedures (COR3:8).

Communication

Besides stakeholder communication, there are mainly two aspects of communication prominently mentioned in the evaluation survey and throughout the interviews: internal and external communication. In the case of regional hubs, **internal communication** overlaps with comments on communication tools (Q 6), coordination and support provided by the RegHub secretariat. In the case of RegHub partners, it mostly refers to all instances of communication on RegHub within the CoR, e.g. between the RegHub secretariat and CoR commission secretariats, political groups or CoR members *other* than for the purpose of a consultation. An example for that could be the promotion of RegHub vis-à-vis stakeholders in the CoR. Similarly, **external communication** refers to all instances of communication outside the CoR, which are not related to the working method (e.g. working meetings with the Unit in charge of Evaluation, Impact Assessment and the Regulatory Scrutiny Board Secretariat of the European Commission) but related to the advertisement and – in part – to the political use of the project.

RegHub contact point perspectives

Regarding the **communication tools that have been used during the pilot phase**, hubs are largely satisfied with the most commonly used tool – regular email exchanges: 88,89% report that they are 'very satisfied', 7,41% that they were 'somewhat satisfied'. The picture becomes a bit more diverse when looking at the use of more elaborate communication tools such as the internal online platform for RegHub members (members' portal), which is used to share content and files, as well as videoconferencing tools or the newly established newsletter. Reported issues with those tools were often related to technical problems with videoconferencing software and quality (VAL: Q 6.2; BOZ: Q 6.2; CAT: Q 6.2) and a lack of user-friendliness of the members' portal (ALE: Q 6.2).

Generally, contact points seem to welcome an **intensified use of videoconferencing tools** due to the circumstances of the Covid-19 crisis (THE: Q 6.2) but also for a further complementation and substitution of physical meetings (IBK: Q7.2; ALE: Q 6.2; IBK: Q 6.2; UM: Q9). However, several hubs explicitly underline **the advantages of physical meetings vis-à-vis virtual ones, in particular regarding their function to facilitate exchange among contact points and CoR staff** (FVG: Q 6.2; HDF: Q 6.3; WEPO: Q 6.2). This is also reflected in their high level of appreciation of workshops as a mean to get in contact with other contact points and officials from the CoR (Q 7.1: 85,19% indicating exchange among hubs as 'very important', 66,67% indicating exchange with CoR officials as 'very important').

Worth noting with regard to the communication among regional hubs is the fact that RegHub has in some cases enhanced and perpetuated communication and exchange between regions coming from one Member States. This is in particular the case for the Italian regions, which report that *"through the coordinating role of the Italian Conference of the Regions, a strengthening of relations with other*

Italian regions on issues of European relevance" has been achieved (VEN: Q21; BOZ: Q21). Likewise, Hauts-de-France (Q21) reports that it has developed a closer work relation with the Brittany regional hub. At a more general level, almost all hubs confirm the value of direct exchange with regional hubs from other member states (e.g. BRE: Q21).

Regarding external communication, hubs mention several occasions in which they have used their participation in the **network as a 'door-opener'** in their communication with regional politicians and EU institutions (DUB: Q20; ESLO: Q20; BOZ: Q20; BRA: Q20). They confirm that their activities related to RegHub consultations have in many cases led to higher levels of awareness among regional political and administrative stakeholders as well as among stakeholders responding to RegHub consultations. Brandenburg (Q20), for example, lines out that the participation in RegHub *"is a good way to communicate problems with the implementation of EU law in a constructive way and to break out of top-down communication by getting into a multi-level dialogue."*

With regard to external communication activities, some hubs make suggestions on how to improve visibility and political backing:

- RegHub workshops held in RegHub regions or communities, which would be welcomed by 55,56% of hubs, could provide additional visibility and credibility towards stakeholders (DUB: Q 8) and provide an opportunity to involve neighbouring regions and exchange best practice (FVG: Q8; FVG: Q9; MAZO: Q9; THE: Q9)
- Closer involvement of regional politicians, in particular CoR members (DUT: Q 6.2)

RegHub partner perspectives

Similar to the contact points, RegHub partners mention both aspects of internal communication and external communication as the two main dimensions of communicative activities carried out by the network. Contrary to contact points, interview partner focus less on the evaluation of particular communication tools and practices, but rather highlight the **different roles internal and external communication can play in the future of the project.**

With regard to **external communication**, which is again understood as every kind of communicative interaction going beyond what is covered by the working method of RegHub, for example, promotional activities and presentations that are carried out vis-à-vis other (EU) institutions, regional actors or interested third parties. In this regard, interview partners evaluate to the following aspects of RegHub external communication as positive:

- **RegHub "'sells' in [the CoR's] relation with Commissioners (...)"** (COM2:10; PG3:16) and it is making visible and concrete the contribution of the Committee of the Regions to the Better Regulation Agenda (SG1:31), e.g. **by showing to EC Directorate-Generals that the CoR is active on a given topic** (COR4:20); to **"show that the CoR is making a difference"** (COM2:8)
- It gives the communication department in the CoR the chance to prepare **numbers and graphics, making communication more effective** and in the same way helps **localising communication** and target specific regional stakeholders (COM2:8)
- RegHub reports have the potential to be *"used outside the EU work itself"*, i.e. RegHub consultation results **can be used by practitioners** working in fields other than EU regulatory policy (SPV:19).

Moreover, RegHub partners identify the following areas of action, which can help improve external communication and thereby maximise CoR benefits:

- Due to its established connection with local and regional authorities, the CoR through RegHub could more **actively disseminate information about EU initiatives** *"in an efficient and timely manner"* (AB:6). In combination with a more representative network, this would **further legitimate the initiative** in the regions (AB:10). This indirectly contributes towards enhancing further the processes of European integration at local and regional levels.
- Similar to contact points, (COM2:10) stresses that ensuring *"(...) that RegHub is more plugged-in with politicians and not just with our members"* can **"take [the CoR] policy work into the 270 regions, 93.900 local authorities and municipalities"**.
- (COM1:11-12) names three key aspects to make RegHub better visible inside and outside the CoR, namely **connecting, embedding** and **visualising** it. The first refers to an expansion of presentation activities, e.g. vis-à-vis EP officials and assistants; the second refers to the framing and contextualisation of consultation results in order to make them more accessible; visualising it finally stipulates a more personalised presentation of the network, which might be realised through a video about RegHub and its contact points, broadcasted in local television.
- **Promote RegHub at external events** such as policy forums (COR4:8)
- **Make possible political benefits for CoR members by producing clear messages** like *"this is the impact of this legislation; by doing this [participating in RegHub], these policies have changed, been amended, been restructured (...)"* (PG3:16)

Concerning the latter point, members of the political groups note, however, that the accented political use of such technical statements might in some cases run counter the institutional viewpoint of the CoR as a representative assembly because it has not been a democratically 'secured' opinion. (PG1:24).

In parallel to external communication, **internal communication**, is understood as every kind of communicative interaction going beyond what is covered by the working method of RegHub, inside the CoR. A concrete example was the presentation of RegHub to CoR staff within the "Vendredi d'automne" event series.

Several interview partners point out that internal coordination and – to some extent – advertisement of RegHub among CoR policy officers, CoR members and administration staff is an important challenge (AB:19-22; COM2:21-23; PG3:16). The RegHub secretariat seems to have achieved a **considerable level of attention within the CoR** already, which is perceived to have further increased with the EC's decision on 4F4 (COM2:21-23; PG3:16).

Nevertheless, most of the interview partners affiliated with the CoR, admit that generally, **internal communication in the CoR could be considerably improved**. (PG3:16) notes that *"(...) the rest of the CoR needs to know what is happening in RegHubs. That doesn't always happen. I mean this is the same in a lot of policy areas; you know the left hand doesn't know what the right hand is doing (...)"*.

Furthermore, as mentioned before with regard to the technical/political cleavage, interview partners identify room for improvement regarding the **supply of CoR members with relevant, politically exploitable results** in order to ensure that they appear more consequently in CoR opinions and "help in terms of the messaging." (PG3:20; PG1:22).

Concerning concrete actions to enhance internal communication, interview partners make the following specific suggestions:

- **"The messenger is almost more important than the message."**: members of the RegHub secretariat should present the project rather than someone 'from the hierarchy'. This could be done through a broadcasted interview with the secretariat and the Secretariat-General of the CoR, which would be published on the CoR website. (COM2:21)
- **"We need to publicise more what we are doing."**: the results of RegHub consultations should be publicised more in the CoR intranet, so that not only the policy commission in charge but also all other commissions know what RegHub's main issues are. (PG3:16)
- **Approach CoR members**: short presentations of RegHub at the side of a plenary session or *"a small little messaging in [CoR members'] own language (...) about what RegHub does would (...) be helpful"* (PG3:20)
- **Make RegHub content more accessible**: distinguishing between technical 'staff working documents' and political conclusions thereof could help to avoid an overburdening of political documents (PG1:21-22).

The RegHub impact

As for every evaluation, traceable formalised 'impact' is maybe the most requested item on the agenda because it allows to draw credible conclusions and make decisions that are backed with 'hard' evidence. Despite one obvious and formally tangible outcome of the RegHub pilot phase – its institutionalisation through the EC's decision on the Fit for Future Platform of 11 May 2020 – other kinds of 'impact', such as the project's effect on the political work of the CoR, its relations with other EU-institutions or actors at the regional level, are difficult to robustly state. Nevertheless, perceptual answers to survey questions and interviews can be a credible approximation to formalised evidence. In this regard, the following paragraphs summarise RegHub's formal and informal impact at both CoR/EU and regional level, some of which has already been mentioned in the chapters before.

Both survey questions directed to hubs and interview questions to RegHub partners aimed at answering the question whether the project was able to attain the goals set out in the October 2018 Bureau decision. Based on the responses to those questions, the following main areas of impact can be identified:

- Enhanced **visibility of the CoR** at EU level, national level and in European regions
- Enhanced and regularised **relations between the CoR and partners in other EU institutions**, in particular the European Commission
- Enhanced **cooperation, learning and exchange of best practice** among the members of the RegHub network
- Creation of an **"evidence-based community of practice"** among RegHub network members which is going beyond RegHub consultations
- Contribution to the creation of **policy-specific networks** at regional level
- Credible **contribution to Active Subsidiarity**, which is recognised by EU institutions and scientific experts
- Institutionalised **contribution to the EU Better Regulation Agenda** (F4F)
- Effective **dissemination of information about the EU** in general and better regulation initiatives in particular.

RegHub contact point perspectives

Question 15 asked contact points to describe the impact of their participation in RegHub on the **relations with relevant stakeholders and their regional administrations**. Although not applicable to all hubs (KOS: Q15; IBK: Q15; UM: Q15; MAZO: Q15; DUT: Q15; IALO: Q15; BRE: Q15), many contact points indicate that RegHub has changed those relations considerably. For most of them this implies:

- their own better understanding of stakeholder needs (DUB: Q15; BOZ: Q15; FVG: Q15; BRA: Q15; HEL: Q15)
- a better understanding of EU policymaking among stakeholders (DUB: Q15)
- a better understanding of regional EU policy among stakeholders (HDF: Q15; ESLO: Q15)
- more regular exchanges between stakeholders and local/regional administration, in particular on EU matters (VAL: Q15; MAD: Q15; EMI: Q15; BRA: Q15; WEPO: Q15; THE: Q15)
- expansion of existing policy networks (BRA: Q15; WEPO: Q15)
- strengthened cross-department working relations with colleagues in their administration (HDF: Q15; VEN: Q15; CAT: Q15)
- raised awareness on international engagement in regional administrations (ESLO: Q15; HDF: Q15)
- raised awareness on implementation of EU legislation at regional level (BOZ: Q15).

Organisational impact in terms of a re-allocation of resources or additional staff is reported by only a minority of hubs ([Figure 11](#)).



Figure 11 Change in staffing/ working method

However, there is one considerable formalisation of the RegHub project at the level of a regional hub: Umbria (Q12) has reported that the regional government has issued an order concerning RegHub consultations.

For the Autonomous Province of Bolzano/Bozen, RegHub has had an indirect effect on the on the monitoring by the regional Office of Legislation of the implementation of EU-legislation at the regional level.³⁸

When asked **for RegHub's added value as compared to similar networks** in which member regions are engaged, contact points further highlight the following impacts they have noted during the pilot phase:

- *"Bringing EU policy consultations to a more local level, to everyday users of those policies."* (DUB: Q17)
- *"RegHub is the only network that particularly addresses regulation. It is a link between the EU institutions and encompasses all policy areas."* (BRE: Q17)
- Enhanced networking opportunities with other NUTS 2 regions (ESLO: Q17, FLA: Q17)
- Access to CoR and EC experts (ESLO: Q17, VAL: Q17, MAD: Q17; BRE: Q17, HDF: Q17)
- RegHub provides knowledge about issues of legislation that can be presented at the political level (FVG: Q17; THE: Q17)
- *"RegHub strengthens the feeling on local and regional level to be able to influence the EU decision-making process"* (BRA: Q17).

The latter point, **RegHub's impact on political and administrative actors in the regions** with regards to their perception of the CoR as a partner at the European level, was inquired in question 18. Almost half of the responding hubs (44,44%) indicate that this is indeed the case:

- **Better understanding of the CoR** and its role in the EU institutional setting: *"Many did not have a clear idea on CoR's tasks and are now more aware how it can act as an instrument to transmit the reality at regional level to the European agenda."* (VAL: Q18; BRA: Q18)
- **More frequent contact with elected representatives** since the involvement in RegHub (NWRA: Q18)
- Stronger impression that the CoR is an institution *"closer to their work and also interested in listening to them and gathering their answers and needs."* (FVG: Q18; WEPO: Q18; THE: Q18).

(FVG: Q18) shares one very particular instance of improved cooperation between the CoR and its region - due to the good experiences with RegHub, the president of the Regional Assembly became a CoR member: *"This participation convinced the representatives of my region to intensify the relations with the CoR. Specifically the new elected President of the Regional Assembly after the first meeting in Bucharest wanted to **join the RegHub network as a way to stay in touch with the CoR as an institution.** Thanks to this experience he wanted to become a member of the CoR and convinced the President of the region to do the same. Now they are both members of the CoR (member and alternate)."*

However, several hubs underline that their assessment of RegHub's impact will largely depend upon the way it's results will be used in the regulatory review process, a causal link that cannot be established yet due to **the time lag between RegHub consultations and the actual review of a given legislation** (IBK: Q 17; IBK: Q18; BRA: Q18; DUB: Q18).

A similar question regarding the perception of the CoR as a political actor is question 19, which asked whether contact points think that the **CoR is perceived differently by other EU institutions**. For

³⁸ This was mentioned by the contact point of the Autonomous Province of Bozen/Bolzano during the focus group discussions at the fourth workshop.

obvious reasons, many respond that they do not know if this would be the case. Some, however, note that RegHub's formal integration into the Fit for Future Platform can clearly be interpreted as a shift in perception (VAL: Q19; FVG: Q19; FLA: Q19; HEL: Q19): *"other EU institutions now think the CoR as an intermediary in collecting activities/needs/responses of the European regional authorities and communities"* (FVG: Q19). Brandenburg (Q19) reports that it sees *"appreciation of the CoR RegHub project within Commission and Parliament, as statements of Commission representatives and MEPs at various occasions (e.g. during the European Weeks of Cities and Regions) show. (...) In our view, the CoR is more and more perceived as a bridge to regional and local perspectives on European topics."*

Regarding regions' own relations with EU institutions, several hubs record intensified exchanges with experts from EU institutions, given the project's relatively short implementation period, some remark that it will take time to realise long-term relations. The Autonomous Province of Bolzano/Bozen (Q20) explains that it often mentions its participation in RegHub in its relations with other EU institutions. However, it signals that in terms of communication and promotion, **the CoR could have invested more time and resources in events that underline the value of RegHub.**

RegHub partner perspectives

Speaking of RegHub's formal impact, all interview partners agree that the clearest manifestation is the **EC's Decision on the Fit for Future** and its credible commitment to integrate RegHub as a prominent part of the subgroup system of the platform and to co-finance it as from the platform's official launch. (e.g. PG3:5-6).

(AB:23-24) recognises that the RegHub secretariat has managed to *"become an institutional partner of the European Commission (...). It is institution building, and knowing what I know about the EU institutions and institution set up, this is how you build institutions with initiatives that are formal and informal and are soft, initially they are less institutionalised. This is exactly how the better regulation and public consultation policy started in the European Commission. They started with small non-institutionalised forms of engaging the stakeholders and then, little by little, it grew up into a fully-fledged institution. (...) it looks like this is the future of RegHub as well."* This evolution from informal governance arrangements to more formal and finally fully institutionalised arrangements is, according to scholars in the field, one of the fundamental characteristics of EU politics and policymaking and makes the EU institutional setting one of the most complex but also agile in the world.³⁹

(SPV:8) further lines out the wide opportunities the F4F proposal makes for the CoR and RegHub to influence the platform's work and thus regional participation in better regulation.

This is reflected in the EC's remarks on the usability of RegHub reports: *"These reports were very appreciated by the DGs and I think that what is now becoming clear, is what the potential of the Committee of the Regions through RegHub – but also through other means – (...) has in supporting our Better Regulation Agenda. This is a potential that we already hinted at previously in the work of the task force, but it is making it concrete."* (SG1:31).

Internally, this potential is highlighted by (PG1:15), who perceives RegHub as an important approach to **make the CoR opinion work 'more circular'**, i.e. ensure a better follow up of CoR opinions and go beyond a mere reaction by the CoR to Commission proposals.

³⁹ We thank Adriana Bunea for her further remarks on this.

Several impressions of **informal impact** as perceived by contact points, are shared by interview partners. (PG3:14) confirms from his experience that in the regions, RegHub has established **links between the administration and stakeholders that traditionally do not work together**. This widening of policy-specific contacts *"under the brand of the Committee of the Regions"* is something that is perceived as a huge benefit, both technically and politically.

(SPV:13-14) further sees RegHub to have **an important learning effect in the participating regions**: *"the effect in the participating organisations similar to what happened a few years ago with the creation of CALRE (...) this sort of collaboration mainstreams European policies [and] the culture of subsidiarity, in the way they do scrutiny because (...) they see the impact of what they do or the lack of impact, and that's also a learning exercise that is quite helpful. (...) So in a way it complements the work that is being done by the other platforms already the same way – as in the Urban Agenda – the same participating cities suddenly discover the dimension of their work from Europe, from the European Union (...) and that provided a good learning exercise for them (...)."*

In a similar vein, (PG1:24) emphasises that disregarding their formal impact on legislation, networks such as RegHub are per se desirable because they enhance exchange between the regions and provide EU experience to local and regional authorities, making the EU more accessible to a broader set of actors.

5. Conclusions and recommendations

This chapter draws conclusions from the most important findings of the evaluation. Every conclusion is followed by recommendations for the design and functioning of the network in the mainstreaming phase (RegHub 2.0). Finally, this chapter also contains solutions for possible future challenges due to RegHub's involvement in F4F.

Conclusions on membership

Currently the network consists of 36 members that have proven their capacity to reach out to hundreds of specifically targeted stakeholders. Thanks to this, the network's consultations have been able to obtain previously unavailable granular data from stakeholders who use and implement EU policy 'on the ground'.

Despite covering only 15 Member States and not being a statistically representative network of all of the EU's local and regional authorities (LRAs), the evaluation has demonstrated that this does not affect the (added) value of the RegHub consultations. All those involved agree that what matters most, is the ability of the contact points to reach relevant stakeholders that give useful (granular and technical) replies to the questionnaires. Most of the current members have proven their ability and motivation to do so.

Moreover, striving for statistical representativeness would mean strongly increasing the number of hubs and consequently the amount of contributions to be compiled into the implementation reports. The evaluation shows that this could reduce the quality of reports, as it would take more time and effort to analyse and compile the replies.

Whilst RegHub 2.0 should therefore not strive to become a statistically representative network, a slight increase of membership could contribute to improve consultation results. This is because a larger pool of potential respondents increases the chances of reaching a critical mass of respondents for each consultation - even if the consultation topic is less relevant for some hubs. Slightly increasing the number of network members would also be an opportunity to increase the network's diversity, which could benefit the granularity of consultation replies.

Recommendations for RegHub 2.0

- The network's number of members should be increased to approximately 40
- The current good performers should stay on board
- The selection criteria for new members should primarily reflect the applicants' motivation and ability to contribute, as well as their diversity

Conclusions on the 'three-step approach'

The network's 'three-step approach' during the pilot phase refers to (i) the questionnaire drafting; (ii) the workshops; and (iii) the compiling of the consultation results in implementation reports.

When it comes to the **questionnaires**, the evaluation clearly points towards the need to have sufficient open answer questions. This allows the contact points to set out in detail the diverging answers to the same question from different stakeholders. This in turn, has helped the consultations to gather technical and granular replies that were truly useful for evaluating the implementation of a policy.

Recommendations for RegHub 2.0

- Questionnaires should contain sufficient open answer questions
- Always provide enough space in the questionnaires for diverging answers from different stakeholders
- Focus the questionnaires on concrete and practical implementation aspects of EU legislation and policy

The **workshops** have been an important tool to coordinate the consultation work with contact points and exchange good practices and information between them.

From the evaluation it has emerged that most contact points consider the workshops more useful for practical issues, and less so for presenting the background of policy topics dealt with by consultations. Such information on policy topics, and related discussions with experts and policy officers from the CoR and other institutions, are however considered important for contact points to be able to efficiently conduct a consultation. Other (virtual) meetings, in addition to the regular workshops, should be organised to cover this.

Since the background information on a given policy topic remains necessary for contact points to be able to identify their stakeholders, this information should still be shared with contact points, preferably prior to the workshop. That should allow them to reflect on it and attend the workshop with sufficient knowledge of the topic.

Recommendations for RegHub 2.0

- Focus the RegHub workshops on practical matters and coordination of the consultation work as well as on the exchange of good practices and information between the contact points
- Provide the contact points with technical background notes on the consultation topics before the relevant workshop
- Organise additional specific meetings for presenting the background of consultation topics and for related discussions with experts and policy officers from the CoR and other institutions

As for the **implementation reports**, they have been welcomed as an appropriate way to present the results of consultations. This is because they reflect the great amount of data on the implementation experiences of the hubs and their stakeholders, as obtained by RegHub consultations. The usefulness of reports also depends on the ability of interested parties (CoR members, institutional partners, and stakeholders) to easily extract relevant information from them. It is therefore important to keep them coherent and concise, and to use as much as possible the same type of template for each RegHub report. That should allow to combine easy readability and richness of information.

During the pilot phase, no systematic distinction has been made in the consultations between the degrees of legislative powers of hubs and the effect this has on their implementation experiences. The evaluation results indicate that it would be important to highlight these differences and take them into account in the analysis of consultation results. It is expected that this would further increase the sophistication of the analysis of the gathered data and thus its added value.

Executive summaries have proven to be an important tool to disseminate results and provide feedback to regional hubs and their stakeholders. It is therefore important that they remain an integral part of the three-step approach and are made available in all EU languages in time.

Recommendations for RegHub 2.0

- Use a template for the implementation reports that presents the consultation results in a reader friendly manner
- In the analysis of the consultation results, make a relevant distinction between hubs with important legislative powers and those with none
- Make the executive summaries (which are translated in all EU languages) an integral part of the three-step approach

Conclusions on impact and positive side effects

The impact of RegHub consultations is twofold. First of all, they help to enlarge the evidence base for CoR opinions and thus to strengthen the CoR's political work. Secondly, they are a valuable source of information for evaluations and reviews of EU policies by the two co-legislators.

During the pilot phase, RegHub consultations have contributed to the preparatory work of CoR opinions and thereby widened their evidence base. Despite this already positive impact, the evaluation shows that this opportunity has not been fully exploited in all cases. That is mostly due to the challenges of synchronising the RegHub consultation timelines and the CoR's political timelines, and sometimes also due to the insufficient knowledge within the CoR of the existence of the RegHub implementation reports.

Recommendations for RegHub 2.0

- Increase the involvement of the CoR policy officers in the synchronisation of RegHub and CoR political timelines
- Make the results of RegHub consultations widely available in a timely manner to all those that contribute to the CoR's opinions (rapporteurs, members, political groups, experts, policy officers)

RegHub has also established a new way of working between the CoR and its institutional partners in the context of the EU better regulation agenda. Exchanges between CoR policy officers and their counterparts in the EC's Directorates-General have intensified thanks to their cooperation on RegHub consultations. This cooperation has increased the CoR's impact on reviews and evaluations of EU policies by the EC, as it has been reported by EC officials.

The outlook on the cooperation with the Commission is very promising. RegHub's participation in the Fit for Future Platform (F4F) has the potential to make the CoR a provider of credible and meaningful contributions to better regulation. According to the evaluation, the major challenge for this to materialise is the alignment of the timeframes of RegHub consultations with F4F's timeframes. That is a condition sine qua non to ensure that RegHub consultations effectively feed into F4F opinions. This will require more foresighted and transparent planning of consultations - in cooperation with the hubs - in order to allow contact points to timely deal with potential bottlenecks in the delivery of replies to the questionnaires.

As a positive side effect of its activities during the pilot phase, RegHub helped to raise awareness of EU policies and the CoR's role in the EU policymaking process. RegHub has proven useful for CoR communication purposes and has helped to spread information about EU policymaking and better regulation to relevant actors at the regional level. This has also been reflected in events and activities in the RegHub regions, which were organised independently from the CoR, such as workshops, the launch of dedicated websites or other informational events, which aim at fostering the understanding of and participation in EU better regulation activities at local and regional level.

Moreover, RegHub has been well received by high-ranking Commission officials involved in better regulation, as well as by political leaders, public officials, and stakeholders in the regions. RegHub has thus the potential to make CoR better regulation initiatives even more visible in the regions and also to help the European Commission circulate its public consultations and raise regional participation therein.

Recommendations for RegHub 2.0

- Align RegHub consultations with the F4F timings
- Increase the involvement of hubs in the planning of RegHub consultations
- Spread information on EC better regulation initiatives within the CoR and throughout the network, when appropriate

Besides the already fruitful cooperation with the EC, there is clearly potential to upgrade the cooperation with the European Parliament and the Council. During the network's pilot phase, the CoR and the European Parliament Research Service have identified ways for RegHub consultations to contribute to the EP's ex-post evaluation of EU policies. Furthermore, the Council has recently made way for RegHub representatives to take part in its working group meetings. In that context, both institutions have confirmed that RegHub consultations could be relevant for their better regulation work - RegHub 2.0 will have the chance to step up these exchanges.

Recommendations for RegHub 2.0

- Further explore, on a technical level, the options for cooperation with the EP and Council, with the relevant policy units
- Target political actors and decision makers in the EP and Council to raise awareness of RegHub

Acknowledgements

We thank all our contact points and colleagues working directly or indirectly with RegHub for their valuable contributions to this evaluation. Moreover, we want to thank in particular Dr. Adriana Bunea from the University of Bergen, and Dr. Serafín Pazos-Vidal, for their availability and input during both our workshops and the evaluation process.

6. Annex

Annex I: List of RegHub members

'Core group' members (CG)		
Austria	1	Austrian Provinces (lead: Upper Austria and Vorarlberg)
Austria, Germany	2	International Lake Constance Conference, IBK (lead: Vorarlberg)
Belgium	3	Flanders
Croatia	4	Dubrovnik-Neretva County
Finland	5	Helsinki-Uusimaa
France	6	Brittany Regional Council
	7	Hauts de France Region
Germany	8	Land Brandenburg
	9	Land North Rhine-Westphalia
Greece	10	Region of Thessaly
Ireland	11	Northern and Western Regional Assembly
Italy	12	Region of Umbria/ Region of Veneto (joint hub)
	13	Autonomous Province of Bozen/Bolzano
Netherlands	14	Dutch Provinces
Poland	15	Mazowieckie Voivodeship
	16	Western Pomerania (Zachodnio pomorskie)
Portugal	17	ADRAL (Alentejo)
Romania	18	Ialomita County Council/Harghita County Council (joint hub)
Spain	19	Community of Madrid
	20	Community of Valencia
'Associate group' members (AG)		
Croatia	21	Primorje-Gorski Kotar County
	22	Brodsko-Posavina County
	23	Sibenik-Knin County
Slovenia	24	Zavaska Development Region
	25	Eastern Slovenia (Vzhodna Slovenija)
Hungary	26	Tolna County
Slovakia	27	Kosice Self-governing Region

Poland, Slovakia, Czech Republic	28	Silesia TITRIA (Moravian Silesia (CZ), Opole Voivodeship (PL), Silesian Voivodeship (PL), Zilina (SK))
Greece	29	Region of Crete
Italy	30	Region of Molise
	31	Legislative Assembly of Friuli Venezia Giulia Autonomous Region
	32	Region of Calabria
	33	Region of Emilia Romagna
	34	Region of Marche
	35	Region of Piedmont
Poland	36	Lower Silesia*
Spain	37	Generalitat de Catalunya (Government of Catalonia)

*Lower Silesia left the RegHub project in 2019.

Annex II: Lists of participants RegHub evaluation survey

Responding hubs to the evaluation survey (April/May 2020)		
ADRAL (Alentejo)	Portugal	CG
Land Brandenburg	Germany	CG
Brittany Regional Council	France	CG
Community of Madrid	Spain	CG
Dubrovnik-Neretva County	Croatia	CG
Dutch Provinces	Netherlands	CG
Generalitat de Catalunya (Government of Catalonia)	Spain	AG
Community of Valencia	Spain	CG
Helsinki-Uusimaa	Finland	CG
Ialomita County Council	Romania	CG
Kosice Self-governing Region	Slovakia	AG
Legislative Assembly of Friuli Venezia Giulia Autonomous Region	Italy	AG
Mazowieckie Voivodeship	Poland	CG
Northern and Western Regional Assembly	Ireland	CG
Land North Rhine-Westfalia	Germany	CG
Primorje-Gorski Kotar County	Croatia	AG
Autonomous Province of Bozen/Bolzano	Italy	CG
International Lake Constance Conference (IBK)	Austria, Germany	CG
Hauts de France Region	France	CG
Region of Thessaly	Greece	CG
Region of Veneto	Italy	CG
Region of Emilia Romagna	Italy	AG
Region of Marche	Italy	AG
Region of Umbria	Italy	CG
Flanders	Belgium	CG
Eastern Slovenia (Vzhodna Slovenija)	Slovenia	AG
Western Pomerania (Zachodnio pomorskie)	Poland	CG

Annex III: Lists of participants RegHub evaluation interviews

Evaluation interviews (3 – 19 June 2020)		
Name	Service/Organisation	Date of interview
Hélène Moraut	NAT Commission (CoR)	03.06.2020
Antonina Cipollone	Secretariat-General (EC)	03.06.2020
Ioana Condurat	Secretariat-General (EC)	03.06.2020
Nicoleta Vascan	Secretariat-General (EC)	03.06.2020
Dr. Adriana Bunea	PhD, University of Bergen	04.06.2020
Justus Schönlau	PES group (CoR)	09.06.2020
Matthieu Hornung	PES group (CoR)	09.06.2020
Wolfgang Petzold	Directorate for Communication (CoR)	09.06.2020
Ian Barber	Directorate for Communication (CoR)	09.06.2020
Dr. Serafín Pazos-Vidal	PhD, Community of Scottish Local and Regional Authorities (COSLA)	11.06.2020
Effrosyni Kossyvakı	ECON Commission (CoR)	11.06.2020
Robert Ronstrom	ECON Commission (CoR)	11.06.2020
Michael O Conchuir	EA group (CoR)	11.06.2020
Stefano Panozzo	ENVE Commission (CoR)	19.06.2020

Annex IV: Evaluation indicators

Planning evaluation

Points of reference

Main Goals (Impact) as determined by the Bureau	Sub Goals (Operation)
"putting the experiences at local and regional level of implementing EU legislation forward in a systematic, coherent and inclusive manner"	Timing: reports to be delivered "before the EU proposes new or revised legislation"
	Systematicity: "tangible outcome ... in a systematic and timely way" (representative?)
	Complementarity: "existing instruments for reviewing EU legislation... will be considered"
"establishing a new way of working and a new quality of cooperation between the CoR and the EU institutions in providing first-hand experiences of EU implementation as part of a revised EU Better Regulation agenda"	Relevance: consultation topics to be identified in cooperation with Commissions, COM, Hubs
	Quality: "make it possible to better assess what EU action is needed in a given policy a."
"strengthening the consultative role of the CoR and the political work of the CoR in particular"	
"supporting the efforts at local and regional level to feed back the implementation experiences by setting up regional hubs on EU policy implementation with 20 regions during the pilot phase"	Support/Coordination: "day-to-day coordination", "contact point for other institutions", SSG
	Output: "designing questionnaires", "preparing implementation reports", "coordinating the evaluation of the project"
	Promotion: provide input (CoR) to enable Hubs to share information about the Better Regulation activities with their networks
"expanding the network in a mainstreaming phase with financial support from the European Commission"	Vision: "preparing a work plan in 2019 and 2020" (topics, timeline, activities)
<small>*presence of rapporteurs *infect: Hubs, CoR members; consultation: involved services **recipients to be identified for both dimensions</small>	Financial planning: (upon a positive evaluation decision), co-financing for the mainstreaming phase (COM) "will be (early on) determined during the pilot phase"

Compliance frame for the goals and impact expectations set out by the Bureau-Decision on RegHub (08.10.2018)

NEXT STEPS....

Indicator Level

Quantitative Indicators descriptive statistics	Qualitative Indicators*** qualitative surveying of stakeholders
RegHub: number/diversity of Hubs, timely submission	Internal: adequate timelines, deadlines; convenient method, coherence
RegHub: involvement of DGs, EP committees (incl. EPRS)	External: level and frequency of involvement, consideration of other instruments
RegHub: consideration of REFIT, EER, Urban Agenda...	Internal: involvement of Commissions, rapporteurs, synergy-effects, work-load, efficiency
RegHub: incidents of consultation, joint events	Internal: topic selection, impact on working relation with COM, EP; quality of feed back, usability of reports
RegHub: detail/detailedness of feed back	External: relevance of topics, quality of results, impact on working relation, impact on decision-making, work, value added
RegHub: number of meetings with COM, EP (Council working groups?)	Internal: RegHub as perceived by CoR actors (rapporteurs)
RegHub: number of Workshops*, number of meetings with COM/EP-SSG	External: RegHub as perceived by partners (outlook)
RegHub: completed consultations, submitted reports, evaluation report**, progress report, letters to MEMs, promotion material, code of conduct, web page, opinions informed by reports	Internal: satisfaction with coordination activities, responsiveness, involvement, workshop organisation (panel)
RegHub: work plans, consultations with Hubs, COM	External: satisfaction with provided information/support, coordination, workshop organisation
RegHub: verification of financial possibilities, meetings with COM	Internal: satisfaction with working method, code of conduct, promotion potential and visibility (e.g. web page, events), value added of reports for Commission work
	External: satisfaction with provided information/support, coordination, workshop organisation, working method, code of conduct, "products", promotion activities, synergies
	Internal: quality of work plans, level of involvement (set-up)
	External: level of involvement (set-up)
	External: readiness of COM to finance RegHub follow-up
Mostly quantitative information to be gathered by the Secretariat and retrieved from the relevant documents/minutes. >> Quantitative, descriptive analysis	Qualitative information to be gained from internal and external surveying. >> Qualitative, stakeholder specific analysis
<ul style="list-style-type: none"> Academic Evaluation in some aspects: <ul style="list-style-type: none"> Relevance for implementation evaluation in the EU Consistency of the method Outlook: more/less regions to be involved; balance 	<ul style="list-style-type: none"> External surveys to: <ul style="list-style-type: none"> Involved DGs and COM Involved EP committees Regional Hubs Involved external panelists

Annex V: RegHub evaluation survey

[\[CLICK HERE\]](#) for the RegHub evaluation survey on the RegHub website (pdf).

Annex VI: Statistical output - RegHub evaluation survey

[\[CLICK HERE\]](#) for the RegHub evaluation statistics on the RegHub website (pdf).

Annex VII: Codebook – evaluation interviews

Code title	Coded if	Examples
Working method	This code is used for all passages referring to the working method and administrative organisation of the RegHub project. It encompasses thus both general structural and communicative elements of the network's approach (e.g. three-step approach, attribution of tasks) as well as concrete steps and outputs (e.g. questionnaire design, workshop agenda). 'Working methods' is not coded for all aspects related to the architecture and political governance of the network.	<i>Main code</i>
Coordination	This code is used for all passages referring to the coordinative activities carried out by the RegHub secretariat in order to organise RegHub consultations along the three-step approach of the project. It can encompass formal as well as informal aspects of coordination (laid down in the rules of procedure or spontaneous features).	<i>No, I think I really got the support I needed in the drafting of the questionnaire because you have the experience of the network in the way of formulating the questions. So, no, I think it was really interesting to work with you. Because me, I have my own idea of the policy and the feedback but it was interesting to discuss with you, to have also your view on asking questions to have better feedback from the network. So, for the moment, I think that the way of working together was really good. (COR1:35)</i>
Feedback quality	This code is used for all passages referring to the feedback quality of achieved by the RegHub working method, i.e. the granularity, technicality, credibility and extensiveness (...) of stakeholder feedback on EU legislation collected by contact points 'on the ground', at the local and regional level.	<p><i>I must say it was already very valid and strong in the task force but through RegHub and through our regular ties, which have intensified over the years to the better, I think you also have a case to show that your contribution is much more concrete. Because there are deliverables, because it is more tangible. (SG1:31)</i></p> <p><i>So with the resources you got, being strategic and focus on quality rather than just general statements and so on, that is and added value and that will help RegHub to be more and more recognised as a source of influence in its own right as we move forward. (SPV:19)</i></p> <p><i>In fact, they expect that the result of our consultation will be different from theirs. Because, for example, when DG AGRI launched a consultation, they received a lot of feedback from farmer organisations and so on. But not so much answers from local</i></p>

		<p><i>and regional authorities because their consultations are quite technical and its always the same organisations and people who answer their consultation. So, they expect a different result with our consultation. But for the moment I am not sure because we don't have received the feedback and don't have sent anything to them. But they expect to receive more different feedback than from their own consultation. (COR1: 20)</i></p>
<p>Timing</p>	<p>This code is used whenever a passage refers to matters of time management and deadlines as experienced during the pilot phase. This can entail comments on the RegHub secretariat's capacity to steer and organise the consultation process in a way that allows the Regional Hubs to adequately contribute, as well as the attainment of a timely feeding-in of RegHub consultation results into CoR opinions and European Commission legislative review documents.</p>	<p><i>It takes time. We have to draft the questionnaire, the questionnaire should be translated, this takes time until we receive the answer. Or maybe, it will be possible to – but I know that you have already discussed this with your contact point – to reduce the deadline for them to answer. But it might not be easy, because I know you have already discussed this. So, in my case, finally, it's fine anyway, because the adoption of my opinion was postponed but if we had maintained the initial deadline, normally, my report should have been adopted 18 of June and the deadline for the consultation is the 15 of June. So if we had not postponed the adoption to September, it would be difficult for the rapporteur to take on board all the recommendations. But finally, for me, it runs very well, so I am not complaining but I know that sometime we adopt very quickly the report and in this case, maybe we could have a quicker procedure, I don't know. For me the main issue maybe. (COR1:16)</i></p> <p><i>(...) It is good, but the process can lead to timing issues. (COR3:13-15)</i></p> <p><i>In terms for the fitness check on the Ambient Air Quality Directives, timewise, it was not possible to include it because the fitness check was published in November and we published the report in December. It was not doable in time. And even if we had done it a couple of months before most of the source material for the fitness check on the Air Quality Directives would have been done a bit earlier. So, for that, we did not have enough time. If in the future there is any chance to coordinate with the calendar of fitness check, but in this case, it was practically not doable. And of course, I am talking of the Ambient Air Quality Directives for the NEC Directives it was done a while back so even more not doable. (COR4:22)</i></p>

		<p><i>There will always be the challenge of keeping up with all or the most relevant legislative initiatives. It really depends, and I think I have mentioned this before, if RegHub wants to be part of Fit for Future and also participate in other forms of consultation that the European Commission will organize there is a lot to keep up with. And you will have to be discerning. (AB:17-18)</i></p>
Topic selection	<p>This code is used for all passages referring to the 'topic selection' part of the RegHub working method and the administrative and communicative procedures linked to it. This encompasses both the topic selection process and its outcome in terms of assessment areas that are relevant for local and regional authorities and their stakeholders.</p>	<p><i>(...) It is a challenge inherent what RegHub is, different actors that come together, they all share the same values but they may have different priorities because they have different incentive structures back home. Some are more interested in an issue than others and they have to prioritise those over others. Yes, agenda-setting is not easy but you know with skill, diplomacy and clear rules and maybe telling people that there are different timeframes. Sometimes there will be a short timeframe so you have to present a few issues and in the next round you can present a next round of issues that may be not a priority now and can wait a little bit longer. (...) (AB:20)</i></p> <p><i>I don't think, given the complexity of these issues, I hope that the platform will not go on with 20 issues per year on which they cannot deliver. I think they will need to identify a reduced number of points of areas where they really want to look into and the regions, they know these areas. And I think its good that they contribute this because, there as well, we need to try to find a balance between what is a - that you see as problematic- and what is the Commission (..) that the Commission put in its work programme. So, what is the priorities on which we will work because we cannot work on a million things, different and disparate things, and try to find really the match between the two. So, there I really count on RegHub. (SG1:28)</i></p>
Questionnaire design	<p>This code is used whenever a passage refers to particular parts and aspects of RegHub survey questionnaires.</p>	<p><i>This is what I found as well, when you were developing the Common Agricultural Policy one, I haven't seen the (..) I knew there were some questions that might have an impact into Andersson opinion on rural revival. So, I went in and I downloaded the questions and I found that some of the questions – while they are really important, because the CAP is a delegated competence in a lot of</i></p>

		<p><i>member states – they were quite technical. Most of the questions were very technical. And that raises the issue for me in terms of how do you ensure that the technical aspects is of value to our politicians. To the commissions there are a value behind the scenes but how do we make that linkage that we can fit some of the analyses from the RegHubs into political actions. And that is something that we have to be careful and maybe demonstrate a bit more, in terms of what is our overall objective from that. (PG3:6)</i></p> <p><i>Maybe the Hubs should have the possibility to identify questions they are more relevant to them than others, and only reply to those. (COR2:18)</i></p>
Report compilation	<p>This code is used for all passages referring to the 'report compilation' part of the RegHub working method and the administrative and communicative procedures linked to it.</p>	<p><i>If I can, this is a bit on another level of policy analysis because policy analysis is about providing a policy analysis. But this really implied to have a look to a lot of raw data, raw data that - as I explained before – were not only numbers to interpret. In many cases, long texts to read on very different specific localized topics with references to national issues. This implied a really significant reading work of excel tables. If you want, I can show you one single question with how many excel tables with content it had. It is a bit of another level of policy analysis. (COR4:30)</i></p>
Attribution of tasks	<p>This code is used whenever a passage refers to the attribution of task among the involved policy officers and project stakeholders directly working with the RegHub project. This can entail particular parts and processes in the frame of the RegHub working method, which are either perceived as adequately or inadequately attributed to a (group of) policy officer(s)/stakeholders involved.</p>	<p><i>PG3: (...) But then how do we extract a few analyses from that, that we can then use to back up some of our political demands? Moderator: But is it a role of the Hubs or the regions or is it our internal job? PG3: It is our internal. I has to be our internal. (PG3:8-10)</i></p> <p><i>Yes, for me, it would be helpful to have this kind of input for all our opinions. But it's true also that it takes time. So it's also a question of attribution of human resources and budget. Because we spend a lot of time to do things in the commission, which are completely useless (laughs). But if we could really focus on important things, yes I think if we could do that more (..), so, for example for more opinions to work with you, it would be really valuable. (COR1:29-30)</i></p>

<p>Project governance</p>	<p>This code is used for all passages referring to the networks' political architecture and governance. This includes references to the political ownership and legitimation of the project within the Committee of the Regions, questions of representativeness (both for politicians and network members) and general procedural aspects of and political/technical goals for the RegHub network. Such can include (potential) conflicts between technicality and political use(fulness) of RegHub products, as well as future outlooks.</p>	<p><i>Main code</i></p>
<p>Hierarchy and political legitimation</p>	<p>This code is used for all passages referring to the networks' political architecture and governance. Here, this includes references to the political ownership and legitimation of the project within the Committee of the Regions and questions of political representativeness, which might be subject to conflicts or inefficiencies.</p>	<p><i>The second way in which, I think in which the Committee of the Regions can play a role (..) I think it is able to disseminate information about the EU initiatives and the EU-policy-making process in a legitimate manner, because it is connected with local and regional authorities in an efficient and timely manner. So, I noted for example that the European Commission generally uses national representations to broadcast at national level information about “okay, there will be an upcoming consultation” or “we have an upcoming feedback session about a roadmap or an inception impact assessment or a delegated act or legislative proposal”. But I think that the Committee of the Regions and its structures are some sort of a devolution of power for the dissemination of information. And I think this is something the European institutions want, definitely the European Commission, to try to disseminate its message about its initiatives at a very very fine-grained level and then to encourage the participation of the stakeholders. And I think the Committee of the Regions is in a both politically and institutionally legitimate position to do this. (AB:6)</i></p> <p><i>First of all on what you mentioned last and then I go back to the past, in terms of the Fit for Future, I mean that was a huge coup by the Committee of the Regions overall, I think that’s very very positive. I mean just to be very open and clear, what I mentioned in the Cabinet meeting on Monday was that we might have to look at the governance in terms of how do we ensure that there is a political representativity in terms of that</i></p>

		<p><i>everyone knows what is going on and similar to what we did with the subsidiarity steering group, that you would have conceivably one politician from each of the political groups involved in terms of the overall governance going into the Fit for Future while we will name three members there but there is the political representativity across all the political viewpoints in the CoR because I think that's very important. (PG3:5-6)</i></p>
<p>Membership and representativeness</p>	<p>This code is used for all passages referring to the networks' administrative architecture and governance. Here, this includes references to the membership and membership conditions as well as questions of political, geographical and socio-economic representativeness of the network, which might eventually be perceived as having an influence on the governance and output of the project.</p>	<p><i>Just to confirm to what SG1 said, that indeed we do look at stakeholder consultations in the RSB opinions, but the exact reference is when there is something going wrong. There are criteria that require the board to look at each impact assessment selected evaluations and they look very closely at both public consultations and the targeted ones. If they were carried out in a transparent way and how the views of the stakeholders are represented throughout the whole report. Another thing is also the subsidiarity and proportionality, which are also very closely looked at by the board. (SG2:25)</i></p> <p><i>Yes. It's interesting. Because I think all administrators have their contacts in regional office but maybe a bit biased by their nationality. For example, me I have a lot of contact with French regions, of course, but maybe less with other regions. Of course, I have some contacts in Italy or Spain and Ireland but with this network I think it's good because we cover all the European countries. So, I think the feedback provided by the network is more representative issues in European regions. (COR1:7-8)</i></p>
<p>Technical information vs. political use</p>	<p>This code is used for all passages referring to the networks' political architecture and governance. Here, this includes references to the political ownership and legitimation of the project and its visibility/awareness of it within the Committee of the Regions (and EU institutions), which might be subject to conflicts between technicality and the political use(fulness) of RegHub products/outputs/outcomes.</p>	<p><i>Just to be clear. I am not saying that we should dump down in terms of the technical aspect but what I am saying is how can we use some sort of analysis that we receive to back up some of our political demands. (Moderator: Okay.) So, for example, if you are talking about CAP and the influence of pillar 1 and pillar 2, in particular, you know the Commission, their original proposal was to reduce the pillar 2 and increase the pillar 1. Okay, that's changing in the new MFF. But can we use some of the reporting that we receive from the RegHub to back up the need for rural revival et cetera? So it is just how do we maximise the resources for our</i></p>

		<p>members as well. I agree in terms of the original objective was the technical aspect of it. You can see that technicality in the questions; the questions on the CAP were actually technical rather than political, you know, in terms of we look at the milk quota, we look at (...) going into the very detailed aspect of it. That is correct. But then how do we extract a few analyses from that, that we can then use to back up some of our political demands? (PG3:8-10)</p> <p>I just want to add briefly that I don't necessarily see a contradiction between the political dimension of opinions or the political validity of an opinion and the analytical depth of legislation. I think it would be to the CoR's credit if it would express itself more in terms of practical relevance. (PG2:17)</p> <p>(...) I think, as I said, it does not necessarily have to be one thing or the other, but it should be more clarified when are we talking about a political, party political, or political point of view, and when are we trying to provide evidence. (SPV:7-8)</p>
Communication	<p>This code is used for all passages referring to modes, acts and experiences with communication related to the RegHub project and to the Committee of the Regions' promotional activities in this regard. Communication can relate to both internal communication (within the RegHub network or within the CoR) and external communication (e.g. exchange of information/promotion of activities vis-à-vis other institutions or the public). Communicative activities that can be clearly identified as elements of the RegHub projects' working method (e.g. internal CoR meetings or RegHub workshops) are not coded.</p>	<i>Main code</i>
Internal communication	<p>This code is used for all passages referring to modes, acts and experiences with communication related to the RegHub project and to the Committee of the Regions' promotional activities in this regard. Here, communication relates to internal communication (within the</p>	<p>(...) In terms of internal communication and in terms of communication with the members, I think the thing you must write for yourself and you must be reassured about it you reach the state when somebody inside our organisation, a member or a member of staff says "RegHub what is that?" (..) - When you started, the fact that</p>

	<p>RegHub network or within the CoR). Communicative activities that can be clearly identified as elements of the RegHub projects' working method (e.g. internal CoR meetings or RegHub workshops) are not coded.</p>	<p><i>people did not know, became a kind of reproach on the poor team that had to build all this. In a very short time, now you completely reversed this. If somebody in our staff now says "What is RegHub?" It is their problem now. "Don't you know Rainer, don't you know Teresa and those great people who are doing these fantastic reports? Didn't you see that report on that?" That is what you achieved in a short time, and you should be very proud of it. (COM2:23)</i></p> <p><i>So, one of the things I am not sure if all of the members have is – I mean its very well explained on your website and in this simple language, what you are doing – but I think its something as well that we need to say to members because we have a new badge of members and I do think that a short presentation at the side of a plenary session or a small little messaging in their own language of one page maximum about what RegHub does would also be helpful. And this would also be helpful for allocating resources internally. That kind of thing would be useful. As I say, the questions for CAP in particular, which I read in detail because I had to draft quite a bit of the Anderssen's opinion last minute – and it was very technical. Really technical stuff. Which would be interesting for those who are working in that area and I think it is just a kind of marrying (..) Taking a few small part of the technicalities and simplifying it for the members would also be helpful in terms of the messaging. But then I would not see that for you, I would see that for the NAT secretariat. Or I see it for ECON in case of the state aid or whatever. I think overall it works really well and much better than I envisaged it and for me the added benefits of the consultation, in particular if I take the Irish case and other bodies that might not get in touch with us, is something that we need to harness now. It was a very interesting conversation I had with the director a few months ago, I think it is something we should be more aware of (..) (PG3:20)</i></p>
<p>External communication</p>	<p>This code is used for all passages referring to modes, acts and experiences with communication related to the RegHub project and to the Committee of the Regions' promotional activities in this regard. Here, communication relates to</p>	<p><i>Second point for me, I see RegHub a little bit as a parallel to the YEPs project. The YEPs project is about taking us beyond the very important members and alternates that we have and very generally taking us into the ground of the billion politicians without upsetting or hurting anyone. RegHub is a</i></p>

	<p>external communication (e.g. exchange of information/promotion of activities vis-à-vis other institutions or the public). Communicative activities that can be clearly identified as elements of the RegHub projects' working method (e.g. internal CoR meetings or RegHub workshops) are not coded.</p>	<p><i>little bit the same in a sense that it takes our policy work into the 270 regions, 93.900 local authorities and municipalities. It takes us into that area without creating difficulties like trading on the other associations or national associations. So, from my point of view, I think that it is an interesting model and I think from time to time, at least, we should consider making sure that RegHub is plugged-in with the politicians and not just with our members. (COM2:10)</i></p> <p><i>So if you are the president of a region you can turn around and say “well, we are using this and this is the impact of this legislation; by doing this, these policies have changed, been amended, been restructured”. Then there is a political benefit to it. While the research is technical. And that is something that we have to marry: how do we sell this, in a way? Because you are selling it very well. Because when I rang the director of the Northern and Western Regional Assembly (..) he knew everything that you are doing, which to me is quite impressive and the same is that you have an enthusiasm from a lot of your regions in terms of being active in RegHub. (PG3:16)</i></p> <p><i>On this, furthermore, there is a problem, not a problem, a positive aspect, I tried to push it in another few occasions in a couple of events, we tried to mention the RegHubs, I put it in a couple speak on point for the members and I mentioned myself at the clean air forum and in more situations. So, I wonder what could be done yet to get more inside of the content of an opinion and more in a general use. Of course, I sent it to the colleagues of other institutions (..) and so. On this, I think what I could have done more in this sense but I think that we made it known to a certain extent. (COR4:8)</i></p>
<p>Resources</p>	<p>This code is used for all passages referring to the existence or lack of resources that are necessary for a smooth-running operation of the network. Such resources can be identified for activities and structures both internally (within the CoR) and externally (at the RegHub member level) and can be of material/financial or ideal/communicative nature.</p>	<p><i>Main code</i></p>

Cognitive and motivational resources

This code is used for all passages referring to the existence or lack of resources that are necessary for a smooth-running operation of the network. Such resources can be identified for activities and structures both internally (within the CoR) and externally (at the RegHub member level) and can be of material/financial or ideal/communicative nature. This code is used whenever a passage points to either the lack or presence of cognitive and motivational resources such as the lack of knowledge about a procedure, which is relevant to a process or task linked to the RegHub project.

(...) This would be a trade-off that is worth considering (laughs), because the more students you have in a class, the less time to work one-on-one with them, the less opportunities they will have to contribute (..) so, in some respect, increasing the number of hubs might lead to significantly more efforts on your part, and you have to kind of double your own efforts in time, resources, human capacity to manage your relationships with them, to make sure to communicate and coordinate all the others and you establish bilateral relationships and meetings as well. (AB:11-12)

And of course the interest of the regions, the competition that you made among them and the interest show that there is something behind it. I revised my initial impression. And I was even more impressed, and that is when I stop talking about this, when I saw this group in action, this group of these 30 people. I thought that it is really good stuff. And, in so far, now you have the official rubber stamp that you have to continue this work. I mean in the next phase, I do not know what your thinking is, but it would be crucial to make this stable and even more widespread. 30 regions or 35 regions is nice but as you know we have much more. It would just be important to see how can this be done without 30 million. With (..) a couple of people that are behind it. But I think it is possible. I think the energy that I felt amount these 30 people was such that I thought "wow, well done, these people really deserve it and they have something to say". So, positive. (COM1:6)

(...) First, if you choose to have more members, you should have a good geographic balance and take into account the competences and powers of the regions in each member state. Second, you should look at which Hubs that have shown commitment, that are motivated, that are involved and that apply good practices. This could help to improve the feedback. (COR2:26-29)

I think, to be also a bit critical just to be helpful, I have seen these dynamics two processes. Any, when you set up the network, the platform, you start getting a set of know-how, the problem, the challenge for RegHub and basically for other networks

		<p><i>is that you reach a certain point and then you start having diminishing returns because there is a certain learning process done. But the risk of the network is to become entrenched in certain set of practices and stop being proactive and over time interest descends, goes down. And that is something we have seen in any kind of network. And that is something where RegHubs has to be attentive. And I think what should be focused and that's also a crucial task for the secretariat: its time to be proactive and anticipate the issues that the network should be provided. (SPV:14)</i></p>
Human and financial resources	<p>This code is used for all passages referring to the existence or lack of resources that are necessary for a smooth-running operation of the network. Such resources can be identified for activities and structures both internally (within the CoR) and externally (at the RegHub member level) and can be of material/financial or ideal/communicative nature. This code is used whenever a passage points to either the lack or presence of human and financial resources such as the lack of staff necessary carry out a process or task linked to the RegHub project.</p>	<p><i>I don't think at the moment it is possible to have it for all regions but of course, to cover all regions would be perfect (laughs). But I guess it's not possible. Because it needs time, money (..) (COR1:10)</i></p> <p><i>Where they have most difficulties is actually resources. While you might have regions that actually might have the resources to be able to put into it, what they find is that they are short on resources and it takes a lot of resources in it. (PG3:6)</i></p> <p><i>So, one of the things I am not sure if all of the members have is – I mean its very well explained on your website and in this simple language, what you are doing – but I think its something as well that we need to say to members because we have a new badge of members and I do think that a short presentation at the side of a plenary session or a small little messaging in their own language of one page maximum about what RegHub does would also be helpful. And this would also be helpful for allocating resources internally. That kind of thing would be useful. (PG3:20)</i></p>
Formal RegHub impact and results	<p>This code is used for all passages referring to instances of formal, actual integration of RegHub results and 'products' (e.g. implementation reports, executive summaries) in relevant official documents or processes (e.g. CoR opinions, EC legislative reviews, plenary speeches, scientific contributions, legislative acts). This can apply both at EU-level and at regional (or national) level and can take on different forms. For example, with</p>	<p><i>Main code</i></p>

	regard to the CoR, RegHub can have an impact on internal procedures or on official political opinions.	
Regional and national impact	<p>This code is used for all passages referring to instances of formal, actual integration of RegHub results and 'products' (e.g. implementation reports, executive summaries) in relevant official documents or processes (e.g. CoR opinions, EC legislative reviews, plenary speeches, scientific contributions, legislative acts). Here, this applies at regional (or national) level and can take on different forms. For example, impact can take the form of a legislative act adopted or amended in the context of RegHub consultations at local/regional level. Or it can take the form of decisions and procedural commitments, which are directly applicable in the context RegHub.</p>	<p><i>Where I see the benefit of the issues you do at the moment is also through the regions having to consult with other bodies we may not traditionally have a link to. So with the Common Agricultural Policy one, the Northern and Western region in Ireland consulted with the Irish farmers organisation, with the (Taggars?), which is the (..) organisation that looks at the green development of agriculture et cetera and they had this consultation with them so there you are using under the brand of the Committee of the Regions to be able to consult with other bodies in their own regions. And that is a huge benefit to us. It's not only a benefit technically, it's also a benefit politically. And that is a small aspect (..) (PG3:20)</i></p> <p><i>I see RegHub to have the effect in the participating organisations, similar to what happened a few years ago with the creation of CALRE for regional parliaments and then the platform for regional parliaments in the CoR. And what happened then is (..) that this sort of collaboration mainstreams European policies, or in this for the CALRE case, more the culture of subsidiarity, in the way they do scrutiny. That's what we have seen as well with national parliaments. Just because they have COSAC, they have provided better input to a number of important European discussions no less the subsidiarity taskforce two years ago but also proactive (..) Well they have reached a better understanding how to even address EU legislation in their own domestic scrutiny because they actually see (..) the Slovakian parliament see how the House of Lords – until recently -, otherwise the Danish Folketing does the scrutiny. And they see (..) you know, some provide evidence to put a report together, then they see the impact of what they do or the lack of impact, and that's also a learning, a feedback exercise, that is quite helpful. (SPV:13-14)</i></p>
EU-level impact	<p>This code is used for all passages referring to instances of formal, actual integration of RegHub results and 'products' (e.g. implementation reports, executive summaries) in</p>	<p><i>(...) I want to congratulate you. You managed to build something with very diverse actors in a relatively short amount of time and to build it on such a strong foundation that it moves on and becomes an</i></p>

	<p>relevant official documents or processes (e.g. CoR opinions, EC legislative reviews, plenary speeches, scientific contributions, legislative acts). Here, this applies at EU level and can take on different forms. For example, impact can take the form of a legislative act adopted or amended in the context of RegHub consultations at EU level. Or it can take the form of decisions and procedural commitments, which are directly applicable in the context RegHub.</p>	<p><i>institutional partner of the European Commission and I think that is not a small thing. It is institution-building and knowing what I know about the European, the EU-institutions and institution set up, this is how you build institutions with initiatives that are formal and informal and are soft, initially they are less institutionalised. This is exactly how the better regulation and public consultation policy started in the European Commission. They started with small non-institutionalised forms of engaging the stakeholders and then little by little it grew into a fully-fledged institution. And so I hope (..) it looks like this is the future of RegHub as well. It started with a limited number of actors and maybe with limited scope and participation in some specific consultations and now it seems that it is moving forward. (AB:23-24)</i></p> <p><i>Well, thank you first for the opportunity to contribute to this exercise. As you know I have been exercising on this matter and I have been engaging with this matter for many years. There is some prior opinions from the CoR that eventually became RegHub, that I was very much involved in. And that has prompted friction that you are now evaluating. In the context of the communication and the conclusions of the Council a few months earlier, I think the proposal or the current Commission plans are obviously very positive from the point of view of RegHub and what the CoR, more generally, were asking. (No less) the presence of the CoR in the Fit for Future platform enlarged but also the wide opportunities the proposal makes for RegHub to influence that. (SPV:6)</i></p>
<p>Informal RegHub impact and results</p>	<p>This code is used for all passages referring to instances of informal integration of RegHub results and 'products' or processes it has induced. This can apply to impacts (and their results) on the relation between the EU and the regional level or to the perception of RegHub/the CoR by EU institutions/stakeholders in the regions. Moreover, a better visibility and understanding of EU matters (e.g. the CoR's role in EU policymaking) and an enhanced politico-administrative coordination</p>	<p><i>Main code</i></p>

	<p>within and between levels of government are counted as impact induced by RegHub. Moreover, subcodes from this category of codes are used whenever RegHub's 'meta-impact' or contribution to concepts and measures of good governance and an open government agenda are used. Such can be its contribution to subsidiarity, openness, and transparency in the policymaking process of the EU, as well as its contribution to the consultation regime of the EU within the EU Better Regulation Framework.</p>	
<p>CoR/RegHub visibility</p>	<p>This code is used for all passages referring to instances of informal integration of RegHub results and 'products' or processes it has induced. Here, such instance can encompass effects that RegHub/the participation in RegHub has had on the visibility of and awareness towards the CoR as an institution - both at the EU and regional/local level.</p>	<p><i>In terms of internal communication and in terms of communication with the members, I think the thing you must write for yourself and you must be reassured about it you reach the state when somebody inside our organisation, a member or a member of staff says "RegHub what is that?" (..) - When you started, the fact that people did not know, became a kind of reproach on the poor team that had to build all this. In a very short time, now you completely reversed this. If somebody in our staff now says "What is RegHub?" It is their problem now. "Don't you know Rainer, don't you know Teresa and those great people who are doing these fantastic reports? Didn't you see that report on that?" That is what you achieved in a short time, and you should be very proud of it. (COM2:23)</i></p> <p><i>Where I see the benefit of the issues you do at the moment is also through the regions having to consult with other bodies we may not traditionally have a link to. So with the Common Agricultural Policy one, the Northern and Western region in Ireland consulted with the Irish farmers organisation, (..), which is the (..) organisation that looks at the green development of agriculture et cetera and they had this consultation with them so there you are using under the brand of the Committee of the Regions to be able to consult with other bodies in their own regions. And that is a huge benefit to us. Its not only a benefit technically, its also a benefit politically. And that is a small aspect (..) (PG3:14)</i></p>

		<p>(...) For sure, it was useful to show what we were doing this, and this gave us a bit of visibility. As you know, we consulted the colleagues of DG Environment on the questionnaire at the beginning. And some of the questions were done on their suggestions and their advice. And this, I think, was very useful to show to other institutions that are active on this topic and it was useful to get information on what they were doing and on what they have interest on that. So, I think on that point of view that was quite useful. (COR4:19-20)</p>
Interinstitutional relations	<p>This code is used for all passages referring to instances of informal integration of RegHub results and 'products' or processes it has induced. Here, it encodes passages that refer to RegHub's impact on the relations between RegHub/the CoR and other EU institutions (namely the European Commission, the Council of the European Union and the European Parliament and their respective services) in the policymaking process of the EU.</p>	<p>(...) It depends on the result of the consultation. If it does not suit the Commission, it is unlikely to pick it up. But we seem to have the Commission's ear and that is a progress, also because the information cannot just be dismissed as opposed to purely political opinions. The usefulness of the RegHub consultations for the Commission, helps us, and makes us partners. (COR3:19-23)</p> <p>(...) In my case I was already in contact with the colleague in the Commission working on the same evaluation. But it's true that the agricultural people are always the same and we know each other from twenty years, so it's always the same people working together, (..) But I think this consultation could improve the visibility of the CoR because previously my colleague at the Commission, maybe they think that they provide more information to us than the contrary. And it's true, I always ask them to have some information and details and so on (laughs). But in this case it's really the CoR who will provide valuable information for them. So, I think it could improve our relationship in this context. (COR1:17-18)</p>
Community of practice	<p>This code is used for all passages referring to RegHub's ability to create a network/exchange relation between relevant actors affected by a given EU policy, which enable an evidence-based review of EU legislation [in vivo code]. This entails activities taking place during RegHub workshops or network-building activities carried out either by the RegHub secretariat or the Regional Hubs themselves when organising a RegHub consultation.</p>	<p>Because I see, through the meeting I have been to, that one side-effect of this RegHub is also to foster the links among these regions. So, these are very different regions from across the member states, I think it's very good that you create a community of practice among these regions. So, you even more create sort of an evidence-based community of practice. (SG1:26)</p> <p>(...) I think it is the motivation and Rainer said it earlier; it is the idea of the people that they could make a contribution to better</p>

		<p><i>European solutions to their local knowledge. That is another simple sentence probably for your guys but I think that is not a given thing in Brussel where everybody feels that he or she is an expert because he or she is already in Brussel. And I think these people come from this long way; it is their motivation. I think that is the positive feeling that I had from that workshop. They want to make a difference. They want to make their voice heard. They were really convincing, I am convinced. (COM1:19-20)</i></p> <p><i>(...) So in a way it complements the work that is being done by the other platforms already the same way as in the Urban agenda, the same participating cities suddenly discover the dimension of their work from Europe, from the European Union that there were not (..) or that they simply misunderstood how it worked and that provided a good learning exercise for them to understand and also to make proper cases at the domestic level on how urban policies should be dealt with. So, in the case of the specific constituency of RegHub I see exactly the same benefits. (SPV:13-14)</i></p>
<p>Consultations</p>	<p>This code is used whenever an interviewee points to RegHub's position in the landscape of (stakeholder) consultations, its achievements or failures and its (potential) capacity to complement/substitute/enrich existing consultation practices either at the level of the CoR or the EC consultation regime.</p>	<p><i>And in the same time, the better regulation policy wants for the public to hear and stakeholders to hear about the initiatives of the European Commission and actually should be active participants and well-informed participants in this consultations. In the Committee of the Regions and the RegHub initiative have already proved that they can reach out to places that the European Commission would like to reach out – at the very local and very regional level. To convey stakeholders the message: look there is something happening at EU level and they prepare legislative initiatives – what do you think about this? You managed to reach to very local level and be in contact with stakeholders that perhaps might otherwise not have been so directly informed and therefore not so able to engage with the EU policy-making process. The consultations that I was informed about and I was sort of a privy to the process of discussing it, revealed to me this particular unique ability of the Committee of the Regions and the RegHub to kind of (..) to penetrate certain levels of participation or to ensure participation on behalf of very very local stakeholders. And to treat in an</i></p>

informed manner and to tell stakeholders "look that is what is happening, what do you think about this?". So, it increases the level of knowledge of stakeholders and was able to get their feedback on these issues. (AB:6)

(...) Just as a general point: we do have quite a complex system of consultation based on a consultation strategy, so we do consult stakeholders. Generally, when we speak about public consultation, as you say, it is web-based, so you have a system where whoever can answer, so there is no filter apart from the registration, which is very easy. But we are sort of throwing the stone in the lake or throwing the bike in the lake and hoping that the fish would gather around it. Of course, we complement this with a lot of targeted consultations, so it's almost never a consultation only based on the results of public consultations and you will also have more targeted exercises, specific stakeholders et cetera. So, we do value very much, actually, the possibility of having public consultations because this is the only way for people who are a little bit outside the circles to have a possibility to speak up. But, I would think that your system of interviews based on a questionnaire – which, by the way, we also do for the public consultation – and (..) but more specific I think your colleagues also refer to the fact that they don't simply send out questionnaires but that they ring up various stakeholders et cetera. It is similar to targeted consultation. In that sense, it is a kind of a personalised consultation and it benefits from the fact that it's tailor-made to the needs of the regions. Meaning it's much easier, of course, if – okay, this questionnaire is maybe the same for comparability reasons – but especially if they are accompanied by phone calls, explanations et cetera, this facilitates also the communication and the input so there is less misunderstanding et cetera. So, per se, I find this is something very good. Of course, you can do it only in a localised setting like this. I mean, we could not do this type of consultation with the same granularity that you do for any time of public consultation. We could do it for some targeted consultations, but I think this is an interesting combination of the two (..) (SG1:20-21)

Subsidiarity

This code is used whenever an interviewee points to RegHub's (potential) role for subsidiarity (proportionality and deferral) in the EU multi-level governance system. This can encompass comments directly related to the concepts of subsidiarity, active subsidiarity and multi-level governance, as well as more perceptual expressions about RegHub's ability to contribute to a better integration of local and regional authorities' views and experiences in the policymaking process of the EU.

And it also keeps up the pace with Brussels in terms of regional and local government participation in policymaking because these actors participate almost like interest group actors. Just that they have very different characteristics from interest group actors; they are very active in getting themselves involved in policymaking in various ways. Either through the Committee of the Regions or they go on themselves, they try to submit policy positions documents, be in the transparency register, trying to be visible. In a way, the Committee of Regions now mirrors very nicely this and it's a recognition of the regions and local authorities as key actors of political and in policymaking. (AB:16)

So, we get numbers, we get a place, and the other thing, which is a potential for the future is the idea of a task force that is upstream policy formulation but also downstream delivery. So, in addition to all the stuff that we can do at the moment when an opinion comes out, which is in the legislative process, we got a kind of radar for the future. But the thing, in which we will see a major change after COVID, is, "did this actually work? Did this actually deliver? Did the regions and the municipalities deliver?" And that, I think that it is a real potential for the future. (COM2:8)

*We are not (...) all *raison d'être* of the Committee of the Regions is to influence the policies and to change regional policies on behalf of the local and regional authorities. The Committee of the Regions is not a technical body that will do research all the time. So we have to marry both. You know we have to marry both what we are doing with active subsidiarity, what we are doing with RegHubs et cetera and then how do we transform at least part of that to back up some our messages. And I think that that will have value, I think that the regions themselves are really keen to get involved and they have this (set?) analysis in the pre-legislation, post-legislative phase et cetera.* (PG3:12)

(...) When I started to write this book, or originally the thesis, I had already have had the idea of trying to marry the legal (...) of subsidiarity with that of better regulation, which is more public policy or much more

		<p><i>operational but obviously that was not that original because in the meantime we have the subsidiarity taskforce and the communication and so on. I was not alone thinking of that. I still think on the notion of subsidiarity, if we just keep that in a binary legal issue of competence, we end up in a quite unhealthy fight. Whereas if you marry that with evidence-base or policy based on evidence, you can actually remove some of the legal tension and try to find much more accommodation of the different priorities, interests or perceptions. That's why my research tried to marry subsidiarity and multi-level governance because after all multi-level governance is an approach of adjusting or adjustment between levels of governance rather than a approach based on tensions. So the contribution of RegHub is, has been, I believe, and I myself have contributed to a number of your reports, is to provide a number of evidence on key topics. (SPV:11-12)</i></p>
<p>EU Better Regulation</p>	<p>This code is used whenever an interviewee directly refers to RegHub's capacity and ability to contribute to the EU Better Regulation Agenda and all measures and mechanisms attached to it.</p>	<p><i>Moderator: In your view and according to your experience with RegHub, do you think that its important (..) or that it can be an important contribution to the role of the CoR or the CoR's capacity to involve in better regulation?</i></p> <p><i>AB: Absolutely, yes. It does in many ways. I will only refer to two, for example: Better regulation is about reaching out to as many as diverse possible stakeholders that are affected by EU regulations and EU policy-making and we want to get them involved into policy-making and to hear from them. (AB:5-6)</i></p> <p><i>Moderator: Do you think that the launch of the Regional hubs project has changed the perception of the Committee of the Regions in the European Commission? Not just in the SecGen but in the line DGs in general. And if so, for the good or for the worse, I would say.</i></p> <p><i>SG1: No, certainly it did. These reports were very appreciated by the DGs and I think what is now becoming is clear is what the potential of the Committee of the Regions through RegHub – but also through other means, I don't want to reduce it to RegHubs - but the potential that the Committee of the Regions has in supporting our Better Regulation agenda. This is a potential that we already hinted at previously in the work</i></p>

		<i>of the task force, but it is making in concrete. (...)</i> (SG1:30-31)
Future of RegHub	This code differs from all other codes in this codebook because it constitutes a different dimension of analysis. Both codes, 'RegHub 2.0' and 'Fit for Future Platform (F4F)', refer to possible future prospects of both administrative and political nature, which can be derived from the interview and survey data. It is thus a conclusionary category aiming at delineating all relevant aspects for the future internal design of RegHub (RegHub 2.0) and institutional embedding in the new EC Fit for Future Platform (Fit for Future Platform (F4F)). Therefore, coded passages will almost always overlap with (several) other codes and subcodes.	<i>Main code</i>
RegHub 2.0	This code is used whenever an interviewee points to an aspect related to the future design of the RegHub network (RegHub 2.0).	<p><i>So if you are the president of a region you can turn around and say “well, we are using this and this is the impact of this legislation; by doing this, these policies have changed, been amended, been restructured”. Then there is a political benefit to it. While the research is technical. And that is something that we have to marry: how do we sell this, in a way? Because you are selling it very well. Because when I rang the director of the Northern and Western Regional Assembly (..) he knew everything that you are doing, which to me is quite impressive and the same is that you have an enthusiasm from a lot of your regions in terms of being active in RegHub. But that enthusiasm will last as long as they see an impact of what they are doing and they see a follow-through with DG GROW, with the different commissions, with DG AGRI on the CAP one et cetera. They will need to see that follow-up. (PG3:16)</i></p> <p><i>Obviously, there should be collaborations with, just in terms of suggestions, the EPRS but also with the different services of the Commission that do studies or impact assessments, I think that should be included. Or with the Secretariat-General. That should be (..) developed. And also, with those organisations at national level or domestic level that have a similar service, for instance, that are operating in a similar fashion. (SPV:16)</i></p>

		<p><i>And another thing, maybe, where you could reflect, is not so much in my view the extension of the number of the regions because that creates also so management concerns on your side. That's your, of course, business (..) but it can create also (..) The possibility that through the 36 or whatever number you will chose, or even more, in the next round (..) that you create nevertheless a network with the remaining regions that are not members of the RegHub, for example as participants that can, on a voluntary basis, participate to some of this work but also to disseminate and to help us – and this would be very valued (laughs) – I stop, sorry for repeating it all the time – it would be also to relay our public consultations. So, if you identify, apart from the network, which can by nature only be limited to a certain number of report per year, obviously, I mean you cannot produce a huge number of reports, but they could also say 'look, okay guys, there are also a number of consultations now, there is now – I don't know - the climate pact consultation that is out, there is now the general product safety consultation that is out' et cetera et cetera. And solicit their peers. I think it could be valuable, also from your point of view to create are more systematic link. Because I see, through the meeting I have been to, that one side-effect of this RegHub is also to foster the links among these regions. So, these are very different regions from across the member states, I think it's very good that you create a community of practice among these regions. So, you even more create sort of an evidence-based community of practice. And to the extent possible in an official formal or less formal way, I think it would be good to extend into the other regions. Perhaps not to all of them because we know the difficulties of the heterogeneity in this. But, certainly to more than just the core RegHub. And of course, the more diversity you reflect in the composition of the RegHub, the better is also – as I say it does not need to be representative – but it is also better to have a more comprehensive picture. (SG1:26)</i></p>
<p>Fit for Future Platform</p>	<p>This code is used whenever an interviewee points to an aspect related to the future design of the RegHub network with regard to its</p>	<p><i>Okay, I think you saw the decision, so I will not have to go back into this, and we have discussed this extensively. I think the main contribution of RegHub will be on the one</i></p>

embedding in the European Commission's Fit for Future Platform.

hand to the annual work programme of the new platform. You know that we count quite a lot on this for the working of the new platform that is not anymore only driven by the stakeholders' input but it's also driven by conscious and deliberate choice of subjects. Of course, kind of scientific-based inputs. And we count on the inputs of RegHub to find those subjects. So, I think that for us this is a very important point because the platform will decide on how many issues to work on. I don't think, given the complexity of these issues, I hope that the platform will not go on with 20 issues per year on which they cannot deliver. I think they will need to identify a reduced number of points of areas where they really want to look into and the regions, they know these areas. And I think it's good that they contribute this because, there as well, we need to try to find a balance between what is a - that you see as problematic- and what is the Commission (...) that the Commission put in its work programme. So, what is the priorities on which we will work because we cannot work on a million things, different and disparate things, and try to find really the match between the two. So, there I really count on RegHub. (...) (SG1:27-28)

Well, politically, as I said earlier, there is a clear decision to be made about giving the network some space (and) recognising that the network can provide evidence that not all the time necessarily fits with the preconceptions that the CoR as a political organisation has. And that should be an opportunity to those who will represent the CoR in the Fit for Future platform to pass on that information. At least not to prevent that information to be shared by other means. And I think, and not just mean, I mean other scientists have studied the CoR over the years, they consistently say that the effectiveness of the CoR can get enhanced by the ability to back up their positions with evidence. (SPV:16)

Annex VIII: Systematic data summary

Assignment of abbreviations to Regional Hubs	
ADRAL (Alentejo)	ALE
Land Brandenburg	BRA
Brittany Regional Council	BRE
Community of Madrid	MAD
Dubrovnik-Neretva County	DUB
Dutch Provinces	DUT
Generalitat de Catalunya (Government of Catalonia)	CAT
Community of Valencia	VAL
Helsinki-Uusimaa	HEL
Ialomita County Council	IALO
Kosice Self-governing Region	KOS
Legislative Assembly of Friuli Venezia Giulia Autonomous Region	FVG
Mazowieckie Voivodeship	MAZO
Northern and Western Regional Assembly	NWRA
Land North Rhine-Westfalia	NRW
Primorje-Gorski Kotar County	PRI
Autonomous Province of Bozen/Bolzano	BOZ
International Lake Constance Conference (IBK)	IBK
Hauts de France Region	HDF
Region of Thessaly	THE
Region of Veneto	VEN
Region of Emilia Romagna	EMI
Region of Marche	MAR
Region of Umbria	UM
Flanders	FLA
Eastern Slovenia (Vzhodna Slovenija)	ESLO
Western Pomerania (Zachodnio pomorskie)	WEPO
Assignment of abbreviations to interview partners (random order)	
<i>CoR commission staff</i>	
Hélène Moraut, Effrosyni Kossyvaki, Robert Ronstrom, Stefano Panozzo	COR1-COR4
<i>European Commission</i>	
Antonina Cipollone, Ioana Condurat, Nicoleta Vascan	SG1-SG3
<i>Political groups (CoR)</i>	
Justus Schönlau, Matthieu Hornung, Micheal O Conchuir	PG1-PG3
<i>CoR Communication directorate</i>	
Wolfgang Petzold, Ian Barber	COM1-COM2

<i>Scientific experts</i>	
Dr. Adriana Bunea	AB
Dr. Serafín Pazos-Vidal	SPV

EVALUATION INTERVIEWS – coded units
Anonymised available for researchers upon request to reghub@cor.europa.eu .

EVALUATION SURVEY	
*Q1-Q36 refer to the questions of the evaluation survey. In order to avoid redundant coding, for single and multiple choice questions, any Q refers to the entire quantity of answers, i.e. including all Hubs (the analysis is taken from the statistical output, Annex VI)	
Code/Category	Corresponding questions
<i>Working method</i>	
Support from the RegHub secretariat/Coordination	Q3; Q28.2; Q30.1; Q30.2;
Time management and deadlines	Q3; Q4; Q12; Q13
Topic selection	Q3; Q22; Q23; Q24; Q25; Q26; Q27 Q29; Q32
Background information	Q3
Visibility and traceability of network activities	Q3
Stakeholder communication	Q3; Q4; Q7.2; Q10; Q11; Q12; Q13; Q14.1; Q14.2; Q15
Translation	Q3; Q12; Q13
<i>Well-defined tools and procedures</i>	
Workshops	Q3; Q7.1; Q7.2; Q20; Q21; Q23; Q28.1; Q28.2
Communication tools	Q3; Q6.1; Q6.2; Q6.3
Questionnaires	Q3; Q5.1; Q12; Q13; Q23;
Implementation reports	Q3; Q5.2; Q23
Executive summaries	Q3; Q5.3; Q23
<i>Project Governance</i>	
Hierarchy and political legitimation	Q28.1
Membership and representativeness	Q31
<i>Communication</i>	
Internal Communication	Q3; Q7.1; Q7.2; Q21
External Communication	Q3; Q4; Q34
<i>Resources</i>	
Cognitive and motivational resources	Q1; Q25; Q34; Q35
Human and financial resources	Q8; Q9; Q16; Q25; Q33; Q35
Regional administrative structures	Q1; Q4; Q8; Q9; Q10; Q16; Q25; Q33; Q35
<i>Formal impact</i>	
EU-level impact	Q25; Q26; Q28.1
Regional and national impact	Q10; Q15; Q25; Q26
<i>Informal impact</i>	
EU-regional relations other than RegHub	Q1; Q2; Q15; Q17; Q20; Q21
CoR perception by EU institutions	Q19; Q28.1
CoR/RegHub perception in the regions	Q3; Q10; Q15; Q18; Q20

Politico administrative cooperation	Q7.1; Q17; Q20
Understanding of EU matters	Q28.1; Q34
<i>Future of RegHub</i>	
RegHub 2.0	Q3; Q23; Q24; Q26; Q29; Q31; Q32; Q33; Q34; Q35; Q36
Fit for Future Platform	Q23; Q24; Q26; Q31; Q32; Q29