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INDEPENDENT EVALUATION SERVICE OF THE REGIONAL RURAL DEVELOPMENT PROGRAM FOR THE PERIOD 2014-2020 OF THE REGION OF LIGURIA

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Thematic Report: Analysis of the Progress of Expenditure Structural Measures

Summary

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1 Background and objectives of in-depth evaluation

This Report stems from the need of the Managing Authority of the Rural Development Program 2014 - 2022 of the Region of Liguria (RL) to delve into the expenditure trend of the interventions supported under the "Structural Measures," with attention to the temporal development of payments and the detection of any critical issues related to them. Accordingly, the **object of the in-depth study is to understand the ability of the Region to liquidate the resources committed in order to achieve the spending objectives of the RDP**: Liguria, in fact, has always met these objectives without suffering the decommitment of unused resources related to the mechanism of N+3. However, in recent years, the MA has found increasing difficulties in achieving a level of spending congruous to "defuse" decommitment.

In this regard, it should be emphasized that several events that were completely external to the 2014-2022 programming as well as unpredictable and unexpected, marred its optimal execution: the effects of the major calamitous events of 2019 (and the years to follow) were added to those of the Pandemic from COVID 19 from March 2020 and again to those of the war in Ukraine (February 2022), leading to a situation of "crisis" across all socio-economic sectors and at all levels of government. The effects of these events have had repercussions on both the PA's working methods and the economic performance of agricultural enterprises, as the problems dictated in the immediate term by the external events (e.g., the need to intervene in the territory or on farms as a result of floods and/or landslides or the inability to move during the "I lockdown" of March - May 2020 that resulted in the remoteness from offices and the stop to many production activities) have been added to those that are emerging in the "long term" (e.g., the need to intervene in the territory or on farms as a result of floods and/or landslides, or the inability to move during the "I lockdown" of March - May 2020 that resulted in the distance from offices and the stop to many production activities). the gradual weakening of regional structures due to the lack of turnover versus the increasing centralization of functions in the head of the Region at the expense of peripheral offices, the various periods of economic crisis in all productive sectors, etc.) creating an ineffective response and reaction system from both the public and private perspectives.

Going down, moreover, to a more detailed and specific level of analysis of the Ligurian case, as will be seen from the in-depth analysis of the context, an additional element has emerged that, although representing a constant of EAFRD programming in Liguria, is today slowing down its spending given the external elements mentioned above. In particular, the reference is to the specific and different weight that "structural" and "area-based" have in the overall Program budget. In Italy, but also with respect to European regions, RL figures as a peculiar case in that it has a much higher than average weight of the financial envelope of structural measures compared to area measures. As is well known, the two types of measures have very different timeframes and modalities for payments: while for the most part these are annual payments that require limited effort on the part of the beneficiary, the implementation of an investment leads beneficiaries to encounter - and clash with complications of a higher order, such as the possibility of accessing bank credit, rising costs and the availability of raw materials, all burdensome dynamics that have been exacerbated with the advent of COVID and the Russian-Ukrainian conflict. What is more, some areas have been affected by extraordinary climatic events that have necessitated significant additional accommodations (economic and physical) before interventions eligible for funding on the RDP can be implemented.

In light of this situation, but also of the reflections to be developed in view of the new programming, the MA has asked the Independent Evaluator (IE) to investigate the progress of spending over time with the aim of identifying both the areas of



intervention/types of beneficiaries that encounter the greatest difficulties in making payments and reaching the completion of investments, and to investigate the presence of any criticalities at the procedural/implementation level by researching their cause, where appropriate, including through direct interlocution with a sample of beneficiaries.

Methodologically, the IE used the database provided by the region appropriately supplemented with additional detailed information.

Direct surveys were then conducted were conducted through the administration of a structured questionnaire through CAWI and CATI technique and addressed to 3 beneficiary profiles to both public and private in delayed status: (i) beneficiaries without balance payment applications (PA); (ii) csd. "missing"¹ : the *beneficiaries mentioned in the previous point* include those who did not submit any PA; the beneficiaries who submitted PA of balance late.

2 Socioeconomic and programmatic context

2.1 Territory and farms: brief analysis of ISTAT data on territory, population and farms (census data and Movimprese data).

According to spatial data, RL is the third last region by area (5,416.15 km²) followed only by Valle d'Aosta and Molise (ISTAT, 2021). As is well known, Liguria is a tongue of land between the mountains and the sea: 37.1 percent of the population lives in the city of Genoa, and the average population over the remaining 234 municipalities is 4,071.4 ab. The average population value is close to those of Trentino-Alto Adige (3,822.5 ab.) and Basilicata (4,122.1 ab.) regions characterized by an important presence of mountainous systems (100% and 47% of territory, respectively) (ISTAT, 2021).

Remembering these territorial characteristics, the regional data on the distribution of PLV revenues and the weight of CAP Pillar I payments compared to rural development (Pillar II) payments as a figure of the weight of public support in RL compared to other Italian regions are not surprising. The average value of CAP direct payments per beneficiary in RL amounts to $\in 2.5$ thousand and is the lowest in Italy, while that for Pillar II is third ($\in 4.4$ thousand) after Calabria ($\in 3.6$ thousand) and Abruzzo ($\in 4.3$ thousand).

¹ To conduct this analysis, beneficiaries with approved PAs and those with applications that have been rejected, which are still in processing or proposed for payment, were excluded. The number of beneficiaries, net of these excluded categories, does not represent the actual number of missing beneficiaries; to arrive at this figure, an additional step is necessary. In fact, the IE calculated among the "missing" beneficiaries which of these beneficiaries actually "vanished" considering the deadline for submitting the balance PA as the threshold value. All beneficiaries who have not submitted PAs of any kind but still fall within the deadline to submit the balance cannot in fact be considered as true "missing" beneficiaries.

2.2 The weight of "structural" measures in the Liguria RDP in comparison with other national and European realities

In the following table, we aimed to compare the weight of the two groups of measures within the different RDPs 2014-2022 of the Italian regions² : this comparison demonstrates the uniqueness of the Ligurian case where there is a decisive weight of structural interventions (equal to about 80 percent of the total) compared to area-based interventions even in the Italian landscape.

Table 1 - Financial weight RDP interventions at the regional level Financial Weight on Total RDP							
	Region	Structural interventions	Surface interventions	Other measures	Spending capacity(%)		
	Bolzano	35,8	63,8	0,4	69,1		
	Friuli	63,6	33,6	2,8	55,7		
	Emilia-Romagna	61,3	36,6	2,1	61,2		
	Latium	54,3	43,6	2,1	55,3		
	Liguria	82,3	14,3	3,4	48,5		
More	Lombardy	65,8	32,8	1,4	51,1		
developed	Brands	63,3	34,6	2,1	46,4		
regions	Piedmont	55,4	41,7	2,9	54,9		
	Tuscany	68,3	30,5	1,2	51,2		
	Trento	52,0	46,6	1,4	55,4		
	Umbria	63,8	34,4	1,8	52,1		
	Veneto	66,9	31,9	1,2	61,7		
	VdA	34,9	64,4	0,7	65,8		
	Abruzzo	66,1	31,3	2,5	46,6		
Transition	Molise	55,4	41,7	2,9	54,9		
	Sardinia	41,6	57,7	6,6	59,7		
	Basilicata	61,8	35,1	3,1	49,2		
	Calabria	49,1	47,5	3,3	59,6		
Less developed	Campania	60,2	38,5	1,4	54,2		
developed	Apulia	68,2	29,6	2,2	46,0		
	Sicily	58,3	40,9	0,8	51,8		
	Italy	62,8	34,8	2,3	55,3		

 Table 1 - Financial weight RDP interventions at the regional level

Source: National Rural Network, data as of 12/31/2021.

When compared with other Italian Regions, the percentage distribution of the two macro-types of measures related to the Ligurian Program shows an undisputed peculiarity, with structural measures weighing 20 percent more than the national average and, in any case, much higher than the other Regions. Consequently, "area-based" interventions in the Liguria Region weigh only 14.3 percent, a very low value both compared to the national figure (34.8 percent) and in relation to the other Regions, among which the lowest percentage is 29.6 percent in the Apulia Region.

This state of affairs gives rise to a further consideration that determines opportunities and constraints for potential and/or actual beneficiaries of the Program: in Liguria, in fact, it is rare that, as is the case elsewhere, beneficiaries can take advantage of the cash acquired from area premiums to advance the resources necessary for business development interventions of investment measures. In fact, this is a money circle that struggles to take place because of the paucity of resources that many farms receive on premiums. This outlines a very peculiar

 $^{^2}$ The three macro categories are broken down as follows: structural interventions (M1 to M9 and M16 to M19, including former 113 and M21), csd. interventions. "area-based" (M10 to M15) and "other measures" (M20, in addition to measures 113, 131, 341 and annual adjustments "AC").



aspect especially for private beneficiaries who are called upon to prove equity when applying for a bank guarantee necessary to take out a standard mortgage loan.

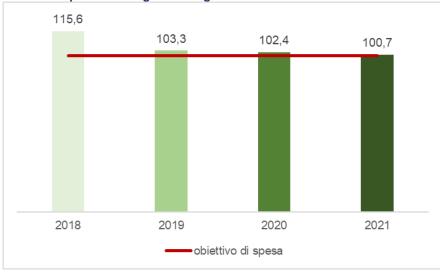
3 Expenditure analysis: the procedural performance of the main structural measures of the RDP 2014-2022 Liguria Region

3.1 Expenditure performance and decommitment

The Region of Liguria has always met its spending targets, and as can be seen from the chart below, 2018 is the last year that it exceeded its spending target by a clear margin. At the annual meeting in January 2018 (see AAR 2017), the Region gave a full presentation of the initial difficulties it was experiencing but felt it should be emphasized that:

despite the delays, the risk of decommitment is avoidable, as spending is expected to accelerate with the closure of the calls for measures 4, 6 and 8 and the payment of past annuities of area-based measures and spending on broadband and technical assistance.

In subsequent years, the spending target was still met, but the additional share over the minimum needed has been steadily decreasing, reporting increasing difficulties.





Source: AAR 2018, 2019, 2020 and 2021

3.2 The behavior of the beneficiaries with respect to the expected timelines with respect to the notice deadline

The IE developed the elaborations taking into account the **main measures and related** structural **sub-measures** of the RDP:

- M4 Investment support,
- M6 Farm and enterprise development,
- M7 Basic services and village renewal in rural areas,
- M8 Support of the forestry sector,

³ The percentage of reaching the spending target includes 3 percent pre-funding.



- M16 EIP (European Partnership for Innovation) Groups,
- M21 Exceptional temporary support for farmers and SMEs particularly affected by the COVID crisis - 19.

There are 4,420 applications (AP) considered in the following analysis distributed mainly on M4 (42 percent), 6 (18 percent) and 21 (29 percent). In particular, the MSs to find more APs are 4.1 - Support for investments in agricultural holdings, 4.4 - Support for non-productive investments related to the fulfillment of agro-climatic-environmental objectives, and 6.1 - Start-up aid for young farmers. There are 1,364 beneficiaries who are late in submitting the balance PA compared to the deadline stipulated in the notice.

From the chart below, it is possible to note the MS for which beneficiaries found it more or less difficult to submit the balance PA within the prescribed deadline. In the cases of MS 16.9 - social agriculture and MS 21.1, introduced as business support following COVID19, all the beneficiaries managed to submit the application within the prescribed time. For all the other MS there are different and rather varied situations: for some MS, such as 4.4, 6.1, 6.2 and 8.6, the percentage of late beneficiaries does not exceed 26 percent, while for others, such as 4.1, 4.3, 6.4, 8.3 and 8.4 more than 60 percent of balance PAs were not submitted by the deadline. The borderline cases are those of MS 7.1 and M16 (excluding MS 16.9) for which none of the beneficiaries managed to submit balance PAs within the time stipulated by the notice.

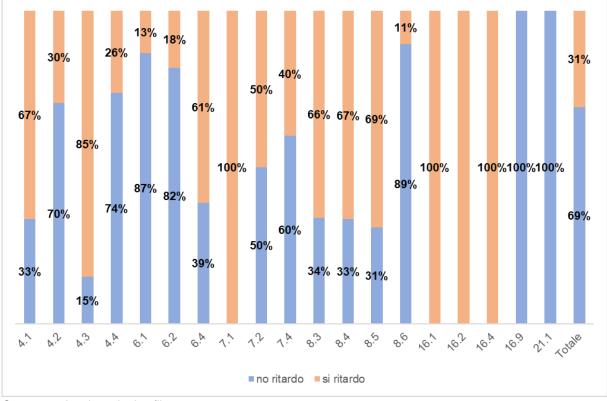


Chart 2 - % PAs of balance without and with delay by MS (notice deadline).

Source: regional monitoring file



3.3 Expenditure trends and related delays compared to notice deadlines by type of public and private beneficiaries

In addition to a distinction by MS, the IE decided to analyze the phenomenon of delay from the perspective of **beneficiary type**. There are 2 categories identified based on the type of beneficiary allowed by RDP. As can be seen from the table below, the publics have the most difficulty in meeting the timeframe set by notice.

Table 2 - APs submitted and PAs of late and non-payment balance by type of beneficiary (notice deadline)

		Beneficiaries with	hout late PA balance	Beneficiaries with late PA balance		
Beneficiary	Total AP					
		N°	% of total AP	N°	% of total AP	
Privates	4.092	2.949	72%	1.143	28%	
Public	328	107	33%	221	67%	
Total	4.420	3.056	69%	1.364	31%	

Source: regional monitoring file

Private individuals, on the contrary, seem to be in percentage value the ones who experience the least difficulty in submitting the balance PA in the correct timeframe. The percentages of beneficiaries and late and not nearly interchange between public and private with the latter managing in 72 percent of cases to meet the notice deadline while in the case of the public 67 percent fail to do so.

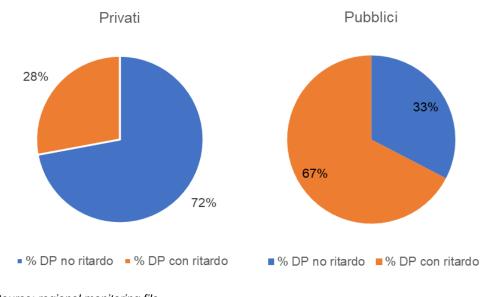


Chart 3 - PA of overdue and not overdue balance by beneficiary type (%)

Source: regional monitoring file

3.4 The categories of beneficiaries identified according to their status

Among the 1,364 delayed beneficiaries there are 2 categories:

- Who delivered the balance PA late;
- Those who still need to submit the balance PA and are late.



The second category is of greater interest as the Region must decide how to handle these specific cases. These are situations with respect to which the IEhas conducted further investigations to support the RL in understanding the cause of these delays. This phenomenon involves 31 calls and many of the MS activated by RL, however, the percentage values of MS 4.3, 6.2, 6.4, 8.3 and M16 (excluding M 16.9) are particularly high. In addition, it is important to point out that many of the beneficiaries of MS 7.1, 7.2 and 7.4 experience this criticality. In absolute numbers, however, MS 4.1 takes on worrying values.

As mentioned earlier, MS 4.1 has some critical issues, and about 70 percent of beneficiaries have a delay, which is, on average, about one year from the application deadline. The first two calls in chronological order have the worst numbers in terms of average delay, but the situation has been improving over the years.

As for the other MS, on the other hand, the situation is rather varied, alternating between calls with lower percentages and calls in which more than 75 percent failed to meet the deadlines. MS 4.3 registers criticalities especially in the first two calls, in the first only 3 out of 33 beneficiaries manage to submit the PA on time, while in the second 100% fail to do so. It should be taken into account that the implementation of these two calls falls in the most complex period of pandemic management, the first in fact has as the date of the grant decree 12/2018 and the second 12/2019. In general, it should be considered that all the rankings for these calls were published between 2018 and 2020. This means that the period for the implementation of the interventions available to the beneficiaries of all the calls coincided more or less significantly with the period of the onset of the pandemic. The first period of the emergency is the one that created the greatest difficulties with regard to works and investments as the government needed time to establish rules regarding the safe continuation of activities. In addition, companies had to adapt and work often resumed, especially initially, at reduced ranks with repercussions on the speed of implementation. Significant criticalities are also highlighted in the first two calls of 6.4 in which 87 percent and 67 percent of beneficiaries fail to meet the application deadline and experience a delay of about 15 and 10 months respectively. M8 represents a further case where delays are widespread, only the first call of MS 8.6 records excellent results with only 1 beneficiary late, moreover by a few months while the borderline case of MS 8.4 call is to be recorded where the majority of beneficiaries are late for a period of almost 2 years.

In addition to the two groups highlighted above, there is a third group, which is the *missing* group and includes **beneficiaries who have not submitted any PA and are behind the deadline for the end of the work set by the notice and, in cases where an extension has been granted, updated with respect to it. There** are a total of 97 beneficiaries in this categria, and the MS most affected by this phenomenon are mainly 16.4, 6.4, 8.6 and 4.3. In these cases, when the percentages are quite high, the significance is not very high as this is mainly due to a limited number of total beneficiaries rather than a substantial number of *missing* beneficiaries.

SM	N. Beneficiaries	N. Beneficiaries without PAs submitted	%	Beneficiaries without PA submitted and with delay (<i>missing</i>)	%
4.1	876	60	6,8	60	6,8
4.3	7	1	14,3	1	14,3
4.4	848	2	0,2	2	0,2
6.1	295	3	1,0	3	1,0
6.2	12	1	8,3	1	8,3
6.4	72	31	43,1	15	20,8
8.5	142	5	3,5	5	3,5
8.6	24	4	16,7	4	16,7

Table 3 - Beneficiaries with no PA by MS and announcement



SM	N. Beneficiaries	N. Beneficiaries without PAs submitted	%	Beneficiaries without PA submitted and with delay (<i>missing</i>)	%
16.1	15	15	100,0	1	6,7
16.4	13	5	38,5	5	38,5
Total	2.297	126	5,5	97	4,2

Source: regional monitoring file

3.5 Undelivered balance PAs and their value in financial terms.

To conclude the desk analysis based on the database provided by the Liguria Region, the IE presents Table 19, which encapsulates the cases that represent a red flag in terms of financial progress. Beneficiaries classified as overdue and who, as of Dec. 31, 2021, have not yet delivered balance PAs total 295 and represent 7 percent of the total number of MS beneficiaries considered. The value of the projects of these beneficiaries is just over 34 mln euros, of which 15 have already been settled (advances and SAL). The remaining 19 mln euros have yet to be disbursed and these may take the form of SAL or balance, in both cases, however, the beneficiaries have passed the deadline given to them for submitting the PA for balance.

Table 4 - No. of beneficiaries in arrears with respect to the notice due date and without balance PA by notice
with amount allowed, cleared and yet to be cleared

SM	no. beneficiaries	Beneficiari es without balance PA and in arrears	%	Amount allowed	Amount cleared	Amount to be settled
4.1	914	152	16,6	13.670.316	5.875.359	7.794.957
4.2	44	3	6,8	1.284.707	741.740	542.967
4.3	47	9	19,1	4.874.287	1.429.331	3.444.955
4.4	882	3	0,3	10.500	-	10.500
6.1	657	36	5,5	889.000	419.000	470.000
6.2	22	3	13,6	92.000	34.000	58.000
6.4	132	25	18,9	1.944.060	740.529	1.203.531
7.2	12	6	50,0	1.549.065	745.476	803.589
7.4	5	2	40,0	292.986	113.230	179.756
8.3	62	4	6,5	2.086.008	765.050	1.320.959
8.4	9	1	11,1	361.583	144.633	216.950
8.5	143	32	22,4	5.547.856	3.649.474	1.898.381
8.6	66	5	7,6	67.988	8.487	59.501
16.1	38	1	2,6	42.947	-	42.947



SM	no. beneficiaries	Beneficiari es without balance PA and in arrears	%	Amount allowed	Amount cleared	Amount to be settled
16.4	13	13	100, 0	1.594.005	384.516	1,209,489
Tot		10	Ŭ	1.004.000	004.010	112001400
al	3046	295	9,7	34.307.310	15.050.826	19.256.484

Source: regional monitoring file

4 Elements that emerged from direct investigations

A total of 84 subjects took part in the online survey conducted on the surveymonkey.com platform, accounting for 36% of the mailings made, and 13 direct surveys were conducted (see next table)

Type of Questionnaire/Beneficiary	Number of responses	of which direct interviews
Beneficiaries without PA balance (Private companies)	10	2
Beneficiaries without balance PA (Public Entities)	3	2
Beneficiaries who submitted PA of balance late during the COVID period (Private Companies)	33	2
Beneficiaries who submitted PA of balance late during the COVID period (Public entities)	13	2
Missing Farms	23	3
Missing "Public Subjects"	2	2
Total	84	13

Table 5- Number of online survey responses and number of face-to-face interviews by beneficiary type

In a nutshell, it is possible to state the centrality of the issue related to the availability of credit for both companies and public entities in each profile. This critical issue was determined, among other things, by the unwillingness of banks to lend in the initial stages of the implementation of interventions, as well as by the progressive difficulties encountered by beneficiaries over time due mainly to exogenous events.

Thus, 2 main complications emerged: first, for both private companies and public entities, there were problems related to initial liquidity and the lack of support from banks in providing financing or, for the public side, the inability to cover the remaining portions of investments. A second group of problems related to a distress in terms of liquidity when externally dictated negative events (pandemic from COVID-19, calamitous events and war in Ukraine) began to persist over time losing their characteristic of a "shock" event and distracted resources to meet other expenses, including current ones.

For public agencies then, especially the calamitous events, have meant a revision-a downsizing-of projects on the ground. Other causes of slowdown included "classic" problems related to reporting or management of projects and relations with suppliers, or start-up delays attributable to PA response times that do not coincide with the production and/or investment needs of farms. However, this group of reasons, while present, is overshadowed when the analysis comes to consider the overall impact of the difficulties that have accrued since March 2020 with the onset of the COVID-19 pandemic and the hostilities in Ukraine, which have led to improper increases in the cost-and sometimes even the availability-of raw materials or other



materials. The latter elements are also creating a climate of great uncertainty and necessary revision and downsizing of investments with consequences that are not entirely predictable.

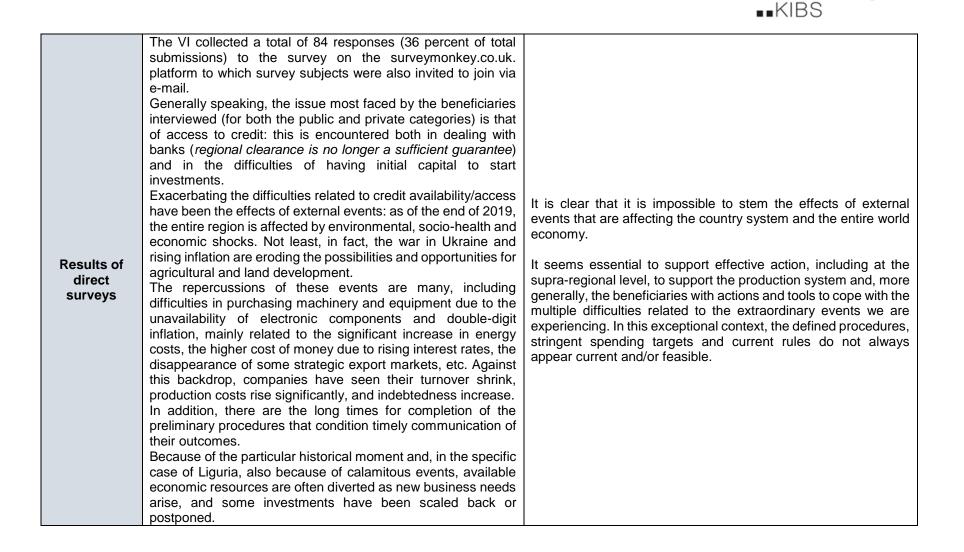


5 Main conclusions and recommendations

THEME	CONCLUSIONS	RECOMMENDATIONS
Context analysis	The study of the evolution of some variables within the context analysis allowed us to take a snapshot of the trend of the agricultural sector, which shows a significant reduction (- 36.6%) of farms between 2010 and 2020 (ISTAT) and the financial weight played by structural measures within the Liguria RDP. The allocation of fewer resources to area-based measures is linked to the particular conformation of the territory: this fact is also confirmed by the value of CAP direct payments (average value received \in 2.5 thousand per beneficiary), which turns out to be the lowest in Italy, while that for Pillar II is third (\in 4.4 thousand) after Calabria (\in 3.6 thousand) and Abruzzo (\in 4.3 thousand). The data used also confirmed the near uniqueness of the Ligurian programming case: in Europe only two other regions have a ratio of programmed resources unbalanced toward structural (although not as much as in the Ligurian RDP) and both programs show relatively low spending advancement (respectively Extremadura-Spain-at 41 percent and 51.4 percent for Schleswig-Holstein-Germany). The low weight of area-based measures in Liguria, significantly reduces the opportunity for beneficiaries of structural measures to be able to count on an adequate level of liquidity, given precisely by the premiums linked to the areas committed, and useful to offset (or cover) the initial costs of farm investments.	The increased weight of structural measures has led to growing difficulties in the progress of payments and the ability to meet spending targets to avert the application of the N+3 rule of automatic decommitment. In the future, it will be appropriate, as also taken up in the other recommendations, to improve the ability to recognize and act promptly and operationally in critical situations.



Expenditure analysis	 Expenditure analysis revealed three main cases of beneficiaries falling behind the deadline for completion of interventions. Beneficiaries in the analysis (4,420) failed to deliver balance PAs on time, and the MS where this phenomenon is most prevalent are 4.1 (67%), 4.3 (85%), 6.4 (61%), 7.1 (100%) and 16 (85%). Of these, public beneficiaries experience the most difficulties: only 10 percent of them manage to submit balance PAs on time, while in the case of private beneficiaries it is as high as 74 percent. Beneficiaries who, despite having applied for advances or SAL, have not delivered PA of balance and are behind the deadline stipulated in the notice. This category includes 441 beneficiaries (mainly for MS 16.1, 16.2, 16.4 and 7.1) who are late in submitting the balance PA. Beneficiaries who have not submitted any PA and are late (missing), whose weight is rather limited (3.2 percent), but who nevertheless represent a criticality for spending targets and unmoved amounts. Correlation between investment classes and delays: the analysis revealed a directly proportional trend between investment classes and the percentage of beneficiaries who are late. Small-scale investments manage to meet their deadlines more frequently, while those requiring greater economic effort are most often late. Value in financial terms of undelivered balance PAs: 7 percent (295) of the APs considered have yet to submit balance PAs and are behind schedule. The IE quantified the value of the projects affected by this delay at 34 mln euros with an amount of 19 mln euros still to be settled. This figure represents a significant share of resources that can play a key role in achieving the spending target for the Liguria RDP but is "de facto" suspended due to the difficulties that beneficiaries are experiencing in meeting the deadlines set for the completion of work. 	The evaluation activity helped to take a snapshot of the situation of expenditure delays for different types of interventions and beneficiaries. As highlighted within the methodology, however, it was necessary to intervene several times and "several hands" within the regional DBs to align data readings and update them. For the future, it would be advisable to strengthen the monitoring system so that the development of different situations can be tracked and possible critical issues can be reported in a timely manner. RL, which like the rest of Italy is facing the lack of turnover within the PA and the progressive centralization of functions, is experiencing a period of necessary reorganization of activities. In this specific context, one could aim for an automated "alert" system in the head of a single office capable of alerting the various beneficiaries of the imminence of deadlines related to administrative paperwork. On the other hand, the value of collaboration between RL and trade associations should be stressed, which, with gradual improvement over the years, have established stable relationships of dialogue and sharing of the main issues and needs related to the RDP.
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