ECF Policy Brief

An analysis of cycling investments by EU Member States using EU Structural Funds

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EUROPEAN CYCLISTS' FEDERATION

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This policy brief is a first-of-its-kind analysis of financial investments in cycling projects made by EU Member States using EU Structural Funds. Our analysis is based on data from the European Commission's "Cohesion Open Data Platform". This data set allows us to compare two EU funding periods, 2014-2020 and 2021-2027. It shows data for all 27 EU Member States at the country level (NUTS-0), plus the UK for the 2014-2020 period.

While we identify a general positive upward trend in the unlocking of EU Structural Funds for cycling, the situation is more complex when looking underneath the surface. This becomes apparent when we compare cycling investments per capita between countries, which shows that there is plenty more countries can do to take advantage of EU funds to build more cycling infrastructure and generate a greater modal shift toward cycling in their countries.

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1. Executive summary

This paper analyses to what extent EU Structural Funds have been and will be used to invest in cycle projects.

As cycling for transport and leisure is becoming more popular among Europe's population and is increasingly seen by policy makers as a solution to address mobility challenges and the climate crisis, cycling investments are on an upward trajectory, too.

Approximately €3.21 billion is set to be invested in cycling projects across Europe in the present 2021-2027 EU structural funding period. This would be a 30% increase compared to the previous 2014-2020 financial period[1] and should finance the construction of about 12,000 km of cycling infrastructure, according to Frans Timmermans, the former Executive Vice-President of the European Commission.[2] If the same phenomenon called "re-programming" occurs in the current period as it did in the previous one, by which Managing Authorities adjust their planned investments mid-way in the cycle, even as much as €4-4.8 billion in Structural Funds could be unlocked for cycling projects.

Behind this positive overall trend hide big discrepancies between Member States. Whereas some countries are set to invest considerably in cycling, such as Czechia, Estonia and Lithuania, others have become less ambitious when it comes to using EU Structural Funds for cycling, notably Spain and Portugal.

A big question mark also needs to be put on the discrepancy between ambition and implementation. For the 2014-2020 funding period, projects can still be implemented by 31 December 2023 to be eligible for payment. Out of the €2.43 billion Member States have planned for cycling from EU Structural Funds in the 2014-2020 period, only €1.64 billion (67%) was spent at the end of 2022. This is a similar spending rate compared with urban transport infrastructure but low when compared with other types of road infrastructure investments where spending rates are between 84-111% of original commitments. However, performance differs a lot between Member States. Whereas some countries have already over-spent on their commitments, including Bulgaria, Hungary and Slovenia, others still have a large spending gap. Italy trails behind, having spent just 17% of their planned investments. Cyprus, Greece, France, Germany, Slovakia and Spain all have spending levels of less than 40%. It remains to be seen how much of that gap can be closed by the end of 2023. The final spending figures for the 2014-2020 funding period should be published sometime in 2024.

All data presented in this report has been retrieved from the European Commission's "Cohesion Open Data Platform". There are some questions related to the quality of the data which are discussed in Chapter 2, "Data quality and gaps in reporting." A full list and explanation of EU Structural Funds are found in the glossary.

Concrete good practice examples of EU investments in cycle projects have not been included in this paper. For this purpose, please consult, among other things, the Interreg EU Cycle project website.[3]

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[1] 2014 – 2020 includes walking infrastructure too. Code 090 – Cycle tracks and footpaths. 2021 – 2027 data is limited to cycling only. Code 083 – Cycling infrastructure.

[2] https://ec.europa.eu/commission/presscorner/detail/en/SPEECH_23_1561

[3] https://projects2014-2020.interregeurope.eu/eucycle/

2. Data quality and gaps in reporting

All data presented in this report has been retrieved from the European Commission's "Cohesion Open Data Platform" (CODP).[4]

Cycling investments have been tracked under different codes during the 2014-2020 and 2021-2027 EU structural funding periods. For 2014-2020, the main code is **090 – Cycle tracks and footpaths,** whereas for 2021-2027 it is **083 – Cycling Infrastructure**.

Additional 2014-2020 cycling investments are hidden under code **043 – Clean urban transport infrastructure & promotion.** In specific cases where we have evidence that code 043 investments include cycle projects, we include them in the overall figures (see Table 1: EU Structural Funds 2014-2020: Planned/Decided/Spent in "Cycle tracks and footpaths" by country). We have no information whether other cycle investments are hidden in other codes, although our research from previous Operational Programmes[5] as well as planned investments during the 2021-2027 financial period suggest this is happening.[6]

We have several critical remarks to make on the quality of the data set:

- There is no data on the exact split between investments in cycle tracks and footpaths for the 2014-2020 period. It is unclear under which code walking investments will be recorded for the 2021-2027 period.
- All data in the CODP is at the country level (NUTS-O). A deeper analysis of data from the NUTS-1 regional level, comparable to what we did in 2014 with the EU Funds for Cycling Observatory (2014-2020), is thus not possible.[7]
- It appears that in some countries cycling investments are not covered by code 090 despite evidence that investments were made with EU support. There is either a problem in (timely) reporting the data to the CODP, or investments in cycle paths were recorded under a different code. This applies to:
  - Croatia: €15 million was planned according to the CODP, though no money was "decided" and "spent" under coder 090. However, we have received confirmation from the Ministry of Regional Development and EU Funds that a total of 29 projects, using the Integrated Territorial Investment (ITI)-mechanism, will be finalised by the end of 2023 for a total value of €25 million, using code 043.
  - Czech Republic: Like Croatia, investments are not recorded under 090 but under code 043. According to national statistics, a total of Kč2.53 billion (€107.2 million) have been invested in cycle projects between 2015-2021.[8] Under code 090, no investments were planned/decided/spent.
  - Lithuania: €8.7 million was planned for cycle tracks and footpaths under coder 090, but according to the CODP, no investments have been decided or spent by the end of 2022. Nevertheless, the Ministry for Transport and Communication informed us that about €8.5

[4] https://cohesiondata.ec.europa.eu/

[5] The Operational Programme 2014 - 2020 of Schleswig-Holstein stated that "In addition, the ERDF shall support investive and non-investive measures for the creation of climate-friendly and resource-saving touristic offers. This also includes improving the accessibility of natural and cultural heritage sites, for example by optimising cycle tourism, which is a core theme of the state's tourism strategy." The related investments were then encoded under 091 - Development and promotion of the tourism potential of natural areas and 094 - Protection, development and promotion of public cultural and heritage assets. https://ecf.com/what-we-do/european-funding/eu-funds-observatory-cycling/funding-streams/operationelles-programm-d-3

[6] See Table 6 in the policy brief: Structural Funds 2021 – 2027: Cycling investments per policy objective (in Euro)

[7] https://ecf.com/what-we-do/european-funding/eu-funds-observatory-cycling-2014-2020

[8] https://www.ceskobezbarier.cz/statistika

million have been invested to date into cycle projects using 2014-2020 funds. We do not know whether there is a similar situation in the two other Baltic countries, how this compares with their two Baltic neighbours, Estonia and Latvia.

- Finland, Ireland and Malta: According to the CODP, no investments were planned/decided/spent on code 090. However,
  - For Finland, the CODP lists at least one specific urban mobility project with a cycling component (e-bikes purchased for a bike-sharing project in the city of Kuopio).[9]
  - For Ireland, the Commission published on 26 May 2023 a story with the headline, "EU Cohesion Policy: New €3 million pedestrian and cycle bridge inaugurated in Galway, Ireland**."**[10] It is possible that it was recorded under a different code than 090.
  - In Malta, investments in cycle projects were investigated in a series of articles by the *EU Observer*.[11] These investments may have been recorded under a different code.

As a general point, it should be kept in mind that the Commission data represents total investments, i.e., contributions from the European Regional Development Fund (ERDF) and Cohesion Fund, in addition to national co-funding. The EU contribution can be as high as 85% in the 15 Cohesion countries.[12]

[9] https://cohesiondata.ec.europa.eu/projects/row-zrei-9sse_ehk9

[10] https://ec.europa.eu/regional_policy/whats-new/newsroom/26-05-2023-eu-cohesion-policy-new-eur3-million-pedestrian-and-cycle-bridge-inaugurated-in-galway-ireland_en

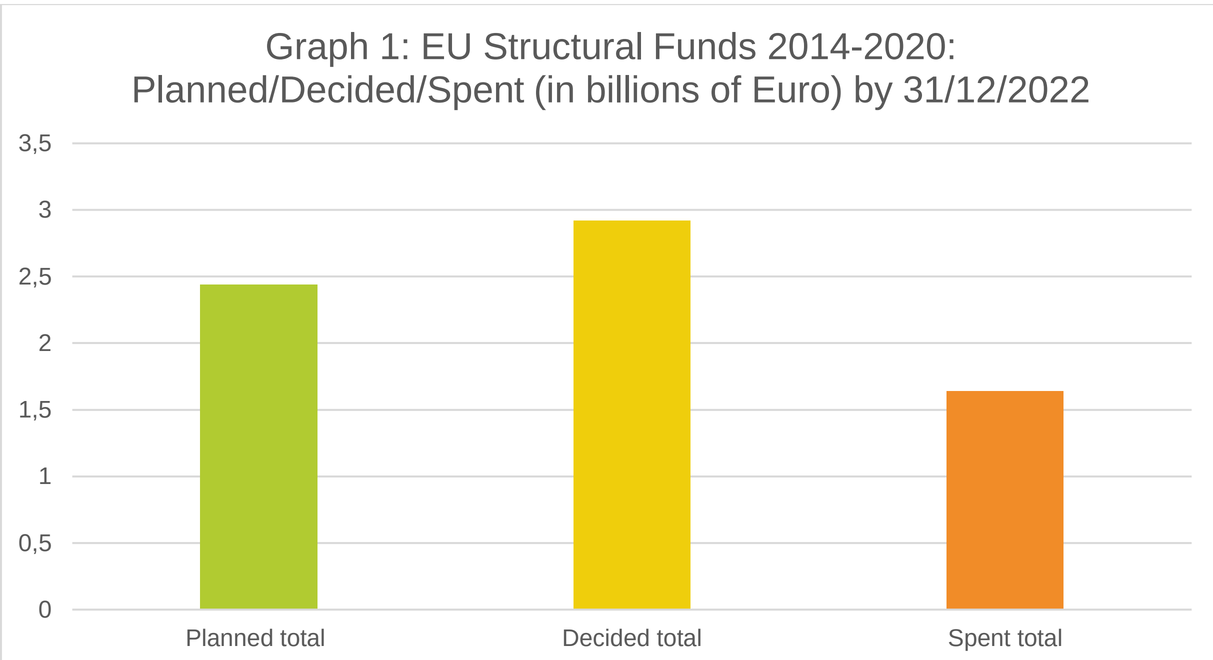
[11] https://euobserver.com/health-and-society/156571

[12] Bulgaria, Croatia, Cyprus, Czechia, Estonia, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia and Slovenia.

3. Cycling investments from EU Structural Funds 2014-2020

3.1 Planned/Decided/Spent

Graph 1 presents aggregated information on investments from Structural Funds (the ERDF and Cohesion Fund) recorded under code **090 – Cycle tracks and footpaths** and covers the period up until 31 December 2022. We added additional cycling investments recorded under code **043 – Clean urban transport infrastructure & promotion** when reliable sources confirmed their existence.



Graph 1: EU Structural Funds 2014-2020: Planned/Decided/Spent (in billions of Euro) by 31/12/2022.

The combined total of *planned* Member State investments using EU Structural Funds in the 2014-2020 is €2.44 billion. The *decided* total is € 2.92 billion, and the total spent so far is just €1.64 billion. The ERDF accounts for about 95% of cycling and walking investments, with the remaining 5% coming from the Cohesion Fund.

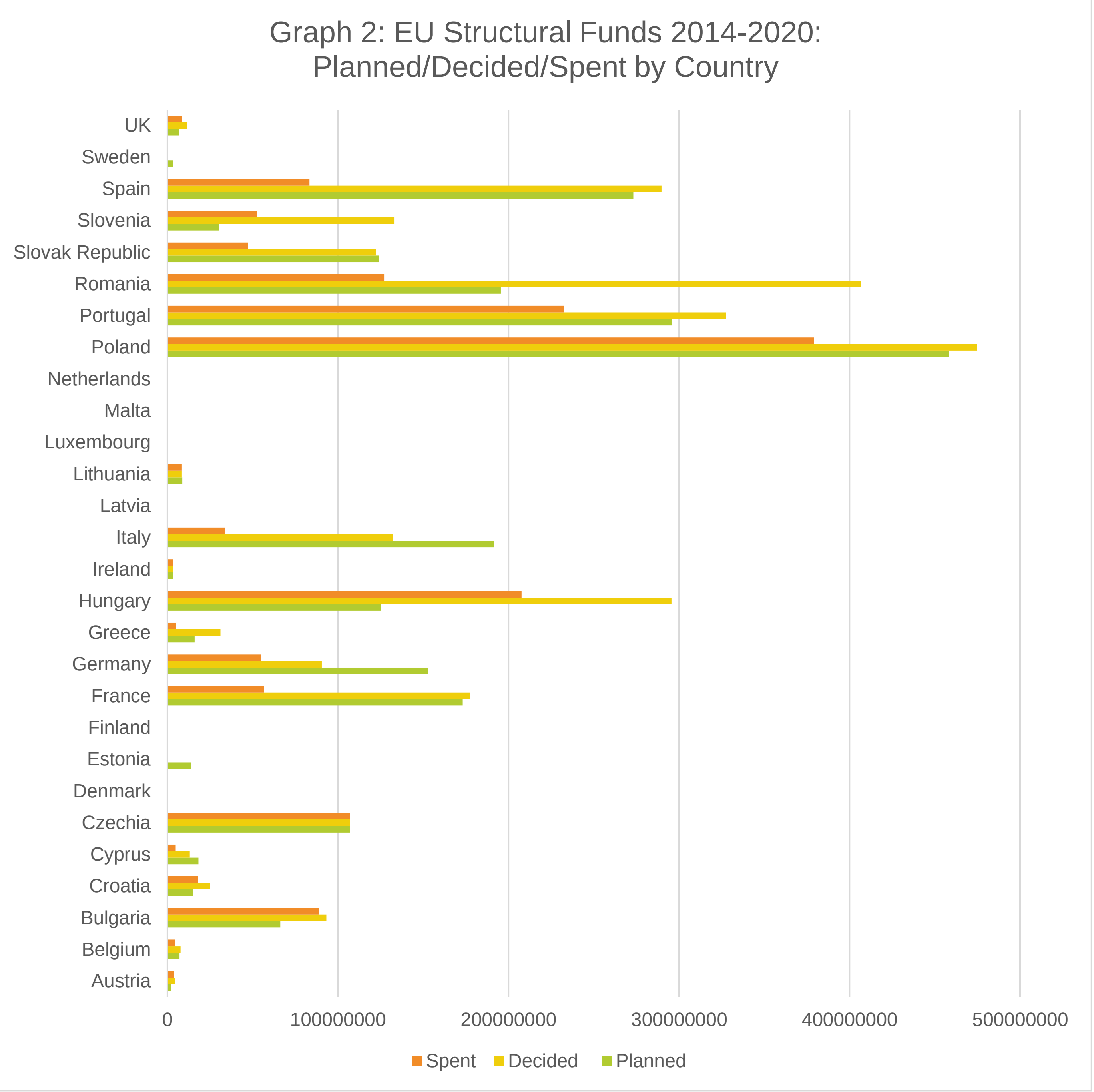
By the end of 2022, there was still a yawning gap between “planned” and “decided” investments and on funds that were “spent.” About one third of “planned” investments have not been “spent” yet. Member States still have time until the end of this year 2023 to close this gap. See section 3.3 for further information.

Table 1: EU Structural Funds 2014-2020: Planned/Decided/Spent in "Cycle tracks and footpaths" by country[13]

	Code: 090 – Cycle tracks and footpaths					
	Planned		Decided		Spent	
	Total	%	Total	%	Total	%
Austria	2,350,000	100	455,5802	194	3,857,221	164
Belgium	7,065,121	100	7,699,903	109	4,655,526	66
Bulgaria	66,171,502	100	93,175,667	141	88,817,715	134
Croatia	15,000,000	100	*25,000,000*	*167*	*18,000,000*	*120*
Cyprus	18,250,000	100	13,076,444	72	4,863,476	27
Czechia	*107,200,000*	*100*	*107,200,000*	*100*	*107,200,000*	*100*
Denmark	0	0	0	0	0	0
Estonia	14,048,944	100	0	0	0	0
Finland	*350,000*	*100*	*350,000*	*100*	*350,000*	*100*
France	173,097,500	100	177,627,634	103	56,761,234	33
Germany	152,851,452	100	90,555,201	59	54,848,734	36
Greece	15,881,986	100	31,057,409	196	5,069,995	32
Hungary	125,350,351	100	295,556,961	236	207,646,217	166
Ireland	3,500,000	100	3,500,000	*100*	3,500,000	*100*
Italy	191,550,519	100	132,070,623	69	33,718,727	18
Latvia	0	0	0	0	0	0
Lithuania	8,688,601	100	*8,500,000*	*98*	*8,500,000*	*98*
Luxembourg	0	0	0	0	0	0
Malta	0	0	0	0	0	0
Netherlands	0	0	0	0	0	0
Poland	458,412,833	100	474,777,409	104	379,252,981	83
Portugal	295,727,720	100	327,690,143	111	232,522,467	79
Romania	195,559,415	100	406,647,756	208	127,074,665	65
Slovakia	124,194,866	100	122,086,500	98	47,299,966	38
Slovenia	30,327,722	100	132,896,256	438	52,692,220	174
Spain	273,170,665	100	289,669,930	106	83,332,950	31
Sweden	3,555,745	100	0	0	0	0
UK	6,641,832	100	11,247,566	169	8,595,663	129
Sub-Total	***2,288,946,774***	*100*	***2,754,941,204***	*120*	***1,528,559,757***	*67*
Interreg	149,870,102	100	182,954,270	122	109,385,767	73
Total	***2,438,816,876***	*100*	***2,937,895,474***	*120*	***1,637,945,524***	*67*

[13] Numbers in italic deviate from official 090 CODP data as a result of incorporating cycling investments from 043.

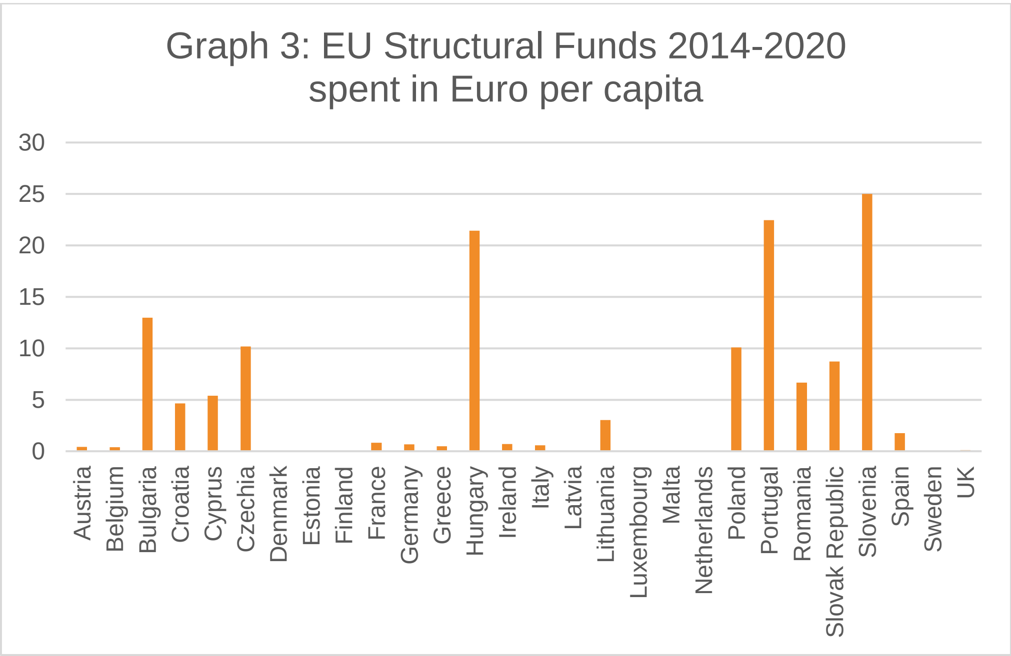
Graph 2 is a visual representation of the data from Table 1.



Graph 2: EU Structural Funds 2014-2020: Planned/Decided/Spent by Country

3.2 Cycling investments per capita

When comparing cycling investments per capita (Graph 3), Slovenia turns out to be the leading investor with €25 per capita, followed by Portugal (€22.5), Hungary (€21.4) and Bulgaria (€13). Czechia and Poland invest about €10 per inhabitant, and Slovakia invests at €8.7 per capita.



Graph 3: EU Structural Funds 2014-2020 spent in Euro per capita.

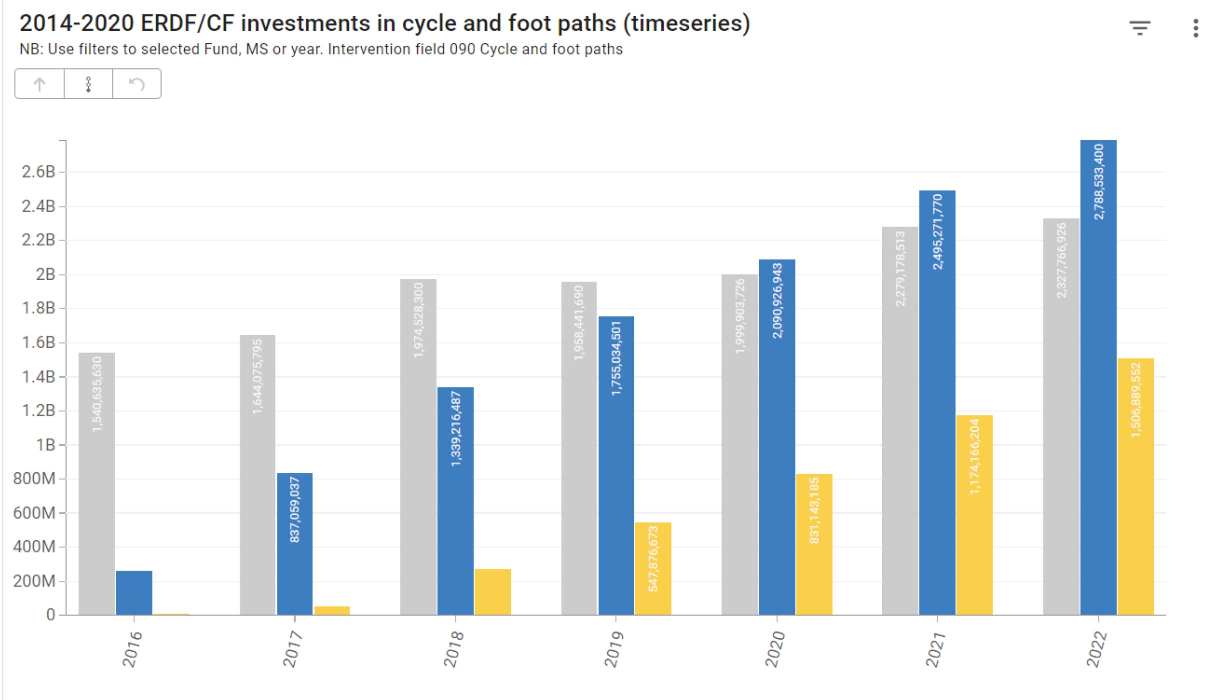
3.3 Re-programming

The following graph shows that "planned" cycling investments (the grey bar) have steadily increased throughout the seven-year programming cycle. Starting at €1.54 billion in 2016, they increased by about 50% to €2.33 billion in 2022. This increase is likely due to a re-programming effort by Managing Authorities favouring cycling investments at the expense of other infrastructure projects. A reason could be that cycling infrastructure projects were regarded as quicker to implement than other major infrastructure projects, such as tram or metro lines, and therefore more likely to meet the 2023 implementation deadline.[14] Any EU cohesion money that is not spent by 31 December 2023 is lost by the member state.

It should be noted that these graphs only include 090-recorded investments. Investments under code 043 and possible other codes are excluded.

[14] The delivery of "New or improved tram or metro lines (km)" is slow. By 2021, from 506 km planned tram or metro lines, only 172 km were delivered. In 2015, 747 km were still in the planning. https://cohesiondata.ec.europa.eu/stories/s/mgkf-h7hj

This graph[15] is copied and pasted from the cohesiondata.ec.europa.eu website and shows the growing investments in cycle and foot paths during 2014-2020 due to re-programming efforts.



Graph 4: 2014-2020 ERDF/CF investments in cycle and foot paths

3.4 Low spending rate

At 67%, the spending rate for cycle projects one year before the deadline seems to be very low. Several countries still have spending rates of less than 40% by 31 December 2022, including Cyprus, France, Germany, Greece, Italy, Slovakia and Spain. In Italy, only 17.6% of planned cycling investments have been spent by 2022.

Even more worrisome, at first sight, was the situation in Croatia, Estonia, Latvia and Lithuania, who initially had planned investments in cycle tracks and footpaths but apparently had not decided on any investments by 31 December 2022. However, from Croatia and Lithuania we have received confirmation that investments have been made. We are unaware of the situation in Estonia and Latvia.

On a positive note, by December 2022, Austria, Bulgaria, Hungary, Slovenia and the UK had already spent more on "cycle tracks and footpaths" than initially planned.

3.4.1 Comparing cycling with other codes

How low the cycling investment rate is exactly can be seen when compared to other codes. It appears that "clean urban transport infrastructure and promotion" (code 043) projects have a similar low spending rate from ERDF funds (63%), against 74% from the Cohesion Fund. By contrast, other road infrastructure projects appear to have higher spending rates of between 84%-111%.

[15] https://cohesiondata.ec.europa.eu/stories/s/In-profile-Support-to-cycle-and-foot-paths-2014-20/wue2-sfsb

We can only speculate why other infrastructure projects have higher spending rates. Possible explanations could be:

- Walking and cycling projects are generally still seen as a lower priority than other types of road infrastructure projects.
- Walking and cycling projects by nature are more small-scale than say a motorway-extension project. In motorway-type of projects, the money available can be spent on a much smaller number of projects which causes less administrative burden.
- Walking and cycling projects are often delegated to the municipal level, which further contributes to the fragmentation of the projects and to a higher administrative burden. At the same time, smaller municipalities often do not have capacity, both in terms of project management and in terms of cycling know-how, to carry out the projects. In large cities, cycling departments are under-staffed. It is difficult to find skilled and experienced cycling planners and engineers on the labour market. This negatively affects the absorption capacity of public administrations, particularly when cycling project budgets increase. In starter cycling countries, planners and engineers often do not have education in and experience with designing cycle infrastructure.
- Missing legal provisions (for example not including cycle infrastructure on the list of investments of important public interest,[16] or a lack of legal tools for land acquisition[17]) in some countries make land acquisition, obtaining environmental or construction permits for cycle infrastructure much more complicated than for motorways. On top of that, as cycling projects are implemented on municipal level and the legislation is decided on national level, addressing legal issues for cycle projects is often of lower priority than for projects implemented by national-level stakeholders (for example, by road, rail or waterway administrations).
- Missing, unclear or conflicting technical standards and traffic ordinances for cycle infrastructure, signs, marking and signals for cyclists,[18] which complicates and prolongs the design process. In extreme cases this makes it impossible to receive a construction permit for the initially planned project.
- In 2020/2021, as a reaction to the economic fallout of the COVID-19 pandemic, the Recovery and Resilience Fund (RRF) under the NextGenerationEU Programme was created. In their National Recovery and Resilience Programmes for this new funding stream, Italy and Spain dedicated substantial amounts of investments to cycling. To a certain extent, there might have been a shift of cycling projects to this funding stream because of its more favourable conditions (no co-financing required) and to fulfil the RRF's specific requirement to allocate at least 37% of the budget to green measures. This could explain why they, and other countries using the RRF, are not using EU Structural Funds for cycling investments.

[16] https://themis-test.vlaanderen.be/files/b8e90cf8-d655-11e9-b422-0242ac1b0005/download

[17] https://ecf.com/news-and-events/news/lessons-learned-regional-cycling-network-poland-west-pomerania, see Key lessons learned.

[18] See https://ecf.com/sites/ecf.com/files/MORE_Comparison_cycling_legislation.pdf for examples.

Table 2 lists spending rates from other codes under the ERDF.

Table 2: Spending rate various codes from ERDF by 31/12/2022

Code	Planned	%	Decided	%	Spent	%
043 – Clean urban transport infrastructure and promotion	8,639,616,037	100	9,764,018,317	113	5,433,919,096	63
034 – Other reconstructed or improved road	6,937,906,325	100	9,800,154,656	141	6,552,011,344	94
030 – Secondary road links to TEN-T road network (new build)	2,361,003,860	100	3,194,847,127	135	2,629,035,815	111

Table 3 lists spending rates from other codes under the Cohesion Fund.

Table 3: Spending rate various codes from Cohesion Fund by 31/12/2022

Code	Planned	%	Decided	%	Spent	%
028 – TEN-T motorways and roads – core network (new build)	7,205,103,380	100	9,926,424,669	138	7,230,393,387	100
029 – TEN-T motorways & roads – comprehensive network (new)	5,879,022,409	100	5,585,745,148	95	4,959,808,279	84
043 – Clean urban transport infrastructure & promotion	5,136,835,989	100	6,604,379,400	129	3,900,549,383	76
033 – TEN-T reconstructed or improved road	1,555,475,969	100	1,824,730,741	117	1,486,895,922	96

Table 4 shows that five out of the six EU Member States that were identified with spending rates of less than 40% for code 090 are performing better under code 043. Only in Spain is the rate about the same.

Table 4: Spending rate "043 – Clean urban transport infrastructure & promotion" in selected EU countries by 31/12/2022

	Planned	%	Decided	%	Spent	%
Cyprus	58,745,000	100	91,917,807	156	61,016,813	104
France	326,490,702	100	381,596,033	117	166,227,690	51
Germany	369,831,539	100	433,881,678	117	176,853,236	48
Greece	908,641,480	100	1,091,907,497	120	888,462,211	98
Italy	1,520,711,904	100	2,006,908,217	132	799,133,689	53
Spain	856,271,958	100	688,279,491	80	236,355,479	28

4. Cycling Investments from EU Structural Funds 2021-2027

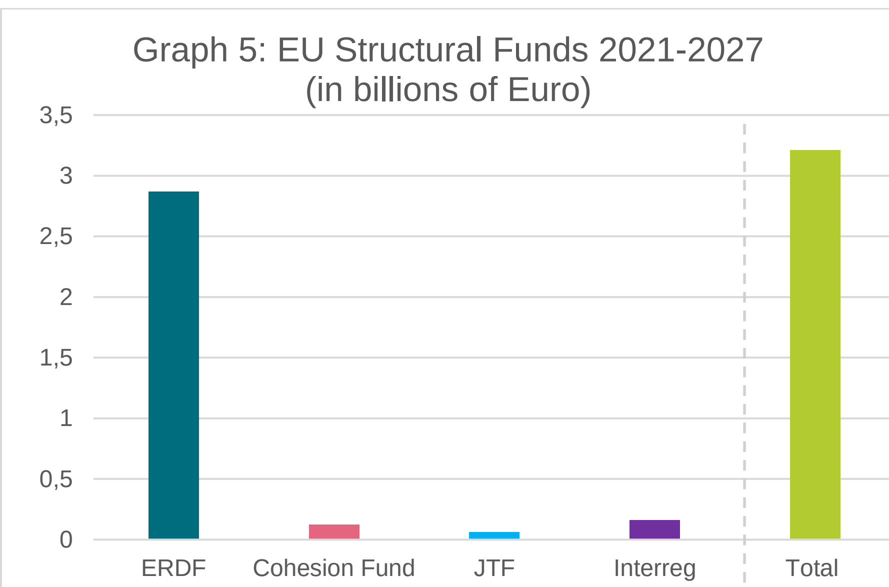
For the 2021-2027 Multi-annual Financial Framework (MFF), a total of **€3.21 billion is planned by Member States for investment in cycling infrastructure**. The relevant code to track such investments is "083 – Cycling Infrastructure". It should be noted that other European funding sources partially outside the MFF are also available for cycling during this period:

- The Recovery and Resilience Facility (RRF), a temporary instrument in place between 2021 and 2026 and financed through common borrowing on the capital markets. ECF currently estimates that over €2 billion from the RRF are dedicated to cycling investments in National Recovery and Resilience Plans.[19]
- From 2026, the EU Social Climate Fund, financed through revenues from the Emissions Trading System and its planned extension to the building and transport sectors, can deliver additional funding for cycling infrastructure, purchase incentives for bicycles and bicycle sharing schemes. The exact amount of funding from this source will depend on allocations in national social climate programmes.[20]

4.1 Investments per fund

The ERDF remains by far the single largest structural fund relevant for cycling investments, followed by the Cohesion Fund and the Just Transition Fund.[21] Interreg is part of ERDF. The Cohesion Fund is reserved for 15 Member States whose gross national income (GNI) per capita is less than 90% of the EU average.[22] The EU co-funding rate can be as high as 85%.

The latest structural fund, the Just Transition Fund (JTF), is in principle open to all EU Member States, but only two countries – Poland and Czech Republic – make use of it for cycling investments.



Graph 5: EU Structural Funds 2021-2027 (in billions of Euro)

[19] https://ecf.com/news-and-events/news/cycling-investments-nextgenerationeu-stimulus-package-taking-stock

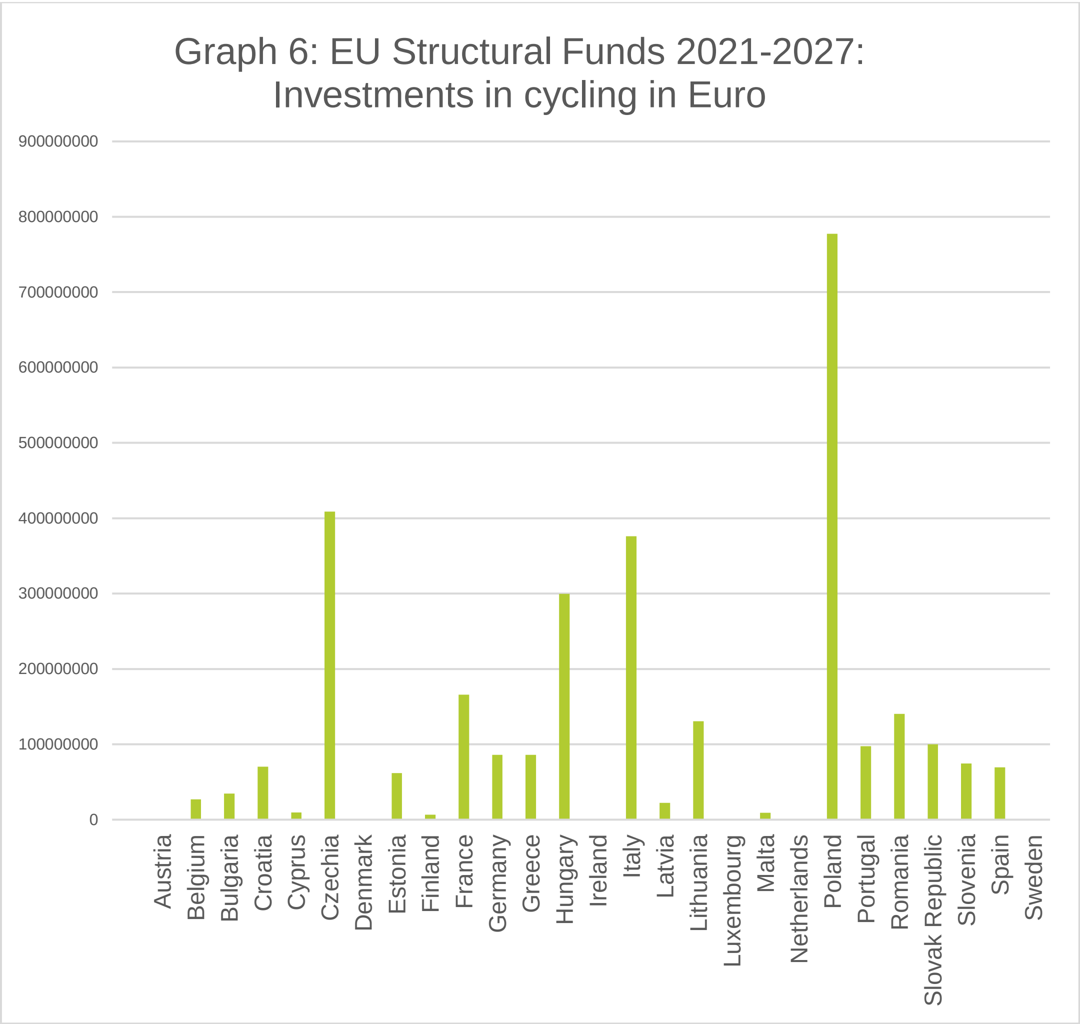
[20] https://ecf.com/news-and-events/news/new-european-source-funding-cycling-eu-social-climate-fund

[21] European Regional Development Fund (ERDF): 2.87 billion Euro; Cohesion Fund: 124 million Euro; Just Transition Fund (JTF): 60 million Euro; Interreg: 161 million Euro

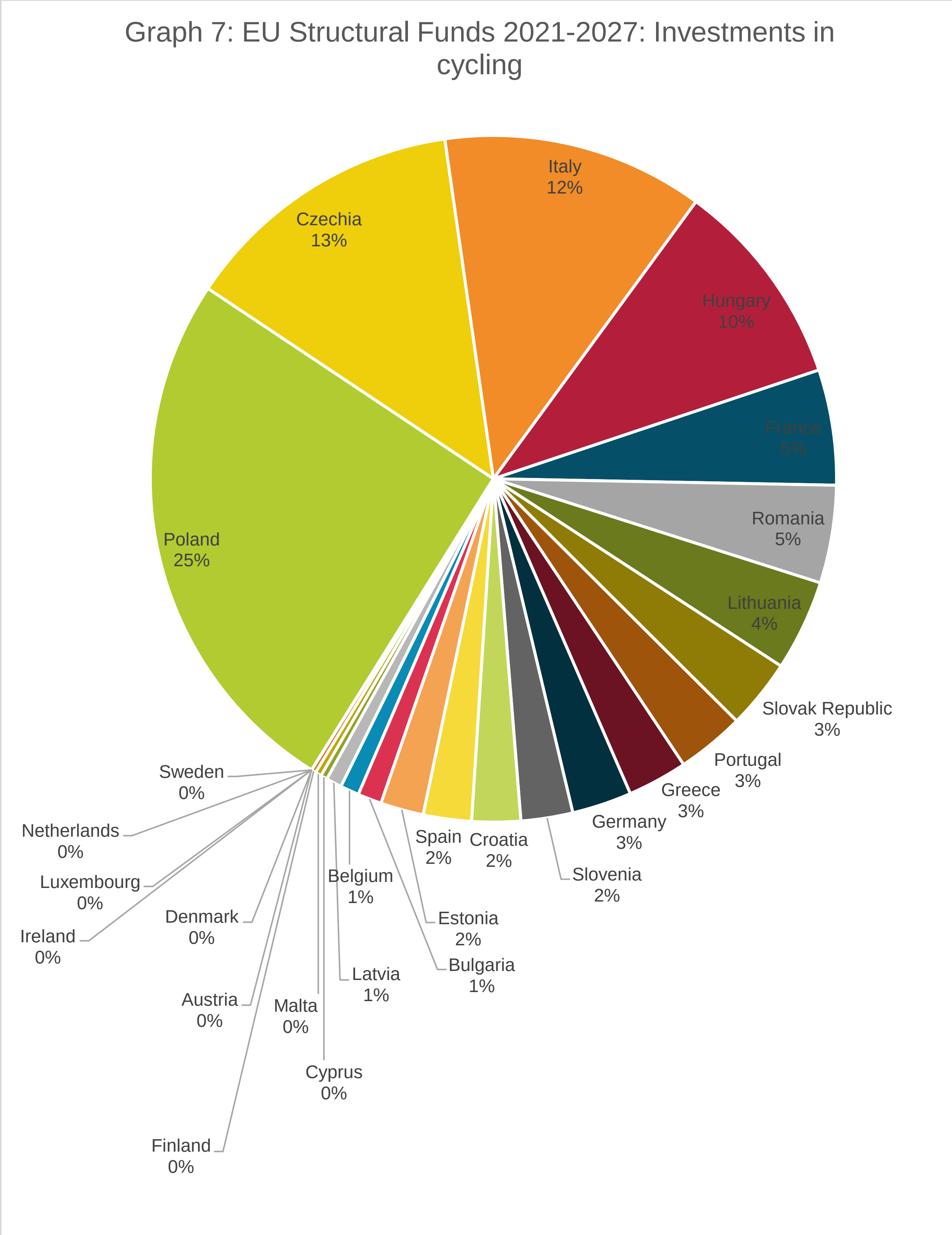
[22] https://www.europarl.europa.eu/factsheets/en/sheet/96/cohesion-fund

4.2 Total cycling investment per country

In total figures (Graph 5), Poland is the single largest beneficiary of EU funds for cycling investments with close to €780 million, followed by Czechia (€409 million), Italy (€376 million) and Hungary (€300 million). These four countries account for 60% of total “planned” investments (see Graph 6).



Graph 6: EU Structural Funds 2021-2027: Investments in cycling in Euro



Graph 7: EU Structural Funds 2021-2027: Investments in cycling

Table 5 lists the detailed “planned” investments per structural fund and county.

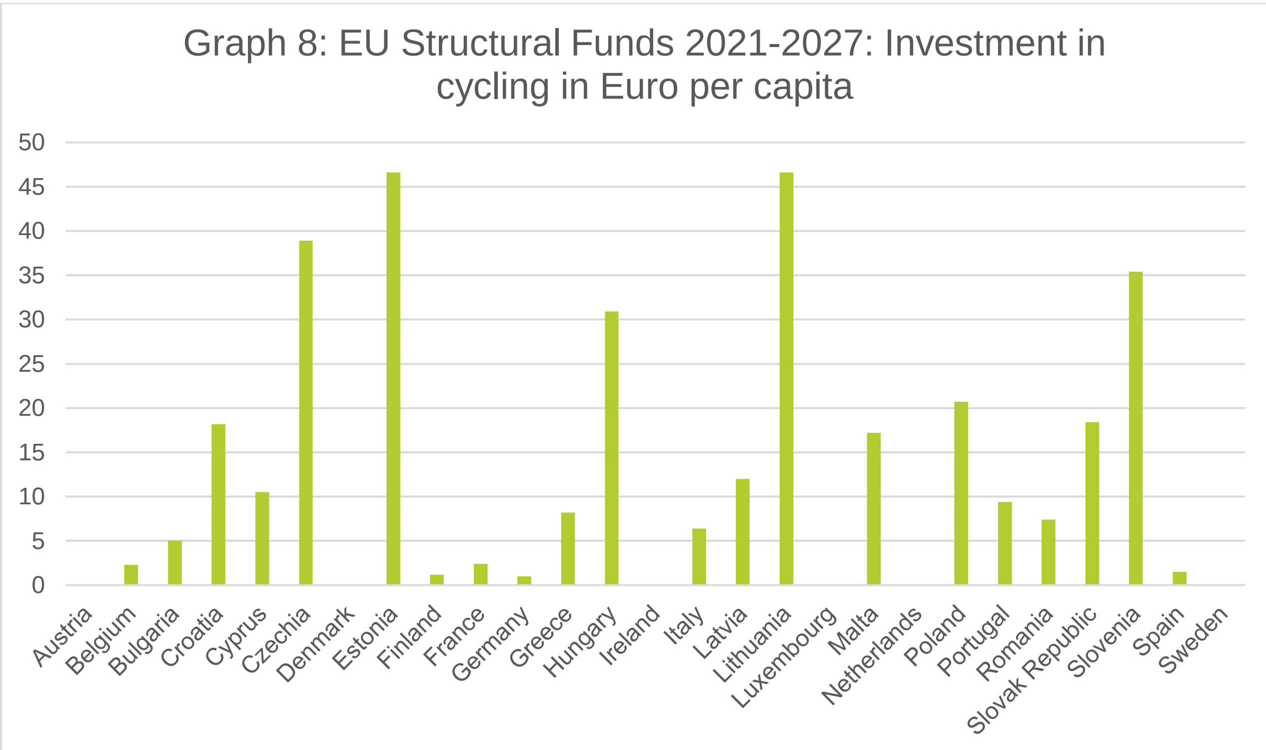
Table 5: Cycling investments per fund and country in the 2021-2027 structural funding period

Country	ERDF	Cohesion Fund	Just Transition Fund	Total Country	Interreg
Austria	0	n/a	0	0	
Belgium	27,159,037	n/a	0	27,159,037	
Bulgaria	34,405,900	0	0	34,405,900	
Croatia	70,100,000	0	0	70,100,000	
Cyprus	9,500,000	0	0	9,500,000	
Czechia	401,797,639	0	6,848,770	408,646,409	
Denmark	0	n/a	0	0	
Estonia	42,000,000	20,000,000	0	62,000,000	
Finland	6,563,210	n/a	0	6,563,210	
France	165,859,379	n/a	0	165,859,379	
Germany	85,879,042	n/a	0	85,879,042	
Greece	86,087,112	0	0	86,087,112	
Hungary	287,827,186	11,935,009	0	299,762,195	
Ireland	0	n/a	0	0	
Italy	376,110,667	n/a	0	376,110,667	
Latvia	22,492,390	0	0	22,492,390	
Lithuania	108,226,000	22,500,000	0	130,726,000	
Luxembourg	0	n/a	0	0	
Malta	0	8,925,000	0	8,925,000	
Netherlands	0	n/a	0	0	
Poland	723,574,418	0	54,000,000	777,574,418	
Portugal	97,450,000	0	0	97,450,000	
Romania	140,574,469	0	0	140,574,469	
Slovak Republic	100,000,000	0	0	100,000,000	
Slovenia	13,550,000	61,000,000	0	74,550,000	
Spain	69,276,837	n/a	0	69,276,837	
Sweden	0	n/a	0	0	
Sub-Total	**2,868,433,286**	**124,360,009**	**60,848,770**	**3,053,642,065**	**160,615,073**
Total	**3,214,527,138**				

4.3 Cycling investments per capita

The largest investors measured in Euro per capita are Lithuania and Estonia with both investing €46.6, followed by Czechia (€38.8), Slovenia (€35.4) and Hungary (€30.9).

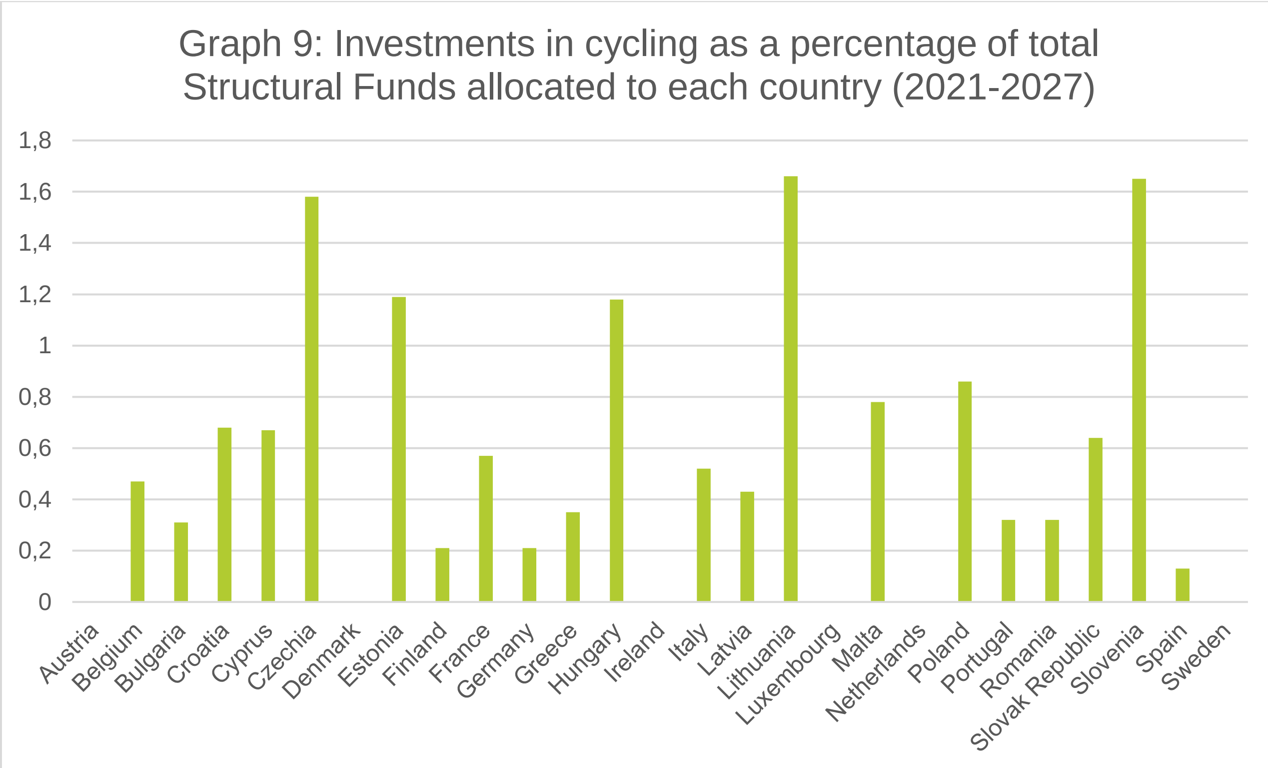
Six countries – Austria, Denmark, Ireland, Luxembourg, the Netherlands and Sweden – will not invest any money on cycling from EU Structural Funds under code 083. We do not know at this point whether they will include cycling investments under other codes.



Graph 8: EU Structural Funds 2021-2027: Investment in cycling in Euro per capita

4.4 Cycling investments in relation to the size of the Structural Funds per country

A perhaps fairer comparison between investment levels of countries is to examine the share cycling receives from the total Structural Funds per country (i.e., the EU allocation plus national allocation), depicted in Graph 8. In this case, the largest share for cycling occurs in Lithuania (1.66%), closely followed by Slovenia (1.65%) and Czechia (1.58%). Estonia (1.19%) and Hungary (1.18%) also top the 1% threshold.



Graph 9: Investments in cycling as a percentage of total Structural Funds allocated to each country (2021-2027)

4.5 Cycling investment per policy objective

EU Regulation 2021/1058 on the European Regional Development Fund and the Cohesion Fund[23] has set various policy objectives that Member States and regions can choose for projects they want funded. Six of these policy objectives are being used for cycling investments, shown in Table 6.

[23] Regulation (EU) 2021/1058 of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1058

Table 6: Cycling investments per policy objective in the 2021-2027 structural funding period (in Euro)

Policy Objective	ERDF	Cohesion Fund	Interreg	Total
2.7 Nature protection and biodiversity	2,278,771		5,440,204	7,718,975
2.8 Sustainable urban mobility	1,883,411,472	43,360,009	8,385,330	1,935,156,811
3.2 Sustainable transport	351,402,974	81,000,000	15,460,197	447,863,171
4.6 Culture and sustainable tourism	61,472,865		101,099,571	162,572,436
5.1 Integrated development in urban areas	224,111,173			224,111,173
5.2 Integrated development in rural and coastal areas	345,756,031		30,229,771	375,985,802
Total	**2,868,433,286**	**124,360,009**	**160,615,073**	**3,153,408,368**

The €60.8 million from the Transition Fund needs to be added to arrive at the total investment figure of €3.21 billion.

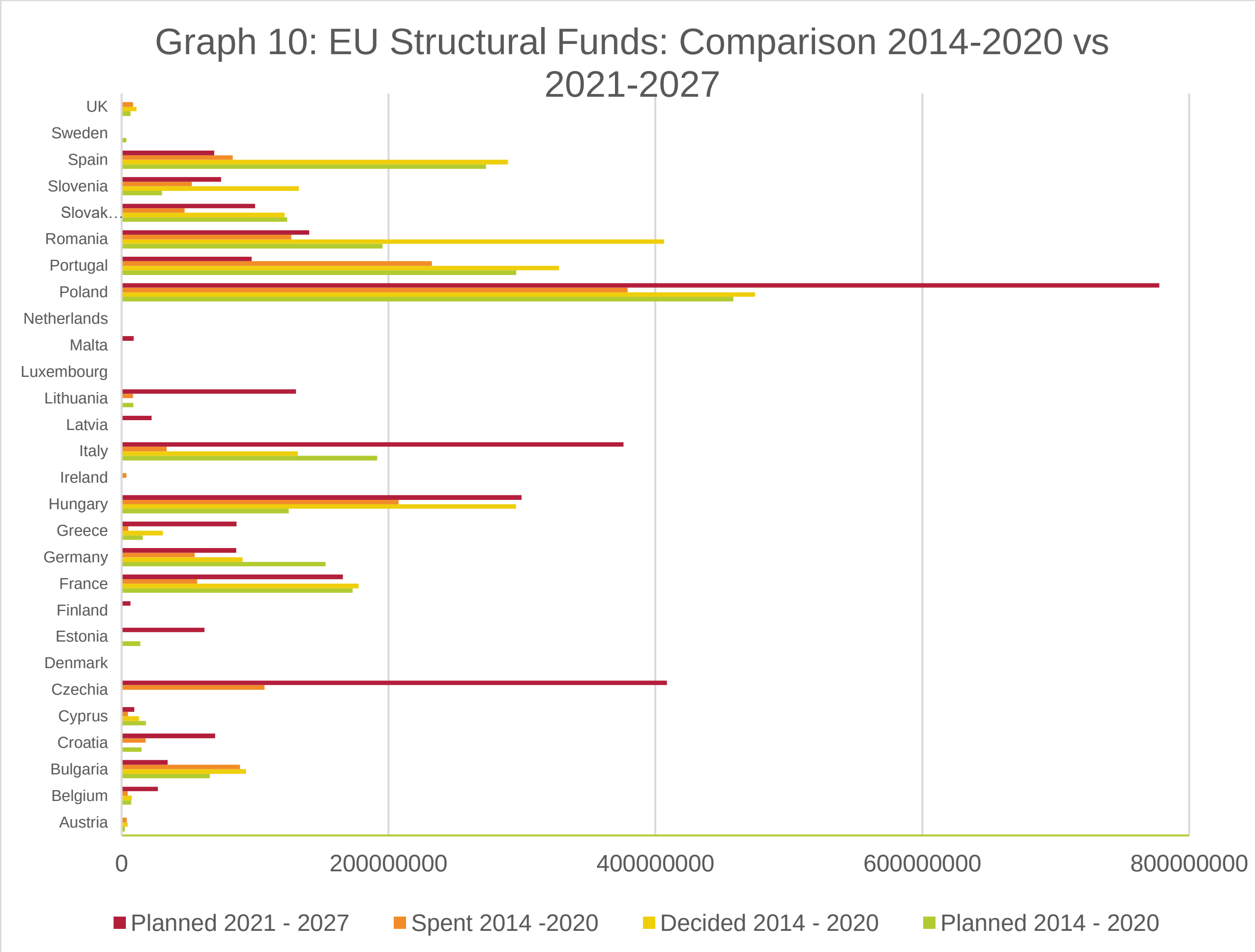
5. Comparing the 2014-2020 and 2021-2027 financial periods

One of the main changes between the two time periods is the way that investments are encoded in the Commission's "Cohesion Open Data Platform", or CODP. Whereas walking and cycling were put together in one **code 090 – Cycle tracks and footpaths** for the period 2014-2020, cycling has now been split from walking and received its own **code 083 – Cycling Infrastructure** for the 2021-2027 period. We assume this follows the approach of the ERDF and Cohesion Fund Regulation which has a specific output and results indicator for cycling, but not for walking.[24] This obviously makes a one-to-one comparison difficult.

Disregarding walking investments from the 2014-2020 period, "planned" cycling investments are set to increase by 50% in 2021-2027 compared to the previous seven-year cycle.

The graph below shows the evolution of EU Structural Funds being used for cycling investments by different countries during the two time periods.

[24] RCO 58 - Dedicated cycling infrastructure supported; RCR 64 - Annual users of dedicated cycling infrastructure.



Graph 10: EU Structural Funds: Comparison 2014-2020 vs 2021-2027

Table 7 and 8 extract the biggest climbers and decliners.

Table 7: The biggest climbers ("planned" 2014-2020 vs "planned" 2021-2027)

Country	**Difference between 2014-2020 and 2021-2027**	
	In %	**In millions of Euro**
Lithuania	+1504%	+122m
Greece	+542%	+70m
Croatia	+467%	+55m
Estonia	+441%	+48m
Belgium	+384%	+20m
Czechia	+382%	+302m
Slovenia	+245%	+44m
Hungary	+239%	+174m
Italy	+196%	+185m
Poland	+169%	+319m

Table 8: The biggest decliners ("planned" 2014-2020 vs "planned" 2021-2027)

Country	Difference between 2014-2020 and 2021-2027	
	In %	In millions of Euro
Austria	-100%	-24m
Spain	-75%	-204m
Portugal	-62%	-198m
Bulgaria	-48%	-31m
Cyprus	-48%	-9m
Germany	-44%	-67m
Romania	-28%	-55m

Re-programming 2021-2027?

During the 2014-2020 financial period, "planned" cycling investments under code 090 increased by approximately €800 million over the years, an increase of about 50%.

If the same phenomenon repeats itself for the 2021-2027 period, the "planned" €3.21 billion could increase to as much as between €4 and €4.8 billion.

The challenge to spend the Structural Funds will only increase for Member States as the 2026 deadline for spending the national allocations from the Recovery and Resilience Facility is already looming.

6. Recommendations

Using EU Structural Funds for cycling projects is highly welcome, and certainly cohesion countries heavily rely on it.

To unlock even more EU Structural Funds and maximise their benefit, ECF recommends that:

1. As Structural Funds fall under shared management between the European level and Member States, it should be in both interests to minimise the gap between "planned" and "decided" investments on the one hand and "spent" on the other.

   We further recommend that:
   - The European Commission encourages Managing Authorities to improve their absorption capacity with regards to active mobility projects, for example through training and education programmes.
   - The European Commission encourages Managing Authorities to build larger-scale cycle networks at the expense of small-scale isolated projects.
   - The EU reviews the legal framework for cycling infrastructure in Member States, identifying best practices and significant barriers to implementation of state-of-the-art cycle projects.

2. The €3.2 billion projected to be invested in cycling during 2021-2027 financial period should provide for the construction of approximately 12,000 km of cycling infrastructure. Though it seems substantial, it is only a small fraction of what is needed to double cycling across the EU. Cycle infrastructure could be implemented more efficiently if cycling was properly integrated in TEN-T policy, for example by identifying synergies when building or upgrading TEN-T infrastructure such as building cycle routes alongside rail tracks or waterways.

3. EuroVelo, the European cycle route network, should be fully integrated in the revision of the TEN-T Regulation, as proposed by the European Parliament, in a process that is still ongoing as the time of this paper's publication.[25] This seems a logical step as we have identified already close to 8,000 intersections between the existing TEN-T network and EuroVelo.[26]

4. The revised TEN-T regulation should also mandate health impact assessment in transport economic appraisal and require SUMPs for all urban nodes on the TEN-T networks.

5. Member States should ensure that cycle infrastructure projects are also systematically integrated in non-TEN-T road and rail projects, as well as for example in public transport, urban renewal or flood defence projects.

6. The European Commission must proceed with the development of "Guidance on quality requirements regarding infrastructure of vulnerable road users", to improve the quality of cycle infrastructure built, as stipulated by article 4 paragraph 6 of the revised Directive on Road Infrastructure Safety Management.[27] Since the adoption of the revision in 2019, the Commission has not even convened an expert (sub)group to start the work on the guidance.

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[25] https://ecf.com/system/files/2023_05_22-ECF_recommendations_for_TEN-T_trilogue.pdf

[26] https://pro.eurovelo.com/news/2020-10-30_close-friends-eurovelo-connects-with-ten-t-network-nearly-8-000-times

[27] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0096-20191216

Glossary

Cohesion Fund	The Cohesion Fund (CF) concerns 15 Member States: Bulgaria, Croatia, Cyprus, Czechia, Estonia, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia and Slovenia. Its funding is allocated to trans-European transport networks and to projects falling under EU environmental priorities.
Cohesion Open Data Platform	The Cohesion Open Data Platform (CODP) provides transparent data to EU taxpayers on the use of EU budget funds. Open Data is free public data published by the European Commission
European Regional Development Fund	The European Regional Development Fund (ERDF) covers all Member States and invests under all European Structural and Investment Funds (ESIF) thematic objectives. It has a strong focus on four key priority areas: Research and Innovation, Digital Economy, SME Competitiveness and Low Carbon Economy. The ERDF also finances Interreg for cross-border, transnational and interregional co-operation under the Territorial Cooperation objective.
European Structural and Investment Funds (ESIF)	Five funds make up the ESIF: The European Regional Development Fund (ERDF), the Cohesion Fund (CF), the European Social Fund (ESF+), the European Agricultural Fund for Rural Development (EAFRD) and the European Maritime, Fisheries and Aquaculture Fund (EMFAF). When we speak in this paper of “Structural Funds”, we mean the ESIF.
Just Transition Fund	The Just Transition Fund (JTF) is a financial instrument within the Cohesion Policy, which seeks to provide support to territories facing serious socio-economic challenges arising from the transition towards climate neutrality. The JTF will facilitate the implementation of the European Green Deal, which aims to make the EU climate-neutral by 2050.
Managing Authority	A designated Managing Authority provides information on the programme, selects projects and monitors implementation. Select a country to find out which organisations are responsible. https://ec.europa.eu/regional_policy/in-your-country/managing-authorities_en
Multiannual Financial Framework	The Multiannual Financial Framework (MFF) of the EU, also called the financial perspective, is a seven-year framework regulating its annual budget. It is laid down in a unanimously adopted Council Regulation with the consent of the European Parliament. The financial framework sets the maximum amount of spending in the EU budget each year for broad policy areas ("headings") and fixes an overall annual ceiling on payment and commitment appropriations. The MFFs addressed in this paper are 2014-2020 and 2021-2027.
Operational Programme	Operational Programmes (OP) break down the overarching strategic objectives agreed in the Partnership Agreement into investment priorities, specific objectives and further into concrete actions. OPs facilitate the selection, implementation, monitoring and evaluation of individual projects according to the priorities and targets agreed between the European Commission and the national or regional Managing Authorities.
Partnership Agreement	A Partnership Agreement is a strategic document where a member state describes the long-term strategy of the use of the funds governed by the Common Provisions Regulation (EU) 2021/1060. They include the ERDF, ESF+, CF, EMFAF and JTF.
Structural Funds	See European Structural and Investments Funds (ESIF).

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