Ex ante assessment

for Financial Instruments in the 2014 – 2020 programming period

Ex ante assessments

The objective of the ex ante assessment is to **assess the rationale for a Financial Instrument (FI) against** prevalent **market failure or suboptimal investment** and to ensure that the FI will contribute to the **achievement of** the Programme and ESIF **objectives**. It will also help to **avoid overlaps and inconsistencies** between instruments implemented at different levels.

The ex ante assessment shall be completed before the MA decides to make programme contributions to a FI and shall be **submitted to the monitoring committee for information** purposes in accordance with Fund specific rules. The ex ante assessments **summary findings and conclusions shall be published** within three months from their date of finalization.

European Investment Bank The EU bank

Breakdown of the article 37 requirements

Article 37(2) of the Common Provisions Regulation (CPR) articulates the required content of an ex-ante assessment around seven main elements, namely:

a) Analysis of market failures, suboptimal investment situations and investment needs;

b) Assessment of the added value of the FI;

c) Estimate of additional public and private resources to be potentially raised by the FI;

d) Assessment of lessons learned from similar instruments and ex-ante assessments carried out in the past;

e) Proposed investment strategy;

f) Specification of expected results;

g) Provisions allowing the ex ante assessment to be reviewed and updated.

Breakdown of the article 37 requirements

a) Analysis of market failures, suboptimal investment situations and investment needs;

- Analysis of the investment needs for the policy areas and thematic objectives or investment priorities of the Programme(s) vs. Union Priorities/focus areas;
- FI needs to contribute to the strategy and to the expected results of the relevant Programme(s);
- Identification of the main reasons of market failure and suboptimal investment situations with a best practice methodology to make sure the FI resources are used where they make a difference.

Breakdown of the article 37 requirements

b) Added value of the financial instruments;

- Check the value added of the FI and how the investment gap is addressed;
- Consistency with other forms of public intervention addressing the same market in order to limit overlapping and avoid conflicting targets;
- Possible state aid implications;
- Proportionality of the envisaged intervention to the identified market needs;
- Measures to minimize market distortion resulting from the FI.

Breakdown of the article 37 requirements

c) Additional public and private resources;

- Estimate of additional public and private resources to be potentially raised by the FI;
- Co-financing down to the level of the final recipient (expected leverage effect);
- If relevant, assessment of the need for, and level of, preferential remuneration to attract counterpart resources from private investors.

d) Lessons learned;

- Analysis of lessons learnt from similar/considered relevant instruments in the past;
- Analysis of ex ante assessments carried out by the MS in the past;
- Future application of these lessons to make sure that the FI builds on existing and acquired knowledge.

Breakdown of the article 37 requirements

e) Investment strategy;

- Thematic and geographical coverage of the FI;
- Options for implementation arrangements within the meaning of Article 38, to make sure the most appropriate is chosen taking into account the country/regional situation;
- Financial products to be offered to ensure an adequate response to market needs;
- Final recipients targeted;
- If relevant, envisaged combination with grant support to maximize efficiency and ensure minimum intensity of subsidy.

Breakdown of the article 37 requirements

f) Expected results;

- Specification of the expected results and outputs of the FI within the programme(s);
- Definition of reference and target values based on the specific contribution of the FI to the programme results and outputs indicators.

g) Provisions allowing the ex ante assessment to be reviewed:

- Rationale for the revision of the ex ante assessment;
- Practical and methodological procedures to update the market assessment;
- Steps to adapt the FI implementation.

Consistency with the programme strategy

- ## Consistency with Thematic Objectives

The FI shall fit into the intervention logic established by each programme in order to contribute to the Europe 2020 priorities and the selected Thematic Objectives. The use of FI should be then consistent with the expected outputs and results of each applicable strategic axis, in line with the corresponding Thematic Objectives.

- ## Financial consistency

In case the FI is funded through contributions from multiple priority axes or Programmes, the balance between the different financial contributions has to be reflected in the investment orientations of the FI.

- ## Governance consistency

The governance of the FI has to be consistent with the Governance of the Programme and has to assess the relevance of the involvement of national and regional stakeholders. In the case of multi-funds FI, a strong collaboration between the different Managing Authorities involved is needed and the governance of the FI has to be adapted accordingly.

Consistency with ESI funds ex ante evaluation guidelines

- The ex ante assessment of the FI should **build upon the ex ante evaluation of the corresponding Programme(s**). As such, the tools and approaches of the general ex ante evaluation general methodologies for ESI Funds could be considered also for the ex-ante assessment.

- Furthermore **some outputs** of the related ex ante evaluation(s) should be **considered as relevant inputs** for the ex ante assessment of FIs.

European Investment Bank — The EU bank

Iterative process of an ex-ante assessment

Article 37(2) of the Common Provisions Regulation (CPR) articulates the required content of an ex-ante assessment around seven main elements, namely:

a) Analysis of market failures, suboptimal investment situations and investment needs;
b) Assessment of the added value of the FI;
c) Estimate of additional public and private resources to be potentially raised by the FI;
d) Assessment of lessons learned from similar instruments and ex-ante assessments carried out in the past;
e) Proposed investment strategy;
f) Specification of expected results;
g) Provisions allowing the ex-ante assessment to be reviewed and updated.

Building block 1: Market assessment

- **Article 32(2)(a)** — Market failure, suboptimal investment situations and investment needs
- **Article 32(2)(b)** — Value added
- **Article 32(2)(c)** — Additional resources to be potentially raised
- **Article 32(2)(d)** — Lessons learned

Building block 2: Delivery and management

- **Article 32(2)(e)** — Proposed investment strategy
- **Article 32(2)(f)** — Expected results
- **Article 32(2)(g)** — Provisions for the update and review

Cross-reference : Article 32(2)(g)
Market conditions can change and may need to be revised during the ex-ante assessment and during the implementation of the FI.

Cross-reference: Article 32(2)(c)
The expected leverage effect has to be consistent with the leverage considered in the assessment of additional resources

Cross-reference: Article 32(2)(b)
The capacity to attract additional resources is part of the value added of a FI.

Cross-reference : Article 32(2)(a), (b), (c), (e) and (f)
Lessons learned can be drawn from different types of experiences and can therefore refer to both market assessment and delivery and management.

Cross-reference to: Article 32(2)(a) and (b)
Proposed investment strategy has to be consistent with the results of the market assessment and value added assessment. This will have already narrowed the options for the envisaged FI.

Cross-reference to: Article 32(2)(a) and (e)
Expected results are directly linked to the investment needs identified in the market assessment and to the proposed investment strategy

Cross-reference to: Article 32(2)(a), (b), (c), (d), (e) and (f)
The context may evolve both during the elaboration of the ex-ante assessment and during the implementation of the FI. These changes can affect all components of the ex-ante assessment.

Methodological guidance

Publication of a guidance document:

«Ex ante Assessment Methodology for Financial Instruments

in the 2014-2020 Programming Period»

- **General guidance**
- **Additional guidance** for:
  - **TO 1** strengthening research, technological development and innovation;
  - **TO 3** enhancing the competitiveness of SMEs;
  - **TO 4** supporting the shift towards a low-carbon economy;
  - Integrated territorial development, with a specific focus on sustainable **urban development**

Methodological guidance - preview

Purpose and preliminary considerations

Scope and Value 1	Consistency of Programme Strategy 2	Information Gathering 3
Define the scope and the timeframe of the ex-ante assessment and recognise its value added in validating and justifying the setting-up of a FI as well as supporting its design.	Check the consistency with the Programme strategy.	Gather information from the ex-ante evaluation of the Programme, to ensure consistency and build on its conclusions.

Methodological guidance - preview

Analysis of market failures, suboptimal investment situations and investment needs

Market problems 1	Market failure and suboptimal investment 2	Investment gap 3
Identify the market problems existing in the country or region in which the FI has to be established.	Establish the evidence of market failure, by analysing the gap between supply and demand, and identify suboptimal investment situations.	Quantify the investment gap to the extent possible.

Methodological guidance - preview

(Main) type of gap	Examples	(Main) type of market failure
Viability gap	Under-utilised city space (non-excludability)	Public good
	Long amortisation time for sustainable investment (e.g. sustainable public transport)	Externalities
	Necessity of grant-loan combination for water-infrastructure	Externalities
	Non-excludability for climate adaption investment (e.g. protection of river sides and sea sides)	Missing market
	Shortage of investment in new industries (e.g. in areas with industrial history)	Allocative inefficiency
	High sunk costs of project development	Missing market
	High sunk costs in brownfield development (e.g. decontamination where polluter pays principle not enforceable)	Information failure
	High risk of catalytic investment to foster economic revival of an (deprived) area	Allocative inefficiency
	Energy efficiency investment in historical monuments	Public good
	Energy efficiency investment in apartment buildings with tenants	Allocative inefficiency, coordination failure
	Shortage of public investment due to budgetary constraints (e.g. modernisation of public lighting)	Government failure

Methodological guidance - preview

Box 1: Example of bottom-up approach to determine investment needs

A multi-region multi-purpose study of 2013 provides an example of a bottom-up approach to determine the investment needs for specific areas:

- Step 1: four sectors of investment have been defined, namely (i) urban regeneration, (ii) social infrastructure, (iii) energy and (iv) business environment;
- Step 2: all potential projects are collected from local stakeholders or identified from national or regional actions or support schemes;
- Step 3: all potential projects are mapped to one Thematic Objective;
- Step 4: for each of the four sectors the probability for successful project development is assessed. Typical figures were found in the range from 15-60%. A ‘bonus’ for regions currently involved in FI was established, mirroring the experience already collected;
- Step 5: for each of the four sectors the probability of using FI[1] is assessed. As it is a multi-region study the probabilities may be different in the different regions. Typical figures are 10% for urban regeneration and 50 - 75% for energy. These figures could be adjusted taking into account the readiness of the region in using FIs;
- Step 6: for each of the four sectors a breakdown in financial products (equity, loans, guarantees), grants and the private resources raised by the FI is assessed. Typical figures for the private resources are 40-50%, for guarantees 5-10%, for loans 20-27%, and for equity 12-15%.

Once this is done, the investment needs are assessed and the share of those needs to be covered by the envisaged FI will have been identified

Methodological guidance - preview

Assessment of the value added of the FI

- Value added
- Consistency
- State Aid implications

1

2

3

Methodological guidance - preview

Assessment of the value added of the FI

The consideration of State Aid implications (step 3) can be further subdivided into 5 additional steps

- Market Conformity
- *De minimis* Regulations
- Block Exemption Regulation
- Off-The-Shelf Instruments
- Further action

3.1 3.2 3.3 3.4 3.5

Methodological guidance - preview

Additional public and private resources to be potentially raised by the FI

1. Identification of additional resources	2. Leverage of the FI	3. Preferential remuneration	4. Approach
Identify the additional public and private resources to be potentially raised by the FI and assess the indicative timing of the intervention, the form and level of the national co-financing (public budget or private) and the level and indicative timing of the additional contributions (mainly private)	Estimate the leverage of the FI.	Assess the need for, and level of preferential remuneration based on experience in the relevant markets.	Choose an approach for alignment of interest with private cofinancing. (decision-making process for investments and the remuneration of the manager where applicable)

Methodological guidance - preview

Lessons learned

- Information Gathering

1

- Success Factors

2

- Performance Enhancement

3

Methodological guidance - preview

Proposed investment strategy

Level of Detail *1*	Scale and Focus of FI *2*	Additional Analysis *3*
Define the level of detail for the proposed investment strategy maintaining a certain degree of flexibility.	Define scale and focus of the FI consistently with the results of the market assessment and the value added assessment, in particular by selecting the financial product to be offered and the target final recipients.	Define the governance structure of the FI, by selecting the most appropriate implementation arrangements and the envisaged combination with grant support.

Methodological guidance - preview

Specification of expected results consistent with the relevant Programme

Expected Results 1	Strategic Objective 2	Monitoring System 3
Establish and quantify the expected results of the FI by means of result indicators, output indicators and FI-performance indicators	Specify how the FI contributes to deliver the strategic objectives for which it is set up	Define the monitoring system in order to efficiently monitor the FI, facilitate reporting requirements and identify any improvement areas

Methodological guidance - preview

Provisions for the update and review of the ex-ante assessment methodology

Trigger Values 1	Data Enclosure 2
Define the conditions and/or the timing in which a revision or an update of the ex-ante assessment is needed.	Enclose this information in the monitoring and reporting provisions established in the previous step of the analysis.

Thank you!

Pieter Coppens
Municipal and Regional Unit
Advisory Services Department
p.coppens@eib.org
+352 4379 88270