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Work Package 3 - The effectiveness of projects' communication strategies

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Report from focus group for assembling Deliverable 3.1

“Qualitative report on the impact and effectiveness of communication strategies from the semi structured interviews with cohesion policy practitioners (including third-party partners in the consortium), written by each partner”

Chapter I: Communication strategy at different levels and LMAs' organization

1. Main features of the regional (case studies) communication strategy (aims of the communication, priorities, key messages and targets)

Regione Emilia Romagna considers CP' implementation and communication as a key tool for bolstering regional development both in terms of peoples' education and support for enterprises' research and development. Indeed, as a participant to the focus group points out, "the CP has been a lighthouse in these very dark years of history".

The programs ERDF and ESF are managed and communicated independently, despite the fact that synergies are researched between the divisions in charge of both managing and communication. Both program had in the period 2007-2013 an official communication strategy. In the following period, 2014-2020, beside the general Communication Strategy, yearly communication plans are developed, in order to better adapt the communication to the changing environment, that is dependent on new threats and opportunities. The following section analyzes first the ERDF communication, than the ESF one.

1.1 ERDF

Figure 1 - ERDF Communication Strategy 2007-2013: summary

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The Communication Strategy consists of a 40 pages document. The summary (Figure 1) is organized around the following topics:

1. General introductions
2. Contextual data
3. Strategy
4. General objective

5. Operational objectives
6. Groups of potential beneficiaries
7. Contents
8. Activities and tools
9. Timeline
10. Evaluation and Monitoring
11. Budget
12. Organization and partnership network
13. Compliance with European Union norms

In particular, objectives (Figure 2) are:

1. General objectives:
 - Create awareness among citizens regarding the expected benefits of ROP programs and the role of EU. These benefits entail the specific value of EU funded policies for sustainable development of the Region.
 - Guarantee transparency regarding funding possibility
2. Operational objectives
 - Guarantee equal accessibility and information availability for all the potential beneficiaries
 - Provide information to all beneficiaries
 - Improve the level of awareness of citizens regarding the role of the EU regarding results and regional development

Figure 2 - ERDF Objectives

OBIETTIVI GENERALI

Il piano intende raggiungere i seguenti obiettivi generali:

1. far conoscere ai cittadini i benefici attesi e i risultati del POR, rendendoli consapevoli del ruolo dell'Unione europea e del valore aggiunto delle politiche comunitarie per lo sviluppo innovativo e sostenibile del territorio e della società regionale, per potenziare la competitività economica e per rafforzare la coesione economica;
2. garantire trasparenza e accessibilità relativamente alle opportunità offerte, fornendo informazioni chiare rispetto a come le risorse disponibili vengono impiegate.

OBIETTIVI OPERATIVI

I due obiettivi generali declinati per grandi categorie di destinatari portano all'individuazione dei seguenti obiettivi operativi:


- a. garantire che il programma operativo venga ampiamente diffuso e sia facilmente accessibile a tutti gli interessati e *potenziali beneficiari*;
- b. fornire informazioni e assistenza adeguata ai *beneficiari*, sensibilizzandoli rispetto alla promozione degli interventi e ai loro obblighi informativi;
- c. accrescere il grado di conoscenza e sensibilizzare il *grande pubblico* sul ruolo dell'Unione europea nello sviluppo regionale e sui risultati ottenuti, fornendo informazioni su strategie, obiettivi e risultati raggiunti dal POR.

More informations are provided online, on a dedicated website, regarding:

- Promotional campaigns (Figure 3): <http://www.regione.emilia-romagna.it/fesr/por-fesr/por-2007-2013/comunicazione/risultati-e-campagne-informative-1/campagne-informative>

Figure 3 - Promotional campaigns

Campagne informative

- Campagne informative ed iniziative speciali
 - L'Europa si vede da qui
La campagna sui risultati del Por Fesr 2007-2013
 - L'Emilia-Romagna non smette mai di stupire
I progetti di valorizzazione del patrimonio culturale e ambientale raccontati attraverso diversi itinerari
 - Por per fare
Costruiamo insieme il Programma 2014-2020
 - "Il futuro abita qui"
La nuova campagna di comunicazione
 - Festival AllegroMosso
Emilia-Romagna, 17-19 maggio 2012
 -  Il Por Fesr e le pari opportunità (pdf, 680.3 KB)
Sintesi dei risultati raggiunti (novembre 2009)
 - PORTa per l'Europa
Gioco per ragazzi
- Multimedia
 - Video
Pubblicati sul canale YouTube del Por Fesr Emilia-Romagna

- Results (Figure 4): <http://www.regione.emilia-romagna.it/fesr/por-fesr/por-2007-2013/comunicazione/campagne/risultati-por-fesr-2007-2013>

Figure 4 - Results

Su queste pagine sono disponibili le informazioni e gli approfondimenti suddivisi nelle tre principali aree di intervento:

- Ricerca tecnologia e laboratori
- Start up, nuove imprese, ict
- Città, cultura e ambiente

► Il video dei risultati

Sono state realizzate tre pubblicazioni che raccontano per dati e immagini i progetti realizzati

 <p>►  Scarica il file (pdf, 1.5 MB)</p> <p>► <u>Sfoggia la pubblicazione</u></p>	 <p>►  Scarica il file (pdf, 2.2 MB)</p> <p>► <u>Sfoggia la pubblicazione</u></p>	 <p>►  Scarica il file (pdf, 1.8 MB)</p> <p>► <u>Sfoggia la pubblicazione</u></p>
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L'Europa si vede da qui - Inserzioni e spot

I risultati ottenuti sono raccontati anche da una campagna di comunicazione che si articola attraverso spot radio, inserzioni sui principali quotidiani, pubblicità web sui principali portali di informazione.

- A Youtube channel was created in 2011 to upload videos regarding programs and results: <https://www.youtube.com/user/fesremiliaromagna>

Two evaluation reports on communication were produced by an independent consultancy firm, Nomisma: an intermediate one and a final one. Data include, in example, evaluations of the effectiveness of web and radio as channels (i.e Figure 5); moreover the results of communication strategy are tested. See in example:

- Figure 6, that deals with the regional development
- Figure 7, that deals with personal situation
- Figure 8, that deals with attitude toward EU.

Figure 5 - effectiveness of web banners

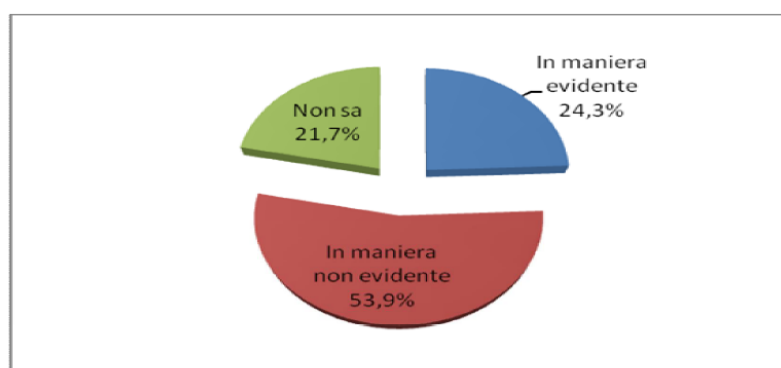
Web banner su portali internet di informazione

I *web banner* presenti sui portali di quotidiani *online* possono essere giudicati di qualità elevata, sia in termini di efficacia, sia in termini di diffusione e diffusività. Questi esprimono, in modo sintetico, gli *input* relativi ai risultati conseguiti dal POR FESR rimandando, in modo interattivo e diretto, al relativo sito web. Ovviamente non si tratta di un'informazione approfondita ma di *slogan* che, attirando l'attenzione dell'utente, lo invoglia a svolgere un maggiore approfondimento.

Caratteristiche	Domande	Descrizione Punteggio	Giudizio (0,1,2,3) A	Peso (da 0,25 a 1) B	Giudizio ponderato (A*B/3)
Esaustività dei contenuti	I contenuti sono dettagliati al giusto livello?	0 = superficiali 3 = dettagliati	2	0,5	0,33
Chiarezza dei contenuti	I contenuti sono chiari?	0 = confusi 3 = chiari	3	0,75	0,75
Accessibilità dei contenuti	La strutturazione dei contenuti rende le informazioni accessibili?	0 = poco 3 = molto	3	1	1,00
Utilizzabilità delle informazioni	Le informazioni hanno un'utilità pratica?	0 = nessuna 3 = elevata	2	1	0,67
Grado di interattività	Il servizio consente un'interazione avanzata?	0 = nessuna 3 = elevata	3	0,5	0,50
Totale				3,75	3,25
Indice di congruità dello strumento					88%

Figure 6 - Are funded projects able to improve regional development?

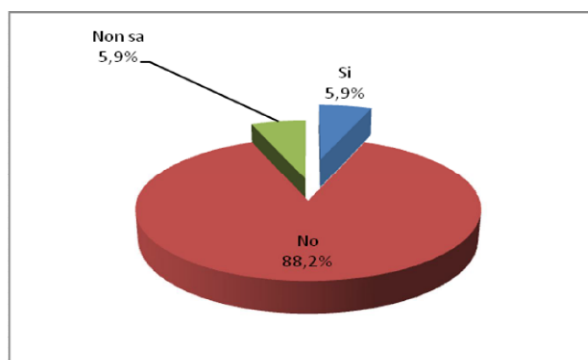
Graf. 4 – Giudizio sulla capacità dei progetti realizzati con i finanziamenti europei di migliorare le condizioni di sviluppo del territorio in cui si vive (valori %)



Fonte: elaborazioni su dati indagine campionaria ATI Ecoter-Nomisma-Sign

Figure 7 - Are funded projects able to improve personal situation?

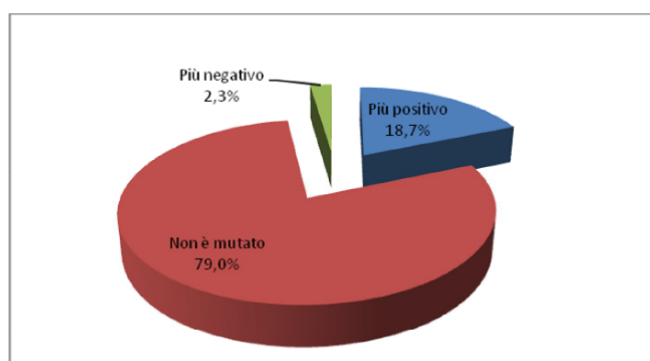
Graf. 5 – Giudizio sulla capacità dei progetti realizzati con i finanziamenti europei di migliorare la propria condizione personale (valori %)



Fonte: elaborazioni su dati indagine campionaria ATI Ecoter-Nomisma-Sign

Figure 8 - How did your attitude toward EU changed after discovering the existence of these projects?

Graf. 10 – Atteggiamento verso l'UE di coloro che hanno scoperto dell'esistenza di finanziamenti europei destinati allo sviluppo della regione grazie all'indagine (valori %)



Fonte: elaborazioni su dati indagine campionaria ATI Ecoter-Nomisma-Sign

1.2 ESF

ESF's Communication strategy for the 2007-2013 period is a 66 pages document organized around the following chapters (Figure 9):

1. General premise
2. General objectives
3. Communication Strategy
4. Communication targets
5. Activities
6. Operational objectives
7. Tentative timeline
8. Evaluation and monitoring
9. Implementation
10. Financial Plan

Figure 9 - ESF Communication Strategy 2007-2013: summary

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4.	Attività del Piano	25
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6.	Pianificazione temporale indicativa	51
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8.2	Reportistica	60
9.	Piano finanziario	63

Activities' timeline (Figure 10) and the budget for channel and for year are clearly stated in the Communication Strategy (Figure 11).

Whereas a clear evaluation of the results is lacking on the 2007-2013 section of the webpage is lacking, some quantitative data regarding communication's effectiveness can be found in the 2014-2020 communication strategy (i.e Figure 12). The section of the website that deals with 2014-2020 programming period is partly available in English.

Figure 10 - Activities' timeline for ESF

ATTIVITÀ DEL PIANO	2007	2008	2009	2010	2011	2012	2013	2014	2015
Web									
Portale del FSE	•	•	•	•	•	•	•	•	•
Newsletter digitale	•	•	•	•	•	•	•	•	•
Numero Verde e Punti Informativi									
N° verde e PI URP	•	•	•	•	•	•	•	•	•
Rete regionale PI	•	•	•	•	•	•	•	•	•
Editoria									
Periodico d'Informazione			•	•	•	•	•	•	•
Brochure FSE		•	•	•	•	•	•	•	•
Doc. PO	•	•	•	•	•	•	•	•	•
Doc. annuale risultati PO		•	•	•	•	•	•	•	•
Manuale per beneficiari		•	•	•	•	•	•	•	•
Glossario per la Stampa		•	•	•	•	•	•	•	•
Iniziative Pubbliche									
Iniziativa di lancio PO		•							
Iniziativa annuale PO		•	•	•	•	•	•	•	•
Convegni e seminari	•	•	•	•	•	•	•	•	•
Iniziative Grande Pubblico	•	•	•	•	•	•	•	•	•
Eventi per i giovani	•	•	•	•	•	•	•	•	•
Fiere		•	•	•	•	•	•	•	•
Sponsorizzazioni		•	•	•	•	•	•	•	•
Festa dell'Europa		•	•	•	•	•	•	•	•
TV e Radio									
Format		•	•	•	•	•	•	•	•
Spot		•	•	•	•	•	•	•	•
Audiovisivi									
Prodotti audiovisivi		•	•	•	•	•	•	•	•
Campagne di comunicazione									
Campagne istituzionali		•			•				
Campagne informative	•	•	•	•	•	•	•	•	•
Indagini, sondaggi e questionari									
Indagini via web		•	•	•	•	•	•	•	•
Indagini telefoniche				•			•		
Inserzioni stampa									
Stampa locale e regionale	•	•	•	•	•	•	•	•	•
Relazioni con i media									
Comunicati stampa	•	•	•	•	•	•	•	•	•
Conferenze stampa	•	•	•	•	•	•	•	•	•
Televideo	•	•	•	•	•	•	•	•	•
Interviste, interventi...	•	•	•	•	•	•	•	•	•

Figure 11 - Channels' yearly budget for ESF

PIANO DELLE ATTIVITÀ	2008	2009	2010	2011	2012	2013
WEB	100.000	70.000	70.000	70.000	70.000	100.000
NUMERO VERDE	50.000	50.000	50.000	50.000	50.000	80.000
EDITORIA	200.000	100.000	100.000	90.000	110.000	170.000
INIZIATIVE PUBBLICHE	80.000	90.000	80.000	80.000	80.000	100.000
TV E RADIO	60.000	50.000	50.000	50.000	50.000	60.000
AUDIOVISIVI	50.000	30.000	20.000	30.000	30.000	40.000
CAMPAGNE DI COMUNICAZIONE	140.000	50.000	50.000	140.000	60.000	70.000
INDAGINI SONDAGGI	10.000	10.000	30.000	10.000	10.000	30.000
INSERZIONI STAMPA	40.000	40.000	40.000	40.000	40.000	50.000
RELAZIONI CON I MEDIA	90.000	80.000	80.000	70.000	70.000	140.000
Totale	820.000	570.000	570.000	630.000	570.000	840.000

Figure 12 - Example of evaluation for ESF's webpage

ANNO	VISITATORI UNICI	VISITE	VISULIZZAZIONI DI PAGINA
2013	478.000	702.000	2.300.000
2014	680.000	945.000	2.500.000

Moreover, more information can be found online regarding:

- Objectives: <http://formazione.lavoro.regione.emilia-romagna.it/sito-fse/programma-operativo-regionale-2007-2013/piano-di-comunicazione/obiettivi-general>
- Activities: <http://formazione.lavoro.regione.emilia-romagna.it/sito-fse/programma-operativo-regionale-2007-2013/piano-di-comunicazione/attivita-realizzate>
- Microhistories created for communicating the plan. We will discuss these histories in the following section: <http://formazione.lavoro.regione.emilia-romagna.it/sito-fse/programma-operativo-regionale-2007-2013/piano-di-comunicazione/le-storie/le-storie-1>

2. How is communication organized and practically works within Emilia-Romagna

On both the communication plans, details on how to practically carry out communication activities are clearly stated. Now we will describe what is stated in each plan.

2.1 ERDF

- Officials responsible for communication activities are clearly stated
- Internal communication is described as a mean to enhance external communication, and organizations, directions and agencies to collaborate with are listed
- There is a specific role for partnership network with beneficiaries and institutions within Emilia Romagna
- External institutions, which can be an aid in communicating policies or in mutual support are listed.

2.2 ESF

- Officials and structures responsible for communication activities are clearly stated

- Internal communication is described as a mean to enhance external communication, and means to empower internal communication are stated
- The role of the Surveillance Committee is highlighted

Beyond the level of the plans, there is the level of the actual organization. As for funds' management, communication is organized around two different divisions, that deal with ERDF and ESF communication respectively. The two programs are indeed very different in terms of potential beneficiaries. Nonetheless, integration is carried out when possible:

Even when there was no obligation of integrated programming between the various funds, there's always been, in the 2014-2020 in a structured path, a control room among the various directorates¹

Indeed the directorates dealing with ERDF and ESF program will integrate their efforts even more from the actual programming period, as their organizational structure are now under the managing control of one Council Member (assessore) only.

ERDF management is quite centralized.

The only external part was the ex-ante assessment of the programme because it was obligatory and so ... and the other thing that according to my opinion characterises a lot Regione Emilia-Romagna [...] is that it's governed in a more centralised way, in the sense that in many other regions the implementation is decentralised to various directorates, while our tradition is that even if parts involve the social, such as the ESF, or involve transport and mobility they are nonetheless actions managed by the directorate in charge of the programme.

On the contrary, communication for ERDF relies on an external communication agency as well:

With 2007-13, it was not like this at first. We did an initial tender for three years + three for assistance in communication. It is planned that there will be a person with skills in journalism working full time with us, and liaising between us on the inside and the parties working on this project, which are joint ventures because diversified skills are needed. I am communications manager and coordinate everything. The great commitment is to demand the maximum effort from a private party, something that is not taken for granted. There is a lot of talk of the public's shortcomings, but I see a private sector as yet not oriented towards a planning approach. Let's talk about a video: the product is the video in a series of videos and other instruments, not the single video. This mentality is not always perceived. Now there are three parties: the project leader and events coordination. One deals with video, and one has journalism skills. Integrating the parties, which must come through us, is difficult, because they are not oriented towards integration. They have a mentality oriented to the individual enterprise with its objectives.

The problem with this kind of partnership is that the budget for communication

Is too big for a small communication agency, and too small for a big one. So we deal with a partnership of small enterprises, and integration may become a problem. [...] Yet I have to say that we are a complicated client: they would like to have a yerly plan, whereas we don't have a tight schedule. We have only long range planning, so it' ois hard...

¹ Quotes from focus group are indented and in italic.

ESF, on the contrary, realizes the high level communication, whereas the beneficiaries, that are the accredited bodies that realize the communication of the actual courses, are in charge of the “last mile”. They manage the relationship with the actual and potential beneficiaries.

Then, as for the requirements defined by EU regulations, the other management authorities are responsible for the other piece. They are obligated to do training in a logic of transparency, with given formats, and this is taken into account for FSE. FESR turns to companies without other transitional steps, but we cannot monitor the activity on the individual path. There are changes along the way, that they let us know about, but we do the higher communication. We do communication at a higher level: strategy.

3. How is communication organized and works within beneficiaries projects (if any info communication activity is carried out and information is available on this level)

Whereas there are no specific rules for ERDF. In the past there was an attempt to have a coordinated communication for FSE:

In 7-13, we did a lot. The regulations determine the obligations of the management authorities and of those with access to opportunity. We then had decisions, that explain ... The decision over how we explain to bodies how they must do communication. I send you a 150-page decision, which is done at the start of programming, based on what was provided for by the regulations. Then, on the sites, we put up the logos, we explain the characteristics, we listen to the authorities. For some types of training, which are now called “Rete Politecnica” or “polytechnical network,” we had asked the authorities to use the same format, making our communication agency available to the authorities. [There were] press insertions, all graphically coordinated, with all the polytechnical network, Region, and Europe logos. The newspapers were carpeted with very entertaining but coordinated training offers. But the authorities feel their autonomy is reduced. It is true that they are services under concession, but they're on the market. Then it was very arduous, because if the authority buys space in Repubblica because it has an offer, and you're late... You must guarantee the service – you can't hinder them. After a few years, we concluded that the important thing is that communication be dignified. We worked on that, but we did not oblige everyone to do the same things. But we have a new little logo: ER, which stands for “Educazione Ricerca Emilia Romagna,” identifying all the financed training activities as a single regional educational infrastructure on development, which goes from three-year qualifications for fifteen-year-olds to PhDs. It's a different political arrangement: once approved, the operative programme starts off the programming. But depending on your objectives, there's room to formulate the programming.

Now the involvement of region is reduced. Yet it still provides beneficiary bodies with documents and suggestions:

They've learned too, now. This year, we gave them a customizable A4 with their logo, which explains the importance of the European objectives, with the financing ... We also did infographics because at the start of the course, they have to recount it, since they're in contact with people. We can do the campaign every so often

A short time ago, they had to dedicate two hours. It's also true that it had been introduced in a standard training phase, all classroom. Now, the programming has changed a great deal: there are also internships – not just the classroom. I have to check, because management does it, whether they've accurately defined how this training has to take place. And they do it, because they're asking us for materials. For me, universities do it less. The classical authorities do it, the accredited training bodies.

4. Main features of the national communication strategy (please report the main points and issues in the communication strategy)

Agenzia per la coesione Territoriale was created with a decree on August 2013 to sustain and promote projects for regional development and cohesion according to effectiveness and efficiency criteria. The main strategic aim is to help Central and local managing authorities in implementing and monitoring investments, with a special emphasis on transparency.

A general Communication Plan, approved during 2008 within the program “Governance and technical Assistance”, had the following objectives:

- Contribute to the success of the plan
- Ensure transparency for a greater participation from stakeholders and citizens
- Create awareness regarding the role of EU and the added value of CP for the innovative and sustainable development of the regions and the society
- Harmonize the communications efforts by creating an integrated image

The image, together with guidelines on how to perform communication by beneficiaries, were created in 2012. Yet, in this period and even in the previous one, the role of the national level was providing LMAs and beneficiaries with guidelines, being an intermediate level between EU and regions. No actual communication activities on funded projects were performed by the *Agenzia per la coesione Territoriale*.

More information here:

http://www.agenziacoesione.gov.it/it/pongat/Attuazione_del_programma/Comunicazione/

Chapter II: Focus groups and in depth interviews

1. The role of the communication: success and barriers to communication

1.1 successful experiences

Communication success lacks a clear definition. Communication, indeed, may refer to several aspects:

- Communication of the funding possibilities to potential beneficiaries
- Communication of the value of the projects
- Communication of the results to the citizenship
- Communication of the role of the European Union

Each communication dimension entails specific aims and specific way to analyze success, which are almost not overlapping. On the contrary, they may even oppose each other, being that not everything can be transmitted in one single communication message.

When asked about successful cases of communication, LMAs managers tend to refer especially to the first two dimensions:

I have two in mind, one concerns the crisis and one the earthquake, which I think are the two delicate moments of the 07-13. First of all the earthquake, the ability to invest 40 million Euros in

people's competences in an area where people couldn't have access to their homes wasn't at all easy. To explain why to invest in people's competences when they didn't have ... so that was a complicated job, because however there was the opportunity to invest 40 million Euros of resources in a territory in this front and we even believed in it very much. It was difficult to reach people and especially in certain cases motivate them, explain, and I think it should be considered a successful case a) because all the activities were realised and not only the ITS, because for example we carried out lots of international mobility also for the younger ones, those enrolled in professional training, lots of young people, which is not obvious ... So we were satisfied to have been able to explain it, to have carried out the activity, to have spent very little to communicate it because we managed to do a pretty interesting work through Facebook, we were even called to make a presentation at national level, so this for me is a successful case. We didn't spend much, the message was complicated, and the people used the opportunities. The other one concerning the crisis, since at the beginning of 2007 we had imagined a campaign, no 2007, 2008, when we were ready to launch it though it had become offensive, because it was concentrated on how many things you know, I mean, the request was to face unemployment, and we had to re-imagine it even convincing people to carry out labour active policies against the theme of social security cushions. That was particularly complicated, and through the relationships with the employment centres that however were the places where the unemployed went to activate the cushions and for active policy, the results were quite ..., plus people are always very much upset when they're unemployed, so I mean it's not easy to relate, quite positive results, because we based it a lot on people's stories, so as the European Union asks we tried to convey a message through testimonies, through storytelling.

Overall, I would say that if the Emilia Romagna Region managed, in 2007-13, to use all the resources, given that communication is at the service of the operative activities, by starting up a series of activities the businesses took part in, the objectives the communication plan responds to were reached.

Yet, the communication on the role of the EU is less effective, as we will see in the following paragraph:

when community resources intervene in the project's development – because we often forget, or don't know about it. So, one indicator is to understand the knowledge of those who worked on it, and the organizations working on it, and I am thinking above all of public projects, which for us are the most significant

Success is sometimes interpreted as the creation of managerial and administrative skills and in improving partnerships:

Certainly the part of communication of the technopoles, as much as we can still improve it [is successful], I think it can be considered a successful story, also because it's a story of integration between us and ASTER, of various moments of diffusion, there's the Research To Business fair...

Yet clear success indicators are related only to target reached, and it's harder to have a clear impact on the perception of Europe. :

The dialogue with you, who are studying how we have communicated, is highly important, also in the absence of communications assessments which we have no longer done since 2013. Your activity can give us indicators on which to then work.

We don't have a structured idea. We have classic indicators for development, quantitative ones, that leave the time they find. In particular, the 2007-2013 communication report has a table. We will be presenting it on 17 March; we sent it to the supervisory committee yesterday. There's a table on the indicators, in which the forecast numbers were amply exceeded. One is prudent in the forecast

phase. Meetings: 30 planned, 100 held. On the quality indicators, we go by the evaluations made by us or by the Ministry of Economic Development and Agenzia per la Coesione territoriale (agency for territorial cohesion), as our reference.

1.2 Barriers to communications

Despite an apparent effort on performing an effective communication, the fact that the same message is wide and complex creates some barriers to communication. The long list of barriers don't have to be interpreted as an admission of inefficacy. On the contrary, it highlights the specific deep knowledge that is possessed by Emilia Romagna's employee on what to do to perform better. There are several possible kinds of barriers, that we describe in the following list:

1.2.1. Scarce visibility: some programs has by their inner nature scarce visibility for the citizenship

it's clear that the ERDF in this region carries out interventions on enterprises, on very few infrastructures, so it's also a type of policy and a type of project not particularly visible to citizens immediately, I mean we're not in the southern regions where we build an airport, a bridge, a road, a big infrastructure that clearly has a more immediate return on citizens, right?

I mean let's say that in this programme more than half of the resources are in favour of enterprises, because it's a correct policy, but we don't see that materially, no, the single enterprise sees it, or perhaps it has it's small plate, I mean, it's not visible

1.2.2. Technical complexity: the task of conveying in a single message the description of the project, the acronym of the program, the role of the EU is considered very hard:

for us it's very difficult to communicate results

we're creating a tool to communicate results, communicate results on many projects [...] it's not simple.

In particular it is difficult to communicate the role of Europe, both as the institution providing funds, and as the sponsor of an integrated development.

But even if we set the aim to communicate, I don't think that we set the aim to communicate that the result was achieved with the European fund. We set the aim to communicate that the regional policy, all the investment that I made, all this chaos produced results, and perhaps when we communicate it all, we mention the ERDF ROP because we have to mention it, but that's not our aim, and so this is something to think about.

Local managing authorities have to communicate the name of the funds, but this micro-focus may hide the big picture:

Well, from my point of view it's extremely important for a communication to be carried out on all the funds together [...] If one starts, like the Commission asks, because the Commission then asks you, to do communication for the single funds, that's where you then lose the information, actually the message doesn't arrive because you first get lost among the various acronyms, and so the right

thing that was done is this and I think that it's necessary to continue carrying out such communication [...], I mean, it's tragic, or even, there's the case where one starts talking about all the programmes, ERDF..., but he doesn't know what they are, so there's lots of acronyms and he doesn't understand what they can do in practice, so you have to communicate what they can do, what these financing tools can do for your enterprise. This is the target that has to be given

To work on the mediation of that language, I mean exactly on language is one of the greatest challenges of the moment. Not because the message isn't communicated correctly, but because it's the typology of terms rather than ... this facilitation is necessary...

Well, it's not that it's lacking. It's that it's a matter of choices. To simplify the communicative message, if you start from the CP, the message doesn't arrive that the Region, through the CP, the ERDF, etcetera etcetera, financed the laboratory, that they collaborated with the enterprises

So perhaps we should learn how to communicate these actions more, and somehow, make it so that these actions are increasingly more in contact with Europe, but Europe has to be satisfied to be perceived as an active subject on policies. It can't think that there's someone interested in its technicalities.

If the partners and beneficiaries ask me if it's OK to display "financed by POR-FESR," I tell them to display "2007-2013 European funds." Then there's this alphabet soup of abbreviations and acronyms...

Then it is hard to deal with technicalities on a long range plan, which is the reason why now Emilia Romagna produces yearly plans

A seven-year communication plan, well, it was difficult, I mean, it had to be continuously redefined, and so in this programme, this criticality, now we're asked a strategy with annual communication plans.

1.2.3 Lack of interest by newspapers. It is reported that newspapers are not really interested in publishing the daily activities around Cohesion Funds. What newspapers are more interested into is the lack of usage or the misuse of the funds. Yet, in this region, almost no bad story about misuse appeared

An article published in Sole, I believe, concerning the inauguration of a technopole where no mention had been made [to CP or Europe].

The press isn't even interested in training anymore. It's really hard to get anything out of our classic communiqués. We'll have a language that's mistaken, but... If I now approve 20 million Euros of training for persons in conditions of disadvantage, it's an important investment. [...] Nothing comes out. The only thing that comes out is the polemics of the Regions that don't spend the resources, but how they spend them isn't news. Or what comes out is news of the training system as a course mill, a money machine of use only to the training bodies.

But in our region, there have never been scandals. I know there were problems for the technology centre in Bologna and the one in Rimini, and investigations, too, but they were resolved.

We use the funds, and so you can't do news on that ... There was a major attack by the Corriere Locale on the employment results, but we were wrong, too, because we underestimated an article 30, the one with which the regional councillors asked us for access to the administrative documents. [...] We had provided the data without contextualizing them. M5S passed them to Corriere, something that shouldn't even be done, but that's how it went... And from there, they built a case. "The Region's machine is transparent, effective, and perfect, but the results are what..." But either there's the inquiry, because they decide to follow, or there's disinterest.

One of the problems that even journalists have difficulties in understanding the technical jargon:

We also did a course for journalists last year, in May.

Because even if something's interesting, perhaps they don't have the tools to explain what's going on. I'm not referring to the approval of a call for bids for 20 million. But if you have to explain at what point the partnership agreement between the Ministry and Europe is ... I understand that our languages are opaque.

Yet communication officials lament the lack of interest toward funded funds, even from the local press:

what should be of interest to local papers, and that is to say to the people who are interested, like to young people coming out of school, "enrolments are now open for the new higher technical schools, (ITS), there are 19 of them, they're free..." That kind of thing doesn't come out anymore in the press.

1.2.4. Insufficient resources: resources for communication are described as insufficient for large scale campaigns, that should be managed by the State or by EU

it's not that you can organise great campaigns. Whereas if the State created campaigns and then tailored them to the various regions, probably, communication would be more effective.

ESF we had an important drop, between 2000-2006 and 2007-2013.

It's another order of magnitude, going on television. If you want to go national ... and on national what, then? That's the problem. I say I'm going on Rai1 and I cover everyone, but it's not like that. Not even with Rai3, Mediaset. And we're insisting, but obtaining little, because we would like Agenzia per la Coesione Territoriale to do a big umbrella communication campaign we could latch onto. To have economies of scale on planning. We should have to purchase spaces, but with a competition with other authorities ... If one hears talk of POR-FESR or of European funds, even in another region, perhaps it piques one's curiosity. For us, 3 million over 9 years, for communication, isn't a lot.

1.2.5. Contingent factors. Then there are contingent factors, that lead to reshape campaigns. The two most important are the economic crisis and the earthquake that hit Emilia Romagna in 2012:

I organised a call for tenders on research in 2009, for which I allocated thirty million Euros, of which ten million Euros of projects remained standing, despite having a list also afterwards, I mean, the enterprises totally renounced to do research projects, we had to reissue these resources, not because we hadn't committed them from the very beginning, we had committed them, but the crisis put into crisis, so to say, also a system. The Region insisted in research, to the point that, and I think we're the only region in this sense, and this I say only outside, that during the earthquake it issued a call for tenders for research aimed at enterprises that had undergone damage, and the enterprises made research projects to show the multinationals that not only the territory would have rebuilt its businesses but it would have been on their side to recover the competitiveness that the earthquake, having a reconstruction time of 6-8-10-12 months of course,

Really, very little, I mean, with reference to the programming-implementation it changed because for example we had envisaged, in the initial phase of 2008, a campaign also with 6x3 posters in all of the cities ...[then the crisis hit] and that's where we blocked everything, for a while I kept one of those posters all in pieces in my office because I felt so sorry ...

I mean according to my opinion the communication of funds during the crisis was really complicated. I also remember various campaigns thought and not carried out because there weren't the conditions to do them, in the sense that you didn't know what would have happened the day after, how many crisis tables would have been opened,

2. Awareness and use of central directives

European directives are known and applied by Emilia Romagna:

also the European regulation was the first to highlight the role of communication so much, to ask for communication plans, indicators, assessments, a whole series of activities that are important to be able to be effective in communication.

Yet, European emphasis seems to be more focused on the technical compliance with norms, than on the actual message to be carried to the audience:

So according to my opinion also Europe should focus better on the targets that it wants to achieve, and as rightly mentioned, study ad hoc campaigns for this, because we can do a great job, but the sense of Europe cannot be only through ... Also the sense of the CP...The chain is very important. I think that Europe doesn't have in mind, unfortunately, the chain, I mean in that beautiful Schuman Room you should be hosting continuous exhibitions of your European regions.

Write your annual report mentioning a successful case." Well, we write it, two of them read it and it ends there. So, according to my opinion the European Union's ability to communicate itself through projects is very lacking.

And sometimes the rules that govern European processes are not clear

But it's not that Europe made specific calls for tenders and said "Who of you wants to sit at this table, who wants to sit at the other ..." I mean, every once and a while a table comes up and assumes incredible power, then it disappears, but six months later because, on this, it's not that they're particularly transparent, because I believe that, for example we had created urban laboratories. I

3. The communication mix: channels, targets, messages

3.1 The communication matrix

Regione Emilia-Romagna uses a variety of channels in order to reach all the target segments of the audience. Table 1 presents the communication matrix, that synthetize with how each target was reached through specific channels. For each target-channel combinations:

- 3 means that a target is reached through a channel in a recurring combination
- 2 means that a target is reached through a channel in a likely combination
- 1 means that a target is reached through a channel in a might happen combination
- 0 means that a target is reached through a channel in a unlikely combination

Table 1 - Communication matrix: channels and targets

		Local Newspapers	National Newspapers	Press Conferences	Radio	Television	Institutional Websites	Social: Facebook, Twitter	newsletter	Local Information points: free phone number	Billboards	Information plates & roadsigns	printed promotional material (leaflets, posters)	Events, meetings in school	Meetings and workshops with stakeholders:
Potential & Actual beneficiaries	Youth	2	0	0	1	0	2	2	0	1	1	1	2	3	1
	Enterprises	2	0	1	1	0	3	1	3	3	1	2	2	3	2
	Universities & Research Centers	0	0	1	1	0	2	1	2	1	0	2	2	3	3
	Government agencies (national and local)	0	0	2	0	0	3	2	2	1	0	1	2	3	3
Journalists		1	1	2	1	0	2	1	0	0	0	1	1	3	3
Citizens		1	1	0	1	0	2	2	0	0	2	2	3	3	1

Of course, different channels are used for communicating ERDF and ESF programs, as they differ both according to the desired audience and according to the possible messages:

I mean, for obvious reasons [...] there's also a difference between ERDF and ESF, because the ESF enters homes more often, so to say, you hear the advertisement of a course over the radio that says "Financed with ESF funds" (imitates the quick succession of words) that horrible thing that you hear,

The communication strategy is clearly oriented toward an integration of the several communication channels, each one devoted to carry the right message to the right audience. In particular, whereas at the beginning of the 2007-2013 programming period traditional communications means, such as insertions on local newspapers and press conferences were more important, the web become more and more relevant along the years. Yet some peculiarities arises, dealing with web communication: neither ESF or ERDF have a dedicated Facebook Page, whereas a Youtube Channel is active since 2011. This variety of means was clearly stated during the focus group:

For the ERDF we placed insertions in all the local newspapers ... there was an evolution, first we used the print then we passed to the web for our communication campaigns, the message in the beginning was "There's crisis but there's also, there are European funds," but provided in the various scopes of action, so research, tourism, in the various assets of the ERDF ROP... Channels, we used the web more and more, we've always done press releases, always organised at local level, so, I don't know, we had the results of a call for tenders and we communicated how many enterprises in a territory or in another, we held press conferences, we organised many events, fairs ... So, I'd say that on communication there has always, I think, I mean, even if the ESF, I mean, was characterised as an integration of channels. With reference to social networks, we've been using YouTube since 2011, the ERDF ROP channel, we didn't use it very much in the past programme, we opened specific Facebook pages, but we understood that it didn't make sense, so now we use the Region's pages.

So the channels were integrated between traditional ones and ones that at the time were innovative and are now traditional. This was in order to achieve all the targets. Some were excluded from the internet, and some from paper. So the channels: traditional print, the web, something on the radio and television, as resources permitted, many direct meetings and direct services.

Then, for analytical aims, we can see more in detail how each channel was used. Radio and television, are not the principal mean of communication both as they are expensive and as they do not permit to target the message to a specific audience:

But we don't have the opportunity to go on TV and radio. Newspapers change nothing.

Internet is a better mean of communication: Emilia Romagna provides several informations on its institutional website. Moreover, the both ESF and ERDF programs have dedicated websites. It's harder for Emilia Romagna to use effectively the social networks. Twitter is used to diffuse press conferences, whereas there are not specific Facebook pages. This may depend on both the idea to centralize communication, and on the fact that it is difficult to work on a facebook page with continuity.

Now, social media. And there, we're still doing too little. In 2007-2013, [we did] very little on the social media, except the final. There was the web before the social media. Less interaction, but we have a number of visitors, of portals, that are important.

The Region wouldn't want 1,000 pages to be opened... some years ago, we had 170 sites. I said a random number, but it's to say there are a lot... They're different, but a risk is run, that public administration often runs: [when] you have an agency, you open a channel. [Then] the contract is up, you're not autonomous in managing it, and that channel remains... Given that the sites and the social media are so different, we give our content to those who manage the pages of the Emilia Romagna region. But managing the interaction directly is a bit different. We were evaluating doing not sensational campaigns, but being systematic in communicating the opportunities. We don't have social media channels like the councillorship. But in my opinion, we're doing little. The fact that you're not managing it ...Twitter is used during the press conferences. Usually, we don't have anything to communicate on a daily basis. It's managed at the level of press office. It gave us satisfaction, but we could do more.

Then, related to digital communication, there is the Econer newsletter:

Newletter: We also used Econer a lot, which substantially is this house-organ of the Region and of Unioncamere, that will soon become an on-line newspaper, and that communicates with ten thousand subjects in Emilia-Romagna, more or less, and that therefore is a magazine in which the space devoted to structural funds was very very wide.

Several interviewee emphasize the importance of the enterprise help desk (Sportello Imprese), which is a free phone number where potential beneficiaries for ERDF can have continuous and detailed support:

We already had an enterprise help desk, it was quality certified in 2011, so we have indicators of the service provided

One of the communication gems is "Sportello Imprese," the business help desk, which is a sort of service for the beneficiaries, quality-certified since 2011 and, organized like a call centre, provides information by phone and e-mail on all the programme's activities and opportunities. We have indicators on the opening of the help desk, for quality certification, with respect to the opening of the help desk for at least 98% of working days, which we have amply complied with. We have to respond to 93% of the requests by no later than three working days after they arrive – this has also been amply complied with. [...] We are structuring to have a physical point not only in the Emilia Romagna Region, but also in the chambers of commerce. [...] It is a highly important communication tool: when a person calls and makes a generic request, he or she is referred to the

site. If the question is specific, there's also the e-mail address at info@por-fesr, abbreviations that are referred to.

The business help desk is used in a two-way fashion to communicate and to recover information on what may be less clear [...] we have a person who's been working there for 15 years, and as soon as he reads a call for bids he immediately understands where the critical points of demand will be. One of the questions for which there is a lot of work to be done is on the language of the calls for bids and on the procedures.

And let's not underestimate the toll-free number, which seems to be from another era, but for certain types of beneficiaries ...

Then, in order to communicate the results to citizenship, plates and billboard are used:

For example, Silvano Bertini, who is the manager during this period and in the previous one, always tells us we have to put up an enormous billboard at the motorway exit – the driving instructions to reach the technology centre. This is because it is more difficult in some places.

And the distribution of printed material, especially to meet peculiar communication needs, such as the one that arise after the earthquake:

Since these are 54 municipalities - and not the whole Region - You have to be extensive in the distribution of material on paper: 50,000 posters in bars, Arci - Associazione Ricreativa Culturale Italiana clubs. Some events on the territory to explain, where we also received some insults, because earthquake victims rightly enough have other needs

There is the perception that fairs and meetings are an effective tool for interacting with potential beneficiaries. These events take several forms. First of all, events are organized within schools in order to communicate the ESF program. The results are not always apparent, but being presents within schools is something very important for interviewee:

We have done campaigns in schools. If we look at the contacts we have, the effort we make is very costly. In general, how many students from higher schools are acquainted with the project? The percentage is quite low.

It's hard to get into schools – I don't know if it's an excuse or real, because they have data programmes, with which there has to be relevance, and they're getting a lot of offers from different parties. So you have to make the proposals at the right times, and find sponsor teachers that believe in it and make it their business to introduce it.

Then there are events and contests especially targeted at young people:

We do it periodically with the schools. We call years four and five; we always use stories. Did it a month ago with the Golinelli foundation. A year ago at Sala Borsa. We also do it on the local territories; we call schools, youths, 3-400 people, and we have those who have done or are doing the course, or companies that have hired young people that have done this path, tell the whole story. In these paths, we have a level of employment outcome at 100% in three months. [This is because we train] specialized technicians that companies are complaining they can't find, in strategic sectors in ER, and therefore we don't even let the training body speak. The ones speaking are the young people in year two, or hires, or the businesses telling the story... We use stories that way, too – also because if you put the training bodies with the youths in the schools ... they can also be very interesting but only if they have already developed an interest in doing it. They listen, even for three hours, to the subjects for two years. If they don't, watch out ...

We've done a lot of activities to get young people involved – 2007-13 contests: by answering three generic questions on the internet about Europe and European financing, contestants could win a trip for two. An Interrail Pass – it was called "Porta per l'Europa" ("gateway to Europe"). Then there are several iPads. [...] Then there are initiatives with the technology centres, as "researchers for a day," in

which young people can visit the research labs. I found these visits very interesting, and the young people were excited to see, first hand, creativity applied to diverse environments

Finally, direct meetings and workshops area realized with different stakeholders:

In fact we organised a workshop on the new programme for journalists, addressed to the press

so we actually carry out a daily activity with the region related to the communication of opportunities of the calls for tenders of the ERDF ROP through the Chambers of Commerce toward enterprises

We focus a great deal on small, medium-sized, and micro-enterprises, in terms of the Small Business Act and the type of funds. But large enterprises are also a part, through the trade associations and Confindustria. For this programming, the commission has asked us to involve partners in the tender definition phase. Tests are done with trade associations to see whether the instrument is adequate for our objectives. For example, we call the table of regional enterprises, to which everyone except Confindustria belongs, and we call Confindustria; we present all the instruments we're putting into play, while collecting all the information we can get. We call the Table of Regional Enterprises on a regular basis. Now, the professions have the same standing as enterprises, so even someone with only a VAT registration number can take part in tenders. It is thus necessary to call the partners before making the decision to submit the instruments we will be approving to gather all the observations. Then there will be a mediation activity, but the result is also the result of mediation.

ASTER is the consortium company that joins Regione Emilia-Romagna with all the universities of the region, so also the University of Bologna, the chamber system and the major centres of national research with premises in Emilia Romagna, CNR, ENEA and INFN.

In conclusion, all these channels are used both to communicate opportunities and results, and to grasp information from potential and actual beneficiaries, in a communication process that, far from being in one direction only, permits a sort of co-creation of the program. Indeed, "the square", where people talk, discuss and interact, are a metaphor for how communication in realized in Emilia- Romagna:

The bargaining activity is a particular feature of our Region. The symbol is that of the "piazza." I remember Carrada, who works at Quark: some years ago, he did the screenplay for a video on the energy plan. It was all about the piazza, because he - who was not from the Emilia Romagna region - identified the piazza as the place that represents how we do politics here, by gathering opinions and negotiating.

3.2 Urban/rural divide

In the programming period 2007-2013 there was no real concern, in the Emilia Romagna region, regarding the differences between urban and rural areas. Actually the point is that this difference does not really apply to this case, where the big difference is between cities that are located along the Via Emilia, on one hand, and other cities (Ravenna, Ferrara) and the Apennines on the other hands. Provinces were used as intermediate bodies to deal with this differences. More important, at least for ESF, the single beneficiary bodies tailored the communication on the specificities of their territory.

3.3 Open data and transparency

Emilia Romagna takes pride of its policy of transparency and open data:

I don't even understand the question, I don't know if... No, no, I'm joking, I'm joking ... It's so transparent that ...

We've always published, as we used to do previously, despite in the European Commission there was a debate on whether or not there was a privacy issue, the lists of the benefitting parties. It's clear that we published them in PDF, so, I mean a transparency that can't be reused much or, the data of the single calls for tenders in PDF. In the last phase of the programming we carried out an experimentation making the data accessible in open format

Yet, as the partnership is a very important tool to discuss project and funding schemas even before they are public, some enterprises say that the ones that can join these tables have an advantage

Unfortunately on the basis of my experience I've noticed differences in the access to information, [...] It's a doubt I have, and have always had, now I don't know if this is the table that will answer me absolutely not or perhaps yes, but the companies that are however associated to category associations, and in part it's the role of category associations, to inform them, to make them always participant, to support them, so they have this kind of advantage. I mean ...

The answer of the region is that they do everything they can to have all the stakeholders involved in these tables of discussion

Yes but that's not the Region's problem ...

I mean, it's clear that the associations, as well as the tripartite, or let's say the permanent conference for training etcetera, have this information, I mean, because, let's be clear here, I mean, the partnership has a positive value and also a negative one. If the partnership represents 100% of the company it's clear that the partnership absolutely has a value of true representativeness.[...] we widened the partnership's seats as mentioned before, universities, freelancers, that is it's not only the association anymore, but it's evident that if I'm an enterprise that works on policies I have all the interest to have some form of relationship with an association.

4. Storytelling: communicate through numbers or data?

Emilia Romagna's managing authorities are well aware of the use (and abuse) of the concept of storytelling. For communicating the ESF program they realized a documentary composed of microhistories, that were used both as a whole video product and individually:

At the end of the 2000-06 programming, which was more substantial from the economic standpoint, we realized that out of 4 million people, 1 million had had access to training. What's the best way to recount an opportunity if not to ask those who have had this experience what value it had?

The storytelling for us, can I just say one thing, as to the storytelling we tried to do something, we actually carried out a work with Massimo Coppola after the closing of the programme Avere Vent'anni.

We did it with Massimo Coppola, the author of Avere 20 anni, who we thought was suitable for helping us. He did the interviews along with us. His collaborators came with me onto the territory to meet people and decide what could be the stories that worked, and then they did the interviews, the photographs of people for the inserts. We used the interviews on the web and did a planning effort on the television broadcasters. It is a successful case because people got a little pissed off, pardon the expression, and this means... Those who had the perception that the stories might not be everybody's, actually [got pissed off]

The problem is not telling stories, but selecting which stories to tell:

For me a mixture because sometimes the exemplary stories make people a bit upset. They're complex cases, we brought lots of exemplary stories but, how can I say, the ESF's addressees are also people, so it has to be a good mix, both normal and exemplary stories, because the exemplary ones can be ..., however also the normal stories can be exemplary, simply combining a bit of data that help understand the dimension ... without exaggerating ...

It's also true that a story can be exemplary in the final result, in the way it achieves the result, but along the path it might have involved or faced a whole series of issues that perhaps the person listening says "Oh, good, not everything is black or white ...".

Yes, absolutely the right mix of information and the form, if we really want to talk about the most effective tool, that's storytelling. Storytelling probably more of good practices than best practices, so more of good practices than best practices, which is exactly ... That do not trigger the mechanism of competition, of discontent, so yes, very quick messages and very, absolutely, very direct, sharing the, the praxes that resulted effective and winning. This... and that are absolutely repeatable in their simplicity, so...

The problem, when selecting stories is not only avoiding an excessive emphasis, but avoiding hidden commercials as well:

For example, the European Commission asks us to describe examples of financed projects. For a region like ours, it's easy to describe public projects, which are few in number and major in importance. But we have an extraordinary number of private projects: more than 3,900 projects in 2007-2013, including the public ones which, although large in scale, are small in number. What we always underscore is that as early as the project assessment phase, we identify criteria based on which to provide examples. I have to explain why I'm speaking of one enterprise and not another, above all without doing any advertising.

And yet, for sure

A bit of data, though, I believe help not to ... simplify...

So definitively, the answer is that it is necessary to balance the use of stories and the use of data:

I see this network at the level of the European Commission, on the communicators. There was the phase in which we only had to provide the data, and then the phase that became intolerable, of storytelling. We reasoned over it at a recent meeting, too. At times, storytelling is intolerable. For example: businesses in crisis that see this entrepreneur who has obtained excellent results ... Well, it's not like the other businesses are seeing "gee, I'll do that, too." What they propose to me, also with videos, should be something not like yelling "I'm the best", but a normal story which everyone can do. This is highly suited to our actual situation. We don't have enormous business projects: we need testimony, but also saying that, like him, 1,000 others were financed, and they got a certain amount of money. We count on putting a subject in focus.

Chapter III: Conclusions

Overall, the picture that emerges, regarding communication of ESF and ERDF in Emilia Romagna is clearly positive. Plans are carried out, updated and respected, Numbers and figures are clear. Roles are clearly stated and respected. It seems to be a machine that works perfectly, and that need only minor improvements. Indeed, the almost complete continuity between the previous and the current programming periods highlights the fact that things are going well. And yet, as it is always possible to improve something, we can point out what

the same officials described as a barrier: the aim of communicating funding possibilities to potential beneficiaries is accomplished.; all the funds are used; what remains to be better communicated is the pervasive role of the EU in providing policies and values, which impact goes beyond the single funding opportunity. EU must be described not only as the payer, but as our community, that has a major role in fostering regional, economic and social development. It is a very ambitious objective, but it is the only possibility left to communicate the role and importance of EU, so to strengthen the sense of europeanness. Despite budgetary limits for communication, it's only in regions such as Emilia Romagna, where projects are well managed and communicated, that is possible to imagine a step further, with a high reaching communications, which aims goes beyond the daily activities. It is something that may have a positive impact on those that seek to reinstate borders because of fears, because EU can help them, even if they do not believe so. Indeed:

I think that Europe doesn't have a crisis toward those who are the true stakeholders of the European policies. Europe has its crisis, as well as the national governments, with that part of the society that has great difficulty in facing changes, and that in all this globalised system, let's say, etcetera and with lots of changes, it risks to remain at the margins more and more