



LISBOA, 31st October 2025

CONCURSO PÚBLICO nº 226/SCP-DCP/SUSTENTÁVEL 2030/2024
AVALIAÇÃO DE FUNDOS EUROPEUS: OPERACIONALIZAÇÃO DO
SUSTENTÁVEL 2030

ENTIDADE ADJUDICANTE:
SECRETARIA-GERAL DO AMBIENTE E DA AÇÃO CLIMÁTICA

Executive Summary

ATTHIS CONSULTING | AMBIENTE E ECONOMIA DOS RECURSOS NATURAIS

PPLL CONSULT



Equipa de Avaliação

Coordenação

Cristina Marta-Pedroso

Equipa Técnica

Cristina Marta-Pedroso

Filipa Seiceira

Lia Laporta

Marco Henriques

Ramiro Neves

Tatiana Alves

Tiago Domingos

TABLE OF CONTENTS

| | |
|--|----|
| EVALUATION OBJECT | 1 |
| SCOPE AND OBJECTIVES OF THE EVALUATION | 1 |
| METODOLOGY | 2 |
| SUMMARY OF RESPONSES TO THE EVALUATION QUESTIONS (EQS) | 5 |
| QA1. Are the administrative procedures throughout the project life cycle, and the information systems in which they operate, effective and efficient? | 5 |
| QA2. Is the Programme able to mobilise demand (in terms of quality), ensuring that the projects submitted are aligned with the Programme's objectives, considering the characteristics of the Programme and its main beneficiaries?..... | 5 |
| QA3. Is the Programme able to select, in a timely manner, the projects that best ensure the achievement of its objectives? | 6 |
| QA4. Do the Programme's systems for collecting, analysing and processing information and indicators — including those contractually agreed — provide an adequate response to the Programme's management, monitoring and evaluation needs?..... | 6 |
| QA5 Is the Programme's management structure, including the Intermediate Bodies, adequate for performing its assigned functions? Is the management and delegation model involving Intermediate Bodies appropriate for ensuring the effectiveness and efficiency of the Managing Authority's functions?? | 7 |
| QA6. Has the governance model implemented contributed to the effectiveness and efficiency of Programme management? | 7 |
| QA7 Does the Programme's implementation to date (in terms of commitment levels, physical and financial execution, and the quality/adequacy of approved projects), in each intervention area, ensure the achievement of the Programme's targets and objectives? | 8 |
| QA8. Is the Programme's communication and dissemination strategy proving to be effective? | 9 |
| MAIN CONCLUSIONS AND RECOMMENDATIONS | 10 |

EVALUATION OBJECT

1. The *Sustentavel 2030* (Program for Climate Action and Sustainability) is a national and thematic program created through the European Commission's Implementing Decision of December 14, 2022, financed by the Cohesion Fund. It is a tool for Portugal to face the challenges of energy and climate transition and achieve carbon neutrality by 2050. It is one of 12 programs created to implement Portugal 2030, which embodies the European fund programming cycle for the period 2021-2027 and stems from the Partnership Agreement signed between Portugal and the European Commission (EC) in July 2022.
2. The Sustainable 2030 mobilizes three priorities (2A Sustainability and climate transition; 2B Sustainable urban mobility; and 3A Rail transport networks) and several specific objectives (SO), falling under OP2 and OP3, to which technical assistance (TA) is added.
3. The program's allocation per specific objective is presented in the following table.

| SPECIFIC OBJECTIVE | TIPOLOGY OF INTERVENTION | LOCATION | AMOUNT (M €) |
|---|--|-------------|--------------|
| 2.3 Develop smart energy storage systems, networks and solutions outside the TEN-E | Energy storage enhancement, improved management, and increased digitalisation of energy networks | PT Mainland | 25 |
| 2.4 Promote adaptation to climate change, disaster risk prevention and resilience, considering ecosystem-based approaches | Coastal protection and defence | PT Mainland | 232 |
| | Civil protection and integrated risk management | RAM | |
| | Climate change adaptation | RAM | 24 |
| 2.6 Promote the transition to a circular and resource-efficient economy | Urban waste management | PT Mainland | 20 |
| 2.8 Promote sustainable multimodal urban mobility, as part of the transition to a net-zero carbon economy | Metropolitan Area railway networks | PT Mainland | 1 312 |
| | High-capacity passenger transport networks | | |
| | Rail rolling stock | | |
| 3.1 Develop a climate-resilient, smart, safe, sustainable and intermodal TEN-T. | Rail infrastructure (TEN-T) | PT Mainland | 972 |
| | Port infrastructure (TEN-T) | PT Mainland | 363 |
| | Airport infrastructure (TEN-T) | RAA | |
| 7.1 Technical Assistance. | Technical Assistance. | PT Mainland | 78 |
| | | RAA | |
| | | RAM | |

RAA - Autonomous Region of the Azores; RAM - Autonomous Region of Madeira

SCOPE AND OBJECTIVES OF THE EVALUATION

4. Overall, the evaluation aims to analyze whether the implementation of the Program is proceeding as planned and, considering the pace of implementation and execution, whether it is contributing to the maximization of the expected results, identifying any difficulties encountered in the operationalization of the various supports and/or anticipating potential deviations in the achievement of these objectives. Considering that the evaluation is taking place at an early stage of the implementation of Sustainable 2030, it is particularly relevant in that any necessary programmatic adjustments can be incorporated in a timely manner, namely in the Mid-Term Review of the Program and in the ongoing implementation processes.

5. In terms of specific objectives, two have been defined for the evaluation:

- Assess the adequacy of the strategic management (including the monitoring and evaluation of the intervention instruments included therein) and operational management of the program and the adequacy of the instruments created to ensure high levels of efficacy and efficiency in its implementation;
- Assess, based on the pace of implementation of the program and the projects supported, whether the implementation of the Program is ensuring the necessary conditions for the achievement of the defined objectives and established targets.

METODOLOGY

6. The evaluation is structured around the development of answers to a set of eight evaluation questions (EQs) and their sub-questions.
7. The evaluation drew on multiple sources and information-gathering techniques, with the objective of ensuring a more robust and reliable understanding of the various dimensions under assessment. Interviews played a cross-cutting role in the evaluation process and, within a triangulation logic, complemented the documentary analysis, the survey work, and the case studies, thereby validating and enriching the interpretation of results.
8. The matrix of information-gathering techniques that supported the evaluation is presented in Table 1, and the coding of the symbols used is provided in the following figure.

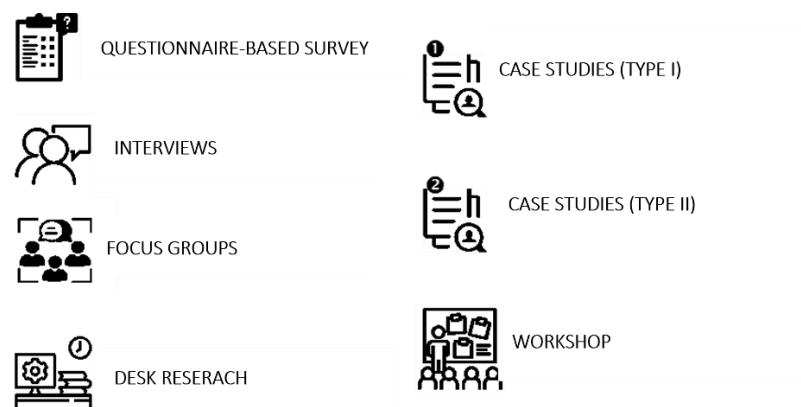


Figure 1 Coding of the symbols presented in the information-collection techniques matrix

Table 1 Information collection techniques by Evaluation Question (EQ)

| EQ | | SubEQ | | TECHNIQUE |
|-----|--|-------|--|---|
| QA1 | Are the administrative procedures throughout the project life cycle, and the information systems in which they operate, effective and efficient? | 1.1 | Conclude on the ease of access to the application and payment request forms for external users, as well as on the quality (availability and clarity) of the supporting documentation. |  |
| | | 1.2 | Conclude whether the procedures and requirements imposed on beneficiaries are effective and efficient in ensuring the quality of applications, project monitoring, and payment requests, verifying whether the level of requirements is appropriate to the size and nature of the projects, the beneficiaries' capacity, and the principle of simplification. |  |
| QA2 | Is the Programme able to mobilise demand (in terms of quality), ensuring that the projects submitted are aligned with the Programme's objectives, considering the characteristics of the Programme and its main beneficiaries? | 2.1 | Conclude on compliance with the Call Launch Plan and on the adequacy of the frequency of call openings in relation to the desired pace of Programme implementation. |  |
| | | 2.2 | Conclude on the influence of beneficiaries' capacity levels on the quality of demand, assessing the effectiveness of the capacity-building provided through: the Managing Authority's direct training activities; the pilot project developed under a European Commission DG Regio initiative; JASPERs – the European Investment Bank's Technical Assistance programme; and AD&C and other entities through the Funds Ecosystem Capacity-Building Roadmap. |  |
| QA3 | Is the Programme able to select, in a timely manner, the projects that best ensure the achievement of its objectives? | 3.1 | Conclude on the efficiency of the selection process in terms of decision-making timelines, procedures, and the resources allocated to the assessment of applications, ensuring both rigour in the selection process and timely responses to beneficiary entities. |  |
| | | 3.2 | Conclude on the relationship between beneficiaries' capacity levels (distinguishing cases in which external consultants are involved) and the quality of applications, as well as their likelihood of success. |  |
| QA4 | Do the Programme's systems for collecting, analysing and processing information and indicators—including those contractually agreed—provide an adequate response to the Programme's management, monitoring and evaluation needs? | 4.1 | Conclude on the adequacy and sufficiency of the output and result indicators defined by the Programme to monitor and assess its performance in relation to its objectives. |  |

| EQ | | SubEQ | | TECHNIQUE |
|-----|---|-------|--|---|
| QA5 | Is the Programme's management structure, including the Intermediate Bodies, adequate for performing the functions assigned to it? Is the management and delegation model involving Intermediate Bodies appropriate for ensuring the effectiveness and efficiency of the Managing Authority's functions? | 5.1 | Conclude whether the delegation of competences to the Intermediate Bodies (IBs) generates gains in effectiveness and efficiency in the management of the Programme (e.g., demand mobilisation, project selection, monitoring) or whether it results in losses of effectiveness and/or efficiency. |     |
| QA6 | Has the governance model implemented contributed to the effectiveness and efficiency of Programme management? | 6.1 | Conclude on the contribution of political and technical coordination (CIC Deliberations and AD&C Standards/Guidelines) to the efficiency and effectiveness of the Programme's management. |   |
| | | 6.2 | Conclude whether the Monitoring Committee has an appropriate composition and functioning, whether it contributes effectively to the implementation of the Programme, and whether stakeholder involvement is appropriate. |    |
| | | 6.3 | Conclude on the contribution of the Climate Action and Sustainability Network to the institutional capacity-building of stakeholders and to the effectiveness/efficiency of programme management, including coordination between Managing Authorities in the planning of calls, knowledge sharing, and the implementation of other management instruments. |    |
| QA7 | Does the Programme's implementation to date (in terms of commitment, physical and financial execution, and the quality/adequacy of approved projects), in each intervention area, ensure the achievement of the Programme's targets and objectives? | 7.1 | Assess whether the targets for the Programme's specific objectives are realistic given the pace of project implementation. Identify the internal and external factors driving differences in performance across intervention areas, including unexpected constraints, and clarify how external contextual costs (legal and administrative requirements, etc.) affect application submission and project execution. |     |
| QA8 | Is the Programme's communication and dissemination strategy proving to be effective? | 8.1 | Conclude whether the Communication Plan is adequate to promote the visibility of the Programme and the European funds, and whether the communication requirements imposed on beneficiaries are appropriate for disseminating the EU support. |     |
| | | 8.2 | Conclude on the degree of implementation of the Communication Plan and on the beneficiaries' compliance with the obligations to publicize the support received. |     |

SUMMARY OF RESPONSES TO THE EVALUATION QUESTIONS (EQS)

QA1. Are the administrative procedures throughout the project life cycle, and the information systems in which they operate, effective and efficient?

- The administrative procedures of *Sustentável 2030* generally ensure the quality of applications and project implementation, but their effectiveness is limited by process complexity, uneven beneficiary capacity, and bureaucratic rigidity. Monitoring is close and collaborative, helping to prevent risks, although the lack of human resources within the Managing Authority (specifically in civil engineering, evaluation, communication, and information systems) reduces agility. There is, therefore, room to simplify procedures and strengthen technical capacity.
- The *Balcão dos Fundos*, the front-office system, centralizes applications and payment requests, offering useful features and interoperability with other entities. Despite generally positive assessments, there are limitations related to programme-specific adaptations, reduced information in payment requests, and limited autonomy for Managing Authorities. The back-office system, SI3 *Sustentável 2030*, still under development, is valued for enabling paperless processes but faces interoperability issues and some errors.
- The supporting documentation is accessible and generally clear, especially calls for proposals and application forms. However, platform user manuals are perceived by beneficiaries as less clear than the other documents.

QA2. Is the Programme able to mobilise demand (in terms of quality), ensuring that the projects submitted are aligned with the Programme's objectives, considering the characteristics of the Programme and its main beneficiaries?

- The Annual Call Plan was fulfilled and strengthened with additional calls, totalling 46 calls (43 by invitation), covering all intervention areas except SO 2.3 and making 67% of the Programme's allocation available.
- As of 31/12/2024, the Programme showed low execution (2%) and high commitment (30%), with a strong concentration of funds in a small number of beneficiaries (17) and operations (46).
- The delay in the Programme's approval significantly contributed to the current slow pace of implementation.
- The low execution rate is not, on its own, attributable to the frequency of call openings.
- Capacity building improves the quality of applications, but specific areas still require strengthening (indicators, technical justification, budgeting, public procurement), along with better segmentation and dissemination of training activities.

QA3. Is the Programme able to select, in a timely manner, the projects that best ensure the achievement of its objectives?

- The rigour of the selection process is demonstrated by the low number of complaints (7 out of 48 approvals), reflecting the Managing Authority's experience and the use of conservative methodologies and external expert opinions, which ensure compliance and mitigate legal and financial risks.
- Although innovative and with harmonisation potential, the information system requires further consolidation and optimisation to reduce administrative burden and maximise efficiency.
- After the constraints experienced in 2023, the assessment of applications took place within (and even below) the expected deadlines, without jeopardising the Programme's objectives; this performance is also linked to the adequacy of the human resources assigned to the evaluation process.
- The low number of rejected applications (4) indicates general compliance with the requirements set out in the Calls, although additional clarification requests are frequently needed as provided for by law.
- Requests for clarification are widespread, regardless of beneficiaries' participation in capacity-building actions or the use of external consultants, reinforcing the perception of the complexity involved in preparing applications.
- The frequency and nature of these requests, combined with the views of the Managing Authority's Technical Secretariat leadership, highlight the need to expand, segment, and improve the dissemination of capacity-building activities.

QA4. Do the Programme's systems for collecting, analysing and processing information and indicators — including those contractually agreed — provide an adequate response to the Programme's management, monitoring and evaluation needs?

- The output and result indicators adequately cover the Programme's intervention areas, combining EU common indicators with specific ones (e.g., waste), defined through an intensive negotiation process with the European Commission.
- At this early stage of low implementation, the usefulness of the indicators is mostly potential, with limited practical application so far.
- There is some uncertainty regarding the suitability of the indicators for the contracted operations; however, given the Programme's specificity and the limited expected variability between what was programmed and what is being implemented, the indicators are expected to reflect the Programme's activities effectively.
- The information collection and processing system works adequately for defining indicators and estimating targets, but it does not yet have fully consolidated mechanisms for collecting and validating implementation data, which are still under development.
- The system is conceptually robust but still requires operational consolidation; strengthening data collection mechanisms, data reliability and indicator suitability will be essential to ensure effective future use.

QA5 Is the Programme's management structure, including the Intermediate Bodies, adequate for performing its assigned functions? Is the management and delegation model involving Intermediate Bodies appropriate for ensuring the effectiveness and efficiency of the Managing Authority's functions??

- The delegation of competences to the Intermediate Bodies – the Regional Directorate for Planning and Structural Funds (DRPFE-RAA), the Intermediate Body for the Autonomous Region of the Azores (RAA), and the Regional Development Institute, IP-RAM (IDR-RAM), the Intermediate Body for the Autonomous Region of Madeira (RAM) – has brought clear operational management gains to the Sustainable 2030 Programme.
- In terms of effectiveness, key gains include the incorporation of local knowledge and proximity to beneficiaries. This proximity strengthens the ability to mobilise the intended demand, adjust calls to regional needs, select projects better suited to the territory, and closely monitor project implementation. In terms of efficiency, the technical expertise and accumulated experience of the Intermediate Bodies' teams enhance the quality of application assessments and the compliance of implementation, while their close coordination with the Managing Authority ensures smoother and more efficient processes.
- Beneficiaries confirm this added value, describing the Intermediate Bodies as privileged communication channels, facilitators in understanding insularity-specific constraints, and strategic partners in project monitoring. However, challenges remain: limited specialised human resources and dependence on supervisory procedures by the Managing Authority, which extend application approval times.

QA6. Has the governance model implemented contributed to the effectiveness and efficiency of Programme management?

- The governance model of *Sustentável 2030* is considered appropriate and important for ensuring strategic coherence, harmonisation of methods, and institutional capacity-building, although challenges to operational efficiency remain.
- The Interministerial Coordination Committee (CIC) deliberations ensure political and strategic alignment, but their formalism and the requirement to submit operational decisions to the CIC create constraints. AD&C Technical Guidelines strengthen the harmonisation and quality of management, although they are sometimes overly detailed and complex, affecting efficiency.
- The Monitoring Committee (MC) is broadly representative and actively engaged, but its effectiveness is limited by its large membership and formal meeting format. Its composition and role clarity could be improved, and its work strengthened through specialised thematic sub-groups.
- The Climate Action and Sustainability Network (RACS) operate as a collaborative space that strengthens competencies in environmental and climate topics, facilitates knowledge transfer, and promotes alignment of practices, thereby contributing to more coherent and efficient management. However, it faces challenges such as members' lack of time, limited participation from the autonomous regions, difficulties in information flow, and the absence of formal decision-making capacity. The upcoming PT2030 reprogramming may require redefining the network's areas of action.

QA7 Does the Programme’s implementation to date (in terms of commitment levels, physical and financial execution, and the quality/adequacy of approved projects), in each intervention area, ensure the achievement of the Programme’s targets and objectives?

- Although the Programme — like the entire PT2030 — started late (December 2022), and its launch overlapped with the closure of POSEUR, by 30 November 2024 a total of 46 Calls had been opened (including Calls launched prior to the first Annual Call Plan and out-of-plan Calls), covering all Programme intervention areas except SO 2.3 (Develop smart energy systems, networks and storage outside the TEN-E). These Calls made available €2,128 million of funding (around 67% of the Programme’s allocation).
- As of 30 November 2024, the commitment rate stood at 28% and the execution rate at 1.7%. The execution rate is particularly low given that this figure corresponds to roughly the mid-point of the programming period.
- In addition to the low execution rate, there is uncertainty regarding the real capacity to carry out investments within the Programme’s eligibility period, due to successive delays — relative to what was foreseen at application stage — reported by beneficiaries during the Managing Authority’s biannual monitoring exercises.
- In its exploratory assessment activities, the Evaluation Team recommended broadening the Programme’s eligibility scope as a way of dispersing risk.
- The low level of execution — and, consequently, the failure to meet intermediate indicator targets — reflects the difficulties experienced at the start and during the implementation of operations (as evidenced by the beneficiary survey and the Type II Case Studies). These difficulties stem from various factors, notably those relating to expenditure authorisation and obtaining the Court of Auditors’ approval (visto).
- The case studies revealed three structural patterns of delay: (1) a critical dependence on administrative procedures, with significant impact from the Court of Auditors’ approval and expenditure authorisation — factors accounting for between 20% and 40% of the total delay in major projects; (2) weaknesses in technical and budgetary planning, including the late preparation of execution projects and unrealistic base prices, leading to unsuccessful tenders and, even so, multiple extensions due to clarification requests; (3) external conditions that, while not determinative on their own, amplify delays already embedded in the project life cycle (e.g. the COVID-19 pandemic).

QA8. Is the Programme's communication and dissemination strategy proving to be effective?

- The communication strategy of *Sustentável 2030* is well structured and aligned with national and European rules, setting clear objectives, appropriately segmenting internal and external audiences, and using multiple channels. The communication requirements for beneficiaries are considered appropriate and proportional to the size of the projects.
- Implementation of the strategy is still at an early stage and with some delays. The website and social media channels have been launched, but digital indicators are below target, while events and capacity-building activities have exceeded expectations. Execution faces constraints related to the lack of human resources, low brand awareness, limited message segmentation, public-procurement bureaucracy, and the high cost of large-scale communication channels.
- Most beneficiaries comply with the formal communication requirements, but the approach is generally reactive and limited to minimum rule-compliance, with low digital presence and little communication throughout the project lifecycle. Examples such as Metro do Mondego show that more integrated and creative communication strategies generate better results, reinforcing the need to train and raise beneficiaries' awareness of communication as a strategic tool to showcase public investment.

MAIN CONCLUSIONS AND RECOMMENDATIONS

| CONCLUSIONS | | RECOMMENDATIONS | | RECEPIENT |
|---------------------------|----|--|----|--|
| ADMINISTRATIVE PROCEDURES | C1 | The <i>Balcão dos Fundos</i> , as a single interface, seeks to ensure user-friendliness by centralising applications and payment requests, thus preventing beneficiaries from having to deal with multiple separate systems. Application and payment request forms are standardised, featuring automatic validations and contextual help fields to promote greater speed and consistency in data entry. However, they still show limitations due to insufficient adaptation to the specific features of each programme. Even so, some beneficiaries report difficulties in accessing and completing the application forms. | R1 | Continue the process of improving information systems, particularly the <i>Balcão dos Fundos</i> , as flexible and responsive platforms capable of ensuring efficient adaptation to the specificities of the Programme. |
| | C2 | The documentation made available is generally clear and useful, particularly regarding the essential elements required for applying. However, the platform's user manuals require significant improvement to ensure greater readability and effectiveness, as this remains a critical aspect of the user experience. | R2 | Review and update the platform's user guides to ensure greater clarity, practical examples, and language adapted to different profiles of beneficiaries and potential beneficiaries, while simultaneously strengthening their dissemination among these target groups. |
| | R3 | Intensify capacity-building activities focused on accessing and using the <i>Balcão dos Fundos</i> platform for beneficiaries and potential beneficiaries, particularly at the time of launching calls for proposals. | | |
| | R4 | Training for beneficiaries in specific areas — namely the preparation of applications (particularly compliance with formal requirements, technical justification, and budgeting), public procurement, and the calculation and reporting of indicators — should be strengthened. The offer of capacity-building actions should be accompanied by segmentation of target audiences and improved outreach. | | |
| | R5 | The Managing Authority should adjust the level of requirements and procedural complexity to the size and characteristics of each project, ensuring that a €0.2M grant and a €200M investment are not treated in the same way, by adopting proportional and differentiated solutions. | | |
| | R6 | It is important to reinforce the allocation of specialised human resources within the Managing Authority, ensuring stable teams with specific technical skills to support Programme implementation, particularly in the areas of civil engineering, evaluation, communication, and information systems. | | |

| | CONCLUSIONS | RECOMENDATIONS | RECEPIENT |
|--|---|--|---|
| DEMAND AND QUALITY OF DEMAND | C4 <p>The timely opening of new Calls for Proposals is desirable to sustain the programme's implementation pace, provided it is framed within a broader strategy aimed at diversifying the types of investments financed (and the programme's eligibility criteria, as proposed in the Exploratory Evaluation Activities document).</p> | R7 <p>Open new eligibility areas aligned with policy objectives, namely in the fields of promoting energy efficiency in Public Administration, under-represented renewable energy sources, water management to address water scarcity, flood and inundation protection, sustainable water management and the elimination of environmental liabilities in the water sector, as well as the management of urban waste.</p> | Management Authority |
| | C5 <p>Capacity-building has a positive effect on the quality and organisation of applications. However, it is necessary to strengthen certain areas of training — such as the calculation and reporting of indicators, technical justification, budgeting, and public procurement (as also highlighted in the case study recommendations) — as well as to improve the segmentation of target audiences and the dissemination of capacity-building initiatives.</p> | --- | --- |
| | C6 <p>The non-approval of applications — although limited in number and concentrated within a specific group of beneficiaries — resulted mainly from the failure to comply with essential formal and technical requirements set out in the Calls for Proposals, thereby compromising their eligibility and operational maturity.</p> | --- | --- |
| EFFICIENCY OF SELECTION AND DECISION PROCESS | <p>The minimum level of maturity required, when considered in isolation, does not ensure that investments are executed within the timeframe set out in the application, as several external factors may affect on-the-ground implementation. Cross-analysis of information gathered through different techniques indicates that the main factors impacting the implementation of operations are:</p> <ul style="list-style-type: none"> • Critical dependence on administrative procedures, with significant delays associated with the Court of Auditors' approval and expenditure authorisation; • Weaknesses in technical and budgetary planning, including the late definition of detailed design projects and the use of unrealistic baseline prices, which lead to failed tenders and, even when successful, to multiple extensions due to clarification requests; • External conditions which, although not individually decisive, exacerbate pre-existing delays in the project life cycle (for example, the COVID-19 pandemic). | R8 <p>Since the expenditure authorization emerges as one of the most significant constraints, the requirement for its submission as a minimum maturity condition should be reconsidered, or its obtaining should be simplified through an appropriate legislative framework — like other measures recently adopted by the government to accelerate the implementation of EU funds. The recommendation is therefore that the application process and the expenditure authorization should be allowed to proceed in parallel.</p> | Management Authority Ministério da Economia e Coesão Ministério da Finanças |
| | | R9 <p>In the same line of action (as presented in the previous recommendation), a legislative framework should be created to allow the Court of Auditors' approval ("visto") to be obtained <i>ex post</i> rather than prior to the start of the works. According to the press, this possibility is being considered in the context of the state reform.</p> | Ministério da Reforma do Estado |
| | | R10 <p>In the case of larger and more complex projects, the minimum maturity required for the application should be the submission of the detailed execution projects for all works to be carried out. To ensure this minimum level of maturity, it is necessary to change the way public</p> | Management Authority CIC PT2030 |

| CONCLUSIONS | | RECOMENDATIONS | | RECEPIENT |
|---------------------------------------|-----|---|---|---|
| | | | investment is planned, by anticipating the preparatory work needed for launching the works contracts even before funding opportunities become available. For works tenders to be launched at the very beginning of programming periods and completed within those deadlines, it is essential that each governmental or sectoral area has updated execution projects and baseline price estimates. | |
| | C8 | According to the information collected through the case studies, the ancillary condition linked to the minimum maturity level ("the call for tenders must be launched within 60 days after signing the acceptance agreement") is, at times, not met. Its non-compliance becomes the first source of time deviations, which naturally propagate to the remaining phases of project implementation. | R11 | The ancillary conditions set out in the call for proposals or in the acceptance agreement (for example: "The tender must be launched within 60 days of the signing of the acceptance agreement") should be monitored and subject to measures to ensure their effective compliance, such as penalties applied to the approved amount, unless restricted by fund regulations. |
| INFORMATION COLLECTION AND INDICATORS | C9 | The set of indicators adequately covers the Programme's areas of intervention and is appropriate as a reflection of the types of operations supported. | --- | --- |
| | C10 | The system for collecting, analysing and processing information for estimating indicators functions adequately—based on the information gathered—for the phase of indicator selection and target estimation. However, it does not yet have consolidated mechanisms for collecting and validating indicator execution data, as this component is still being implemented. The system is viewed as conceptually robust and coherent but still undergoing operational consolidation. | R12 | The development of the operational system for collecting information on indicators during the implementation phase of operations should be continued. |
| MANAGEMENT STRUCTURE | C11 | The delegation of competences to the Intermediate Bodies (IBs) contributes positively to the effectiveness and efficiency of the operational management of the Sustainable 2030 Programme, particularly in the areas of demand mobilisation, project selection and monitoring, adaptation to territorial specificities, and coordination with beneficiaries and the Managing Authority. However, to maximise these gains, it is necessary to strengthen technical human resources and ensure greater operational autonomy aligned with the competencies demonstrated. | R13 | Simplify and eliminate procedural redundancies, removing duplicate analyses and strengthening trust in the Intermediate Bodies, while ensuring supervision by the Managing Authority for harmonisation and technical clarifications. |
| | | | R14 | Continue strengthening the human resources of the Intermediate Bodies, both by increasing the number of technical staff and by recruiting specialists with the competencies currently lacking. |
| GOVERNANCE MODEL | C12 | The CIC decisions are appropriate for ensuring political and strategic alignment, bringing gains in coherence and legitimacy, but they have a limited impact on execution efficiency due to increased formalism and hierarchical dependency. The AD&C Technical Standards and Guidelines are appropriate and relevant | R15 | Review and adjust the mechanisms of political and technical coordination, promoting greater agility and proportionality in the issuance of decisions and guidelines, without compromising the required coherence and rigor. |

| CONCLUSIONS | | RECOMENDATIONS | | RECEIPIENT |
|-------------|---|----------------|--|--|
| | for technical and methodological harmonization, strengthening effectiveness and comparability across programmes, although their level of detail may constrain operational efficiency. | | | |
| C13 | The Monitoring Committee of <i>Sustentável 2030</i> has an overall adequate composition and functioning, providing relevant contributions to the programme's implementation and effectiveness. Its composition may be adjusted to include new strategic entities and avoid overlaps. Stakeholder involvement is essential and should be strengthened through more flexible and collaborative formats. These measures could enhance the impact of the Committee, consolidating it as an instrument of participatory and effective governance within the Portugal 2030 framework. | R16 | When the Programme undergoes significant changes, such as reprogramming or the inclusion of new areas of eligibility, the composition of the Monitoring Committee should be revised to reflect the evolution of <i>Sustentável 2030</i> . This includes ensuring the representativeness, relevance, and up-to-date nature of its members, by incorporating entities pertinent to new areas of eligibility and removing those linked to areas no longer covered, while avoiding overloading the Committee with entities whose mandates overlap. | Management Authority |
| | | R17 | Implement the creation of thematic subgroups, restricted forums, and informal meetings dedicated to examining specific issues, promoting more qualified technical inputs and enabling the participation of external experts with relevant knowledge in the areas under analysis. | Management Authority |
| C14 | The RACS, coordinated by <i>Sustentável 2030</i> , has played a structuring role in strengthening the institutional capacity of stakeholders and promoting the effectiveness and efficiency of the management of EU funds. Through formal and informal coordination mechanisms, its contribution to key management instruments, and the development of studies and technical capacity-building activities, RACS has helped consolidate an integrated and collaborative approach that is essential for the success not only of <i>Sustentável 2030</i> but also of Portugal 2030 in the areas of climate and sustainability. | R18 | Maintain RACS's activities, particularly regarding the continuous identification of cross-cutting and strategic themes that require clarification among its members and may lead to studies and capacity-building actions. | Management Authority as RACS's coordinator |
| C15 | Persistent challenges include the limited availability of RACS members, the low participation of the Autonomous Regions, insufficient transmission of information produced to the Intermediate Bodies, the network's lack of formal decision-making power, and difficulties in integrating environmental issues within the competitiveness area. | R19 | Strengthen participation within RACS and improve the effective dissemination of knowledge by ensuring the organisation of in-person meetings in the Autonomous Regions—promoting greater proximity and the active involvement of their Managing Authorities—and by intensifying the delivery of capacity-building actions and thematic workshops for Intermediate Bodies. This will help ensure effective transmission of information produced, as well as the harmonisation of knowledge and procedures. | Management Authority as RACS's coordinator |
| | | R20 | Consolidate the operational role of RACS by strengthening the binding nature of its guidelines and recommendations, ensuring their uniform application across all | AD&C Management Authority as |

| CONCLUSIONS | | RECOMENDATIONS | | RECEIPIENT |
|---------------------|-----|--|--|---|
| | | | Managing Authorities, and by promoting structured coordination with the Innovation and Digital Transition Network, so that climate action and sustainability dimensions are fully integrated into competitiveness support instruments. | RACS's coordinator |
| IMPLEMENTATION PACE | C16 | Large projects must align with the expenditure implementation timeline and should not be oversized in relation to the technical complexity and external risks identified as limiting factors for their completion within the desired timeframe. | R21 | Implement time-risk management mechanisms, with quarterly reports on physical and financial execution and mandatory mitigation plans whenever delays exceed 10% of the schedule agreed with the Managing Authority. |
| | | | R22 | Promote early inter-institutional coordination by creating project groups with representatives from the supervising ministry, the project promoter and the funding authority, starting from the design phase. |
| | | | R23 | Strengthen the existing legal framework to allow simplified contractual revisions (e.g., price-update clauses and replacement of equivalent materials) to reduce project stoppages during periods of scarcity. |
| PROGRAM VISIBILITY | C17 | The Communication Strategy is still in an early stage of implementation, with some growth in digital presence that contributes to the Programme's visibility. However, indicators such as website visits and social media followers remain below the 2025 targets, revealing execution delays. The implementation of the Strategy does not yet have a fully established monitoring system and is constrained by the lack of human resources within the Managing Authority. The overall visibility of the Programme is affected by factors such as the low recognition of the "Sustentável 2030" brand, insufficient segmentation and differentiation of messages, bureaucratic barriers (public procurement), and limited use of large-reach communication channels. | R24 | Strengthen the implementation and operational capacity of the Communication Strategy by executing all planned actions, prioritising the creation and regular dissemination of the Programme's newsletter, and reinforcing the Managing Authority's communication team through the recruitment of specialised professionals to ensure continuity, quality, and effectiveness of communication activities. |
| | | | R25 | Enhance the digital presence and public visibility of <i>Sustentável 2030</i> through regular updates of the website and social media channels, search engine optimisation, development of paid digital campaigns, and partnerships with influencers, opinion leaders and large-reach media, including television channels. This should always consider the need for message segmentation, adapting language and formats to different target audiences. |
| | | | R26 | Implement an effective monitoring and adjustment system for the Communication Strategy, including systematic mechanisms to track the progress of all communication actions, review targets, and adjust the execution timeline, ensuring the Strategy adequately responds to identified needs. |
| | C18 | There is a high level of compliance with the formal and regulatory communication requirements set out in the Strategy. Beneficiaries meet the basic visibility rules, but proactive, strategic, and results-oriented communication remains limited. There are isolated good practices that demonstrate potential for | R27 | Promote regular and diversified training and awareness-raising activities for beneficiaries, encouraging the sharing of good practices and exchange of experiences between projects, to strengthen communication capacity and ensure coherence with the Programme's messaging. |

| CONCLUSIONS | RECOMENDATIONS | RECEPIENT |
|-------------|--|-----------|
| | wider replication, where beneficiary training is essential to improving the level of implementation and the effectiveness of the Communication Strategy. | |