

Official Correction Request Regarding Recovery Letter – CB845 CBSmallPorts

To: Managing Authority, Interreg Central Baltic Programme

From: Satakunta University of Applied Sciences (SAMK), Lead Partner of CB845 CBSmallPorts project

Summary of the Recovery Request by the Managing Authority:

On 25 June 2025, the Managing Authority of the Central Baltic Programme issued a recovery letter concerning the CB845 CBSmallPorts project. The reason for the recovery is a reported change in ownership, which has resulted in the discontinuation of the initially planned use of the Keihässalmi small port. Specifically, the Managing Authority claims that:

- The supported productive activity (guest harbor services) has ceased.
- A change in ownership has caused a substantial change undermining the original project objectives;
- Project sustainability has not been ensured.

As a result, the Managing Authority requires the Lead Partner (SAMK) to repay €25,638.24 of ERDF funding by 30 September 2025.

This is an official request to correct the decision. We respectfully request that the Managing Authority:

- Cancel the enforcement of the recovery
- Accept additional documentation on the development status of the Keihässalmi small port;
- Consider follow-up reporting from the Lead Partner in 2026 and 2027.

Justification for the correction request:

1. Ownership has changed, but the situation is not permanent.

The area was transferred from the Municipality of Pyhtää to a private owner in 2022. The boat slip was temporarily closed but was reopened for boaters in spring 2025. The future use of the area remains open: zoning appeals are pending, and there are development plans for boating services. The development company (Hitis Kiinteistöt Oy) has announced plans to develop the street and harbor structures further. In addition, the local stakeholder community – including summer residents and recreational users – has actively called for maintaining public access and services in the area, demonstrating continued interest in preserving the project's original goals.

2. EU regulation (CPR Regulation No. 1303/2013, Article 71) requires a "substantial change" for recovery.

A mere change of ownership is not sufficient for recovery. According to Article 71, recovery is applicable only if the change leads to a substantial alteration in the nature, objectives, or

implementation conditions of the project. In this case, the essential infrastructure – including public access to the boat slip and supporting utilities such as the electrical connection that was moved from air cable to under soil/sea – remains operational and available to boaters. Furthermore, the core objectives of the CBSmallPorts project, namely the support of guest harbor services and improved facilities for maritime tourism, can still be achieved. Local demand for these services remains strong, indicating that the investment continues to serve its intended purpose.

3. The review period is 10 years – there is still time.

The investment was reported in November 2022, and the required 10-year period extends to 2032.

The sustainability of the project results can therefore still be secured.

4. The inspection and municipal confirmation did not reflect recent developments.

The on-site inspection and email communication with the Municipality of Pyhtää (27 May 2025) did not consider the reopening and ongoing development plans, on which we can provide further details.

5. We request a delay in enforcement and propose continued monitoring.

Due to the evolving nature of the situation, we respectfully request a postponement of the recovery enforcement and propose that progress be monitored with the possibility to report again in 2026 and 2027.

Pori, 4.7.2025

Yours sincerely,

Cimmo Nurmi
Vice-rector

Minna Keinänen-Toivola
CBSmallPorts project lead

Satakunta University of Applied Sciences (SAMK)
Lead Partner – CB845 CBSmallPorts

This document is signed electronically.

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