

Brussels, 30 June 2025  
(OR. en)

11026/25  
ADD 2

POLMIL 189  
INDEF 69  
CFSP/PESC 1055  
CSDP/PSDC 430  
COPS 332  
EUMC 258  
IND 241  
COMPET 669  
RECH 310  
ECOFIN 920  
MI 494  
EMPL 342  
EDUC 309  
CADREFIN 75

**COVER NOTE**

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
Subject:	Opinion of the Regulatory Scrutiny Board

Delegations will find attached document SEC(2025) 169 final.

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EUROPEAN COMMISSION

Brussels, 5.5.2025  
SEC(2025) 169 final

**REGULATORY SCRUTINY BOARD OPINION**

**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE  
COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE  
COMMITTEE OF THE REGIONS**

**The European Defence Fund: supporting the development of the defence capabilities of  
tomorrow Interim evaluation of the European Defence Fund**

{COM(2025) 299 final}  
{SWD(2025) 151 final}



EUROPEAN COMMISSION  
Regulatory Scrutiny Board

Brussels,  
Ares(2025)

## **Opinion**

**Title: Evaluation/fitness check of the European Defence Fund**

**Overall opinion: POSITIVE WITH RESERVATIONS**

### **(A) Policy context**

The EUR 7.3 billion European Defence Fund (EDF) is the EU's defence research and development (R&D) funding programme for 2021-2027 which aims to strengthen the competitiveness, efficiency, and innovation of the EU defence industry. It supports cross-border collaboration, particularly among SMEs and mid-sized companies, and improves defence supply and value chains. The EDF is designed to integrate co-financing thereby leveraging national contributions.

The EDF builds on two precursor programmes: the 2017-2019 Preparatory Action on Defence Research (PADR) and the 2019-2020 European Defence Industrial Development Programme (EDIDP). In line with Article 29 of the EDF Regulation, the interim evaluation covers the period 30 June 2021 until 31 July 2024.

### **(B) Key issues**

**The Board notes the additional information provided in advance of the meeting and commitments to make changes to the report.**

**However, the report still contains shortcomings. The Board gives a positive opinion with reservations because it expects the lead Service to rectify the following aspects:**

- (1) The analysis of the performance of the programme is not framed by an intervention logic that fit for the purpose of the evaluation. The specific objectives are insufficiently operationalised.**
- (2) The report does not provide sufficient reassurance on the effectiveness of the monitoring and evaluation framework or that it will adequately support the final evaluation. The data and data collection limitations are not properly reflected in the conclusions.**
- (3) The presentation of the findings and data does not allow for a robust appreciation of the programme's effectiveness and efficiency. It does not use possible benchmarking to demonstrate the programme's benefits. The Rhomolo-based projection of the benefits is inappropriate for the purpose of the evaluation or the specificities of the defence sector.**

This opinion concerns a draft evaluation which may differ from the final version.

**(4) The conclusions do not reflect the outcome of the analysis in a balanced way.**

**(C) What to improve**

- 1) The report should review the programme's intervention logic to ensure the European Defence Fund's (EDF) specific objectives are sufficiently operationalised to be precise enough and measurable. The report should reconstruct the intervention logic to include causal links between its elements, allowing for a better assessment of the programme's progress towards success, thereby preparing the ground for the final evaluation. Against this backdrop, the report should discuss the validity of the indicators set out in the Regulation's Annex and the programme's monitoring and evaluation framework to ensure they are fit for future monitoring and capable of providing meaningful results at the time of the final evaluation. This includes assessing the framework's ability to track the programme's progress and propose possible adjustments. The findings on evidence gaps on monitoring and reporting arrangements should be reflected in the conclusions section. In the lessons learned section of the report an analysis should be included whether and how the indicators in the Regulations' Annex and the monitoring and evaluation framework should be amended.
- 2) The report should better link the findings with the corresponding evidence and analytical methods. Given its wide reliance on the stakeholder consultations, the report should transparently present views from different groups and data from all affected parties, including non-participants to the programme whose feedback can provide valuable insights into the programming and implementation shortcomings.
- 3) Further, the report should review the parts of the effectiveness and efficiency analysis (and corresponding conclusions) that are based inappropriately on the macroeconomic projections of the Rhomolo model, which – being an ex-ante methodology – is conceptually misplaced for demonstrating benefits in retrospective evaluations. The unsuitability of this model is further accentuated by the numerous specificities of the defence sector which are not adequately considered by the model. Instead, the report at this stage should establish effectiveness and efficiency using other methods, complementing the output indicators with a comparison with the pre-programme situation in the defence industry and the national approach to R&D in the sector, benchmarking against earlier projects or approaches and/or explaining the limitations of the possible points of comparison. The report should assess key implementing modalities of the programme such as allocation of bonus points in the project selection phase. Anecdotal evidence and flagship achievements, e.g. around the prototypes envisaged and under development within the pipeline of ongoing projects should be used to a greater extent to build the case as potential indicators of the future programme's success. The report should also better present the nature and results of the increased cooperation and multinational partnerships in innovation, discussing value added of reduced fragmentation and increased convergence and impacts on competitiveness of the sector.
- 4) Regarding efficiency, the report should consider the costs associated with reporting and project coordination accruing to the stakeholders. It should discuss the lead time of its programming phases, accentuating the adequacy of the framework and identifying justified potential for improving efficiency. The report should assess to what extent the programme allows for sufficient agility and reactivity in the evolving

dynamic geopolitical context with quickly emerging needs, notably through the lens of the Russian war of aggression against Ukraine.

- 5) The report should draw conclusions, reflecting the outcome of the analysis of the programme's functioning, paving the way for the necessary adjustments.

Some more technical comments have been sent directly to the author Service.

**(D) Conclusion**

**The lead Service should revise the report before launching the interservice consultation.**

Full title	Interim evaluation of the European Defence Fund
Reference number	PLAN/2023/1621
Submitted to RSB on	2 April 2025
Date of RSB meeting	30 April 2025

