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### **COVER NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034  
- Opinion of the European Committee of the Regions

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Delegations will find attached a copy of the above-mentioned opinion.

This opinion is available in all language versions on the following website:

[European Fund for Regional Development including for Interreg and the Cohesion Fund | European Committee of the Regions](#)



**European Committee  
of the Regions**

**COTER-VIII/008**

**171st plenary session, 6-7 May 2026**

## **OPINION**

### **European Fund for Regional Development including for Interreg and the Cohesion Fund**

THE EUROPEAN COMMITTEE OF THE REGIONS (CoR)

- highlights the impact of ERDF and Cohesion Fund investments, which exceeded EUR 250 billion in 2014-2020 [...] and recognises their irreplaceable value for the territorial development;
- supports the need to adapt, modernise and simplify cohesion policy [...] and make it more flexible [...] as well as safeguard the role of local and regional authorities in shared management, the partnership principle and multi-level governance;
- calls for cohesion policy funds to provide appropriate and sufficient support for competitiveness, infrastructure, just transition, the demographic challenge, sustainability, climate change, digitalisation, connectivity and services of general interest, including social services and housing;
- calls for clear amounts to be earmarked in future for both the ERDF and the Cohesion Fund so that the EU's objectives can be achieved;
- stresses that European territorial cooperation (ETC), together with cohesion policy, is the epitome of EU added value and one of the bloc's most important tools for strengthening competitiveness and the single market;
- welcomes the continuation of Interreg, with its four strands, and the allocation of a dedicated budget for ETC;
- emphasises the importance of continuity in the planning and implementation of Interreg Plan chapters; therefore deems it necessary to include the necessary legal provisions to ensure timely and predictable budget availability from 2028;
- is concerned about the proposed scope of the implementing act, which seems to go beyond the intended use of this legal instrument, and believes that including more detailed provisions in the Regulation itself will speed up its implementation;
- advocates taking full advantage of the cross-border, transnational and interregional nature of European groupings of territorial cooperation (EGTCs) when designing and implementing Interreg chapters and other projects.

**Rapporteur:**

María GUARDIOLA MARTÍN (ES/EPP)  
President of the Autonomous Community of Extremadura

**Reference document:**

[Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for Regional Development including for European Territorial Cooperation \(Interreg\) and the Cohesion Fund as part of the Fund set out in Regulation \(EU\) \[...\] \[NRP\] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034 \[COM\(2025\) 552 final\]](#)

**Opinion of the European Committee of the Regions – European Fund for Regional Development  
including for Interreg and the Cohesion Fund**

**I. RECOMMENDATIONS FOR AMENDMENTS**

**Amendment 1**

**Recital 1**

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
Article 176 of the Treaty on the Functioning of the European Union ('TFEU') provides that the European Regional Development Fund ('ERDF') is intended to help to redress the main regional imbalances in the Union. Pursuant to that Article and the second and third paragraphs of Article 174 TFEU, the ERDF is to contribute to reducing disparities between the levels of development of the various regions and the backwardness of the least-favoured regions, among which particular attention is to be paid to regions which suffer from severe and permanent natural or demographic handicaps, including in particular handicaps resulting from demographic decline, such as the northernmost regions with very low population density, islands, and cross-border and mountain regions.	Article 176 of the Treaty on the Functioning of the European Union ('TFEU') provides that the European Regional Development Fund ('ERDF') is intended to help to redress the main regional imbalances in the Union. Pursuant to that Article and the second and third paragraphs of Article 174 TFEU, the ERDF is to contribute to reducing disparities between the levels of development of the various regions and the backwardness of the least-favoured regions, among which particular attention is to be paid to <b>rural areas, areas affected by industrial transition and</b> regions which suffer from severe and permanent natural or demographic handicaps, including in particular handicaps resulting from demographic decline, such as the northernmost regions with very low population density, islands, and cross-border and mountain regions.

<i>Reason</i>
The amendment seeks to take account of the full scope of the third paragraph of Article 174 TFEU.

**Amendment 2**

**Recital 8**

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
Member States and particularly those with significant Roma population challenges shall pay specific attention to Roma equality and inclusion. Support should not be provided for actions that contribute to any form of segregation or exclusion of persons with disabilities and <b>rationalised</b> communities such as Roma.	Member States and particularly those with significant Roma population challenges shall pay specific attention to Roma equality and inclusion. Support should not be provided for actions that contribute to any form of segregation or exclusion of persons with disabilities and <b>marginalised</b> communities such as Roma.

<i>Reason</i>
Correction of terminology

### Amendment 3

Article 1 – Subject matter

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
This Regulation lays down specific conditions for the implementation of Union support in accordance with the general objectives laid down in Article 2 of Regulation (EU) [NRP Regulation], <b>and in particular point (a) and (e) thereof.</b>	This Regulation lays down specific conditions for the implementation of Union support <b>in all regions</b> in accordance with the general objectives laid down in Article 2 of Regulation (EU) [NRP Regulation].

<i>Reason</i>
This amendment makes it clear that the ERDF will cover all regions and must support all the objectives set out in the NRP Regulation.

### Amendment 4

Article 1 – Subject matter

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
This Union support shall be provided under the National and Regional Partnership Fund, in accordance with the rules governing that Fund and set out in Regulation (EU) [NRP Regulation].	This Union support shall be provided under the National and Regional Partnership Fund, in accordance with the rules governing that Fund and set out in Regulation (EU) [NRP Regulation]. <b><i>The rules set out in Regulation (EU) [NRP Regulation] and Regulation [Performance framework] shall apply to the Interreg Plan, except where more specific rules are set out in this Regulation for the implementation of the Interreg Plan. In accordance with Article 10(2) of the NRP Regulation, a budget of EUR 248.37 billion in current prices shall be allocated to the ERDF, and a budget of EUR 46.99 billion in current prices shall be allocated to the Cohesion Fund. EUR 11.57 billion in current prices shall be allocated to the Interreg Plan referred to in Chapter II of this Regulation.</i></b>

***Reason***

To move Article 7(3) to Article 1 to clarify the distinction between the rules applicable to NRP plans and those applicable to Interreg plan chapters, adding a reference to the performance framework. Specific allocations for the funds covered by this Regulation have also been included. This is to ensure consistency with the Parliament's report on the MFF which was adopted by the BUDG committee on 15 April, and with the CoR opinion on the NRPP Fund Regulation.

**Amendment 5**

Article 2 – Support from the ERDF and Cohesion Fund

<b><i>Text proposed by the European Commission</i></b>	<b><i>CoR amendment</i></b>
The ERDF and the Cohesion Fund shall support the specific objectives set out in Regulation (EU) [NRP Regulation] contributing to the <b><i>general objective</i></b> set out in Article 2(1)(a) of Regulation (EU) [NRP Regulation] in accordance with their respective scope set out in Articles 176 and 177 TFEU.	The ERDF and the Cohesion Fund shall support the specific objectives set out in <b><i>Article 3 of</i></b> Regulation (EU) [NRP Regulation] contributing to <b><i>all the objectives</i></b> set out in Article 2 of Regulation (EU) [NRP Regulation] in accordance with their respective scope set out in Articles 176 and 177 TFEU.

***Reason***

This amendment makes it clear that the ERDF and the Cohesion Fund should support all the objectives of the NRP plans. That said, they should always be used in accordance with their respective scopes of application as set out in Articles 176 and 177 TFEU.

**Amendment 6**

Article 3 – Definitions

<b><i>Text proposed by the European Commission</i></b>	<b><i>CoR amendment</i></b>
For the purpose of this Chapter, where provisions in Articles <b><i>69</i></b> [Responsibilities of Member States], <b><i>70</i></b> [Submission of the annual assurance package], <b><i>74</i></b> [Data collection and recording], and <b><i>77</i></b> [Submission and assessment of payment applications] of Regulation (EU) [NRP Regulation] refer to a 'Member State', that term shall be construed as meaning 'the Member State hosting the managing authority'.	For the purpose of this Chapter, where provisions in Articles <b><i>58</i></b> [Responsibilities of Member States], <b><i>59</i></b> [Submission of the annual assurance package], <b><i>63</i></b> [Data collection and recording], and <b><i>65</i></b> [Submission and assessment of payment applications] of Regulation (EU) [NRP Regulation] refer to a 'Member State', that term shall be construed as meaning 'the Member State hosting the managing authority'.

***Reason***

Correction of the articles referenced.

### Amendment 7

#### Article 4 – Support for disadvantaged areas

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>1. In accordance with Article 174 TFEU, Member States shall pay special attention to addressing the challenges of disadvantaged regions and areas, in particular rural areas, areas affected by industrial transition, regions which suffer from severe and permanent natural or demographic handicaps, such as the northernmost regions with very low population density and island, cross-border and mountain regions, and also just transition areas and regions bordering Russia, Belarus and Ukraine. Member States and regions shall, where appropriate, set out an integrated approach to addressing demographic challenges or specific needs of the regions and areas referred to in this paragraph in their National and Regional Partnership Plans in accordance with Articles <b>72 to 74</b> [integrated local and urban development] of Regulation (EU) [NRP Regulation]. Such an integrated approach may include a commitment on dedicated funding for that purpose and may be included in dedicated chapters of the National Regional and Partnership Plan.</p>	<p>1. In accordance with Article 174 TFEU, Member States shall pay special attention to addressing the challenges of disadvantaged regions and areas, in particular rural areas, areas affected by industrial transition, regions which suffer from severe and permanent natural or demographic handicaps, such as the northernmost regions with very low population density and island, cross-border and mountain regions, and also just transition areas and regions bordering Russia, Belarus and Ukraine. Member States and regions shall, where appropriate, set out an integrated approach to addressing demographic challenges or specific needs of the regions and areas referred to in this paragraph in their National and Regional Partnership Plans in accordance with Articles <b>74 to 76</b> [integrated local and urban development] of Regulation (EU) [NRP Regulation]. Such an integrated approach may include a commitment on dedicated funding for that purpose and may be included in dedicated chapters of the National Regional and Partnership Plan.</p>

<i>Reason</i>
Correction of the articles referenced.

### Amendment 8

#### Article 5 – Sustainable urban development

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>As part of their territorial development, Member States shall support integrated urban development strategies which focus on sustainable development and tackle environmental, energy and climate challenges, in particular the fair transition towards a clean and climate-neutral and resilient economy</p>	<p>As part of their territorial development, Member States shall support integrated urban development strategies which focus on sustainable development and tackle <b>economic, social, demographic</b>, environmental, energy and climate challenges, in particular the fair transition towards a clean and</p>

<p>by 2050, paying special attention to housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages.</p>	<p>climate-neutral and resilient economy by 2050, paying special attention to <b>sustainable mobility, energy efficiency</b> housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages. <b>Member States and regions may, where appropriate, establish such strategies using territorial tools in accordance with Articles 74 to 76 [integrated local and urban development] of Regulation (EU) [NRP Regulation].</b></p>
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<b>Reason</b>
<p>The full list of challenges should be added, in line with Recital 9. Sustainable mobility and energy efficiency should be added as areas for special attention.</p> <p>This amendment also specifically refers to the territorial tools mentioned in the NRP Regulation. It makes clear that use of integrated urban development tools is optional.</p>

### Amendment 9

#### Article 6

<b>Text proposed by the European Commission</b>	<b>CoR amendment</b>
<p><b>Measures shall be established in the National and Regional Partnership Plans to cover structural support for their economic, social and territorial development and operating costs or compensation including for the provision of services under a public service obligation and contracts in those regions with a view to offsetting the additional costs incurred in the outermost regions as a result of one or more of the permanent restraints to their development listed in Article 349, first paragraph, TFEU.</b></p>	<p><b>The Member State shall include in the National and Regional Partnership Plans measures to offset the additional expenditure resulting from one or more permanent constraints on their development, covering both structural and operating costs. The costs of compensation granted for fulfilling public service obligations and their contracts in these regions may also be financed. The Member State shall provide support in the outermost regions for activities such as:</b></p> <ul style="list-style-type: none"> <li><b>infrastructure investments;</b></li> <li><b>activities for applied research and innovation;</b></li> <li><b>investments in access to services;</b></li> <li><b>equipment, software and intangible assets;</b></li> <li><b>networking, cooperation, exchange of experiences and activities involving innovation clusters, including between businesses, research organisations and public authorities;</b></li> <li><b>information, communication and studies;</b></li> <li><b>technical assistance; and</b></li> </ul>

	<p><i>productive investments in enterprises, irrespective of their size.</i></p> <p><i>Such measures should be financed through a specific additional allocation for the outermost regions.</i></p>
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<i>Reason</i>
<p>The text of the European Commission has been rewritten to clarify the EU's commitment to its outermost regions. The introduction of an additional specific allocation for these regions cannot be made dependent on the will of the Member States.</p>

**Amendment 10**  
Article 7 – Scope

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>1. Interreg shall focus on supporting the following strands of cooperation:</p> <p>(a) cooperation between adjacent regions to promote integrated and harmonious regional development between neighbouring land and maritime border regions (cross-border cooperation);</p> <p>(b) cooperation over larger transnational territories or around sea basins, involving national, regional and local partners in Member States and non-Member States with a view to achieving a higher degree of territorial integration (transnational cooperation);</p> <p>(c) cooperation to reinforce the effectiveness of cohesion policy by promoting exchange of experiences, innovative approaches <b>and</b> capacity building (interregional cooperation);</p> <p>(d) cooperation among outermost regions and with their neighbouring non-Member States or regional integration and cooperation organisations to facilitate their regional integration and harmonious development in their neighbourhood (outermost regions' cooperation).</p>	<p>1. Interreg shall focus on supporting the following strands of cooperation:</p> <p>(a) cooperation between adjacent regions <b>of Member States and non-Member States</b> to promote integrated and harmonious regional development, <b>address common challenges and harness the untapped growth potential</b> between neighbouring land and maritime border regions (cross-border cooperation – <b>NUTS 3 territorial reference level</b>), <b>ensuring that the application of distance criteria (150 km) does not lead to the exclusion of island regions belonging to the same sea basin;</b></p> <p>(b) cooperation over larger transnational territories or around sea - basins, involving national, regional and local partners in Member States and non-Member States, with a view to achieving a higher degree of territorial integration <b>based on multilevel governance</b> (transnational cooperation – <b>NUTS 2 territorial reference level</b>);</p> <p>(c) cooperation <b>between regions of Member States and non-Member States</b> to reinforce the effectiveness of cohesion policy by promoting exchange of experiences, innovative approaches, capacity building <b>and an analysis of development trends in relation to territorial cohesion objectives through Interreg Europe, Interact, URBACT and ESPON programmes based on multilevel governance</b> (interregional cooperation – <b>NUTS 2 territorial reference level</b>);</p>

	(d) cooperation among outermost regions and with their neighbouring non-Member States or regional integration and cooperation organisations to facilitate their regional integration and harmonious development in their neighbourhood (outermost regions' cooperation).
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<i>Reason</i>
Cross-border and interregional cooperation must also encompass cooperation between Member States and third countries, promoting multilevel governance. Interregional cooperation should ensure the continuity of successful programmes that sustain Interreg's impact. Furthermore, in consistency with the new performance-based approach (achievement of results and assessment of territorial impact), it is essential to specify the statistical territorial reference levels, which were already stipulated in the previous Regulation for the 2021-2027 period. On the other hand, in the case of maritime cooperation, applying distance thresholds may have exclusionary effects that are at odds with the rationale of territorial cohesion, especially when it comes to island regions.

**Amendment 11**  
Article 7 – Scope

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
3. The rules set out in Regulation (EU) [NRP Regulation] shall apply to the Interreg Plan, except where more specific rules are set out in this Regulation for the implementation of the Interreg Plan.	

<i>Reason</i>
This clarification should be moved to Article 1 of the Regulation, see amendment 3.

**Amendment 12**  
Article 7 – Scope

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
4. In addition to the specific objectives set out in Article 3, <i>points (a) and (c)</i> , of Regulation (EU) [NRP Regulation], Interreg shall support ‘better cooperation governance’, ‘a safer and more secure Europe’ and ‘more resilient regions bordering Russia, Belarus and Ukraine’.	4. In addition to the specific objectives set out in Article 3 of Regulation (EU) [NRP Regulation], Interreg shall support ‘better cooperation governance’, ‘a safer and more secure Europe’ and ‘more resilient regions bordering Russia, Belarus and Ukraine’.

<b>Reason</b>
Interreg can potentially help meet all the specific objectives set out in Article 3 of the NRP Regulation. In line with Recital 13 and Article 8(3)(b) of the ERDF / Cohesion Fund / Interreg Regulation.

### Amendment 13

#### Article 8

<b>Text proposed by the European Commission</b>	<b>CoR amendment</b>
3. (b) describe the intervention strategy of the Interreg Plan chapter based on a clear analysis of territorial needs and gaps in the area covered, identifying the measures for cooperation, including any measures for territorial or local development and explaining how these measures are expected to contribute to the objectives set out in Articles 2 and 3 [policy objectives] of Regulation (EU)	3. (b) describe the intervention strategy of the Interreg Plan chapter based on a clear analysis of territorial needs and gaps in the area covered, identifying the measures for cooperation, including any measures for territorial or local development, <b>including cross-border functional areas</b> , and explaining how these measures are expected to contribute to the objectives set out in Articles 2 and 3 [policy objectives] of Regulation (EU)

<b>Reason</b>
Only Interreg can provide support to functional cross-border areas that are divided by national borders. Each Interreg chapter should identify these cross-border functional areas where integrated interventions and synergetic investments can be implemented.

### Amendment 14

#### Article 8 – Requirements for the Interreg Plan chapters

<b>Text proposed by the European Commission</b>	<b>CoR amendment</b>
3. (c) provide a list and description of measures, including the general and specific objectives that each measure primarily pursues <b>and the list of envisaged milestones and targets, with their indicative completion date during the programming period.</b> The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation XX [Performance] except where duly justified;	3. (c) provide a list and description of measures, including the general and specific objectives that each measure primarily pursues. <b>The chapter shall describe support for projects of limited financial volume and the use of small-project funds, or else set out the reasons why such support cannot be included.</b> The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation XX [Performance] except where duly justified;

***Reason***

To reintroduce support for small projects and the small-project fund, which has proven useful for Interreg in previous programming periods. See Articles 24 and 25 of the Interreg Regulation for 2021-2027.

**Amendment 15**

Article 8 – Requirements for the Interreg Plan chapters

<b><i>Text proposed by the European Commission</i></b>	<b><i>CoR amendment</i></b>
3. (f) <b><i>promote partnership and knowledge exchange by setting out</i></b> which stakeholders have been <b><i>consulted</i></b> , how they were selected, how their representativeness has been ensured and how their input is reflected in the Interreg Plan chapter in line with the code of conduct on partnership, and <b><i>by including</i></b> a summary of the <b><i>consultation</i></b> process conducted for the preparation of the Interreg Plan chapter;	3. (f) <b><i>establish</i></b> which stakeholders have been <b><i>involved</i></b> , how they were selected, how their representativeness has been ensured and how their input is reflected in the Interreg Plan chapter in line with the code of conduct on partnership, and <b><i>include</i></b> a summary of the process conducted for the preparation of the Interreg Plan chapter;

***Reason***

In line with Article 6 of the Regulation on the NRP plans and other requirements proposed in the CoR draft opinion on these plans to improve the provisions on partnership and multi-level governance, the chapters of the Interreg plan will be the result of a comprehensive partnership with the active involvement of all partners.

**Amendment 16**

Article 9 – Approval and amendment of the Interreg Plan

<b><i>Text proposed by the European Commission</i></b>	<b><i>CoR amendment</i></b>
1. The Commission shall adopt an implementing act, in accordance with the procedure referred to in Article <b><i>13(2)</i></b> [Committee Procedure], setting out: <b><i>(a)</i></b> the list of Interreg Plan chapters, the designation of the respective chapter areas and the indicative allocation from the Fund and, where applicable, from the Global Europe Instrument; <b><i>(b) where appropriate,</i></b> detailed arrangements covering the specific implementation modalities of Interreg to ensure a consistent approach.	1. The Commission shall adopt an implementing act, in accordance with the procedure referred to in Article <b><i>14</i></b> [Committee Procedure], setting out the list of Interreg Plan chapters, the designation of the respective chapter areas and the indicative allocation from the Fund and, where applicable, from the Global Europe Instrument. <b><i>2. The</i></b> detailed arrangements covering the specific implementation modalities of Interreg to ensure a consistent approach – <b><i>including provisions on eligibility and recoveries - are specified in Annex XX to this Regulation.</i></b>

<i>Reason</i>
An annex to the Regulation would seek to avoid uncertainty, increase legal certainty, ensure that rules are applied and interpreted in the same way and reduce delays in programming that could be caused by delayed adoption of the implementing act.

### Amendment 17

#### Article 9

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
2. The Commission shall assess the Interreg Plan chapters or the amended Interreg Plan chapters submitted by the Member State hosting the managing authority within 4 months of their submission. When carrying out its assessment, the Commission shall verify that the Interreg Plan chapter complies with all requirements in Article 5 and follows the template set out in the Annex to this Regulation [Interreg chapter template]. The Commission may make observations and request additional information. The deadline for the approval shall be interrupted from the day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.	2. The Commission shall assess the Interreg Plan chapters or the amended Interreg Plan chapters submitted by the Member State hosting the managing authority within 4 months of their submission. When carrying out its assessment, the Commission shall verify that the Interreg Plan chapter complies with all requirements in Article 8 and follows the template set out in the Annex to this Regulation [Interreg chapter template]. The Commission may make observations and request additional information. The deadline for the approval shall be interrupted from the day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.

<i>Reason</i>
Correction of the article referenced.

### Amendment 18

New article after Article 9 (Article 9a) - Support to projects of limited financial volume

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
	<p><i>Support to projects of limited financial volume</i></p> <p><i>Cooperation under strand (a), (b) and (d) shall support projects of limited financial volume, either: a) directly within each Interreg Plan chapter; or b) within one or more small project funds. Where a chapter for cooperation under</i></p>

	<i>strand (b) and (d) is unable to fulfil this obligation, the reasons why the obligation cannot be fulfilled shall be set out in the chapter.</i>
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<b>Reason</b>
Reintroducing article of the current regulation.

### Amendment 19

New article after Article 9 (Article 9b)- Small project funds

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
	<p><b><i>Small project funds</i></b></p> <p><b><i>1. The total contribution from the ERDF (or, where applicable, an external financing instrument of the Union) to small project funds within an Interreg chapter shall not exceed 20% of the total allocation of the Interreg chapter.</i></b></p> <p><b><i>2. The final recipients within a small project fund shall receive support from the ERDF (or, where applicable, the external financing instruments of the Union) through the beneficiaries and implement the small projects within that small project fund ('small project')</i></b></p> <p><b><i>3. The small project fund constitutes an operation which shall be managed by a single beneficiary (cross-border legal body such as cross-border EGTC) or in partnership by legal bodies on respective sides of the border that promote cross-border cooperation in given geographical area (such as Euroregions and similar cross-border structures). The beneficiary shall select the small projects which are implemented by the final recipients. A body involving representatives from at least two participating countries, of which at least one is a Member State, shall select the joint small projects.</i></b></p>

	<p><i>4. Additional documents setting out the conditions for support to a small project fund shall set out the elements necessary to ensure that the beneficiary or beneficiaries: (a) establish a non-discriminatory and transparent selection procedure; (b) apply objective criteria for the selection of small projects, which avoid conflicts of interest; (c) assess applications for support; (d) select projects and fix the amount of support for each small project; (e) are accountable for the implementation of the operation and keep at their level all supporting documents required for the audit trail; and (f) make available to the public the list of the final recipients which benefit from the operation.</i></p> <p><i>5. The selection of small projects shall not constitute a delegation of tasks from the managing authority to an intermediate body.</i></p> <p><i>6. Staff costs generated at the level of the beneficiary for the management of the small project fund or funds shall not exceed 20% of the total eligible cost of the small project fund or funds, respectively.</i></p> <p><i>7. Where the public contribution to a small project does not exceed EUR 100 000, the contribution from the ERDF shall take the form of unit costs or lump sums or flat rate financing, except for projects for which the support constitutes State aid. Where the total costs of each project do not exceed EUR 100 000, the amount of support for one or more small projects may be set out on the basis of a draft budget which is established on a case-by-case basis and agreed ex ante by the beneficiary managing the small project fund (e.g. on the basis of data already in their possession from the previous implementing period where applicable).</i></p>
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<b>Reason</b>
Clarification of the rules applicable to Small Project Funds. Simplification for the current situation.

## Amendment 20

Article 10 – Functions of authorities responsible for the Interreg Plan chapter and the monitoring committee

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
1. Member States and, where applicable, non-Member States participating in an Interreg Plan chapter shall identify a single managing authority <b>and</b> a single audit authority which shall be located in the same Member State. <i>A</i> coordinating authority <i>as</i> referred to in Article 49 of Regulation (EU) [NRP Regulation] shall not be identified for the Interreg Plan.	1. Member States and, where applicable, non-Member States participating in an Interreg Plan chapter shall, <b><i>in agreement with the competent subnational authorities</i></b> , identify a single managing authority, <b><i>which may be a European grouping of territorial cooperation (EGTC) or an equivalent cross-body entity</i></b> . <b><i>They shall also identify</i></b> a single audit authority which shall be located in the same Member State. <b><i>The</i></b> coordinating authority referred to in Article 49 of Regulation (EU) [NRP Regulation] shall not be identified for the Interreg Plan.

### *Reason*

To clarify the role of subnational authorities in accordance with national legislation. EGTCs, as legal bodies under EU law, together with equivalent entities, have valuable experience in the cross-border implementation of EU programmes. Clarification in line with Article 45(4) of the Interreg Regulation for 2021-2027.

## Amendment 21

Article 10

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
2. a) drawing up and submitting payment applications for the chapter of the Interreg Plan to the Commission in accordance with Article <b>63</b> [payments] of Regulation (EU) [NRP Regulation]; ... d) coordinating and submitting to the Commission all the documents requested as part of the annual assurance package referred to in Article <b>70</b> [annual assurance package] of Regulation (EU) [NRP Regulation].	2. a) drawing up and submitting payment applications for the chapter of the Interreg Plan to the Commission in accordance with Article <b>65</b> [payments] of Regulation (EU) [NRP Regulation]; ... d) coordinating and submitting to the Commission all the documents requested as part of the annual assurance package referred to in Article <b>59</b> [annual assurance package] of Regulation (EU) [NRP Regulation].

### *Reason*

Correction of the articles referenced.

## Amendment 22

Article 10 – Functions of authorities responsible for the Interreg Plan chapter and the monitoring committee

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>6. A monitoring committee shall be established for each Interreg Plan chapter. The monitoring committee shall be responsible for selection of Interreg operations, in accordance with the Interreg Plan chapter’s strategy and objectives. The Commission may lay down further requirements to be met by the monitoring committee in <b><i>the implementing act</i></b> provided for in Article 9(1) [approval and amendment of the Interreg plan].</p>	<p>6. A monitoring committee shall be established for each Interreg Plan chapter. The monitoring committee <b><i>whose members are the administrative authorities of the reference territories for each cooperation component set out in Article 7</i></b>, shall be responsible for selection of Interreg operations, in accordance with the Interreg Plan chapter’s strategy and objectives. <b><i>The monitoring committee may set up one or more steering committees that shall act under its responsibility for the selection of operations.</i></b></p> <p><b><i>Each monitoring committee shall adopt its own rules of procedure.</i></b></p> <p><b><i>The composition of each monitoring committee shall respect the principles of partnership and multi-level governance.</i></b></p> <p><b><i>The monitoring committee shall analyse progress in implementing and achieving the milestones and objectives of the Interreg Plan chapter.</i></b></p> <p>The Commission may lay down further requirements to be met by the monitoring committee in the <b><i>Annex XX to this Regulation, which is</i></b> provided for in Article 9(1) [approval and amendment of the Interreg plan].</p>

<i>Reason</i>
<p>Key elements for the establishment of a monitoring committee and its functions. See Articles 28 to 30 of the Interreg Regulation for 2021-2027. As already stated in amendment 14 to Article 9, the detailed rules for the specific implementing arrangements for Interreg should be set out in an annex to this Regulation and not in an implementing act.</p>

## Amendment 23

New article after Article 10 (Article 10a) – European groupings of territorial cooperation (EGTCs)

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
	<p><i>1. A European grouping of territorial cooperation (EGTC) may be designated as managing authority for a chapter of the Interreg Plan.</i></p> <p><i>2. A cross-border legal body or an EGTC may be the sole partner of an Interreg operation under strands of cooperation a, b and d, provided that the members thereof include partners from at least two participating countries.</i></p> <p><i>3. The cross-border legal body or EGTC shall have members from at least three participating countries under the Interreg Europe and URBACT programmes.</i></p> <p><i>4. A cross-border legal body or an EGTC may also be a single beneficiary of a small-project fund.</i></p> <p><i>5. Where a cross-border legal body or EGTC implements integrated territorial investment, it may also be the sole beneficiary, provided that there is a separation of functions within the cross-border legal body or EGTC.</i></p>

<i>Reason</i>
<p>To clarify the inherent multinational nature of EGTCs. To group together all the functions of EGTCs set out in various articles in the Interreg Regulation for 2021-2027.</p>

**Amendment 24**

Article 12

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>3. Any Interreg Plan chapter that has already been approved by the Commission shall be discontinued or its allocation shall be reduced, in accordance with the applicable rules and procedures, in particular if: i. none of the partner countries covered by the external cross-border Interreg Plan chapter concerned has signed the relevant financing agreement by the deadlines set out in</p>	<p>3. Any Interreg Plan chapter that has already been approved by the Commission shall be discontinued or its allocation shall be reduced, in accordance with the applicable rules and procedures, in particular if: i. none of the partner countries covered by the external cross-border Interreg Plan chapter concerned has signed the relevant financing agreement by the deadlines set out in</p>

<p>accordance with Article [XX] of the Interreg Plan; or ii. the Interreg Plan chapter cannot be implemented as planned due to problems in the relations between the participating countries. In cases referred to in the first subparagraph, the contribution from the NRP referred to in paragraph 1 corresponding to annual instalments not yet committed, or annual instalments committed and decommitted totally or partially during the same budgetary year, which have not been re-allocated to another Interreg Plan chapter shall be allocated to another Interreg Plan chapter in which the Member State concerned participates.</p>	<p>accordance with Article [XX] of the Interreg Plan; or ii. the Interreg Plan chapter cannot be implemented as planned due to problems in the relations between the participating countries. In cases referred to in the first subparagraph, the contribution from the NRP referred to in paragraph 1 corresponding to annual instalments not yet committed, or annual instalments committed and decommitted totally or partially during the same budgetary year, which have not been re-allocated to another Interreg Plan chapter shall be allocated to another Interreg Plan chapter in which the Member State concerned participates, <i>giving priority to other plans affecting the same geographical area or cross-border area.</i></p>
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<i>Reason</i>
<p>To highlight the importance of making provision for decommitted funds to be reallocated as a matter of priority to other programmes that benefit the same geographical region or cross-border area, strengthening the continuity of investments in the territory concerned.</p>

## II. POLICY RECOMMENDATIONS

### *European Regional Development Fund (ERDF) and Cohesion Fund*

#### THE EUROPEAN COMMITTEE OF THE REGIONS (CoR)

1. highlights the impact of ERDF and Cohesion Fund investments, which exceeded EUR 250 billion in 2014-2020, as well as national and private co-financing, and recognises their irreplaceable value for the territorial development of local and regional authorities;
2. points out that in 2014-2020 the ERDF and the Cohesion Fund supported more than 2.5 million SMEs and helped create over 370 000 jobs and implement major infrastructure and environmental projects, and contributed to strengthening climate resilience;
3. points out that small and medium-sized enterprises (SMEs) are the backbone of Europe's economy. The ERDF should therefore continue to support the development of SMEs by promoting their growth, innovation and competitiveness. In view of current and future crises which may affect businesses and employment, the ERDF should support measures to create and safeguard jobs in SMEs;

4. supports the need to adapt, modernise and simplify cohesion policy, while maintaining respect for horizontal principles, including environmental principles, and make it more flexible, as well as the need to safeguard the role of local and regional authorities in shared management, the partnership principle and multi-level governance and ensure complementarity and synergies with other EU funding sources; however, rejects any hidden budget cuts that jeopardise both the continuity and predictability of cohesion policy and its focus on long-term structural transformation and place-based development;
5. stresses the importance of adopting a different terminology, replacing the term ‘region’ with the term ‘territory’ to emphasise the value of cohesion policy as a tool for the development of territories, without any administrative connotation;
6. regrets, in relation to the Regulation on national and regional partnership plans (NRP plans), the loss of specificity regarding funds and of legal certainty with respect to the ERDF and the Cohesion Fund for 2028-2034, in particular as regards differing approaches to intervention, eligible actions and differences in the visibility of funded projects and operations;
7. warns that the European Commission’s proposal risks violating the principle of subsidiarity, as it does not provide robust legal guarantees governing the role of subnational governments in designing, managing and implementing the ERDF and the Cohesion Fund, two of the funds covered by the NRP Regulation;
8. notes that, in order to ensure its effectiveness and the optimisation of available funds, cohesion policy should continue to be based on an integrated and bottom-up territorial approach, tailored to the specific characteristics and needs of each territory, including urban and rural areas and those that suffer severe and permanent natural or demographic challenges, such as island cross-border and mountainous regions, and those with very low population density, avoiding uniform solutions that do not reflect the territorial diversity of the Union;
9. calls for clear amounts to be earmarked in future for both the ERDF and the Cohesion Fund so that the EU’s objectives can be achieved; in this regard, there is a need for the allocation of amounts to the ERDF and the Cohesion Fund to ensure stable, predictable and sufficiently flexible funding to support long-term territorial strategies;
10. recognises the importance of suitable administrative capacity to maximise cohesion policy’s impact and return; this should be accompanied by adequate funding and simplified rules, in

particular for smaller local and regional authorities, as well as for less developed and transition regions;

11. calls for cohesion policy funds to provide appropriate and sufficient support for competitiveness, infrastructure, just transition, the demographic challenge, sustainability, climate change, digitalisation, connectivity and services of general interest, including social services and housing;
12. stresses that many of the ERDF's major achievements in areas such as boosting regional innovation ecosystems and supporting smart specialisation, which have been instrumental in supporting structural and industrial transformation processes in the regions, are not specifically mentioned either in the general or specific objectives of the NRP Regulation or in the ERDF-Cohesion Fund Regulation; this could weaken the continuity of this type of intervention in the 2028-2034 period;
13. calls for greater coherence with the NRP Regulation and clarity regarding the scope of support from the ERDF and the Cohesion Fund, and echoes the CoR's draft opinion on the NRP plans, which states that all funding provided under the fund should support all the objectives, in accordance with their respective scopes of application;
14. regrets that the provisions on integrated territorial development are weaker and advocates that specific, visible legal instruments be retained in this regard;
15. calls, in particular, for a clear alignment between the NRP Regulation and the ERDF-Cohesion Fund Regulation with regard to the provisions on territorial tools, fully complementing the European Competitiveness Fund (ECF);
16. advocates, in line with the CoR draft opinion on the NRP plans, that the N+2 decommitment rule apply to the period from 2028 to 2034; notes, in this regard, the difficulties faced in the current period and, therefore, the need for programmes to be approved swiftly and for the regulatory framework to be clear at the beginning of the period, so as not to jeopardise compliance with the expenditure path;

#### *European territorial cooperation (Interreg)*

#### THE EUROPEAN COMMITTEE OF THE REGIONS (CoR)

17. stresses that European territorial cooperation (ETC), together with cohesion policy, is the epitome of EU added value and one of the bloc's most important tools for strengthening competitiveness and the single market;
18. stresses that Interreg must remain a key pillar of territorial cohesion, with its strategic role in addressing cross-border and transnational challenges, macro-regional strategies, inter-regional cooperation, cooperation with outermost regions and cooperation with non-EU countries;
19. calls for the restoration of references to NUTS levels for each type of cooperation, in order to ensure the effectiveness of European territorial cooperation (Interreg) and to maintain close

consistency between intervention areas and local administrative and geographical realities, also in accordance with the performance principle;

20. points out that Interreg programmes have successfully contributed to the development of cross-border public services and infrastructure;
21. welcomes the continuation of Interreg, with its four strands, and the allocation of a dedicated budget for ETC;
22. considers it appropriate to deal with Interreg outside the NRP plans, given its cooperative nature, with partners from different Member States and regions being involved;
23. emphasises the importance of continuity in the planning and implementation of Interreg Plan chapters; therefore deems it necessary to include the necessary legal provisions to ensure timely and predictable budget availability from 2028;
24. calls for considering a revision of the deadlines laid down for the preparation, assessment and amendment of Interreg Plan chapters, in order to better reflect the complexity of multi-country cooperation. In particular, considers that a longer period for the submission of Interreg Plan chapters, combined with a shorter assessment period by the Commission and a more proportionate timeframe for the approval of subsequent amendments, would contribute to a more efficient and predictable programming process;
25. is concerned about the proposed scope of the implementing act, which seems to go beyond the intended use of this legal instrument, and believes that including more detailed provisions in the Regulation itself will speed up its implementation; stresses that the tasks, responsibilities and obligations of the bodies involved in the implementation of Interreg chapters, including monitoring committees, managing authorities and national certification bodies, should be defined at the level of the basic act, and should not be extended or modified through implementing acts;
26. calls on the Commission to clearly specify, within this regulation, which provisions of the Regulation (EU) [NRP Regulation] do not apply to the Interreg Plan, following the approach used in Article 1(5) of Regulation (EU) 2021/1060, in order to ensure legal clarity and take account of the specific nature of territorial cooperation;
27. advocates taking full advantage of the cross-border, transnational and interregional nature of European groupings of territorial cooperation (EGTCs) when designing and implementing Interreg chapters and other projects;
28. notes that, for cooperation under strand (a) functional reality might justify the separation of cross-border cooperation programmes or creation of new tri- or multi-lateral cross-border programmes and the geographical coverage does not necessarily have to coincide with the entire border of the neighbouring countries or regions;

29. calls for the performance indicators to be adapted to the specific nature of Interreg cooperation and for control and audit standards that are as harmonised and simplified as possible to be applied; calls on the Commission to provide further guidance;
30. calls for the reintroduction of specific provisions for small projects under Interreg;
31. calls for Interreg programmes to also be able to support cooperation and long-term partnerships between regions and towns in the form of regional or town twinning, where such cooperation contributes to Interreg objectives;
32. insists that all participating Member States and, where applicable, non-Member States must formally agree in writing to the content of the Interreg Plan chapter prior to its submission to the Commission, including a commitment to provide the necessary national co-financing and, where applicable, the financial contribution of non-Member States;
33. calls for clarification of the consequences for Interreg projects when payments to one of the participating Member States are blocked due to non-compliance with general principles such as the principle of the rule of law.

Brussels, 6 May 2026.

*The President  
of the European Committee of the Regions*

Kata Tüttö

*The Secretary-General  
of the European Committee of the Regions*

Petr Blížkovský

### III. PROCEDURE

<b>Title</b>	European Fund for Regional Development including for Interreg and the Cohesion Fund
<b>Reference documents</b>	<a href="#">Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034 [COM(2025) 552 final]</a>
<b>Legal basis</b>	Article 307, first paragraph, TFEU
<b>Procedural basis</b>	Rule 41(a) RoP – mandatory, optional and outlook opinions
<b>Date of Council/EP referral/Date of Commission letter</b>	18 September 2025
<b>Date of Bureau/president's decision</b>	23 September 2025
<b>Commission responsible</b>	Commission for Territorial Cohesion Policy and EU Budget (COTER)
<b>Rapporteur</b>	María GUARDIOLA MARTÍN (ES/EPP)
<b>Discussed in commission</b>	1-2 December 2025
<b>Date adopted by commission</b>	5 February 2026
<b>Result of the vote in commission</b>	Adopted by a majority
<b>Date adopted in plenary</b>	6 May 2026
<b>Previous Committee opinions</b>	
<b>Subsidiarity reference</b>	