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INFORMATION

From:	General Secretariat of the Council
To:	Ad Hoc Working Party on the Multiannual Financial Framework (AHWP MFF)
Subject:	Multiannual Financial Framework 2028-2034 - Written questions to the European Commission

Delegations will find attached all the written questions addressed by the Member States to the Commission on the proposals on the Multiannual Financial Framework 2028-2034.

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BELGIUM

1	Own resources
2	A technical fiche is desired on the Union's planned own resources that have an impact on own national budgets - both new and existing own resources + per member state the difference if these new own resources are adopted or not.
3	ETS and CBAM: what is the formula used by COM to calculate ETS and CBAM revenues? Can we receive updated sheets from COM on these own resources (the latest versions date from July 2023)?
4	For CBAM, the average amount per year is 1.4 bn € in the factsheet and 1.2 bn € in SWD_2025_570 p63, which is the correct figure ?
5	E-waste: what is the underlying logic for charging EUR 2/kg for non-collected e-waste? On what basis has the rate been decided upon
6	E-waste: Will the contribution for non-recycled e-waste be indexed yearly (just as is the case for plastics)?
7	CORE: what is the rationale behind CORE and how does it relate to strengthening competitiveness?
8	CORE: on which level will the turnover in the accounts of the companies be taken into account, e.g. national, EU, worldwide? How will the consolidation of the accounts be put into practice, which rules will apply? How will it be possible to get this information as authorities
9	CORE: How will the CORE contribution be categorized, will it be a direct tax, an indirect tax, or something else? Which Member State or institution will be responsible for collecting the tax? Is there an interlinkage with the OECD Pillar 2?
10	CORE: What will happen if a company with a high turnover is realizing losses? Will it be obliged to pay the CORE tax? What if the mother company realizes losses, but some of the entities realize gains?
11	TEDOR: The proposal to introduce TEDOR “complements the proposal for a recast of the tobacco excise directive” , but: “TEDOR is not legally dependent on the adoption of this recast”. In this respect: is the expected revenue calculated by the Commission based on the current minimum rates, or is it based on the new minimum rates as included in the proposal for recast?
12	TEDOR: [Recital (9) states that it is appropriate to have a call rate of 15% “to the revenue stemming from the application of the harmonized minimum rates”, so we understand that the rationale is that the call rate only applies to the amounts of manufactured tobacco where excise duties have been levied. However, the definition of “released for consumption” that is used in the proposal (referring to the definition of the excise directive), is very broad and includes, for instance, also the situation of illegal production. Can the Commission confirm that the call rate only applies to the amounts for which excise duties have been collected?]
13	TEDOR: Will there be harmonized minimum rates for tobacco products (e.g. e-liquids) that are prohibited in some Member States, but allowed in other ones?
14	Handling fee e-commerce: comparison between calculations of revenues as projected in the MFF 2028-2034 and calculations send by DG TAXUD in a previous stage.
15	Handling fee: In the non-paper on handling fee, COM mentions amounts of 2 and 0.5 EUR. In the Own Resources discussion, other amounts are mentioned. Where does the difference come from? Can COM give the underlying calculations?

16	Handling fee: The amounts to be recovered as a handling-fee, do they amount to the ‘approximate costs of recollection’, or is there another reasoning for arriving at the amounts per parcel? How were the amounts calculated?
17	Handling fee: On the basis of the proposal, can COM confirm that the income for Member States in which the goods are being put into circulation will be 100% of the handling fee until the end of 2027, 25% as from 1.1.2028 and 10% as from 1.3.2028?
18	Customs: Will it be the Member State in which the goods are put into circulation which has the right to keep the collection costs, even in the case where an appropriate IT solution at EU level for the purposes of the Union handling fee will be provided for?
19	Customs: Which budget will be foreseen for the Customs Control Equipment Instrument" (CCEI) and the "Customs Programme" in the MFF 2028-2034? Under which programmes will these budget lines be available?
20	Customs: Which budget will be foreseen for the European Customs Authority (EUCA) and for the EU Customs Data Hub (EUCDH)? Under which programmes will these budget lines be available?
21	Are all figures used in the text of the communication in current prices except the amount per year for the own resources ?
22	Could the European Commission provide a version in constant prices 2025 of Table 6 (Long-term forecast of future inflows of the EU budget of 2028-2034 MFF) of the annex of COM_2025_573_1_EN (Report Long-term forecast of future inflows and outflows of the EU budget (2026-2034) p21
23	NRPP
24	How do AMIF, BMVI and ISF fit into NRPP? Could the commission give more clarification on the horizontal NRPP rules applicable on the home funds? How and who determines the objectives for the home funds? Are there separate home fund objectives? How is flexibility provided for the allocation of funds between the home funds?
25	How do the home funds relate to EU facility, the crisis mechanism and global Europe? Do migration crises also fall under the category of crises?
26	How is article 22 linked to evaluations of Schengen, IBM, AMMR, EUAA, Frontex Vulnerability Assessment,... ?
27	Is a separate council implementing decision needed for the home funds?
28	Can the European Commission confirm that a Member State will be able to keep the current governance of the Social Climate Fund and reporting on the SCF by using article IV of the SCF Regulation (as suggested by article 80.4 of the NRPF proposal) and not the annex I of the performance framework ? How will the European Commission ensure the transparent reporting at EU level of the use of the ETS-2 revenues as two parallel reporting system may co-exist?
29	Why does the Impact assessment for the NRPF not assess an option without the inclusion of the SCF?
30	The proposal does not foresee a prolongation of the Just Transition Fund while the Political Guidelines indicated to “significantly increase our funding for a just transition across the next long-term budget.” Which funds or programmes will be dedicated to financing a just transition towards climate neutrality?
31	Comparative budgetary analysis desired: can it be clarified specifically for the funds falling within the NRPP whether the technical assistance part was also included?
32	Calculations amounts NRPP: a fiche is desired for clarification with all calculation rules bundled together, and with the concrete dates and origin of source material used by the European Commission to make these calculations.

33	Calculation rules: how was the non-allocated part of market measures from the EAGF handled? Was this co-distributed using the distribution key in Annex 1?
34	Amounts per Member State: is it possible to provide the exact amounts per Member State for the NRP Plans, as well as specifically for migration, border management and internal security (as stipulated in Article 10(2)(a)(iii))?
35	Social Climate Fund amounts: is it possible to provide the distribution of Social Climate Fund receipts per Member State and the formula to calculate them? In this document, amounts can be found on page 31. There are 2 series. Is this the right document, and if so, which of the 2 series must be used?
36	Governance NRPP: an explanatory fiche is needed on the governance of the NRPP compared to the governance of both the RRF and current funds under shared management (ERDF, ESF+, EMFF, EAFRD and EAGF)
37	Governance: What would be the role of the federated entities in this architecture? Will the Regions/federated entities of Belgium be directly in contact with the Commission for their projects part of the Plan? Will the information be centralised by a single national authority?
38	Mainstreaming social objectives: now that ESF+ is no longer a separate fund, what is effectively provided in the current proposals in terms of dedicated funding for social objectives?
39	Mainstreaming social objectives: Do investments in social infrastructure represent a loss of funding in other sectors that promote cohesion?
40	Agricultural funds (pillar structure - Art. 10(2)(ai(ii))): part of CAP funds will be ringfenced, but what exactly is covered by this, given that the classic CAP two-pillar structure disappears?
41	Agricultural funds (ringfencing - Art. 10(2)(ai(ii))): minimum ringfencing is currently at EU level, but what is minimum ringfencing at Member State level?
42	Agricultural funds (budget on top of ringfencing - Art. 35): can Article 35 intervention types also use budget on top of earmarked funds? If so, in what way and is this subject to certain conditions?
43	Cohesion: how much of the cohesion budget is earmarked for the most developed regions? Will the Berlin criteria be abandoned?
44	National contributions (Art. 20): is it correct that the national contribution based on the category of region applies to all forms of measures, regardless of sector (i.e. also measures related to the agricultural and fisheries sectors)?
45	Contribution to climate and environmental objectives (Art. 22 (2)): what (objective) criteria will the COM apply to determine whether a Member State should contribute a lower or higher minimum percentage of its plan to climate and environmental objectives and, consequently, can this percentage change through the implementation period of the NRP?
46	Resources for agriculture and marine fisheries (Art. 10(2)(a(ii))): the financial distribution of resources within the 'Fund' provides at least €295.7mia for interventions related to income support for the agricultural sector and support for the fisheries sector. What is the proportion of this amount envisaged for the fisheries sector and will it be guaranteed that a minimum amount of funds will be earmarked for the fisheries sector?
47	Adjustments to the Plan (Art. 24(6)): can member states make budgetary amendments to their plan and limit themselves to a notification for this, as long as the impact on an objective is less than 5%?
48	Funding through EU Facility regarding natural disasters: are conditions attached to this? E.g. whether sufficient adaptive measures were taken beforehand?

49	Regional chapters agriculture: Annex V, point 1.2, indicates that only national challenges and needs for the CAP may be indicated - how can this be reconciled with the possibility of regional and sectoral chapters within the NRP Plans?
50	Country-specific recommendations (Art. 22(2)(b)(i)): the European Semester will serve as a framework for economic policy coordination to identify country-specific recommendations and reform priorities. Will these include a regional approach (in country reports and country-specific recommendations), given the regional chapters within NRPs?
51	Relevant country-specific recommendations and country reports (Art. 22(2)(b)(i)): There is sometimes mentioning of "country-specific recommendations" and "relevant country-specific recommendations". Can there be more clarity on this? Do both country-specific recommendations 2025 and those for the years 2026 and 2027 (yet to be published) come into the picture? Is there a specific reason why some articles refer to the "country reports" and others to the "country-specific recommendations"?
52	Article 22 specifies that 'each NRP must be duly justified and substantiated, and must include the elements referred to in paragraph 2 of this Article (...)'. Can the Commission clarify what exactly it means by 'justified and substantiated'? One of the stated objectives of the new multiannual financial framework is to simplify procedures and reduce the administrative burden.
53	Given the already considerable length of the CAP strategic plans and cohesion programmes, would it not be more appropriate to focus on documents with a more strategic and macro scope? This would avoid a continuous process of modifications and amendments. List of regions considered as less developed (see annexes)
54	Guidelines for preparing the NRP (recital 29): The experience of previous years, including on the RRF and the preparation of the national budget plans for the MLT, shows that the time windows for preparing these plans are usually extremely short. There is provision in the proposed regulation that to ensure rapid implementation of the Fund, member states should be able to submit a draft plan from June 2027. When does the EC intend to publish the more concrete guidelines that Member States can refer to for preparing the draft plan, as "ANNEX V Template for the National and Regional Partnership Plan" seem to be very generally outlined?
55	Contribution to the specific objectives (Art 22(2)(a) & Art 3): Article 22 states that the NRP Plan should contribute to all specific objectives. Does this mean contributing to all specific objective at global level (Art. 3(1) a - e) or also all sub-specific objectives (Art. 3(1) a, i-x; b, i-iii, ...)?
56	NRP Plan submission date (recital 29): what is the reasoning behind the deadline of 31 January 2028 to submit an NRP Plan instead of 31 December 2027?
57	EU Facility and its relation to TSI (recital 39): it is stated that the EU Facility should be able to provide technical support to Member States for the implementation of the policy domains under the NRP Regulation. Consequently, will the EU Facility replace the existing Technical Support Instrument (TSI)? Will the budget for technical support come from the 'budget cushion'?
58	EU Facility (LIFE) (Art. 26(4)): a total amount of around EUR 63 billion is foreseen to finance 'Union Actions' within the EU Facility, which includes four components (Unity Safety Net, Home Affairs actions, LIFE actions and Solidarity Actions). In the proposal's estimated financial impact table (section 3.2.1.1), each component has been allocated a budget, with the exception of LIFE. Does this mean that LIFE can dispose of the residual value for Union Actions within the EU Facility of about EUR 11.5 billion?

59	Annex 1, general key: Please provide the exact sources for the following elements relevant for the calculation of the general key: DPi is the amount of direct payments (agriculture) estimated in budget year 2027 (excluding POSEI/SAI) / ha is hectares declared as eligible for support under the ("potential eligible area"; claim year 2022)
60	Annex 1, general key: Regarding the passage below, in calculating the 'general key' we need the underlying data for these calculations: "For all Member States, the allocation share α_i cannot be lower than 80% and not be higher than 105% of its allocation share in the 2021-2027 total of all relevant pre-allocated funds under shared management, as calculated by the Commission based on the initial 2020 allocation of pre-allocated funds before transfers"
61	Annex 1, Home affairs key: please provide exact sources for: 1)Sea borders and external borders = geographical borders defined by geodesic length based on ellipsoid ETRS89 (Eurostat/GISCO, 2024, 20M, EPSG: 3035) 2)Surface = geographical area defined by geodesic length based on ellipsoid ETRS89 (Eurostat/GISCO, 2024, 20M, EPSG: 3035) 3) Visas: member state share in the number of total uniform visas applied for short stays (DG HOME). The following link provides data for the Schengen countries https://home-affairs.ec.europa.eu/document/download/6552447c-1d75-4f7c-bed6-1bd17a5d59f8_en?filename=2024-schengen-visa-statistics-consulates_en.xlsx Is this the correct hyperlink? Where can data be found for non-Schengen countries (Ireland, Cyprus...)?
62	Annex 1, Home affairs key: regarding the passage below, more insight is needed on the impact on calculations:"The financial allocation of a Member State under the Fund takes into account the special provisions laid down in Protocol No 19 and Protocol No 22 annexed to the TEU and the TFEU in relation to Denmark and Ireland. The allocation for Lithuania includes resources for the Special Transit Scheme laid down in Article 6 of Regulation (EU) (BORDERS)."
63	Annexes 1A and 2 – COM(2025)565_1_annex: Can the Commission provide a list of the changes made to the general allocation formula and to the calculation of the minimum amount for less developed regions, and explain the reasons for these changes?
64	Annex 2, calculation of minimum contribution for less developed regions: Variable 'Env': defined as the financial allocation for the implementation of the National and Regional Partnership Plans defined in Article 10(2)(a) minus the allocations specified in Article 10(2)(a)(ii). Why is this not also minus Article 10(2)(a)(iii). Indeed, the amount of 782,879,00,000 is for the NRP. Must be deducted 2(a)(ii) 'CAP interventions. ' But (a)(iii) 'asylum, migration...' must also be deducted from the amount of 782,879,000,000 in order to have the amount of (a)(i) 'less developed', no? ENV comprises the amount for less developed regions mentioned in 2(a)(i), but in the calculus for less developed regions in annex II, ENV is already a variable. Isn't this circular reasoning? Could you provide financial data per member state?

65	<p>Annex 2, calculation of minimum contribution for less developed regions:</p> <p>For all Member States, the amount allocated to less developed regions shall not be lower than 90% and not be higher than 112.5% of the corresponding amount allocated to less developed regions under the 2021-2027 pre-allocated funds under shared management, as calculated by the Commission.</p> <p>Is this amount 2021-2027 in current prices? Do these restrictions apply to the LDR regions or the countries (who have LDR regions)? Could you provide financial data (amount/shares) per member state?</p>
66	<p>Annex 3, Interreg: Up to date statistics are required for: Other NUTS-3 level regions of which at least half of the regional population lives within 25 km of the border. Population living within 25 kilometres of the borders. What is the time period used? The average of the last 3 years?</p>
67	<p>Classification of regions: Can the Commission provide a precise list of the regions considered to be 'less developed' in each Member State? In the case of Belgium, can you confirm that this includes the provinces of Hainaut and Luxembourg?</p>
68	<p>In the budget table in Communication COM(2025) 570 final, the line 'Economic, territorial and social cohesion (including fisheries, rural communities and tourism)' shows an amount of EUR 452 965 billion. However, in the proposed regulation COM(2025) 565 final, the article on the budget mentions a sum of 295,700,000 for the least developed regions.</p>
69	<p>Can we conclude that the difference between these two amounts represents the leeway given to Member States to determine which policies to strengthen, within the framework of the fund's main and specific objectives (see Articles 2 and 3)?</p>
70	<p>Could you clarify the amounts and budgets allocated to the first pillar? The figures in the annex to the Communication on the MFF (COM(2025) 570 final) appear to differ from those mentioned in Article 10 of the proposed Regulation COM(2025) 565 final. Would it be possible to have a consolidated budget table containing all the relevant data?</p>
71	<p>Regarding Article 14.2 on the 25% flexibility, does this amount remain allocated to the Member State concerned?</p>
72	<p>For Member States with a 'limited' national budget, such as Belgium, after deducting the minimum investments to be made for less developed regions, the CAP, the AMIF, Interreg - and the 25% flexibility to be retained, it seems plausible that there will be almost no unallocated budget left. Has the Commission provided for a mechanism for this scenario, in order to guarantee flexibility for Member States in defining their partnership plans?</p>
73	<p>In light of the previous question, what are the reasons behind the Commission's proposal for a significantly higher flexibility rate (i.e. 25%) than that provided for in the current programming?</p>
74	<p>Article 4(20) of the proposed regulation defines the concept of 'crisis' by reference to the Financial Regulation. However, Article 34 of Regulation COM(2025) 570 final appears to restrict this concept to natural disasters only.</p> <p>Could the Commission clarify what it specifically means by 'crisis' in the context of these provisions?</p>

75	<p>Regulation COM(2025) 570 stipulates that Member States' payment requests will be based on the achievement of targets and milestones, and calls on Member States to apply a similar approach to beneficiaries.</p> <p>In light of recent reports published by the European Court of Auditors, what measures has the Commission put in place to ensure a harmonised interpretation of regulations between the various European institutions? And how does it intend to ensure legal certainty for beneficiaries?</p>
76	<p>Article 61 of Regulation (COM(2025) 570 on the single audit approach states that "Notwithstanding paragraph 3, any milestone and any target may be subject to several audits if the audit authority concludes, on the basis of its professional judgement, that it is not possible to issue a valid audit opinion. Can the Commission clarify what it means exactly by “professional judgement” and define the clear conditions under which a “double” or even “triple audit” could be considered?</p> <p>Indeed, such an approach seems to run counter to the fundamental principles of single auditing.</p>
77	<p>Could the Commission give precisions on the activities that are covered by the Facility Fund?</p>
78	<p>ECF</p>
79	<p>Which governance tools of the European Competitiveness Fund are also applicable to the Innovation Fund and Horizon Europe</p>
80	<p>Could the European Commission provide more information about how the Competitiveness Coordination Tool will be applied to the MFF and the ECF in particular ?</p>
81	<p>Could the Commission clearly confirm that the Innovation Fund will stay outside the MFF and that the amount for the Innovation Fund is not counted in heading 2?</p>
82	<p>Could the European Commission provide figures in 2025 constant prices for the 2021-2027 allocations for the programmes LIFE, InvestEU, EU4Health, Horizon Europe ?</p>
83	<p>Has the European Commission considered in its Impact Assessment of the European Competitiveness Fund the impact on NGO which were inter alia beneficiaries of LIFE, Horizon Europe? If not, why?</p>
84	<p>Why have the LIFE actions in article 33.1(a) been limited to the aspects of the current LIFE sub-programme climate related to mitigation and awareness raising and not to other aspects of the current LIFE programme ? Could the European Commission provide a clear overview of which current LIFE actions are covered by the ECF (or NRPF) and which have been interrupted ?</p>
85	<p>Skills: Within the ECF, what sectors are considered strategic?</p>
86	<p>Skills: Will Investments as part of the ECF be conditional upon skills investment? If so, how will it be measured? Will there be minimum spending requirements?</p>
87	<p>Skills: Article 30 of the ECF links the European Skills Guarantee to “strategic growth sectors and occupations”: what sectors and occupations are we talking about?</p>
88	<p>Why did the commission choose not to keep LIFE and EU4health as separate programmes to fund EU public goods related to the environment and health that may not all be “competitive” but could be important for societal and policy reasons.</p>
89	<p>FP10 (Horizon Europe): how will the 175 billion euros be distributed?</p>
90	<p>ECF: how will the funds for Health and Bioeconomy (22.6) be deployed? The same question can be asked for the other policy windows.</p>

91	Coherence: Question for more insight into coherence/coherence FP10 and ECF.
92	ECF and CEF: How will the Commission ensure the link between ECF (specifically the clean transition & industrial decarbonisation component) and CEF, given that CEF is an important enabler for this theme?
93	DEP and ECF: what is the rationale for fully tipping DEP into ECF?
94	Governance: various committees, boards etc are being set up or continued, how will coherence be ensured? How will it be checked that there is not too much duplication, or even worse opposition? How will the work programmes referred to under the various windows be developed?
95	Linking the Innovation Fund to ECF: what exactly is the added value of this? Does this involve only the Industrial Decarbonisation Bank. What else is covered by the 26 billion MFF contribution within clean tech, besides the Industrial Decarbonisation Bank? What about the 50 million for the first three years of Window I?
96	Governance: how will the COM ensure that a realistic and workable governance structure is set up in which Member States can participate in a sufficiently qualitative manner?
97	Horizon Europe: The structure of Horizon Europe 2028-2034 has been greatly simplified (from 6 clusters to 4 clusters consistent with the 4 pillars of the ECF), how will the COM ensure sufficient qualitative follow-up from the Member States on these 4 very broadly defined themes?
98	Erasmus+
99	What safeguards does the European Commission foresee to maintain separate sectoral chapters and earmarked budgets to ensure implementation of, among others, the EU Youth Strategy and policy continuity?
100	Can the European Commission clarify how the available budget will be divided between the two clusters and how much estimated funding will go to each initiative?
101	How will the European Solidarity Corps be guaranteed in budgetary and organisational terms within the integrated Erasmus+ programme, and how will inclusion and diversity be concretely embedded and funded so that both strands can continue to achieve their specific objectives?
102	Can the European Commission clarify how it specifically envisages the proposed reduction in the number of national agencies? Is one agency proposed for all three policy areas together per Member State? And how will this ensure that the separate identity and specific needs of each policy field within Erasmus+ are adequately safeguarded?
103	Can the Commission clarify what comitology procedures are envisaged for the implementation of the Erasmus+ programme and how transparency, monitoring and evaluation will be structurally guaranteed?
104	CE Desk: what does the new programme mean for the functioning of the Creative Europe desk?
105	Performance framework
106	Mainstreaming climate and environment: the current MFF includes an overall spending target of 30% for climate and 10% for biodiversity, the new COM proposals adjust this to an "overall climate and environment spending target of at least 35". We would like to receive a fiche of 1) the differences from the current MFF in what exactly is covered by "green spending"; basis for determining the coefficients? 2) what dedicated funding for environmental objectives is effectively provided for in the current proposals, now that the LIFE fund no longer appears to be continuing separately.

107	Could the European Commission provide actual figures of climate and biodiversity mainstreaming in current MFF in 2025 constant prices ? Could the European Commission indicate how much of this amount was in overlap ?
108	DNSH (Do no significant Harm): to be effective, this screening should also be done at project level. Who will carry out this screening? What are the exact exceptions to this principle?
109	Why does the European Commission replace the current separate climate and biodiversity mainstreaming by a single target ?
110	Global Europe Fund
111	ODA accountability: how much ODA accountability did the EU achieve under the current programme period? We would like a fiche with the overview of the past 2 periods
112	Global Gateway: A clarifying fiche is required on how Global Gateway is implemented through Global Europe (is not in the articles, only in a whereas of the proposed regulation)
113	Other questions
114	NUTS classifications map and reference averages of years 21-22-23 is desired

BULGARIA

Disclaimer: The questions below are submitted with the sole view of contributing to the technical analysis of the Commission's proposals and they could in no way pre-empt the position of Bulgaria on the particular elements of the draft legislative acts regarding the MFF and the Own Resources System. Therefore, demanding clarifications for the technical details for their eventual implementation could not be considered as principal acceptability or support for their introduction.

A. FICHES

We would like to request the Commission to submit as soon as possible the following fiches:

Fiches on the MFF 2028-2034

1. Fiches with detailed breakdowns of allocations by Member State and by policy area, incl. comparisons with the current MFF, both in current and 2025 prices.
2. Fiche on the size of the MFF containing a comparison between the proposed size of the new MFF and the current MFF size adapted to inflation and including the Solidarity reserve and the Emergency aid reserve.
3. Fiche on the advantages and disadvantages of adjustable deflator and fixed deflator, incl. considering the eventual added value of using an adjustable deflator (which would hamper simplification and predictability both in national and European budgetary procedures) compared to increasing the level of accuracy through reflecting cumulated effects of inflation within a potential mid-term revision of the legislation (which has already become almost a regular practice).
4. Fiche related to the NRPP with data, figures, and charts explaining the real reasons behind the current shortcomings of the system and why the proposed changes have been made]
5. Fiche with a breakdown of the ESF, ERDF and CF, as well as their distribution by Member States and respectively by types of regions within the Member States as Annex 1 (Methodology) of the draft NRPP Regulation does not clarify how the distribution by regions is made;
6. Fiche with a comparative analysis between CAP 2023-2027 and the current proposal at both EU and Member State levels;
7. Fiche with a more detailed comparative table, highlighting differences in both, financing (numbers) and governance (structures) of the programmes included in the proposed new Global Europe as they are financed and governed under the current MFF and as they are proposed to be financed and governed under the next one;
8. Fiche with a comprehensive list and detailed justification for each derogation, particularly regarding the non-establishment of a provisioning rate for loans to Ukraine and the possibility to reuse carried-over funds and reflows from financial instruments as the proposal for Global Europe allows for derogations from the Financial Regulation;
9. Fiche with detailed breakdowns by programmes and institutions (including Commission DGs) with the posts and their budgetary impact and also comparisons with the current MFF as well;

Fiches on the Own Resources System

10. Fiches with detailed information on each of the own resources under art. 3 of the proposed Own Resources Decision (incl. separately for handling fee for e-commerce as part of TOR), both in current and 2025 prices, as follows:
- source data and statistical data for their calculation;
 - forecasted amounts per Member State and year in the period 2028-2034;
 - implications separately of each of the own resources and implications of the total contribution to the particular Member State compared to its GNI;
 - figures which prove the stated in the explanatory memorandum in the draft new Own Resources Decision reduction of burden on Member States, accompanied by comparison with the burdening under the Own Resources System in force;
 - figures supporting the statement that the new own resources would ensure sustainable funding, accompanied by comparison with the 'level of sustainable funding' under the Own Resources System in force;
 - comparison of the contributions by Member State and year in the period 2028-2034, both in current and 2025 prices, according to the proposal on the table and the hypothesis for maintaining the Own Resources as defined in Art. 2 of the Own Resources Decision in force.

When should we expect the Commission to distribute the fiches requested above?

B. QUESTIONS

I. Questions on the MFF 2028-2034

On the Proposal for a Council Regulation laying down the multiannual financial framework for the years 2028 to 2034

1. In the current programming period NGEU is an instrument outside the MFF. During the revision our leaders agreed that the outstanding interest costs will be ensured through a special instrument over and above the ceilings (EURI and FLEX). Why should we now change course and include the repayment of NGEU in heading 1? Could the Commission provide more details on the matter?
2. On the Ukraine Reserve – How will it differ from the current Ukraine Reserve under the Ukraine Facility? Will the Reserve include pre-accession assistance to Ukraine or there will be a separate line through the Global Europe fund for pre-accession?
3. On the SMI – why is the Commission proposing to go back to the three separate instruments (GMC, GMP and Contingency Margin) from the previous MFF? Can the Commission share pros and cons to having three sub-instruments (provided we aim for simplification)?

On the Proposal for an Interinstitutional Agreement between the European Parliament, the Council and the Commission on budgetary discipline, on cooperation in budgetary matters and on sound financial management

4. Point 2 in Part B of the Annex to the proposed IIA stipulates that *'in due time before the adoption of the draft budget by the Commission, a budgetary trilogue shall be convened to discuss the funding priorities for the budget of the coming financial year'*. The first question is what would "in due time" mean. We know that internal procedures in the Commission for the preparation of the draft budget take time. A more general question is where can we see in writing the step by step description of this process of making decisions on an annual basis on how to use the flexibilities of the budget to direct resources to new priorities and challenges?
5. What is the total amount of flexibility which will be subject for a decision during the annual budgetary procedure, and what are the different elements that make up this amount? Could the Commission confirm that the 25% reserve in the national plans will not be subject to this procedure, and in case it is – the question would be how?
6. Could the Commission provide more details for the reason not to include the area of economic, social and territorial cohesion as an exception when ensuring sufficient margins beneath the ceilings (see point 18 of the proposed new IIA vs. point 7 of the IIA in force), taking into account the priority importance of this EU policy area and the specificities in the programming and implementation process of the respective funds, which require all conditions for their smooth implementation to be guaranteed, including by adding a reference for exceptional treatment of the area of economic, social and territorial cohesion when ensuring sufficient margins?
7. As regards the establishment of the draft budget and updating of estimates (see point 5 of the Annex to the proposed new IIA vs. point 5(a) of Annex I of the IIA in force), and by analogy of the current approach for taking *'into account ... forecasts provided by the Member States in relation to the Structural Funds'*, why would the Commission, according to the proposed IIA, not take into consideration the *'forecasts of the amount for payment applications ... submitted for the current and subsequent calendar year by 31 January and 30 July'* by the coordinating authority according to Article 50 of the draft Regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security (document ST 11815/2025)? Moreover, the proposal on the table envisages to take into account only the financial programming referred to in point 11 of the proposed IIA, which (by analogy of the current IIA) does not cover the heading containing the area of economic, social and territorial cohesion. In this regard, what is the reason for neglecting the Member States forecasts for one of the main EU expenditure priorities?

On the Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities

8. Regarding the related coefficients for contribution to climate, environmental and social objectives, we also welcome the Commission's approach, while at the same time we would appreciate clarification if there is a change in methodology used for calculation of the relevant weights as of the current period. As regards the field 'Promote generational renewal of farmers' in Annex 1 to the draft Regulation for example, we are a bit puzzled that the contribution to social is '0'.

9. Article 14 provides that the eligibility of an activity under the budget shall be based solely on the sector-specific rules and it shall not be restricted by the definition of intervention fields, which are established only for the purposes of tracking expenditure and monitoring the performance of the budget. Will these sector-specific rules for eligibility be added to the sector specific regulations as such are not currently part of the Home affairs funds?
10. Following the same article, each plan submitted by a Member State, and any amendment thereof, shall include for each measure the proposed assignment of at least one intervention field from Annex I and, for each intervention field assigned to that measure, one output indicator defining the final milestone or target for that measure and selected from Annex I corresponding either to the assigned intervention field or, where appropriate, to a different intervention field, or in duly justified cases and in agreement with the Commission an output indicator not included in Annex I and also one or more result indicators corresponding to the intervention field of the measure as provided under Annex I, if available. No additional output indicators shall be defined. Further to these provisions and as far definition of additional output indicators will not be envisaged the EC should be aware that for some operations the output indicators may not be relevant and the interventions may not be condition for eligibility but the fulfilment of outputs will be a condition for payments. Could the Commission provide clarifications and justification in this regard?
11. Following Annex I of the proposed regulation, intervention ‘Strengthening and developing legal migration to the Member States and early integration of migrants in accordance with their economic and social needs’ need to contribute 40% to the Social policies which is not feasible given the nature of the AMIF support. How will this contribution be measured? According to Art 6 (2) of the Regulation ‘*Programmes and activities shall, where feasible and appropriate in accordance with the relevant sector-specific rules, be implemented to achieve their set objectives respecting working and employment conditions under applicable national law, Union law, ILO conventions and collective agreements in accordance with Article 33(2), point (e), of Regulation (EU, Euratom) 2024/2509*’.
12. We note with concern the absence of a specific code for infrastructure related to cultural heritage and tourism assets. The current code ‘Protection, development and promotion of cultural heritage and tourism services’ explicitly excludes infrastructure investments, which considerably limits the ability to capture and steer public spending in a comprehensive and meaningful way. We therefore recommend the introduction of a dedicated code that allows the tracking of infrastructure investments directly contributing to the protection and sustainable use of cultural and tourism assets. This would ensure a more accurate reflection of Member States’ efforts in these policy areas and support the strategic objectives of the EU in promoting culture, heritage preservation, and sustainable tourism. Could the Commission provide clarifications and justification in this regard?

On the Proposal for Regulation of the European Parliament and of the Council establishing the European fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034

The new structure of the budget

The fragmentation between EU funds and instruments targeting defined objectives, such as the European competitiveness, for example, has not been abandoned, but funds with similar/overlapping objectives and activities, such as the European Competitiveness Fund and the new Single Fund for national and regional partnerships, are presented in different sections of the MFF instead, although

they are supposed to operate in complementarity and synergy. With this in mind we have the following questions related to the programming of the resources towards concrete investment actions:

13. How to avoid administrative complexity and competition between funds, with a view to facilitating Beneficiaries' access to EU support?
14. What will be the clear and concrete division of responsibilities between the Commission and the Member States that will be ensured with a view to achieving ensuring complementarity, synergy, coherence and consistency between the different EU instruments?
15. How demarcation between different similar instruments is ensured in order to avoid double funding and how the Commission will ensure and help to achieve it – in particular how the Competitiveness Coordination Mechanism of the Commission will work specifically and in detail, without it leading to a delay in implementation?
16. How the proposals will lead to achieving real simplification of implementation for the 'programme authorities' and Beneficiaries, taking into account that the specificities of the individual funds and their objectives do not allow 100% application of uniform rules to be applied in a general and simplified manner, but imply a number of derogations and references to other regulations, where relevant (e.g. for the CAP) instead?

Financial resources

17. What are the reasons for the Commission to put in tranches the amounts under art. 14 of the draft Regulation in a decreasing trend towards the end of the programming period? How does it take into account the experience with the multiannual structural investment programmes, given that their cycle (and implementation modus, incl. public procurement, public consultations and assessments in the programming period, etc.) is quite the opposite to this projected overall spending. Having said that and in the context of the draft IIA, where the Institutions commit mutually to mitigate the risk of hampering the implementation of Union programmes because of a lack of payment appropriations at the end of the MFF, what will happen if the payment forecasts of national programmes for cohesion show an increased need for payments at the end of the programming period, as so far? How the corresponding needs for payments will be respected by the Commission?
18. Why the indicator for population in a risk of poverty concerns only rural regions, but not also urban ones in the General Key of the allocation methodology of the resources in Annex to the draft regulation?
19. What is the rationale to include in the calculation of the cap of 105% (respectively the safety net of 80%) the Just Transition Fund, the European Maritime, Fisheries and Aquaculture Fund, the European Agricultural Fund for Rural Development, the European Agricultural Guarantee Fund?
20. Article 20 (NRP Regulation) National contribution to estimated costs is given in differentiated rates for less developed regions/ transition regions/ more developed regions. How will an operation being implemented by a single beneficiary in different regions be co-financed?

Programming:

21. What is the base for calculation of the result of at least 14% concentration of the resources under the respective Plan under art. 22. q to Social objectives? Why the resources under Article 10(2), point (a) (ii), as well as (the externally assigned revenue) from the Social Climate Fund are excluded from this concentration, given that some of them also relate to social expenditure? If our

understanding is correct, 'the external assigned revenue' means the one under art. 10.1 of Regulation (EU) 2023/955.

22. How the approach of a pre-defined objectives, all of them obligatory for selection by a Member State for spending (art. 22.2), reflects the various realities on the ground across Europe and how does it take into account the principles of partnership and multilevel governance of the Cohesion Policy and the regional development decision-making, incl. the known bottom-up approach?
23. Article 67 one or more milestone or target or output included in a payment application has not been fulfilled or a milestone or a target, for which a payment has been disbursed, has been reversed pursuant to Article 69 'Durability and reversals' The Member State shall ensure that the fulfilment of any of the relevant milestones and targets remains ensured for at least five years after the date of the Commission payment corresponding to the achievement of the milestone or target. We would appreciate clarification of 'remains ensured'.

Horizontal conditions (incl. Rule of Law):

24. Generally speaking, how will it be ensured, with no other horizontal or thematic conditions relevant to the specific objectives of the Plans, besides the provisions in art. 8 and 9, that the smooth and effective implementation of the investments will take place?

Given that we don't find any stipulated methodology, conditions or criteria for assessment of the fulfilment/non-fulfilment of the horizontal condition related to the Rule of Law for disbursement of funds, we would like to kindly ask:

25. Will the CION share its view on the methodology with the Member States?
26. Should the requirements of art. 9 be considered as additional layer of legislation to Regulation 2020/2092 which is currently applicable and will be still in force? If yes, meaning that these two pieces of legislation are to be applied cumulatively, how art. 9 relates to the respective procedure of Regulation 2020/2092, with a view to avoiding of overregulation and repetition of obligations. If no, then what is the added value of the proposed art. 9?

Delivery model

27. Is the FNLC obligatory for all cohesion investments in the Plan, or a hybrid model will be used, where other forms of support incl. a reimbursement of real costs are also possible as an option to be selected by the Member State, depending on the types of operations and the concrete situation with the administrative capacity, timing, level of preparation (maturity) and other circumstances related to the investments concerned?

De-commitment rule

28. When will the budgetary commitment occur, based on which the de-commitment rule will apply?
29. Taking into account the following considerations, how art. 15 of the NRRP Regulation relates to art. 12 of the ERDF regulation? Article 15 allows the Commission to de-commit funds before the Member State has made use of the possibility of reallocating these funds within the Interreg plan, as provided for in Article 12 (ERDF and Interreg Regulation). In the absence of clarity and procedural coordination, there is a risk that Interreg funds will be decommitted prematurely –

before the possibilities for internal reallocation, within the Interreg plan, have been exhausted. In other words:

- Article 12 (ERDF and Interreg Regulation) provides for specific time windows for the reallocation of funds until 2030 and 2031, with rules allowing for the reallocation of unspent resources between the chapters of the Interreg Plan.
- Article 15 (NRF Regulation) introduces an annual automatic decommitment deadline of 31 October of year n+1, which may affect the same funds before the start of 2030/2031.
- Article 12 implies a logic of ‘redeployment before loss’ within Interreg.
- Article 15 does not contain a reference to the postponement of the de-commitment of funds in case such a reallocation is underway or is about to take place.

Additional questions concerning Interreg IPA programmes:

30. Under which legal framework are the Interreg IPA programmes expected to be implemented – Global Europe, or the ERDF/Interreg Regulation? If both apply, how will the legal interplay be regulated? Will the specific ERDF/Interreg rules prevail, or will they be subordinated to Global Europe’s external action logic?
31. Who has the lead in the strategic governance of IPA-type Interreg programmes – the DG REGIO or the EEAS/DG INTPA? How will this division of roles be reflected in the Commission-level decisions?
32. What procedural guarantees will be put in place to ensure that the delay in signing financing agreements with third countries (as required under the Interreg Regulation) does not lead to irreversible reallocation or decommitment of funds under Article 12 and 15 of the proposed regulations? Could the Commission provide a harmonized timeline and set of conditions for finalizing IPA financing agreements?
33. How does the Commission intend to safeguard Interreg IPA programmes from premature decommitment – especially considering the shift from the current ‘n+3’ to a proposed ‘n+1’ rule, given the apparent operational inconsistency between Article 12 of COM(2025) 552 (reallocation of Interreg resources) and Article 15 of the NRP Regulation (automatic decommitment)? What legal or procedural mechanisms will be put in place to ensure that internal reallocation within the Interreg Plan is fully exhausted before any decommitment is triggered, particularly in light of the specific administrative and procedural delays associated with IPA partners? Is the Commission considering a dedicated derogation or special regime for Interreg IPA programmes to mitigate these risks?
34. Which audit and control standards will apply to IPA Interreg programmes – those under shared management in the Cohesion Policy context, or those under indirect management in Global Europe? What happens in cases where partner countries have not adopted EU-compatible public procurement, audit, and anti-fraud standards?
35. How will the Commission ensure that the principle of territorial cooperation (Article 174 TFEU) is respected and operationalised, if the legal and financial framework of IPA-type Interreg programmes is governed predominantly by external action logic (focused on EU geopolitical priorities)?

36. Will participating IPA countries be full partners in the programming of Interreg chapters, or will their role be limited to project-level participation, as is often the case under indirect management in external programmes?
37. How will the Interreg IPA programmes contribute to enlargement-related reforms, such as institution building, minority rights, and regional development, and how will these be measured separately from the development logic of Global Europe?

Common Agricultural Policy

38. Until and including the current programming period, the EAFRD funds non-agricultural investment activities supporting the production or sale of non-Annex I products under the Treaty on the Functioning of the European Union (regardless of the input materials used), as well as service development across all sectors (e.g., childcare, elderly and disabled care, health services, accounting and auditing, veterinary and IT-based services), the development of crafts, and other non-agricultural activities. From the materials currently available, we see no indication that such investments will continue to be supported. In this regard, could the Commission clarify whether such investments are excluded from support, and if not, where are they included for financing?
39. Until and including the current programming period, the EAFRD supports investments in basic services and small-scale infrastructure in rural areas, as well as investments aimed at preserving the cultural and spiritual life of rural populations – including studies and investments related to the maintenance and restoration of cultural and natural heritage, construction, reconstruction, renovation, equipping and/or furnishing of sports infrastructure, and the development or renewal of public-use spaces of municipal significance, energy efficiency of municipal buildings, improvement of road and street infrastructure in rural areas, etc. From the materials currently available, we do not see such investments supported through the proposed agricultural investment packages. In this regard, could the Commission clarify how is the implementation of such investments expected to be managed through a reduced administrative burden, given that reallocation across different funds or administrative structures of eligible rural activities implies a significant administrative burden for Member States, including the restructuring of national administrations – which runs contrary to the ambition to reduce red tape?
40. Until and including the current programming period, the EAFRD supports investments in processing agricultural products, linked to processing and/or marketing of products listed in Annex I of the Treaty on the Functioning of the European Union and cotton, such as milk and dairy products, meat and meat products, fruits and vegetables, etc. From the currently available materials, we see no indication that such investments will be supported. In this regard, could the Commission clarify whether such investments are excluded from support, and if not, where are they included for financing?
41. We express concern about the lack of a protection policy at the EU level for rural areas and food production. The proposal does not clarify how the EU's goals of promoting employment, growth, social inclusion, and local development in rural areas – including the bioeconomy and sustainable forestry – will be ensured. Nor is it clear how the production of quality food and the responsiveness of EU agriculture to societal expectations regarding food and health (including safe, nutritious, and sustainable food, food waste, and animal welfare) will be supported. Could the Commission provide clarifications in regard to these concerns?
42. How was the range of the degressive payment set between EUR 130 and EUR 240?
43. Why is national co-financing foreseen under the small farmers' scheme, considering it replaces interventions for which there is generally no national co-financing?

44. Having in mind the financial rules laid down in art. 10 (2) point (ii), where a minimal allocation of EUR 295 700 000 000 is determined for types of intervention contributing to the objectives of CAP and CFP, there is a need of further clarification how these resources are planned to be distributed between the two sectors, and also will this distribution at Member State level be performed by the Commission or each Member State will be responsible to make their own allocation between the two policies and specific needs at national level? How such common allocation will guarantee achieving all general and specific objectives that each of the two policies primarily pursues? Could the Commission give more details how this common allocation will ensure a regular, effective and efficient use of Union resources, based on the specific features of the fisheries sector taking into account that the information is necessary to clarify to the Member States the mechanism by which financial resources will be distributed under two key policies for the Union's food security? The general allocation of resources, without additional details, creates the prerequisites for harming one policy at the expense of the other and neglecting goals and priorities specific to our country and to both sectors.
45. Having in mind the listed interventions in art. 34 (11), point (d), where compensations for income foregone or additional costs is provisioned, could the Commission give more details what mechanism will be used for these compensations, if any crises or disasters make these compensations necessary? Will there be established a straightforward way to relocate funds and will it be necessary to revise the whole NRP plan at national level? This is related to the possibilities for compensation of operators in the fisheries sector during the 2014-2020 programming period from the consequences of COVID-19 and the war in Ukraine. Given the unstable political situation and the conflicts raging near the EU, it is necessary to establish an easy and quick to implement mechanism that will provide timely support to operators in need.

For interventions in the wine sector:

46. Article 35, paragraph 8 of the draft Fund Regulation (st. 11815), which also applies to sectoral interventions in the wine sector, is written in a vague manner. The following questions arise:
- Will the maximum support rate of 75% apply to all interventions in the wine sector?
 - Does the 30% national co-financing apply to all interventions in the sector?
 - Does the current wording mean that the 75% represents the total support – EU + national?
47. Article 12 of the CAP Regulation draft (st. 11733) lists an eligible intervention in the wine sector. Does this imply that a sectoral intervention such as harvest insurance will be eligible in the wine sector?

For interventions in the 'Fruit and Vegetables' and 'Other Sectors' – Operational Programs

48. Article 35(1)(r) provides support for certain sectors listed in Title X of Regulation (EU) No 1308/2013. The amended regulation lacks information on Title X. Could the Commission provide clarifications in this regard?
49. According to Article 35(8), the minimum national contribution for interventions listed in paragraph 1(r) is no less than 30% of eligible costs for each intervention. For operational programs in the 'Fruit and Vegetables' and 'Other Sectors', it is unclear how the national contribution is determined. Is national support linked to the market value of production sold by producer organizations?

50. Article 35(8) states that the maximum support rate is 75% of total eligible costs for each intervention. Does this imply a mandatory 25% contribution from POs, APOs, and GPs when implementing operational programs in the ‘Fruit and Vegetables’ and ‘Other Sectors’? Does the 75% cap include both EU and national funding?
51. Article 35(8) allows Member States to increase the support rate to 95% of total eligible costs for interventions related to generational renewal, research and innovation, risk management, or environmental and climate measures, as well as for POs implementing operational programs for the first time. What are the criteria and requirements for generational renewal? Which interventions under Article 35(1), relating to operational programs, are linked to generational renewal?
52. According to Article 35(9), EU financial assistance is limited to 4.1% of the marketed production value of each producer organization for interventions in certain sectors referred to in Article 31 of Regulation (EU) No 1308/2013. Does this percentage apply to operational programs in “Other Sectors”?
53. Under Article 35(9), if Member States specify in their CAP Strategic Plans that entities referred to in Article 32(3) of Regulation (EU) No 1308/2013 may be beneficiaries of interventions in certain sectors under Article 31, they must also provide support for the establishment of producer organizations in accordance with Article 74 [cooperation], in addition to support for implementation of the intervention. How is the implementation of operational programs linked to support under Article 74 (cooperation)?
54. According to Article 35(9), EU financial aid and the national contribution together may not exceed 100% of the actual costs of an intervention in the sectors referred to in Article 31 of Regulation (EU) No 1308/2013. How is this requirement – that combined EU and national support not exceed 100% – reconciled with the 75% support cap in Article 35(8)?

On the Proposal for amending the regulation of the European Parliament and of the Council amending Regulation (EU) no 1308/2013:

In implementing operational programs, a requirement is introduced to set maximum percentages of the operational fund for each type of intervention to ensure balance among different intervention types. In this regard following questions arise:

55. How is the requirement for balance expected to be structured?
56. Is it necessary to set maximum percentages from the operational fund for each intervention under Article 31?
57. If the operational program includes only two interventions at their maximum allowed percentages, which together may total less than 100%, does this imply that the balance requirement is met?
58. Please specify for which sectors the interventions under Article 31 are eligible.

On the Proposal for a Regulation of the European Parliament and of the Council on establishing the European Competitiveness Fund (‘ECF’) including the specific programme for defence research and innovation activities

59. We need more clarifications about the structure of the single governance framework of the European Competitiveness Fund – priorities, procedures, applications and financial rules, the obligations for the Member States, etc. How will the synergy with Horizon Europe be ensured and implemented while avoiding potential overlaps?

60. We would need more clarification on how the financing of SMEs will continue, and more specifically the current one under the Single Market Programme (SME pillar). How will SMEs and mid-caps be financed under the ECF, given that most references related to SMEs and mid-caps are introduced merely as 'including'?
61. More details about the ECF financial toolbox (including loans, grants, equity, quasi-equity, blending, procurement and guarantees) will be highly appreciated. Is there flexibility foreseen among the separate policy windows and if yes – what percentage?
62. We need more clarity on incentives for defragmenting innovation ecosystems in some countries and increasing innovation and R&D spending in SME's. We are concerned that the centralization process might lead to challenges for effectively utilizing ECF resources aimed at innovation and competitiveness due to the lower ability of some countries to effectively participate in the ECF's innovation-focused programmes.
63. How does the indicative financial contribution of the sums in art. 4 correspond to the Commission's initial presentation – could the Commission confirm the amount of EUR 67.4 billion for 'clean transition'? Does it also include other funds with similar objectives (the Innovation Fund) and if yes – will it continue to operate under its current rules?
64. We should aim at a more balanced geographical distribution of investments. In this line of thought – we underline the huge merits of the widening participation component of Horizon Europe – in our view it should be preserved and also reflected in the ECF which will strive to ensure financing for the growth of the companies. Could the Commission provide reflections on this issue?
65. We are concerned about a possible reduction in national flexibility in determining funding priorities due to consolidation of funding streams under European-level strategic priorities. This might limit the countries' abilities for tailor-made and country-specific funding approaches. In addition, the potential shift towards recovery-fund style of financing might prove to become risky and increase fiscal challenges in countries, if requirements are not met due to unforeseen circumstances. Could the Commission provide reflections on these concerns?
66. We need more detailed information about defence financing – how does this proposal ensure there are no overlaps (given the possibilities to finance defence through the ECF, the national plans and also CEF)?
67. We would also like to receive more details about the proposed advisory support under the ECF, including its budget and scope.

On the Proposal for a Regulation of the European Parliament and of the Council establishing the Connecting Europe Facility

68. Could the Commission clarify why the funding for military mobility isn't explicitly set in Art. 4 as part of the transport strand and only in the legislative financial statement?
69. According to art. 6 the '*Programme shall be implemented in coordination with other Union programmes*'. Could the Commission clarify which programmes?

On the Proposal for a Regulation of the European Parliament and of the Council establishing the Erasmus+ programme

70. The new regulation merges the fields of education, youth, and sport under a single, coherent framework based on two main pillars – 'Learning opportunities for all' and 'Capacity building

support'. Youth and Sport have not their own chapters, e.g. in the existing Programme each area has its own chapter. This raises concerns regarding the preservation of identity and priorities of each sector. In this regard, could the Commission provide clarifications how their preservation would be granted?

71. The current regulation (in art. 27) provides an opportunity for the Member States to establish more than one national agency. This option is deleted, and the new proposal (art. 18, paragraph 2) states that the '*national authority shall designate a national agency for the duration of the Programme and notify the Commission thereof*'. Does this mean that there can only be one National agency per Member State?
72. Why there is no budget threshold mentioned for any sector?

On the Proposal for a Regulation of the European Parliament and the of the Council establishing Global Europe

73. How will the Commission ensure that geopolitical interests and migration control prerogatives don't shift the focus of Global Europe away from poverty reduction, human development and human rights?
74. Can the Commission clarify under what circumstances aid would be conditioned on cooperation with EU migration objectives (e. g. return, readmission)?
75. How will spending on cross-cutting issues (e.g. human rights, gender equality, climate etc.) be tracked across all Global Europe programmes?
76. How does the Commission see a single governance model of the new Global Europe considering the many profoundly different instruments included in it, including in view of the heavy Parliamentary procedures some Member States have in relation to some of the issues, like CFSP matters, for instance?
77. Given the past experience where NDICI-Global Europe's cushion was almost depleted in the first three years of implementation, what specific mechanisms are in place to ensure the emerging challenges and priorities cushion (Article 7) will be sufficient for future unforeseen circumstances?
78. The proposal emphasizes 'increased geographisation' and a 'stronger Team Europe approach' (Article 11). Could the Commission provide more details on how the Team Europe approach will be legally and operationally reinforced to ensure true coordination and pooling of resources, beyond current practices? Moreover, how is the Team Europe approach calculated in the next MFF?
79. Regarding the possibility of easier budgetary transfers between and within pillars, what safeguards will be in place to ensure transparency and accountability in these transfers, and to prevent funds from being diverted from their original intended purposes without proper scrutiny?
80. Given the EU's recently adopted strategic approach to the Black Sea, there is insufficient clarity regarding how its goals – security and connectivity in the region, will be financed under the next MFF. Could the Commission provide information in this regard?
81. What role is reserved for the Eastern Partnership in the next MFF?
82. In what ways will the principle of conditionality be made more effective in the new MFF (with an emphasis on Enlargement)?
83. What budgetary reserves are planned for contingencies in response to international crises?

On the Administration heading

84. We have serious doubts and concerns and would therefore request more information from the Commission on the proposed total size of the heading (including number of FTEs and other staff) and more importantly – justifications on the requested increase of 2 500 posts for the first three years. What will be the budgetary impact of such a request? We remind that in 2023 the Commission's request for 885 additional staff that would have led to EUR 1.9 billion increase of the administration budget was denied.
85. Does the Commission have an alternative scenario in case the request is significantly cut, taking into account that the approach from the last few years to use special instruments to cover administrative expenditure should be avoided at all costs?
86. How does this request correspond to the proclaimed optimisation and simplification of the programmes, taking into account that lowering the number of programmes and decreasing the administrative burden should, in principle, lead to a decrease of the administration budget?

II. Questions on the Own Resources Decision

Member States contributions

87. In the explanatory memorandum in its proposal for a new Own Resources Decision the Commission states the following: '*While the current own resources system has ensured stable and predictable financing of the EU budget, it is largely, and increasingly, dependent on GNI contributions, which will reach its limits as financing needs increase. Introducing new own resources will reduce the burden on Member States and ensure the sustainable funding of common EU policies and the repayment of NextGenerationEU.*'. In this regard, could the Commission explain how did it calculate the limits of the GNI contributions and concluded that they will be reached, taking into account that due to the residual role of the GNI-based own resource, in practice, its limits are the own resources ceilings and the capacities of the national budgets? Moreover, could the Commission clarify how the new own resources would ensure better sustainable funding, taking into account that most of the proposed new own resources would be generally payed by transfers from the national budgets by analogy of the GNI-based own resource?

Ceilings

88. Art. 6 of the Own Resources Decision in force provides that the ceilings shall be temporarily increased by 0,6 percentage points for the sole purpose of covering all liabilities of the Union resulting from the NGEU borrowing until all such liabilities have ceased to exist, and at the latest by 31 December 2058. In this regard, Art. 13, para 3 of the proposed new Own Resources Decision provides that the above-mentioned Article 6 of Council Decision (EU, Euratom) 2020/2053 shall continue to apply for the purpose of the extraordinary and temporary additional means to address the consequences of the COVID-19 crisis. Taking into account the cited articles, could the Commission confirm whether the ceilings for 2028-2034 would, therefore, be equal to 1,75%+0,25%+0,60% for payment appropriations and 1,81%+0,25%+0,60% for commitment appropriations?

Tobacco Excise Duty Own Resource (TEDOR)

89. In the explanatory memorandum in its proposal for a new Own Resources Decision the Commission states the following: '*A Tobacco Excise Duty Own Resource (TEDOR) would support EU health policy objectives as well as address the issue of cross-border shopping for certain products, which is currently influenced by differentials in tax policies between Member States, and generate significant revenue for the EU budget.*'. Could the Commission clarify how these objectives for supporting EU health policy and addressing the issue of cross-border shopping would be achieved by the introduction of TEDOR, taking into account the universality principle and the specification later in the same paragraph that the proposed TEDOR is not legally dependent on the adoption of the recast of the tobacco excise duty Council Directive?

Corporate Resource for Europe ('CORE')

90. As the governmental entities, except state-owned enterprises, are excluded from the scope of the proposed Corporate Resource for Europe ('CORE'), could the Commission clarify how the municipal enterprises, incl. hospitals and other municipal enterprises providing different communal services, would be treated in regard to this own resources candidate?
91. How would the forecasts of the CORE contributions, i.e. the expected number of companies and their turn-over by Member State, be made?
92. According to the draft Own Resources Decision a company in the bottom of particular interval would pay the same contribution as a company in the top of the same interval regardless the fact that the net turnover of the second one could be about 2 or 2,5 times higher than this of the first one. Also, a company in the bottom of particular interval would pay a contribution about 2 or 2,5 times higher than a company in the top of the previous interval which has net turnover lower by only EUR 0,01. In this regard, why did the Commission decided to propose the CORE contribution to be determined as an absolute amount instead of percentage? How does this approach relate to the principal of proportional and fair treatment of the companies?

Non-collected electrical and electronic equipment-based own resource

93. With a view of avoiding the negative experience with the statistical data and the methodologies in regard to the own resource on the basis of non-recycled plastic packaging waste from the recent years, could the Commission assure how reliable and comparable is the statistical data which would be used to calculate the proposed new own resource on the basis of non-collected electrical and electronic equipment? Moreover, could the Commission provide details for the methodologies to be applied in regard to determining the national data for the weight of electrical and electronic equipment placed on the market and the weight of waste electrical and electronic equipment collected?
94. Could the Commission provide financial justification of the proposed uniform call rate of EUR 2 per kilogram? Is its amount relevant to some specificities related to the collection and utilisation of the electrical and electronic equipment or is determined with a view of ensuing some targeted nominal amount of revenues in the EU Budget? As regards the stated reasons of the Commission regarding the area of critical raw materials, is the proposed uniform call rate of EUR 2 per kilogram consistent with the fact that not all the waste from electrical and electronic equipment contain identical critical raw materials, which in turn implies different activities and costs for the recovery of the waste?

95. How relevant is the proposed approach for using the annual average weight of electrical and electronic equipment placed on the market in the three preceding years taking into account the much longer life-cycle of house-hold and industrial electrical and electronic equipment?

Non-Recycled Plastic Packaging Waste-based own resource

96. Could the Commission provide financial justification of the proposed uniform call rate of EUR 1 per kilogram (in 2028 prices) in the form of independent economic and sectorial reasoning, but not just as an update of the current rate of EUR 0,80 per kilogram)?

VAT-based own resource

97. What is the rationale to change the term ‘VAT receipts’ (Art. 2, paragraph 1, point (b) of the current Own Resources Decision) with ‘VAT revenues’ (Art. 3, paragraph 1, point (c) of the proposed new Own Resources Decision)?

Traditional Own Resources – handling fee for e-commerce

98. The proposal for a new Own Resources Decision envisages the handling fee for e-commerce to be included among the Traditional Own Resource (TOR). However, there is no specific provision in the draft and only an indirect conclusion to that effect can be drawn in relation to the wording of recital 4 of the preamble to the draft decision, since the definition of TOR in Article 3, paragraph 1(a) is identical to that in Article 2, paragraph 1(a) of Own Resources Decision in force. In this regard, could the Commission give more information on the reasons for including the handling fee for e-commerce in the draft new Own Resources Decision in the category of TOR and how robust such an interpretation would be in practice if there is no explicit definition through a provision of the decision (Article 3, paragraph 1(a))?

MAR and IMSOR

99. Why, in contradiction with the established approach in the previous MFF cycles, did not the Commission present the whole own resources package together? Moreover, how the proposed own resources candidates could be thoroughly analysed in the current stage of the negotiations when significant part of their characteristics and stemming obligations – namely the provisions and engagements for their making available and administration, are still missing? How would the lack of MAR- and IMSOR-proposals be compensated in the coming months with a view of conducting detailed deliberations?

CZEQUIA

1. General comments

CZ takes note of the Commission's proposal for the MFF package and welcomes the fact, that it takes into account the EU priorities to be financed from the EU budget after 2027. CZ is currently analysing the submitted materials in detail and will present its position on the individual parts of the proposal during the upcoming discussions. **All the positions expressed below are therefore preliminary.**

- CZ requires the Commission to submit explanatory fiches on the topics discussed on an ongoing basis.
- **CZ supports all the requests for fiches and additional information/explanations made by MSs during the July presentation of the package in Council (preparatory bodies) meetings.**

Preliminary CZ position (expressed in italic throughout the document)

For CZ, it is crucial that in addition to focusing on common EU priorities, the new MFF proposal also properly reflects the CZ national priorities, i.e. ensures a simple, transparent and reasonably flexible EU budget focused on current and new challenges without unnecessary administrative burdens. During the negotiations, CZ will insist that the sufficient consideration be given both to traditional areas such as cohesion and agriculture, as well as to new priorities in the areas of defence and security, transport infrastructure and support for competitiveness.

MFF 28+ has to provide a sufficient and stable financial framework for the implementation of existing legislation, including newly adopted legislation, the implementation of which will require adequate budgetary coverage. Insufficient funding could jeopardize the achievement of the Union's objectives and its credibility.

Any transfer of data between different IT systems must be properly prepared in advance and thoroughly tested before its initial implementation.

2. MFF package – structure and general comments

CZ takes notes of the new 3-pillar structure the MFF is based on, broader use of performance-based approach (cf. comments and questions bellow) and changes in flexibility.

CZ is ready to discuss possible proposals on simplification and streamlining of the EU budget and its programmes into three broad pillars and generally welcomes this idea. However, such simplification of programmes and rules (including in shared management and in the NRPP – cf. bellow) should respect the specificities of different funds and policies as well as should only take place where feasible. It should also aim at reducing the administrative burden for the CION, the MS and particularly the final beneficiaries.

CZ can however see significant thematic overlaps between funds and programs, despite the fact that the proposal aims to prevent such overlaps between different areas of funding. Defence, for example, is to be funded from the ECF, NRPs, CEF, and EPF. And the situation seems to be similar in other areas, such as competitiveness.

- How can the Commission guarantee there will be no overlaps between different financing instruments? How can it be achieved in comparison with the current MFF 21-27 aside from reducing the number of instruments? CZ considers it necessary to clearly define and clarify possible overlaps.

CZ supports adequate flexibility in EU budget both at programme level, but also in a broader, more general term. MFF, policies and programmes should be simple, clear and enabling synergies. However, flexibility should not harm programming and planning and predictability of MS contributions to the EU budget.

- There are several instruments giving the MFF 28+ more flexibility. Could the Commission put all these instruments in one fiche/document to describe, clarify and allow for better understanding of the whole MFF 28+ flexibility system/structure, including the links and the interconnections of these instruments? CZ would welcome a clear overview of
 - o who will decide upon their use,
 - o whether there is any clear division and hierarchy between them as to which one, when and to what purpose and extent should be used?
- How will the Commission guarantee that most of the envisaged flexibility would not be used (depleted) already in the first years of the MFF 28+?

CZ is beyond cautious about any kind of debt financing (further the NGEU), including in NRPs.

- Can the Commission provide a complete overview of the areas in which the MFF proposal enables the CION to take out further loans (either directly or on a loan-for-loan basis), under what circumstances, and in what total amount?

3. MFF Regulation and IIA

While CZ can understand the merit of increased flexibility of the EU budget, the SMI concept (enabling the transfer of unused margins from previous years to later phases of the MFF) causes serious challenges at the national budgets level. It makes the forecasting and budgeting of MS' contributions to the EU budget more complicated and complex, causing another layer of uncertainty. In this context, CZ would like to express its deep concerns.

- In this context, CZ is concerned the new concept of the Flexibility instrument and the MFF technical adjustment through an adjustable deflator would only aggravate the situation further, despite the Commission claiming the opposite. How can the CION dispel these concerns?
- CZ takes note of the shortened negotiation period for the next MFF34+, but given the complexity and length of the negotiations, does the Commission believe it is realistic, sufficient, and justifiable to set such a significantly shortened deadline for the MFF34+ proposal? Would such deadline provide for adequate timeframe for in depth understanding and analysis of the proposal (including the time for the CION to provide additional explanations, fiches etc.)?

CZ stresses the importance of respecting the Treaties and maintaining the interinstitutional balance.

- Can the Commission explain more in detail and in writing the reasoning behind new procedure in IIA, i.e. inserting the art. 122 of the TFEU deliberations under the programme of the spring budgetary trilogue? Can the Commission confirm that this new procedure in IIA will not disrupt the balance? Is it tactical to put such provisions in the IIA proposal now?

Performance Framework

CZ understands the merits of performance-based approach, however, as for its wider use we should cautiously evaluate its suitability for different policies, not all policies and projects being equally suitable (e.g. lower suitability in case of EU Home Affairs Funds).

CZ also understands the CION's efforts to harmonize the performance measurement system at EU level, however, CZ warns that overly strict definition of indicators may paradoxically reduce the quality of effectiveness assessments.

The proposed regulation is very complex in nature and its impact affects all programs financed from the EU budget. CZ puts great emphasis on ensuring that implementing the proposed regulation does not increase the administrative burden on Member States. CZ stresses the need to build on existing and functioning monitoring structures and systems at national level. CZ supports the CION's horizontal approach to the DNSH principle with the exceptions where assessment is not appropriate or feasible. Therefore, CZ insists that sufficient time needs be provided for its thorough assessment.

- In order to obtain a comprehensive overview of the allocation and performance of funds, CZ calls on the Commission to publish detailed guidelines on the output and result indicators set out in Annex I as soon as possible.

Regarding the overall effectiveness of the proposal, the proposal is intended to simplify, streamline, and reduce costs. The overall operation of this performance apparatus in the Commission (in accordance with the LFS) is nevertheless considerably costly and demanding to operate.

- CZ thus would like to ask the CION to provide a comparison of the cost of the current performance measurement system with the newly proposed framework. How many Commission staff are currently involved in performance measurement and evaluation?

We understand that based on the draft regulation, the payment of the Union contribution by the Commission to Member States is based exclusively on a performance-based approach — i.e. subject to the achievement of pre-defined milestones and targets, in line with the principles of financing not linked to costs.

Could the Commission confirm whether:

- Only indicators listed in Annex I of the Performance Framework Regulation can be used to define these milestones and targets?
- If so, does this imply that only actions measurable through these indicators can be funded from the instrument?
- Is it possible to propose additional or complementary indicators, or does Annex I represent an exhaustive list that effectively limits the scope of eligible activities?

Heading III – Global Europe

- Could you elaborate more on the Performance Regulation specifically in relation to Global Europe, as this is a new element in comparison to current NDICI-GE Regulation. How it will influence the programming and non-programmable actions? How this follows-up on the Europe Pillar (IPA III principles, incentive-based approach under NDICI-GE) and how it influences the other pillar under the new Global Europe Instrument?

4. Heading I - NRPP

CZ thanks the Commission for the proposal for a regulation establishing the Fund and the National and Regional Partnership Plans. However, CZ is convinced that combining different policies (cohesion policy and home affairs policy) and the CAP within a single regulatory framework could lead to unforeseen complications given their different rules and objectives. CZ therefore prefers that these policies remain separate in order to ensure their effective implementation. CZ also calls for separate and explicitly defined financial resources for fisheries and aquaculture that cannot be diluted by other global objectives. The proposal effectively creates 27 different NRPP, without establishing minimum financial thresholds for most of the policy areas, therefore risking fragmentation and inconsistency

across Member States. At the same time, CZ welcomes the separation and explicit definition of financial resources for home affairs funds.

CZ is also very cautious about any kind of debt financing in national and regional partnership plans. According to CZ, the regulation will need to better reflect the objectives for all emphasized priorities (including border protection, security, and migration), thereby making them more precise and clearer.

- The Commission claims that the current 52 programmes are to be reduced to 16. How will this affect existing funds (e.g. ERDF, EAGF etc.)? Will they also be reduced? Which ones will remain in the new MFF?
- Can the Commission give a specific example of how implementation of National and Regional Partnership plans would work and streamline implementation of funds allocated to each MS – in comparison to how it works now.
- Article 22 of the draft regulation sets out that the preparation phase must include an assessment of the Country-Specific Recommendations (CSRs) and the progress made in implementing various sectoral national plans. However, it is not clear which reference date will be used to assess the implementation of these plans in order to comply with the deadlines for submitting the draft plan. CZ would also like to ask whether the Commission intends to publish an equivalent of Annex D, which previously served as the Commission's initial input for each Member State, and, if so, when this can be expected.

Implementing rules and implementation structure

- The proposal introduces a number of provisions that will lead to undue pressure on national budgets of the MS, whether it be the short decommitment rule (31 October of N+1) or the setting of pre-financing (especially the risk of losing the first tranche of the year 2028 if the plan is not approved by 31 July 2028). Can the CION explain their motivation for this approach and how it is supposed to work in practice?
- Moreover, for unclear reasons, the concept of annual accounts has been removed, which during previous 2 programming periods on the one hand provided adequate protection of the EU budget and on the other hand ensured a continuous cash flow to national budgets of the MS. CZ would welcome further clarification as to why the CION is proposing these changes and how it would ensure that there would be no interruption in the payment of funds to Member States and that national planning would not be jeopardized.
- As far as the implementation structure of the Plan is concerned, CZ finds it rather complex and limiting. The MS should have the possibility to use their already well-established set-ups using long term expertise as well as already running information systems. In particular, some of the functions of the coordinating body should in our opinion be assigned to the level of the MS enabling the MS to establish a body carrying out functions such as submission of payment applications to the Commission, receipt of payments from the Commission and the following distribution of the payments within the Member State in line with its national set-up. In this context, CZ would like to ask whether and to what extent Member States will be able to set up or adapt their implementation bodies for the NRPP.

Allocations/allocation methodology

- CZ would also like to request more detailed information on the allocation for Member States under the NRPP by individual areas.
- Could the CION provide relevant links to datasets used and other underlying assumptions and data (as not all of them are already covered in the Annex to NRP Regulation)?

Part B of Annex I sets out the calculation method for allocating resources in areas related to Home Affairs. The formula appears to be inspired by the approach used in the 2021–2027 programming period. However, certain key parameters — particularly in the area of border management — were modified.

For example, although a significant portion of funding in this area relates to IT systems, the formula relies solely on the length of land and sea borders, omitting air borders. As a result, Member States without land and sea borders are disadvantaged in the allocation process, although they also need to fulfil the goals in the area of European Border control. That's why CZ would like to ask the Commission:

- Why was the formula changed in comparison to the previous period?
- Why was the number of border crossings at international airports excluded from the parameters, despite its relevance for infrastructure and IT-related investments?

Flexibility

- CZ considers the functioning and practical implementation of the EU Facility to be unclear. Can the Commission provide a more detailed explanation of how it is going to work in general and with respect to different tools/parts under the Facility, including their connection? Can the CION explain the Solidarity Actions part (as a follow-up instrument to the current FSEU), including the conditions, procedure, mobilisation and reporting?
- Can the CION elaborate more on the functioning of the Catalyst Europe tool within the national plans? Is this tool complementary to the EU Facility Cushion? And which one would be used first? Or do each of these flexibility tools have a different purpose?

Environment, biodiversity

CZ is concerned about the termination of the LIFE programme, which CZ considers to be the only financial instrument directly focused on biodiversity protection.

- Without LIFE programme, how does the Commission intend to ensure compliance with EU and international commitments in the field of biodiversity?
- Will there be any financial safeguards ringfencing sufficient funding for environmental policies, especially biodiversity?

Agriculture

- CZ would like to ask the Commission to provide the MS as soon as possible with the details of the national allocations and sources of funding for CAP and CFP (when, in what form). Can the Commission also provide all important details on the financial management of the CAP?

Home affairs

- In the case of home affairs policy funds, support regarding the conflict in UA should not be focused solely on Border States, but on states throughout the region that bear the brunt of the situation. Will also this approach be taken into account?
- In the case of the allocation key, CZ requests clarification on home affairs funds, including the removal of certain key parameters compared to the original methodology (cf. above).

NRP Regulation

CZ would appreciate guidance on how the general objectives set out in Article 2 of the NRP Regulation should be understood. In the Commission's Communication, *Migration and Border Protection* are identified as key policy challenges requiring EU-level action. However, we note that *Title V of the Treaty on the Functioning of the European Union (TFEU)* — which provides the legal basis for EU policies in the field of migration, asylum, and border management — is not included among the general objectives in Article 2 of the NRP Regulation.

- How should stakeholders interpret the absence of Title V TFEU in the list of general objectives under Article 2?
- Does this omission affect the eligibility of activities or the scope of funding for actions linked to migration and border management?

Paragraph 2 of Article 49 recognises the authorities designated under the 2021–2027 period as compliant with key requirements. However, it refers only to authorities responsible for cohesion policy, the Common Agricultural Policy (CAP), and fisheries

- Why the provision does not explicitly cover all policy areas governed by the Common Provisions Regulation (Regulation (EU) 2021/1060), including Home Affairs Funds?
- Why authorities responsible for implementing Home Affairs Funds in 2021–2027 — which were also designated under the same regulatory framework — are not included in this continuity clause?

Home affairs funds regulation

We would like to request clarification regarding the interpretation and practical application of Article 7 of the draft Regulation establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period 2028–2034, specifically in relation to operating costs of ETIAS. Article 1 of the Regulation stipulates that support shall be provided under the horizontal rules of the "European Fund for Economic, Social and Territorial Cohesion etc.", whose financial architecture is based on a performance-based model. This model requires the achievement of milestones and targets, measured through specific indicators, as a condition for disbursement of Union contributions. However, Article 7 appears to introduce a different logic, as it foresees operating costs of ETIAS to be covered on the basis of actual costs, without i) a corresponding performance framework (i.e. no indicators related to ETIAS operations are included), ii) any dedicated reporting mechanism, or iii) any link to measurable milestones or targets under the performance-based approach. In this context, Article 7 seems to deviate from the regulatory logic governing the rest of the instrument, which raises questions about its alignment with the overarching financing and monitoring framework.

CZ would therefore appreciate the Commission's guidance on the following points:

- How should Article 7 be interpreted in light of the general rules applicable to the Fund?
- Does the provision constitute an exception to the performance-based logic of the regulation?
- What practical mechanisms will be used to implement and report on the operating costs of ETIAS under this Article?

5. Heading II - European Competitiveness Fund, CEF, Horizon Europe

CZ is aware of the decline in the EU's competitiveness and therefore CZ considers it important to pay due attention to this issue. We generally welcome the reduction in the number of programs, their better targeting, and clearer conditions for beneficiaries. However, in order to ensure internal cohesion within the EU, it will be important to apply a geographically balanced approach to individual instruments.

- Does CZ understand it correctly that ECF will only involve direct (competitive) procedures and there will therefore be no national envelopes or minimum thresholds within the ECF?
- How will support for integration into European value chains be ensured, especially for entities from Member States whose experience is limited compared to other Member States? In this context, we would welcome the implementation of the ECF being based on regular analysis of participation trends and barriers to access – does the COM plan to do this?
- If everything within the ECF is based on the same conditions (common legislation), how will purely security aspects be ensured (protection of classified information, differences in the participation of entities from non-associated third countries, etc.)?
- CZ would also like to know whether the DK PRES plans to allocate the distribution of funds for defence and security (the ratio for individual EDF-like and EDIP-like subprograms) for discussion at the AHWP MFF, or where and how it will be determined/discussed? We also

assume that the establishment of programs will continue to be addressed in separate forums (e.g., the existing EDF program committee, etc.).

CEF

- CZ would like to know whether the CEF will also include a cohesion component with national envelopes.
- CZ is interested in whether the new CEF will focus exclusively on cross-border sections or whether it will also be possible to support domestic sections on key trans-European connections.

Horizon Europe

- With regard to the ECF and HE, how the planned close link between the ECF and the second pillar of the HE program will be implemented in practice? Who will decide on the thematic areas of the calls for proposals? Will it be possible to finance thematic areas other than the priorities of the ECF, which are relatively narrowly defined?

We believe that omitting certain research topics would be a mistake, as the nature of scientific and research work makes it impossible to predict with 100% certainty the ground-breaking scientific discoveries that may have a fundamental impact on society and the economy. By overly restricting the thematic areas of research, the EU will miss out on the possibility of such discoveries in areas that are not included in the activities of the HE framework program.

- What will the comitology process look like in the second pillar of the HE program? How and by whom will the work programs be discussed and approved? Who will decide on the composition of the program committees? Are standard independent program committees planned for each part of the HE framework program?

6. Heading III – Global Europe

CZ welcomes the integration of external support instruments and the linking of priorities. In terms of long-term geographical priorities, CZ puts emphasis on the Neighbourhood, sub-Saharan Africa, and Central Asia, and thematically on targeted reduction of fragility from a security, migration, and climate perspective. A key prerequisite for the successful implementation of the EU's vision of global partnerships will be institutional balance in the management of the Global Europe program, in particular maintaining the political role of the Council of the EU in applying the priorities and capacities of Member States.

- Article 10 (p. 2) is missing/not included in the text of the draft regulation available on the Commission's website. Is this intentional or a mistake?
- CZ would appreciate a fiche on projection / breakdown of nonprogrammable actions, as the amount and activities are not specified in the draft Regulation. This is a new component, and CZ would like to see, what is new (e.g. competitiveness element) and what is the continuity of current activities from the current Heading 6 MFF 2021-27 (e.g. NDICI-GE Rapid Response Pillar) How will the non-programmable action be managed (delegation of power, small operations, players and roles of geographic DGs, FPI, ECHO, ...).
- CZ would also welcome a more detailed presentation on the intention to award grants to private companies from Member States without a call for proposals (see recital 70 and Article 23(4)(e)).
- Regarding the financing provision, CZ would like to receive a more-detailed explanation on the carry-overs and possible transfers between the pillars/different budget lines, decommitments and their transfer to the new Flexibility Instrument, relation and interplay between the Flexibility Instrument and Global Europe Instrument, and explanation/reasoning of absence of a dedicated window for EIB (in comparison to the NDICI-GE).

Ukraine

- CZ would appreciate a detailed fiche on (overall) support to Ukraine - through MFF headroom, Ukraine Reserve, Global Europe and the interplay with other instruments (NRPs, CEF, CFSP, EPF, INSC-D etc.) which would explain:
 - o The reasoning on which the allocation of 100 bn. EUR was set up (based on IMF and WB projections), worst-and-best case scenario of budget support to Ukraine and reasoning for (not setting up) loans and grants ratio component and their possible projections.
 - o How the proposed support will follow-up on the current 2024-2027 Ukraine Facility and its three pillars (incl. the budget guarantee of up to 48 bn. EUR with the initial provisioning rate of 70%).
 - o How the governance of the new support of Ukraine is foreseen under new MFF in comparison to current governing and implementing infrastructure? (Role of the Council, delegation of powers to the Commission, Council Implementing Decisions, comitology under NDICI-GE a under Ukraine Facility Committee, Steering Board UIF etc.).
 - o What other instruments and parts of Global Europe Instrument will be Ukraine eligible to?

MFA

- Could the CION explain in more details budgetary aspects of Macro-financial assistance (MFA)? Where in the new MFF proposal will the MFA grant component be budgeted and what resources will be dedicated for it? How flexible will transfers between the individual geographical pillars be?
- How will MFA loans to countries other than Ukraine be guaranteed? Will the practice of using the CPF continue?
- Is the Commission considering submitting a general regulation for MFA that would be in line with efforts to reduce the number of programs and legislative proposals?

Pre-accession

- How will the Council's control over the financing of pre-accession assistance under the 'Global Europe' regulation be ensured? Are there any differences from the practice for the current IPA III regulation?
- What level of funding does the Commission anticipate for pre-accession assistance under the "Europe" pillar?
- As Europe Pillar combines the IPA III countries, new Eastern candidate countries, as well as EaP non-candidate countries, CZ would like to clearly see the allocation specifically dedicated to the Enlargement and what principles on programming as well as on non-programmable actions will apply under this pillar given the different status and different level of alignment of the countries.
- CZ is also interested in how support for Moldova and the countries of the Western Balkans will be approached. Can the CION give details on bridging between NDICI-GE and Global Europe after 2027, i.a. the transformation of the respective regional reform programs (Western Balkans, Moldova, Ukraine)?

HUMA

- How will the speed and flexibility of EU humanitarian aid be maintained while preserving the principles of humanitarian aid delivery?
- CZ would appreciate more details in general on the future funding for humanitarian action: allocations, programmable parts and flexibilities, programming alongside the triple nexus, geographic v. thematic support including for anticipatory actions.

Global pillar

- CZ would like to kindly ask for a fiche on Global Pillar under the new Instrument, on its at least thematic breakdown (indicative allocation for various thematic streams of this pillar would be also appreciated) and projections of its programmable and non-programmable parts. This is very important one, as this pillar would incorporate various current thematic programs NDICI-GE (Human Rights and Democracy – non-consent element, Civil Society Organizations, Global Challenges, Peace). The result of stronger geographisation leads to weakening of the thematic approach under the new proposed Instrument (e.g. support to human rights and democracy) and this should be addressed.
- How is the area of the external dimension of migration, including the implementation of innovative solutions, specifically addressed in this heading?

7. Heading IV – Administration

CZ understands the challenges in the area of administration, however, the fact that the budget introduces some new priorities at the expense of existing ones, should be duly reflected. The Commission itself states in its Communication that the new MFF will have a simpler architecture with fewer programs, simpler monitoring and reporting (a new approach to performance), all of which should and will reduce the administrative burden on all participating sides including the Commission's.

- Could the Commission share their plans for redeployments of its more than 30,000 employees in relation to the new MFF 28+? Does it plan to carry out a personnel audit in connection with the MFF 28+?
- Can the Commission indicate whether it is already able to identify areas where activities within the Commission could be scaled back and existing capacities transferred to new priority areas in connection with the new MFF?
- In its Communication, the Commission also mentions new regulatory obligations among the administration challenges it will face in the coming years. Can the Commission say what new regulatory obligations it is referring to and whether this trend runs counter to the deregulation and simplification that the Commission is promoting and which is currently being implemented across EU legislation?
- Given the anticipated continued wave of retirements in the coming years, how does the proposed MFF 28+ ensure that the Commission/institutions will be able to recruit a sufficient number of staff with current and newly needed qualifications to maintain operational capacity and simultaneously address the need for both workforce rejuvenation and balanced geographical representation across all Member States?

8. Own resources

CZ thanks to the CION for the MFF package including the ORD part. CZ is now studying and analysing the proposal in detail, all the comments are therefore preliminary.

CZ has in general reserved position towards the introduction of new own resources (NOR). CZ is of the opinion that the own resources system should be simple and primarily based on GNI contributions (which reflect the best the economic situation of MS). We respect the HoSG agreement from December 2020 and are therefore ready to consider and discuss potential NOR. Any possible NOR should be primarily simple (without increasing administrative burden), predictable as regards revenues, stable and fair, i.e. should not disproportionately affect economically less advanced MS.

CZ will present its detailed position during the in-depths discussions on the ORD.

In order to better understand and assess the proposal and its impact, all the relevant information and data are needed. CZ therefore appreciates the willingness of the CION to prepare and present additional inputs in form of fiches. CZ calls on CION to provide especially the following fiches and data:

- Macroeconomic assumptions (GNI growth rates – per year/per MS both in constant and current prices)
- Information on different NORs (as presented in fiche 53) - i.e. income/impact per NOR/year/MS (both in constant and current prices)
- “Zero NOR” scenario, i.e. fiche detailing the impact on MS under the current system of OR
- More in depths presentations on functioning, calculation, collection and making available of the newly presented proposals for OR
- CZ also supports all requests for (other) fiches and additional information made by MSs during the WPOR meeting on July 22nd.

CZ calls on the CION to present the remaining legislation (MAR, IMSOR) in a timely manner, i.e. as soon as possible, in order to allow for a complete picture. CZ reiterates its support for a single MAR and sees this

ETS 1

While maintaining strong reservations toward ETS OR (in form of ETS 1), CZ welcomes the ETS 2 part was left out. However, CZ perceives very negatively that CION has decided to leave out also the SAM on ETS 1. This would make the ETS OR impact even more regressive.

- Could the CION specify, whether there are any important changes to the previous ETS OR proposal (2023)?
- CZ would appreciate further clarification regarding the methodology for calculating the 30% call rate (share). Can net auction revenues become negative due to transfers to the Modernisation Fund? What would happen in such case of negative net revenue - would MS be required to compensate the difference from other national sources or would the contribution of MS be capped in some way?
- Can CION explain the functioning of this OR in practice? What the making available procedure would be? Would the auction revenues be directly transferred by the Platforms to the EU budget (same as in the previous proposal) or would it be the MS making the payment subsequently?

CBAM

- Can the CION elaborate more on the assumptions for the calculations of expected income (i.e. especially what basis/products subject to CBAM were taken into account)?

E-waste

Based on experience with plastic OR, we are not convinced on the incentive role of similar payments (as shows, i.a., the ECA 2024 report).

- If another statistical OR should be introduced, does the CION have an assessment of the plastic OR, i.e. any relevant analysis? How effective this source is? How has its introduction contributed to improving the recycling of packaging waste in MSs?

At the same time, CZ has doubts about the e-waste OR itself, as it should be based on the currently disputed calculation of the WEEE take-back rate. WEEE suffers from reporting difficulties with some electrical equipment ending up outside the system, with CION and JRC investigating on how to resolve this situation. Under these circumstances, introduction of an OR based on “uncollected” electrical equipment does not seem the best way forward.

- What are the assumptions the CION is basing on the e-waste proposal? How would the e-waste contribution work – would it “copy” the plastic OR?

- CZ is taking note CION does not propose any corrections at all to the 2028-2034 OR system. What is the reasoning behind for the e-waste? Have the CION considered/analysed the possibility of a lump sum correction for e-waste OR (similar to plastic OR)? With what results?

CORE

With regards to the current geopolitical situation and our efforts to support and boost the EU competitiveness, CZ is very concerned by this CION proposal, which we find rather contradictory and potentially harming to EU companies by deteriorating of the business environment in the EU. CZ also point out the necessity for in depth discussions of the proposal, its functioning and implications on relevant Council fora (tax working parties).

- What is the nature of CORE (as OR) – would it be conceived/designed and functioning as a tax? If so, what kind of tax would it be (a MS or an EU tax)?
- What would be the relation of this “fee” and the double taxation agreement? Would this “fee” and its amount be linked to existing corporate taxation systems? Would it also take into account the actual economic performance of the company (profit/loss) or only turnover?
- CZ is concerned that the fee would disproportionately burden companies operating in different sectors (precisely because of the focus on turnover, which can generate different profit values in different sectors). Can the CION react to that and elaborate more on the assumptions CION is working on?

TEDOR

While CZ in general supports the works on recasting the Tobacco Directive, we are much more reluctant to use it as a basis for NOR instead of an income of the national budget.

- Could the CION elaborate more on this OR? CZ would be specifically interested in the link between TEDOR and Tobacco Directive recast: CION claims both steps can be made separately. However, CZ has some doubts about this interpretation and is convinced that without the recast, it would not be possible to link the OR to the excise tax on tobacco derivatives despite the fact most of the MS already applies such tax at national level. Do we understand correctly that without the recast, TEDOR scope would be different as it would not be possible to include tobacco derivatives? Can the CION present the comparative data (expected income)?
- Could the CION explain how the contribution to the EU budget would be calculated in general as well as in specific cases where the MS applies mixed taxation (i.e. no minimum tax) or a tax ad valorem?

TOR and e-commerce handling fee

- Could the CION explain the background and assumptions for this sharp reduction of the collection costs proposal? CZ would welcome a detailed background analysis. In this context, CZ draws the attention i.a. to the increasing cost of controls (administrative costs in general) and of the responsibility the MS have in connection with TOR collection. Such change in collection costs could harm the balanced relationship between the MS and CION (and their respective tasks, responsibilities and liabilities).
- Can the CION elaborate more on the reasons for reassessing the handling fee as OR (instead of other revenue)? CZ understood the debates are still ongoing in relevant fora (CUWP), with no conclusive decision made yet – what lead the CION to already incorporate the handling fee as OR in ORD, before the conclusive discussions on the nature of this income and on costs (and therefore potentially) collection costs for MS and EU?

Call rates/contributions annually adjusted for inflation

While CZ can see some logic behind the call rates adjusted for inflation, we would like to point out the importance of predictability of MS contributions to the EU budget and therefore potential negative impacts for national budgets planning.

- Can the CION explain in detail the underlying assumptions and data for the increase of plastic OR call rate and for the proposal to annually adjust the plastic and e-waste ORs call rates for inflation?

OR ceilings

As a general principle, CZ is extremely cautious about and rather reluctant to any further debt financing.

- Can the CION explain in writing why the provisions for the NGEU repayments and temporary increase of the OR ceilings for NGEU are not anymore introduced in an explicit way in the new ORD?
- Can the CION elaborate (in writing) on the extraordinary and temporary increase in OR ceilings for Crisis mechanism?

GERMANY

Questionary on the MFF 2028-34 Proposal

General remarks: The questions reflect a preliminary stage of examining the proposals. They do not entail any positions or focus on particular areas. We may submit further questions arising during the ongoing analysis of the legal texts.

Overarching/Political Questions

Horizontal

Governance

- We ask the Commission to further explain the proposals for the new governance structure – both for the overarching level and for the individual pillars (including the involvement of the Council and the EP, the design of the political steering mechanism, and the link to the annual budgetary procedure, the Competitiveness Coordination Tool, and the European Semester).
- Without a mid-term review, how to evaluate over the duration of the MFF whether the instruments are functioning as intended, and on which basis can adjustments be made if necessary?
- How does the Commission envision the integration of the Preparedness by Design concept into all pillars? How exactly should aspects of disaster and crisis preparedness be integrated into the pillar programs?

Priorities

- Will there be a delay between setting priorities, the draft budget, and the implementation of the budget?
- How often are priorities set?
- Is there a trade-off between a (possibly annual) change in priorities compared to long-term projects (e.g., research/biotech/space/infrastructure/climate/biodiversity)?
- Will the Commission require the inclusion of relevant priorities or target indicators in respect to preparedness and resilience in all programs?

Simplification

- How does the Commission proposal achieve noticeable simplification? Is there a comparison to the status quo or an impact assessment?
- How is the Commission implementing bureaucracy reduction in terms of content (i.e., beyond merging programs)?
- Which regulatory areas are affected?
- What is the timeline for cutting red tape?

Rule of Law

- The Commission emphasizes that "identified breaches must be addressed in a timely manner": How is any loss of funding regulated within this framework?
- If the rule of law criteria is not implemented, no funds will flow from the relevant NRPPs. How will this affect the obligation of Member States to continue payments to final beneficiaries?

- Will there be a way to do direct disbursements to final beneficiaries?
- How to ensure in NRPPs that pre-financing or similar mechanisms do not lead to the circumvention of the rule of law mechanisms?
- What happens if a NRPP violates the RoL principle (the requirement under Article 1 / Article 2(p) of the NRPP Regulation) and the Member State does not remedy this?
- How can RoL violations be addressed that cannot be attributed to a specific measure in the NRPP?
- What is the relationship between the Conditionality Regulation and the mechanism under Article 9 of the NRPP Regulation?
- Are there precedents for the application of RoL criteria to the agricultural sector?

Quotas and spending targets

- A mainstreaming target of 35% is proposed for climate and environmental objectives – what does this mean in absolute terms for climate protection and adaptation, as well as for biodiversity? On what basis did the Commission set the 35% climate and environmental spending target
- Why did the Commission decide against a specific biodiversity spending target?
- What approach did the Commission follow to set individual markers of 100%, 40% and 0% for each intervention field listed in Annex I of the Performance Regulation?
- In the Commission’s estimation, do the markers set out in Annex I of the Performance Regulation avoid overestimation of climate and environmental spending?
- How will the principles of preparedness and climate resilience by design mentioned in the MFF Communication and the Performance Regulation be applied?
- What will be the approach regarding gender equality? How will targets be set and monitored?

Other

- Does the proposed results-orientation include controls? Are these entirely the responsibility of the Member States?
- What exactly does the Commission mean by “*close cooperation* between the authorities responsible for ... control ...”? (see Article 7(5)(b) of the NRPP Regulation)
- How does the Commission assess the endogenous monetary policy effects (especially with regard to the inflation rate) resulting from an automatic equivalent adjustment of the budget for inflation rates above 3%? Does the Commission envisage a cap on the automatic adjustment? How is the adjustment monitored institutionally/steered politically?
- The annual program-specific adjustment of the MFF limits pursuant to Article 5 of the current MFF Regulation has been abolished. How could these funds be used elsewhere?
- Please provide for an impact assessment for the proposal compared to the status quo of the MFF.

Pillar 1

Governance

- How to ensure horizontal equal treatment between Member States with regard to reform requirements (milestones and targets)?
- How to ensure that each Member State meets the specified minimum amounts for the individual policy areas in its NRPP?

- Please provide a comparison of the application of the performance-based approach in the RRF and the planned application in the upcoming MFF.
- How to design and implement NRPPs in federal states?

NRPP in general

- How is ensured that the national level will be not be liable for the regional level in case of mixing central and regional levels?
- If the Country Specific Recommendations (CSR) serve as a starting point for MS and regions to propose reforms, and regional chapters act as regional equally to national partnership plans, what role does COM see for CSRs on the regional level?
- One objective of the proposed regulation for the NRPP is "support for clean energy generation and infrastructure" (Article 3). To what extent does this open up TFEU-based EU programs to energy generation through nuclear fission?
- What share of the implementation costs of the European Water Resilience Strategy will be covered by the MFF?
- To what extent do the LIFE actions under NRPPs cover the scope of the discontinued LIFE programme and what is the Commission's estimation and expectation for their uptake?
- What guidelines are there for individual Member States regarding the use of funds for individual policy areas of the NRPP? How to ensure that the requirements for the minimum funding for individual policy areas apply in the aggregate/at the EU level?

Cohesion

- Given the common provisions in Art 10. to 13 in COM (2025) 565 what remains in the national general allocation (total allocation without CAP, migration and social climate fund) per MS? Please provide a fiche with the allocations per MS for cohesion.
- On which basis did the Commission derive the minimum quota of 14% for "social spending" specified in Article 10, paragraph 5 of the NRP Plan Regulation? Is the 14 % for social spending a national and/or an EU-wide quota?
- Is it technically possible to reach the minimum quota of 14% in a MS without using the ESF?
- Why did the COM not propose a minimum quota for ESF?
- What scope and share (overall and sector-specific) would social spending have in the current MFF according to the intended new methodology in the Performance Framework?

Performance oriented approach (POA)

- With the choice of a mandatory POA for all areas and instruments, does the regulation determine that there will be no ex-post cost-based audit?

Agriculture and Fisheries

- How is food safety addressed by the proposal? What is the connection to other targets (e.g. "Protecting Europe")?
- Given the high degree of flexibility for Member States in allocating funds in their NRPP, how can a level playing field be ensured in the CAP?
- Are degression and capping already taken into account in the premium corridor (Article 35 No. 3 of the NRPP Regulation)?
- Are the Member States allowed to decide by themselves and in full how to use the funds not used for area-based income support as a result of degression and capping?

- Why does the Commission no longer provide for ring-fencing for environmental measures as in the past? What share of the implementation costs will the MFF be able to cover for measures implementing the Restoration Regulation?
- What exactly does the minimum budget of €2 billion for the Common Fisheries Policy refer to – only the funding of fisheries and aquaculture, or all aspects of the European Pact for the Seas?
- Is there an intention to make funding conditions more flexible than those under the EMFAF?
- Why is LEADER enshrined in both the CAP Regulation (Article 18) and, as CLLD, in Article 76 of the NRPP Regulation, and what are the legal and practical consequences?
- Why are sectoral interventions enshrined in both the CAP NRP-Regulation (Article 35) and in Chapter IIa section 3 of the Amendments to Regulation (EU) No 1308/2013, and what are the legal and practical consequences?
- Shall member states obtain the obligation to co-finance all sector interventions (Article 30 CMO Regulation and Article 35 No. 8 of the NRP Regulation)? - also given that interventions “shall be mandatory for Member States with producer organisations or associations of producer organisations in those sectors.
- With a few exceptions, rural development measures are no longer included in the CAP Regulation. Ring-fencing for these measures is not planned. How to ensure that these measures can also be sufficiently implemented?
- The communication states: "This performance framework will represent a major simplification, reducing the administrative burdens associated with monitoring and reporting." What concrete consequences would the changes have for those involved in implementation?
- Has rural proofing been conducted?
- How can and should “specific activities” related to agriculture in accordance with Article 37(1)(g) ECE Regulation [= Pillar 2] be meaningfully differentiated from CAP interventions?
- In particular: The Commission has been criticized in the past for climate tracking under Regulation (EU) 2021/2115 with regard to the current CAP. Why is she now using the same method in relation to the future CAP? How can a “flat rate” of 40 % for degressive area-based income support be justified if the design of ‘protective practices’ is left entirely to the Member States?

Pillar 2

Governance

- How does the Commission envision the governance and ensure a strong involvement of the Council in Pillar 2?
- How will the independent Horizon Europe Programme and the European Competitiveness Fund function together? How will synergies between the ECF and Horizon Europe be ensured, and how will duplication be avoided? What will the decision-making structures look like?
- How does the Commission envision the operative involvement of Member States in Pillar II? In particular, why should the implementing acts for the Work programme of the ECF be adopted by the advisory procedure rather than through the examination procedure?
- How will the existing structures (i.e. Cluster 5 programme committee) fit into the new programme? What changes are foreseen and what will be the role and the functioning of the Clean Transition Committee?

- According to which criteria should the allocation and weighting of funds within Pillar 2 and within the programs be determined? When and how will funding be allocated? How many different annual work programs will the Commission draft? How to ensure that funds are allocated according to the principles of competition and excellence? How to ensure that the allocation of funds is sufficiently predictable?
- When will the minimum budget envelope for long-term planning and commitments be defined and how big will the budget in these envelopes be (percentage or numbers)? How is the predictability for the budget ensured?
- How will the Commission ensure that merging various programmes in the proposed ECF does not undermine the Member States' ability to exercise control and shape programmes that are closely linked to national security objectives (e.g. EU space programme)?
- What are the mechanisms to ensure that funds within the four thematic policy windows are used effectively and efficiently to promote truly key technologies?
- How to achieve that the thematic areas of research and innovation assigned to Horizon Europe are designed in such a way that they are optimally interlinked with the ECF? Why is there a section on agriculture in the "Health, Biotechnology, Agriculture, and Bioeconomy" window in addition to the CAP funds in Pillar 1 of the MFF?
- Is it certain that the funds earmarked for the digital sector will remain available even if the distribution of fund between the different thematic windows is only "indicative" (i.e. a planned flexible handling of the budget)?
- What role is foreseen for the MS concerning the application of EU preference provisions, particularly with regard to the ownership and control restrictions mentioned therein?
- What will the selection and composition of the ECF Strategic Stakeholder Board look like? What will the inclusion of MS look like?

Instruments

- Please elaborate on the ECF Toolbox. Which industrial policy measures will be introduced through the Toolbox? How will the Toolbox work? Please illustrate via concrete examples. How flexible is the budget within the policy windows between the Horizon Europe part and the other activities under the ECF?
- Based on which criteria and at which stage will the most suitable financing tools to support a specific action be determined? Will this depend on the funding needs of the respective applicant, or will the allocation of the budget among the financing tools need to be determined in the work programme?
- How does the Competitiveness Fund interact with the planned Industrial Decarbonization Bank, the Innovation Fund, and the planned Scale-Up Europe Fund?
- Why is no minimum share of the guarantee for the EIB Group provided for in the InvestEU instrument?
- According to Article 5(4) and (5) of the Competitiveness Fund, can reflows and surpluses from instruments of the current and previous MFF be used for all instruments of the Competitiveness Fund?

Research

- Regarding the 11 "moonshots" proposed in the Horizon Europe Regulation: How will decisions be made and how will the governance of the "moonshots" be structured? What are the main

characteristics of the moonshots? Can other examples (i.e in the energy sector) be proposed? If yes, when?

- Please explain in more detail what the new partnership landscape in Horizon Europe will look like after 2028.
- Will the political prioritization of competitiveness impact the excellence-based selection of research projects?
- Will there be priority approval/consideration of projects with immediate (commercial) use and/or associated funding (public-private partnerships)?

Energy

- The proposed regulation lists "Clean energy and decarbonization solutions in industry" and "Clean tech manufacturing and its supply chain" as specific activities (Article 33). To what extent does this open up TFEU-based EU programs to the generation of energy through nuclear fission?
- Will financial support for the construction or maintenance of nuclear power plants be made available?
- Would such expenditures count towards the climate quota?
- Would the promotion of energy through nuclear fission be given a 100% climate marker?

Defence and Space

- How does the Commission intend to ensure an appropriate role for the Member States in the governance of the EU support for defence policy?
- What is the particularity of the European Defence Innovation Scheme that allows it to be considered a dedicated programme?
- Is the goal to fully adopt the provisions of Chapters I and II of the EDIP Regulation to account for the specific characteristics of the defence sector? If so, how does this fit with the ECF's aim of ensuring uniform funding guidelines across all sectors? How will the splitting of regulations lead to more transparency and the reduction of red tape?
- How do eligible activities in the area of military mobility differ between the CEF, ECF, and NRPPs? How to avoid overlap or double funding in military mobility? How to include MilAdvice into the prioritization process when it comes to funding dual-use-infrastructure projects?
- Why is there no dedicated space budget?
- What proportion of the budget will be allocated to space? What proportion of the budget will be allocated to defence industry support?
- How are MS defence and security capability requirements taken into account?
- How are current and planned defence and space capabilities of the Member States considered in the proposal?
- How does the Commission intend to ensure an appropriate role of the Member States in the governance of the EU space programme?
- How to ensure that the development of space infrastructures and services to be provided by the components of the "Union space systems and policy" will be demand-driven (especially in view of proclaimed military needs)?
- Does the proposed budget flexibility mean that potential additional costs in the build-up of two new large EU-owned satellite constellations (EOGS and IRIS²) can be covered through budget reduction in other space components (e.g. Galileo, Copernicus, SSA)?

Climate and environment

- To what extent do the LIFE activities under the ECF cover the scope of the discontinued LIFE programme and what is the Commission's estimation and expectation for their uptake?

Health

- Which parts of EU4Health will be implemented and continued, and how?

Pillar 3

Governance

- How will governance and Council involvement work?
- To what extent will the governance differ from the governance of NDICI, IPA III, and the Ukraine, Western Balkans, and Moldova facilities?
- Will parts of the financial support continue to be implemented via the Western Balkans Investment Framework (WBIF)?
- How will the specific features of support to Ukraine be taken into account?
- Will the Commission continue to submit annual progress reports on the implementation of the instrument?
- To what extent have the lessons learned from the implementation of the NDICI MTR and the Ukraine, Western Balkans, and Moldova facilities been taken into account in strengthening governance?
- How will the Commission ensure the continued involvement of Member States in the implementation of the instruments via the Team Europe approach?
- How large will the programmable / non-programmable share be for each pillar?
- How will the role of the Council be strengthened in relation to the use of resources from the reserve (especially ex-ante)?
How large will be the share of grants awarded without a call for proposals, or simplified forms of funding referred to in Article 125(1) of Regulation (EU, Euratom) 2024/2509?

Monitoring / Evaluation:

- How will the experiences from the implementation of the Global Europe Instrument be regularly captured, analysed and incorporated into the further implementation? What role can/should a mid-term evaluation play here?
- What arrangements are being made to adequately capture the specificities of the impact of EU external action in third countries? Under which circumstances will the Commission carry out a review of a Multiannual Indicative Programme (MIP)?

Allocations for different policy areas

- How can a minimum level of funding for each policy area (pre-accession assistance, humanitarian assistance, development cooperation and international partnerships) be ensured following the merger of the instruments?
- Which type of action would be funded from the new budget lines on 'resilience' and 'competitiveness'?

Investment Board

- How would the Investment Board be different from the current EFSD+ Board?
- Which role would the investment Board play with regard to different cooperation modalities (grants, blending, guarantees, etc.)?

Simplification und Ownership

- How does the Commission proposal take into account the difficulties (lacking capacities) of the beneficiaries to adapt to the changing requirements of each new instrument?
- How shall ownership by the beneficiaries be achieved?

Ukraine

- How and according to which criteria will the distribution and amount of loans, grants, and guarantees to Ukraine be decided?
- How will the Ukraine Reserve, accession aid, and Eastern Neighborhood interact and contribute to overall support for Ukraine?

Global Gateway

- How is Global Gateway taken into account in the Global Europe Instrument?
- How will the implementation of Global Gateway be supported by Global Europe?

Quotas and Spending Targets

- How does the climate and environment quota affect Global Europe?
- Why will a comparatively low sub-target of 30% apply here?
- In the Commission's opinion, would this share be sufficient to meet the EU's international commitments on environmental and climate financing?
- Without an explicit biodiversity quota, how does the Commission ensure that an appropriate contribution is made to international biodiversity financing?
- Without an explicit quota, how will the Commission ensure that the EU remains ambitious with regard to gender equality in its external action, particularly with a view to the forthcoming EU Gender Action Plan IV?
- How will the Council be informed about the implementation and how will the portfolio be redirected if the targets are not met?

Principle of Conditionality

- Within what framework will the Commission continue to apply the principle of conditionality??
- How will Council involvement work in case of backsliding of beneficiaries?
- How does the Commission take into account the experiences from the facilities when applying the principle of conditionality?
- For which countries is a performance-based plan foreseen? Is the performance-based plan the same as the reform agenda under the Ukraine, Western Balkans, and Moldova facilities? How will ownership by the beneficiaries be achieved?

Guarantees and Security

- How would the use of guarantees differ from the current use under the NDICI instrument?
- Will other implementation partners besides the EIB be permitted for the implementation of EU guarantees for governments?
- On what basis is a fixed provisioning rate of 9% proposed in connection with sovereign risks?
- Why does the Commission assume that the provisioning rate does not need to be differentiated more widely by country (e.g., a security rate of 70% is proposed for Ukraine guarantees)?

Macro-financial assistance (MFA)

- Under what conditions should macro-financial assistance be used outside the European Neighbourhood?
- Does the adoption procedure of an MFA programme still require a decision by the Council and the European Parliament under Article 212 TFEU or alternatively a Council decision under Article 213 TFEU?
- Should the security for MFA loans (provisioning rate 9%) be financed from Global Europe?
- Will there still be MFA grants?
- Will there be upper limits for MFA loans and grants?
- MFAs support third countries in the Neighborhood that are committed to the Union's common values. How is the intended global application of the MFA compatible with the Joint Declaration of the Council and the European Parliament of August 14, 2013?
- Why are the framework conditions for the MFA not regulated in the Global Europe Regulation?
- Do principles such as the political preconditions or the IMF commitment of the Joint Declaration of the Council and the European Parliament on the MFA of August 2013 still apply?

Administrative Expenditure

- Why should administrative expenditure and administration-related tasks under Pillar 3 be financed from the instrument's financial envelope (Article 6(4)) and not from Pillar 4?
- What is the budgeted amount for this purpose?
- Which measures of scarcity are planned?

Own Resources

- What impact will the proposed ETS own resource have on the funds available for climate protection in the future?
- How does the ETS own resource relate to the Clean Industrial Deal proposal to use 10% of EU ETS auction revenues for a decarbonization bank between 2028 and 2037?
- Why are, from the Commission's perspective, ETS1 revenues better suited for an own resource than ETS2 revenues or a combination of ETS1 and ETS2?
- Given that CBAM revenues are rather small, what does COM envisage in the context of the CBAM revision, e.g. in relation to an extension to downstream products?
- As COM has proposed to discontinue lump-sum rebates, what does COM envisage to address persistent disproportionate net burdens.

Technical Questions

Non-Thematic Special Instruments

- Will there be no maximum amounts or caps with regard to the Single Margin Instrument?
- Will all unused margins for commitments or payments be added to the "Global Margin for Commitments" or "Global Margin for Payments"?
- Can unused margins from n-2 in the Single Margin Instrument be carried forward to subsequent years?
- Can annual unused contributions be carried over via the Flexibility Instrument for the entire duration of the MFF?

- Is the assumption correct that due to the proposals for the non-thematic special instruments, there would no longer be any decommitments and no more funds would flow back into the budget, thus relieving the Member States' contributions?

Data basis

- We ask the Commission to provide data underlying its calculations:
 - Macroeconomic data and assumptions used by the Commission for its calculations (gross national income, growth rates)
 - Commission assumptions and forecasts regarding the funding generated by new own resources proposals
 - Budgetary impact of the adjustment proposals regarding existing own resources
 - All data sources for calculating own resources
 - Calculation methodology for funds for payments/payment profiles
 - Expected interest costs for the NGEU

Pillar 1

- The reference figure for the safety net is described as "total of all relevant pre-allocated funds under shared management, as calculated by the Commission based on the initial 2020 allocation of pre-allocated funds before transfers." Which document does this refer to exactly?
- Is NextGenEU also relevant for the safety net?
- The "AgriProsperityGap" is defined using the following formula:

$$AgriProsperityGap_i = \frac{Max\left(0, 0,9 \frac{DP}{ha_{EU}} - \frac{DP}{ha_i}\right) \times ha_i}{DP_i}$$

- Is there an error in the formula? The "DP" marked in red should presumably be "DP_i" (the direct payments in the respective MS, not in the entire EU).
- To calculate the "RegionalProsperityGap," the GDP of the NUTS-3 regions should be used as an average for the years 2021-2022-2023. However, the values for 2023 are not yet available in the relevant dataset for the vast majority of regions. When does the Commission expect data for the year 2023?
- The Performance Framework states: "Further efficiencies are expected from the simplification of program evaluations." What evaluation guidelines will apply?
- How does the draft amendment to the EGF Regulation, combined with the establishment of new administrative structures (and the associated costs), fit with the current Commission proposal not to continue the EGF?
- How should the implementation of the "old" EGF, the introduction of the "new" EGF, and the subsequent termination of the "old" and "new" EGF be carried out in concrete terms and process-wise?
- Where should the political objectives of the EGF (e.g. solidarity with dismissed workers), which are currently being expanded, be reflected in the future?
- The "EU Facility" is intended to support Member States in urgent and specific needs in crisis situations. Can the objectives of the EGF be achieved specifically with the help of the EU Facility? If so, how should the process be designed?

- How to ensure that the work programs for the implementation of the individual instruments provide clear guidelines for planned calls for funding?
- Paragraph 1, point (n) of Annex XV (Union actions supported through the Facility) of the NRPP Regulation lists the LIFE project types. Why are the standard action projects from the previous LIFE sub-program Nature and Biodiversity no longer mentioned?
- According to the EU Commission, the NRPP should be drawn up in broad partnership with various stakeholders: Who ultimately decides on the selection, funding levels, and implementation of measures from the NRPP?
- Who defines the objectives and indicators for the NRPP?
- What is the relationship between the "annual assurance package" pursuant to Art. 59 (NRPP Regulation; COM(2025) 565 final) and Art. 8 COM(2025) 545 final („budget expenditure tracking and performance report“)? Are those separate instruments?
- What requirements will there be for national and/or regional co-financing?
- Which tasks and topics will be covered by the EU Facility, and how will the Member States be involved?
- In the run-up to the publication of the MFF proposals, “key reforms” were mentioned in the context of the country-specific recommendations from the European Semester. On what basis should these structural reforms be anchored in the NRPPs?
- In Article 4 (13) of the NRPP Regulation, the "pay-out value" is defined as "the amount to be paid by the Commission to the Member States for the progress achieved in the implementation of the NRPP's measures, taking into account the “amounts set aside for reforms." How to measure this “amount set aside for reforms”? Will there be a calculation system similar to the ARF?
- Art. 22 defines the assessment criteria for the NRRPs for the COM. Which evaluation method/system will COM apply when assessing the NRPPs? Is the evaluation method comparable to the ARF method?
- According to Article 65(2), MS should submit payment applications. The amount should be in accordance with the decision approving the Plan and based on the evidence collected and verified by the MS. What is the assessment procedure on the COMs side?
- What is the calculation method for a payment suspension, also with a view to reforms esp. those without budgetary costs?
- Are there any other references to digitalization besides the reference to the National Digital Decade Strategic Roadmaps?
- The NRP Regulation stipulates that Member States can receive technical assistance for the implementation of the plan (Articles 12 and 13). Does this represent a further development of the Technical Support Instrument? Will the existing regulation for the TSI be repealed?
- What does the integration of the internal funds into the NRPP mean in concrete organizational and legal terms (particularly with regard to the foreseeable need for coordination with the cohesion and agricultural sectors)?
- How can the target orientation for the internal sector be meaningfully implemented within a common NRPP framework?
- To what extent do the UCPM funds and the NRPP overlap?
- How will the 14 different funds be legally consolidated in the NRPPs?
- What restrictions exist under the Commission proposals specifically for the support of energy-efficient conversion or the construction of new fishing vessels?

- Will there no longer be any special conditions for supporting the temporary or permanent decommissioning of fishing vessels?
- What allocation share – expressed as a percentage – is expected for the individual Member States according to the general key A_i from Annex I of the NRP Regulation?
- What actual "earmarking" does the Commission expect for the degressive area-based income support if the premium may not be less than €130/ha and not more than €240/ha (Article 35(3)(a) of the NRPP Regulation)?
- What is the share of fishing in the earmarking according to Article 10(2)(a)(ii) of the NRPP Regulation?
- What is the relationship between the minimum co-financing quotas for Member States in Article 20(1) of the NRPP Regulation ($\geq 15/40/60\%$) and Article 35(4)(1) of the NRP Regulation ($\geq 30\%$)?
- Is the national co-financing of Article 38 (crisis payments) regulated by Article 20?
- Does the 30% minimum quota apply consistently and across all Member States to those CAP interventions underlying a co-financing obligation?
- In Article 3(3)(c)(ii) of the NRPP Regulation a beneficiary in the context of the CAP is defined as a natural person or *small legal person* [...]. In this sense: environmental associations for example that manage agricultural land can also be beneficiaries?
- Article 3(22) of the NRPP Regulation contains a definition of "agricultural land" in general, but no longer a definition for arable land, permanent grassland and permanent crops as in Regulation (EU) 2021/2115. Are Member States allowed to define this themselves?
- What are the relationship and interdependencies between the agriculture monitoring system (AMS) and the new European land monitoring system in Article 70 of the NRPP -Regulation?
- Will there be a deadline for Member States to implement European land monitoring system? Is this new system an integral part of the IACS?
- Article 77 of the NRPP Regulation stipulates mandatory lump sums for certain project funding types. What happens to the highly heterogeneous, small-scale rural development projects that are difficult to classify within a uniform framework for lump sums?
- With a view to Article 7(3), second sentence, of the NRPP Regulation, how should payments be handled which are made to beneficiaries who are legally or de facto exempted from the farm stewardship requirements in whole or in part?
- What is the relationship between the "General Objectives" and the "Specific Objectives" in Part C (Rules on Protective Practices) of Annex I of the CAP Regulation?
- Why are "improve[ment of] on-farm biodiversity" and "protection of habitats and species" (cf. GAEC 8 and 9 in Annex III of Regulation (EU) 2021/2115) no longer listed as objectives of protective practices set out in Article 3(4) and Part C of Annex I of the CAP Regulation, respectively?
- What criteria are to be applied to assess or justify whether the NRPP is "consistent [...] with [...] national restoration plans under Regulation (EU) 2024/1991" (Article 22(2)(a) of the NRP Regulation)?
- How specifically will the Commission take into account the objectives of the Member States' Nature Restoration Plans when deciding whether to require Member States "to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives"?

- How will the Commission assess whether the measures supported by an NRPP and their implementation comply with the principles set out in the Charter of Fundamental Rights (Article 8 of the NRPP Regulation)?
- With regard to Article 21(2), second sentence, of the NRPP Regulation, would it also be possible for a Plan to have a sectoral chapter with regional sub-chapters? Would it be possible to have sub-chapters for different regions under the sectoral chapter for CAP interventions?
- What does it mean that “[o]nly measures whose implementation started from 1 January 2028 shall be eligible for financing” (Article 21(3) of the NRPP Regulation)?
- What does the phrase “concentrate resources on” in Article 22(2)(g) of the NRPP Regulation imply? When would an NRPP be considered to have (or not to have) “concentrated resources on” the aspects listed there? Why are only the few aspects listed there singled out in such a way?
- What does it mean in concrete terms that, according to Article 40(2), second sentence, of the NRPP Regulation, for other CAP interventions than those listed under letters a), d), g), o) and p) “the paragraphs of Annex 2 to the WTO Agreement on Agriculture indicated in Annex XVII to this Regulation *are indicative and those interventions may instead comply with a different paragraph of Annex 2 to the WTO Agreement on Agriculture if that is specified and explained in the NRPP Plan*”. What degrees of freedom does the Member State have in this respect?
- What is meant by “control and enforcement systems in the areas of climate and environment, public health, plant health and animal welfare, social and employment legislation, applicable labour standards, fisheries and aquaculture” in Article 62(2) of the NRPP Regulation? Are the “on-the-spot checks” mentioned in Article 62(1), third subparagraph, of the NRPP Regulation considered to be part of these “control and enforcement systems” or of the controls referred to in Article 58 of the NRPP Regulation?
- What is meant by “enforceable decisions in that respect [...] under the applicable control and enforcement system” in Article 62(3) of the NRPP Regulation? Are notifications under Article 62(3) of the NRPP Regulation the only way in which a managing authority or paying agency is to be made aware of cases of non-compliance of beneficiaries with the requirements referred to in Article 3 of the CAP Regulation?

Pillar 2

- Will the AgoraEU program also be available to accession candidates?
- What measures are planned to protect European interests, especially in key technologies?
- Will there be specific rules for research security within Horizon Europe, and how will they differ from existing regulations?
- How does the Commission envisage the future of the European Institute of Innovation and Technology (EIT) in Budapest within Horizon Europe from 2028 onwards?
- The current EU missions under Horizon Europe will be funded until 2030. After that, will all mission-related activities stop and no new missions start?
- How will synergies between military mobility and general investments in transport networks be leveraged?
- As part of the MFF 2021-2027, €2.2 billion from the “neighborhood and the world” budget has been added to the overall budget of the Erasmus+ program in addition to the €26.4 billion from Erasmus+ program regulation (“heading 2”). Are such additional funds also planned for the Erasmus+ program in the MFF 2028-20234, and if so, from which area (e.g. “Global Europe”) and in what amount?

- As part of the MFF 2021-2027, it was possible to make additional ESF+ funds available for Erasmus+ activities. They were included in the annual Erasmus+ work plan so that these funds could be used on the basis of the Erasmus+ regulations. Are there plans for a similar mechanism in the MFF 2028-2034 and to which budget area of the MFF will it apply and what are the conditions for using this option?
- Given that minimum budgets for the various education sectors for Erasmus+ are no longer foreseen, what criteria should be used to allocate and weight the funds for both pillars for the various education sectors in order to ensure that all education sectors have an adequate and predictable budget?
- What is the reason for the reduction in funding of almost €2 billion compared to the F4E notification (F4E: €7.6 billion, MFF: €5.8 billion)? How to ensure that Member States' participation provided for in Article 83 also reflects the overall coherence between the various windows and financial management?
- How to understand Article 23(2)?
- Please elaborate on how the European Innovation Council and ECF would interact. Would they be complementary to each other?
- Will it be possible to use the ECF InvestEU instrument, in particular EU budget guarantees, also for Innovation Fund calls?
- Is Article 7 the basis for the Competitiveness Coordination Tool?
- Does the third-country provision in Article 50(1)(b) mean that UKR will be eligible for funding to the same extent as under the "Ukraine Support Instrument" in EDIP or will UKR have a MS-like status across the ECF?
- How are reporting obligations regulated under the ECF InvestEU instrument?
- Is our assumption correct that the 17 bn Euro minimum amount of budgetary guarantee under the EU compartment of the ECF InvestEU Instrument is provided from the overall ECF budget of 234,3 bn Euro? According to which formula will this amount be deducted from the initial indicative envelopes allocated to general activities ?
- Why is the provisioning rate for the ECF InvestEU investment 50% higher than for the current InvestEU Regulation?
- According to Article 21(7) of the Competitiveness Fund, the InvestEU guarantee can be increased by 20% by means of a delegated act: Where will the funds for the provisioning rate for such a guarantee increase come from?
- According to Article 25(3) of the Competitiveness Fund, private companies will also be considered as implementation partners for the InvestEU instrument: What is the reason for this regulation, and does the Commission already have specific companies in mind? Could SEAPs qualify as possible implementing partners under Article 25(3)?
- Please elaborate on the setup, functioning and purpose of the proposed Scale-up Facility.

Pillar 3

- How will inconsistencies between the COM communication on the MFF and the Regulation on a Global Europe Instrument be corrected?
- Art. 6: on what basis would the Commission amend the ODA-spending target via delegated act? How would Member States be involved before that decision would be taken?

- Art. 3(2) and Art. 3(3): Please provide further insight as to the clear distinction between non-programmable measures on resilience on the one hand and on crisis, peace and foreign policy needs on the other.
- Art. 9: How should “complex settings” be understood? Why is there a focus on extremely high levels of fragility, rather than fragility in the broader sense?
- Art. 9(9): What does “duly consulted” mean in reference to the involvement of civil society and local authorities?
- Art. 9(10): What constitutes “regular basis” for consultations with civil society?
- Will the ODA-spending target apply also after the duration of the 2030 Agenda?
- Art. 5(2): What is meant by strengthening synergies with the European Competitiveness Fund? What would the interaction between the two programmes look like?
- Under which circumstances could private companies directly receive funding from the global Europe Instrument?
- Why is the “incitative approach” mentioned within the recitals not mentioned under Art. 12 (the wording seems to be otherwise almost exactly the same as for the NDICI-GE Regulation)?
- What is the evidence base behind the proposal contained in Art. 12?
- Art. 14: Given that there are no clear criteria for determining the priorities of partner countries, how can we ensure that their needs and interests are taken into consideration?
- Art. 17(2): What would the process of an MIP review look like? Who could initiate this review and what would it entail (in contrast to an amendment as per Art. 17(3))?
- Exceptions in Art. 19(2) a, b and d as well as 19(3): What is the basis for the set amount?
- Art 20: What would change if Art. 20 would be adopted compared to the eligibility rules currently in place for the NDICI instrument and the UKR Facility? What would be the implications of these changes?
- Art. 21 on excluded activities is less specific than the NDICI-GE regulation (in particular as regards Nationally Determined Contributions and the Paris Agreement). What is the reason for this?

Pillar 4

- How does the Commission arrive at the figure of 2,500 new jobs in the first three years of the next MFF? Please provide a proposed breakdown by Commission departments and EU agencies. What is the connection to an overall red tape cutting?

Own resources

- Should the annual adjustment of the own resources ceiling be made using the current deflator or the established fixed deflator of 2%?
- Can the Commission provide data on projected tobacco tax revenues in the Member States?
- Why does the calculation method for the plastics own resource, in Article 3(1)(e) of the Own Resources Decision, specify two different approaches?
- What is the cost for the Member States associated with the obligation to implement both approaches for the plastics own resource in parallel? Is this cost justified from the Commission's perspective, and if so, why? Wouldn't a reference to the Packaging Regulation (2025/40) be sufficient here?

- Does the Commission have an estimate of the compliance and implementation costs for the plastics own resource in the Member States?
- Given the compliance and implementation costs, are statistic own resources even useful?
- How does the Commission ensure that the data from the individual Member States are comparable and reliable when calculating the collection rates for waste electrical and electronic equipment? How does the Commission assess the implementation effort required to calculate the own resources while ensuring comparable data quality?
- The current calculation method for determining the collection rate under the WEEE Directive has been criticized because it does not adequately reflect the lifetime of individual devices. Which calculation method will be used after the amendment announced for the end of 2026?

ESTONIA

MFF regulation

- We would appreciate a more detailed fiche with the budgets of programmes per year in both current and 2025 prices and in comparison with the current MFF.
- Deflator in the proposed MFF regulation would be flexible according to the inflation forecast. But for example, in the NRP plan it is fixed at 2%. How would the use of flexible deflator work in practise? Please give specific examples of what might happen if the inflation forecast is for example 4% or 5% or 0,5%.
- Why has the flexibility for COM in relation to changes within the programmes been increased from 15% to 20%? Would it be applicable for the indicative amounts of programmes?
- What is the rationale behind the change of proposed timing for 2035+ MFF proposal (from mid-2032 to mid-2033)?

IIA

- We would appreciate a fiche on the implementation of steering mechanism for the annual budget as many other delegations, as there are lots of flexibility in the budget, indicative amounts for programmes, cushions and reserves – how would new priorities be transfer into the annual budget procedure and process (incl. Calendar) in practice? What happens in Council before the COM presents a draft annual budget, how MS can have an impact? Are there limits proposed annually for changes?

Crisis mechanism

- We would appreciate a fiche on this. Understand that loans can be also passed through EU programmes, but these are still loans to MS. How would the procedure look like to use loans under e.g. Horizon or CEF or within ECF, also within InvestEU Instrument?

NRP regulation

- *The NRP Plans should detail how it represents a comprehensive contribution to all objectives of the Fund, taking into account the specific national, regional and territorial challenges of the Member State concerned.* - Is it referring to the specific objectives set out in Article 3?

- (37) *In order to avoid excessive administrative burden, it should be possible for Member States to make minor adjustments to or correct clerical errors in the NRP Plans, by a simple notification of those changes to the Commission, provided that such amendments comply with the requirements of the NRP Plan. Which are the criteria? What kind of minor adjustments have been taken into account here (what is the threshold for “minor”)?*
- (56) *For the same reasons of sound financial management, the Commission EN 29 EN should be allowed to recover amounts previously paid for interim steps of a measure if the final milestone or target of the given measure is not fulfilled and to take action in case of a reversal of a milestone or a target occurring up to five years after the date of the corresponding Commission payment. Is it possible to change final milestone or target during the implementation?*
- Art 4 (18) Which Union programmes/funds can give the Competitiveness seal? Will there be obligation to finance projects with Competitiveness seal from the NRP Plan?
- Art 10, p 5. Are there additional earmarked allocations within the 14%? We did not find additional restrictions in the proposal.
- Art 53, p 4. What is the scope of audit? Does it mean, that the audit authority is not expected to verify the underlying costs of the operations also in cases where support has been provided to the beneficiary based on real costs?
- Art 58, p 2. (c) Will the use of Arachne+ remain voluntary?
- Art 58, p 2. (i) Is this “last payment” the one associated with the specific measure?
- Art 63, p 1. Have not found information in relation to data collection on participants. Is that not required in 2028+?
- Art 63, p 1. (c), (d): Are there no thresholds applicable to data collection, for instance in terms of contract value?
- Art 63, p 1 (e) (viii) (ix): Why is it necessary to distinguish the date given in point ix (actual date when the operation is physically completed or fully implemented) from the date given in point viii (end date of the operation)?
- Art 63, p 1 (f) (ii): According to which definition should the term 'innovation' be understood here?

- Art 78 Which regulation (and which part of it) specifies the topic of FNLC or simplified cost options more precisely?
- Art 10, Art 13 and Art 5 of the draft regulation (COM(2025) 565 final). Please clarify whether the Interreg Plan referred to in Art 10, 13 and 5 will be a single EU-level document covering all Interreg cooperation programmes, or whether each programme area (e.g. Estonia–Latvia) or MS will submit its own distinct Interreg plan?
- How would the CAP ring-fencing at the EU level be transferred to MS level. How would that amount be distributed between MS?
- CAP direct payments: how is the level playing field for farmers developing when only a minimum level is ringfenced at EU level? Are there any maximum limits to CAP support for MS or limits to national co-financing to ensure a more-or-less level playing field?
- Could the Commission please share specific data references for the NRP allocation key. If data is not publicly available, then need the data itself the Commission used (short stay visas, geographical data). Which populations data is used, 1. January of annual average (both for MS and for NUTS3 regions)? Would really appreciate this information before the technical seminar in September.
- How would the procedure to add loans (catalyst Europe) to the NRP look like in practice? How would it fit into the NRP preparation and approval timeframe and process?
- Climate target of 43% for NRP. Is it basically a minimal concentration rule for NRPs? We have the same question regarding the 14% social target.
- As concerns to the indicators and data related to regions, could you please clarify whether in all cases such data would be obtained at the level of NUTS 3 regions or in which cases it would be obtained at the NUTS 2 level?
- Art 15 Decommitments: Since art 15.1 proposes automatic decommitments under rigid conditions (“the Commission shall decommit”) which does not seem to take into account the objective of foreseeing flexibility in view of achieve maximum possible contribution the EU and MS priorities and objectives in the changing global, economic, social, security environment, could you please explain the rationale behind the proposed rigidity and bring examples concerning the potential implementation of such decommitments. Why has n+1 (or more specifically, n+10 months) decommitment rule been chosen?
- Art 35, p 4 second paragraph there is a reference to paragraph 1 point (1) [investments for farmers], which cannot be found. Also, there is a reference to interventions referred to in

paragraph 1, point (i), targeting young farmers, whereas targeting young farmers is point (g). Could you please clarify this?

- Is there differentiated national contribution rate for non-productive investments as there is in the current period? Is it 30% for every region?
- Art 62, p 1 – does the 10 hectares limit apply also to the forest land?
- Art 10, p 2 (a) (ii) establishes common ringfencing for CAP and CFP interventions. What is the reason for one ringfenced amount for these two different policies? Can MS-s allocate all of this ringfenced amount to only CFP interventions or vice versa?
- Is the 2 bln for fisheries ring-fenced separately as well? If yes, then in which legal act (which Commission proposal)?
- What is considered as income support in fisheries?
- Can measures of fisheries be financed also from the general allocation of the national plan (in addition to the ring-fenced part) and from the EU facility?
- Why is the share for technical assistance at the initiative of the Commission raised to up to 0,5% in art 10 p2 (d)? In the CPR 2021-2027 it is 0,35%.
- There seems to be a myriad of different ring-fencing, horizontal targets and additional conditions for the NRP (on the background of reducing the overall workload). Art 22 p 2 states that MS with per capita GNI of less than 90% of the EU average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives of housing and tourism. Why are these specific objectives emphasized and (what is meant by adequate manner)?
- Art 22, p 2 states that “By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.” Based on what the Commission will establish the specific percentage for each individual MS? The specific percentage should be established in cooperation with MS and much earlier, prior to the submission and approval of the NRP Plan, in order to allow Member States to better plan their national programmes, reforms and investments.
- Art 35, p 5 states that „Eastern border regions means Union NUTS2 regions bordering the Russian Federation, Belarus or the Ukraine, by land or sea, not covering the entire territory of the Member State concerned“. Does this apply to the territory of the whole MS in case the whole territory of the MS concerned is one NUTS2 region?

- Art 11, p 2 the possibility for such voluntary contribution/transfer into InvestEU Instrument (within the ECF) is mentioned, however, we could not find in the proposal for NRP Regulation the stipulation linking such possible transfer with the MS in question. Art 24 of the proposal for ECF mentions voluntary contributions of the Member States into the Member State Compartment. Would the Commission please clarify how the planned objectives and intervention logic of the of the transferred MS contribution would be maintained through the planning, management and use of such transfer? Which stipulations of which regulation (ECF and/or NRP Regulation) and to which extent would govern the use of the voluntary transfer from the NRP into InvestEU Instrument? What would be the interrelation of such voluntary transfer and the policy window(s) of the InvestEU Instrument?
- Art 14 Budgetary commitments: what is the rationale behind the proposed distribution of Union budgetary commitments across years (totalling 100%) in art 14.1? How will this enable to taken into account the objective of foreseeing flexibility in implementation and enabling to respond to unforeseen and unexpected circumstances and crises, and how will this relate to the possibility of committing the 25% “flexibility amount” for the MS stipulated in art 14.2?
- Art 20 National contribution to estimated costs: Do we understand correctly that the “national contribution” may be covered either by the MS budget (or regional or municipal budgets) or by the beneficiaries through their own contribution to the supported measures and actions-operations?
- Art 25, p 2: what is the rationale of stipulating the deadline for the Mid-Term Review of the NRP-s one year earlier in the programming period than in the 2021-2027 period (March 31, 2031, vs March 31, 2025 (not 2024)?
- Art 34 stipulates the possibility for amendment of the NRP Plan in the case of natural disasters (incl. to farmers) – perhaps it would be reasonable to also foresee the possibility for amendment of the NRP Plan in the case of disasters or crises not of natural nature but caused by other (e.g. geopolitical, humanitarian) factors?
- Art 71 Financial instruments: Will the continuation or follow-up of financial instruments supported e.g. under 2021-2027 Cohesion Policy or CAP funds be possible (without setting up a new financial instrument from a scratch)?
- In the case of projects that have been awarded the seals (Seals of Excellence, Sovereignty Seals, Competitiveness seal) under centrally managed programmes, how will equal treatment be ensured in relation to the state aid framework? (E.g. for some applicants/beneficiaries, currently up to 100% support rate is permissible under Horizon while up to e.g. 50% support rate is permissible under the state aid requirements within MS managed programmes of Cohesion Policy Funds)

- Will land acquisition be eligible for EU support (e.g. in relation to supporting the building of [energy, transport, defence or other] infrastructure?
- Art 22, p 2 (b) stipulates that the NRP Plan will effectively address all or a significant subset of challenges identified: in relevant documents and strategies adopted by the Council or the Commission in the field of internal security, European integrated border management, visa policy and asylum and migration, taking into account the Schengen IT architecture, the Schengen evaluation mechanism in accordance with Regulation (EU) 2022/922, vulnerability assessments in accordance with Regulation (EU) 2019/1896 and the European Union Agency for Asylum monitoring mechanism in accordance with Regulation (EU) 2021/2303. What are the relevant documents and strategies? Where and when have they been published?
- Art 6, p 5 states: Member States may derogate from the requirements on partnership and multi-level governance for the purposes of the Union support established by Regulation (EU) 202X/XX [border management] and Regulation (EU) 202X/XX [internal security] if duly reasoned and substantiated by the Member State in its Plan. For the purposes of the Union support for asylum, migration and integration established by Regulation (EU) 202X/XX [migration, asylum and integration], partnerships shall include regional, local, urban and other public authorities or associations representing such EN 42 EN authorities, civil society organisations, such as refugee organisations and migrant-led organisations, as well as national human rights institutions and equality bodies, and, where appropriate, international organisations and economic and social partners. Can a MS organise a single comprehensive partnership according to Article 6(1), which covers partners stipulated in article 6(5)?
- Art 5 of the proposal for Connecting Europe Facility (CEF) regulation stipulates the possibility for MS to transfer part of the budget under shared management into CEF – however, we could not find stipulations in the proposal for NRP Regulation concerning such voluntary transfer (similar to the possibility existing in the 2021-2027 period). Would the Commission please clarify under which process and procedure may the voluntary transfer from NRP budget into CEF be made? And which criteria under which fund regulation would govern the planning, application for, and use of such transferred resources?
- The third sentence of Paragraph 1 of Article 38 of TFEU establishes that: “*References to the common agricultural policy or to agriculture, and the use of the term ‘agricultural’, shall be understood as also referring to fisheries, having regard to the specific characteristics of this sector*”? Does this apply also in case of proposal for NRP Regulation?
- Art 3, p 1 of the proposal establishes specific objectives. Will the intervention logic be pre-defined by the Commission? E.g. will it up to the MS-s to decide to which SO the fisheries related interventions contribute or all fisheries related interventions should go under paragraph 1 (d) (iv)?
- Art 3, p 1. What is the reasoning for including access to health care in rural areas under point (d), not under points (a) or (c)?

- Art 7, p 4 establishes that support from the Fund shall be additional to national public funding. What is the minimum and what is the maximum national co-financing rate for CFP interventions?
- Art 10, p 2 (a) (ii) establishes common ringfencing for CAP and CFP interventions. What is the reason for one ringfenced amount for these two different policies? Can MS-s allocate all of this ringfenced amount only to CFP interventions or vice versa?
- Art 10, p 5 establishes that at least 14% shall be dedicated to social objectives. Does this percentage apply to the amounts for CAP and CFP interventions that exceed the minimum allocation established in the paragraph 2 point a) ii) - or not?
- Art 12, p 6 seems to be in contradiction with 2024/2509 art 196 paragraph 3: “*Grants shall not be awarded retroactively for actions already completed.*” Article 196 paragraph 2 provides a derogation for costs incurred prior to the date of submission of the grant application. Which approach is meant across the proposal?
- The wording of Art 12, p 1 and Art 13, p 1 have different wording. Is this intentional? Does it mean that under TA at the initiative of the Member State the staff-related expenses incurred by the MS-s for the management of the Fund can or cannot be supported?
- Art 13, p 5: What is meant here and how is this relevant to the TA at the initiative of the Member State?
- Art 14, p 1 establishes distribution of financial allocation by years. As experiences from the previous programming periods have shown the payments level in the beginning of the period are lower. Proposed allocation profile increases the risk of decommitment. Why are the proposed allocations in the first years bigger?
- Art 14, p 2 establishes that the financial contributions allocated to CAP shall not be counted towards the flexibility amount. Derogation is made also for the financial contribution to Interreg Plans. Why similar derogation is not made for financial contribution allocated to CFP?
- The current wording of Art 15, p 1 creates a substantial risk of decommitment in the beginning of next programming period. It takes time to implement operations and deliver results. Moreover, the decommitment rule does not take into account that in case the NRP is approved in the end of a year there will not be enough time to select and implement the operations. This may create incentive for MS-s not to submit NRP in the second part of the year. Why has the Commission not proposed N+2 or N+3 rule as in previous and current programming periods?
- Art 16, p 3. The wording of this provision has changed compared to the previous wording of similar provisions. The wording seems to imply that there are “amounts not committed under

NRP plans”. What are these amounts? Does “*amounts committed under the NRP Plan*” mean commitments by MS to beneficiaries or by COM to MS-s? According to second sentence the reduction should be distributed across the chapters of the NRP Plan based on the progress achieved. What is meant by that? E.g. reducing the amounts for performing measures or non-performing ones? Does ringfencing still apply in case of decommitment, if yes then how would it be app?

- Art 16, p 5. In case MS will not submit amended NRP, will the reduction be proportionate by chapters of NRP and will it take into account ringfenced amounts?
- Art 20, p 1. Is the “*estimated costs of a measure*” same as “*eligible public expenditure*”? Do we understand correctly that the minimum national co-financing of CAP and CFP interventions will be based on the level of regional development? What is the reference year that will be taken into account for determining the development level of MS-s?
- Art 20, p 1. Is it truly planned that each measure described in the Plan must have at least the minimum national contribution rate as described in points (a) to (c)? If so, why is such a low-flexibility approach preferred to setting the minimum contribution rate at the Chapter or Plan level? What are the characteristics of a „measure“, can different specific objectives be combined as a single measure? Such regulation is a serious obstacle for measures addressing a specific territory or target group with specific challenges.
- Art 21, p 1 establishes that Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Art 64. According to the Art 64, p 1 the website should be set up within 6 months after the Council decision to approve NRP Plan e.g. at the time of the submission the Plan to the Commission the website might not be operational. Is this incoherence intentional?
- Art 22, p 2 (a) second sentence. What are the justifications for selecting specifically Art 3 (a), (vii) and (ix), and Art 3(d), (v)? There are other specific objectives that can be just as relevant (or even more so) for territorial cohesion of the MS with a per capita GNI of less than 90 % of the Union average.
- Why there is f.ex no reference to the specific objective in Art 3 (a) (i), (c) (ii) or (d) (iv)? Why is it proposed that the adequate contribution to objectives of CAP and CFP depend on the regional development level of a MS?
- Art 24, p 6 (a). Does “costing information” mean “financial allocation”?
- Art 24, p 7, does “estimated total cost“ mean „total public expenditure“?

- Does mid-term review cover all interventions, including the ones not subject to the flexibility amount?
- Art 26, p 2 establishes that EU Facility shall be also implemented under shared management. P 4 of this Article refers to the Union actions in Annex XV. Do we understand correctly that MS-s can get financing for actions listed in paragraph 1 points e-g of Annex XV from EU Facility? Will this financing be additional to the ringfenced amounts?
- Annex XV. It seems that certain actions are not covered in the Annex. For example, financial assistance to third countries through sustainable fisheries partnership agreements foreseen by Art 32 paragraph 1 of Regulation 1380/2013 (CFP Regulation) and financing of Regional Advisory Councils foreseen by Art 45, p 3 of Regulation 1380/2013. While Annex XV covers Union Safety Net for certain agriculture products, including aid for private storage, it does not cover the financial support for the storage of fisheries products foreseen by the Art 30 of Regulation 1379/2013 (Fisheries Common Market Organisation Regulation)? What is the reason for excluding it?
- Art 34. Does this Article cover also crisis payments to fishermen and fish farmers in case of natural disaster, adverse climatic event or catastrophic event?
- Does the Title V (Common Agricultural Policy) apply only to agriculture interventions and not fisheries interventions? Why is then fisheries interventions are included in p 11 of Art 35? Or did COM proposal take into account the last sentence of Art 38, p 1 of TFEU and all references to the common agricultural policy or to agriculture, and the use of the term ‘agricultural’, shall be understood as also referring to fisheries?
- Art 35, p 11. The list on interventions is rather limited and is not in line with the need of the sector. The points c) and d) are overlapping, e.g. the support for PO-s and storage is part of Fisheries Common Market Organisation. What is the purpose of this provision?
- Art 36. These actions seem to be covered by Art 12, p 2 or could be added to the Union Actions in the Annex XV. Why are they listed here?
- Art 38. Does this Article apply only to agriculture crisis payments or also fisheries?
- Art 49, p 1. Why the term “paying agency” is used instead of “intermediate body”? From Art 52, p 3 it seems that “paying agency” is carrying out the tasks on Managing Authorities. The only difference seems to be that these tasks are delegated to them on EU level. The inconsistent use of terminology causes confusion e.g. same institution is for some measures “paying agency” and for some measures “intermediate body”. Or in case MA decides to delegate the selection of operations (Art 51, p 1 (a)) to “paying agency” it becomes also “intermediate body”.
- Art 49, p 4 establishes that the tasks delegated to intermediate bodies shall not be entrusted further to other bodies. In the same time, Art 52, p 3 allows “paying agencies” to delegate the

performance of its tasks. Can the Intermediate Bodies still outsource some tasks e.g. technical verification of certain requirements?

- Art 49, p 7. Do we understand correctly that the accreditation requirement does not apply to MA-s or IB-s implementing Union Actions? Why there is a need for accreditation of paying agencies with regard of certain Union Actions? Especially taking into account p 2 of Art 49.
- Art 56, p 2 (e). Does this mean that also the CLLD strategies need to be approved by Monitoring Committee? Art 75, p 3 suggests it is a task of a managing authority. Does it mean that after MA-s have selected the strategies, they should be sent for approval of the Monitoring Committee? Why there is a need for such an administratively burdening arrangement (considering the objective of reducing the workload)?
- Art 53, p 3. What is the justification of coordinating committee approval if the monitoring committee opinion prevails anyway?
- Art 55, p 5. Does this network replace monitoring committee or is it an additional layer? Why is this needed only for CAP? This seems to be already covered by partnership principle established in Art 7. Why does the European code of conduct on partnership not apply to CAP financing?
- Art 56, p 2 (e). Is the double funding from other sources acceptable?
- Art 56, p 3. What specifically is meant here?
- Art 56, p 4 establishes requirement to inform the Commission about the progress of achieving the objectives and it can be based on estimation. Should this estimation be based on the results planned in ongoing approved operations?
- Art 59, p 1 (c) (iii). What is meant by this? What is the difference with other sub-points, for example (iii)?
- Art 60, p 6. What does it mean? Is not expected, but can? In case MS has not verified the underlying costs, but Commission will do it, what happens?
- Art 62, p 1. While second subparagraph clearly applies only to the CAP intervention, does the third subparagraph apply also to CFP interventions?
- Art 62, p 3. Who notifies MA or paying agency, is it the Commission?
- Art 62, p 6. This paragraph seems to refer to the draft Regulation establishing the conditions for the implementation of the Union support to the Common Fisheries Policy and to the Art 3 p 4.

Why are the beneficiaries, who have committed CFP infringements excluded from financing only in case they have also committed fraud? Doesn't the Art 58 p 2 (f) already ensure exclusion of persons who have committed fraud and (c) of same paragraph establish requirement to correct irregularities including fraud? If not, then why the requirement to exclude persons who have committed fraud is only relevant to the CFP interventions, but the same persons can get financing from other interventions? It seems that exclusion of persons who have committed fraud or environmental criminal offences (Art 3 p 4 (c) of CFP proposal) should be horizontal requirements for all NRP interventions.

- Art 63, p 1 points (c) (iii) and (d) (ii). Do we understand correctly that only the data on contracts *relevant to the operation* should be collected?
- Art 63, p 1 points (f) (i). What are the “categories of members”? Is it up to MS-s to define these categories?
- Art 63, p 1 points (f) (ii). Why is the term “actions” used here? Should it not be the “number of operations”?
- Art 63, p 1 points (f) (iii). Why the “inland communities” have been excluded in the proposal?
- Art 64, p 2. Does Commission consider that it is proportional to publish on website the data of natural persons (Art 63, p 1 (a) (iii), (iv), (b) (ii) (v), (c) (ii))?
- The Art 38 p 3 last subparagraph of Regulation 2024/2509 establishes that where natural persons are concerned, the disclosure of the information shall be based on relevant criteria such as the frequency or the type of the measure and the amounts involved. Why the derogation from Art 63, p 1 (a) (iv) is made only for CAP interventions?
- There seems to be also a reference error, p 1 (a) doesn't have subpoint (ix).
- Art 64, p 3. If the data of beneficial owners (natural persons) shall be made public on the website, should they not be informed about it?
- Art 64, p 5. Why is only a farmers specific derogation made and at the same time the publication of all other natural persons, including fishermen is required? The Regulation 2024/2509 Art 38, p 3 (b) provides a derogation for contracts under 20 000 euros. Why is the threshold established at 2500 euros?
- Art 64, p 2 fourth subparagraph. Why are some official languages mentioned here? The second sentence of this subparagraph ensures that automatic translation tools can be used when needed.

- Why is the derogation made only for one specific objective (Art 3, point (c)) and not to the specific objective in Art 3 point (d)?
- Art 71 establishes that for activities falling within the scope of Art 42 TFEU, the total amount of support for working capital provided to a final recipient shall not exceed a gross grant equivalent of EUR 300 000 over any period of three fiscal years. Does it apply also to CFP financial instruments and what is the reason for this specific requirement?
- Art 71. What is the difference between management and arrangement fees?
- Art 74, p 1 (e). Why are the quality schemes of fisheries and aquaculture products excluded?
- Art 74, p 2. What is meant by “That cooperation referred to in paragraph 1 shall involve at least two actors“ – is it at the project level, measure level or something else? How does this requirement relate to implementing Art 75 - Integrated territorial and urban development – do all projects/measures/territorial strategies need to involve at least two actors?
- Art 74, p 3, do we understand correctly that this requirement applies only to CAP and not to CFP?
- Art 75, p 3 establishes that strategies shall be selected by managing authorities. In the same time Art 56, p 2 (e) establishes that territorial development strategies shall be approved by monitoring committee. Does it mean that after MA-s have selected the strategies, they should be sent for approval of Monitoring Committee? Why there is a need for such an administratively burdening arrangement? As corresponding milestones and targets shall be established in the Plan – is it foreseen that the approval of territorial strategies happens before approval of the Plan?
- Art 75. May support for sustainable urban development as foreseen in [ERF_CF Regulation] Art 5 be provided based on a territorial strategy for wider appropriate territorial area? Does such support for sustainable urban development have to be defined as a separate measure in the Plan?
- Art 75. Does Art 75 fully apply to „Other territorial tools“ as defined in [Performance regulation] Annex 2 part 3 (tools including just transition, smart specialisation strategies and strategies for decarbonisation developed with the support of Union instruments in the 2021-2027 period)? Or does Art 75 only apply to integrated territorial and urban development and community-led local development/LEADER initiatives?
- Art 76. What is the difference between paragraph 1 (b) (“*in which no single interest group controls the decision-making*”) and paragraph 3 (c) (“*ensures that no single interest group controls selection decisions*”)?

- Art 77, p 1 (a). Does the requirement to use simplified cost options apply only to operations implemented by the LAGs and not to the CLLD operations implemented by other beneficiaries?
- Art 78. Does the paragraph 1 apply to all NRP interventions with exception of state aid operations, LEADER and interventions in the Art 34 (1)? Art 34 (1) contains also crisis payments eg compensations. Can they be based on real-costs or will the amount of support be calculated based a methodology and a SCO will be established?
- Art, 79 p 1 (c). What is meant by “costing for the measure”? Is it total public expenditure?
- Art 89, p 1. What is the “reference period as defined in sector-specific rules” in the context of CFP interventions?
- Annex I. What is the reasoning behind including the eastern border region specific variables only in the home affairs key, while it is acknowledged in the proposal that the Eastern border regions of the EU face the dual challenge of enhancing security while supporting their economies, businesses and people that have been negatively impacted as a direct or indirect consequence of Russia’s war of aggression and while according to Annex VII MS are expected to take into account the specific needs and challenges of Eastern border regions not only in the areas of security and border management but also in terms of economic development (so, relevant also to the other policies covered in the NRP)?
- Why the N+1 rule has been chosen and how the payments for CAP investments can be made before the end of the period. The NRP Regulation has an N+1 rule and payments for investments (and possibly other interventions) cannot be made before the end of the period. Page 49: *Art 15 Decommitments. 1 The Commission shall decommit any amount in an NRP Plan and the Interreg Plan chapter which has not been used for pre-financing, in accordance with Article 17 [pre-financing] or for which a payment application has not been submitted in accordance with Articles 65 [submission and assessment of payment applications], by 31 October of the calendar year following the year of the budgetary commitments.*
- Art 35, 4 second subparagraph: referred to point (1) [*investments for farmers*] in not correct. *Investments for farmers* is in the art 35 par 1 point (i) and referenced „*paragraph 1, point (i), targeting young farmers*“, should be point (g).
- Art 35, 1 (i) „support for investments for farmers and forest holders“: Is there also a (usually higher) support rate for non-productive investment?
- Art 78 „*Unless provided otherwise in this Regulation, where the total estimated cost of an operation does not exceed EUR 400 000, the public support provided to the beneficiary by the Member State shall take the form of financing not linked to cost or, a unit costs, lump sums or, flat rate, except for operations for which the support constitutes state aid.*“ What does „not linked

to cost or, *a unit costs, lump sums or, flat rate*“ mean? If it is not linked to costs or unit costs, lump sums or flat rate what is it linked to? What remains outside this list?

European Fund for Regional Development and Cohesion Fund

- Art 4. What is meant by the last sentence of the article: „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.“ What would be an example of the integrated approach for addressing the needs of the mentioned regions without dedicating funding? Is it always required that targeting support for mentioned regions and areas can only happen in accordance to Art 72 to 74 [integrated local and urban development] of Regulation (EU) [NRP Regulation] or also through measures with no direct link to territorial strategies (along with required selection and approval processes by MA and monitoring committee)? The wording of Art 4 in general and its purpose is quite unclear.
- Art 5. Does the Art 5 imply that at least some support for urban areas based on integrated urban development strategies has to be provided but there are no additional earmarkings to that? Can the support for sustainable urban development be implemented through individual projects as part of a wider regional development measure based on an integrated territorial development strategy or even territorial just transition strategy?

Common Fisheries Policy, European Ocean Pact and the Union’s maritime and aquaculture policy

- Art 3, p 1. The reference to Art 22 p 2 (i) seems to be incorrect.
- Art 3, p 2. What is meant by “*Member States shall take into account in their NRP Plan the balance between the fishing capacity of the fleets and the available fishing opportunities*“?
- Art 3, p 3. Why is the specific aid intensity mentioned for SSCF?
- Does it mean that in case other operations 100% aid intensity is not possible?
- Art 3, p 4 (c). The Directive 2008/99/EC establishes measures relating to criminal law in order to protect the environment. The Art 3 lists offences that might qualify as criminal offences. None of the listed offences are specific to Common Fisheries Policy or aquaculture and therefore the persons who have committed environmental criminal offences should be excluded from EU financing horizontally without taking into account the source of financing. Moreover, the current proposal foresees exclusion of such persons only in case they apply support under aquaculture measures and at the same time such persons can still get support under other measures. Why the Commission has not proposed the exclusion of persons who have committed environmental criminal offences as a horizontal rule in the proposal of NRP Regulation? Why does the Commission consider that an aquaculture enterprise found guilty of mishandling nuclear waste

should be excluded from aquaculture specific interventions, but at the same time can get financing from the ERDF for investments in their processing unit?

- Art 4, p 3. What is meant by “transfer of ownership of a business” and why is this prohibited? Taking into account that one of the challenges that fisheries sector faces is generational renewal, interventions to support entry of younger people to the sector should be supported by any means. In the context of Financial Instruments, it is possible to support equity-based instruments, which by default include transfer of ownership. Are the equity-based instruments prohibited under the CFP interventions? What is the reason for the exclusion?

CAP regulation

- Art 9 – can Natura 2000 support be implemented as a multiannual commitment in the 2028+ period?
- Art 4, p 16 (CAP) defines „holding“ which is linked with agricultural activities. Art 13, p 2 (NRP) is linked to the forest holding. Does it mean that holding - which is linked with agricultural activities - should present forest management plan; or rather holding - which is linked with forest activity - should present forest management plan?
- Art 13, p 3 – why is there a specific limit to how much agricultural production potential or forestry production potential has been destroyed to receive compensation. It might be a huge area, but when the total area is also huge, the area might be excluded from support. Most important is the restoration of destroyed area. MS could set the limit themselves, if deemed necessary.

Performance framework regulation

- Art 11 (3) – Based on the experience of previous implementations period and underlining the point 2.3 of the non-paper „Opinion on Post-2027 ESF+ evaluation arrangements prepared by member state experts collaborating within the ESF+ evaluation partnership network“ please consider adding more flexibility to the unit of analysis and coverage of the interim evaluation. Instead of covering in one single evaluation the entirety of the plan, it could be stated that at least one evaluation will be carried out, which assesses the relevance, efficiency, and effectiveness of the measures. The exact unit of analysis and scope should be described in the evaluation roadmap, which is point 4 in the same article.
- Considering that the state of implementation may vary across funds, measures, and activities, it is most likely not meaningful or even possible to cover the entire plan with one evaluation, the timing may not be appropriate for every measure. So, to ensure high quality of the evaluation the Member States would need room for deciding what measures can be evaluated at that point in time.
- Art 19 (9) – please add as a potential controller also the coordinating authority or member state as in 2021-2027 period CPR.

- When would the draft DNSH Guidance document be made available to MS (for comments and proposals)?
- Annex II List of codes for the territorial dimension: code 03 Eastern border region. We would like to have clarification, what is the meaning and purpose? Is it only for monitoring investments?
- **The Single Gateway** – it is unclear what is the purpose of having that detailed info on the website and who is the target group (administration, potential beneficiaries, public? Or it is to everybody and for every purpose, incl. performance information and funding opportunities etc). Which current websites will be replaced by the new website? What obligations does the MS have regarding the new website? According to art 11p7, the MS evaluations will go on this web page as well? What is the idea behind this? (art 11 p7: Will all evaluations by the Member States under shared management be translated or will Single Gateway be multilingual?)
- Annex I **Intervention fields and indicators**: 543 different intervention fields plus linked output and result indicators! On what level intervention fields and indicators will be set, “activity” or “measure” or some other?
- Can you bring an example of what is an „*emblem of excellence*“ which is mentioned in in Art 12, p 1 d).
- It is hard to understand from the definitions in Art 2 (2) and (3), what is the difference between measure and activity? Can you please bring some examples?
- Art 19, p 6. What is considered as the end of the activity here? Is it the end of activity in terms of an intervention or is the end the last payment received?
- What exactly is the meaning of level 1 and level 2 of the annex I? How are activities tied to financing?
- In the Annex I there is as subjects agricultural advisory service and enhanced access to innovation in agriculture, but we are missing knowledge transfer. Is it on purpose or by accident? All three are related to Agricultural Knowledge and innovation systems activities that are in the NRP regulation.
- In the recital 4 it states the goal of reducing administrative burden by at least 25% for all companies and at least 35 % for small- and medium-sized enterprises and that the uniform performance regulation contributes to reducing the administrative costs associated with its implementation, for the Commission, Member States, third countries, implementing partners and beneficiaries – so also for companies. Does the Commission have a plan how to monitor the goal of reducing administrative burden and how is it ensured that this common framework does not cause additional administrative burden for companies?
- For example, the administration costs of the COST network are very high compared to other initiatives financed from the Horizon, there are the same issues with several institutionalised European partnership. What are the Commission’s plans to reduce the administrative costs of such initiatives funded by EU programmes?

- What is the reason that Euratom programme is not in the list of programmes of annex IV?
- Annex V, (1) 8b)) states: If requested by the Commission, the funding statement may be replaced with the words ‘European Union’. This simplified statement shall be written out in full and be translated into local languages. Could you give an example in what cases this might be applicable, does it concern also shared management?
- In several places, the need to reduce the number of indicators is emphasised, but in the case of the future Home Affairs Funds (HAF), a more detailed approach has been taken, and additional indicators have been introduced. For example, while currently only the number of devices is reported, under the new plan MSs would have to start reporting them not only by units but by type. Why is this approach taken?
- It is important to avoid the previous practice under the Home Affairs Funds, where indicators and their definitions were established only after the start of implementation, resulting in a retroactive data collection obligation for the MSs. This retroactive obligation approach should be explicitly excluded in these future regulations to ensure legal certainty and effective planning from the outset.
- How was the cost savings of 700.6 million calculated in the impact assessment? Were the new obligations and their costs to MSs related to Single Gateway in Art 12.2 also taken into account including possible MSs' IT development endeavours?
- Given that the term 'programme' is used frequently throughout the draft regulation without a clear definition, would it be possible to include a precise definition of “programme” to ensure consistent interpretation and implementation?
- Art 5.3 states that it shall notably be considered that it is not feasible or appropriate to apply the do no significant harm principle in relation to defence and security activities. But **“Security activities” is an imprecise legal concept and needs clarification**. Are the activities related to the security of the EU external border, including measures against hybrid threats at the external border and migrant instrumentalization considered as “security activities”? We would propose the wording that all activities financed from Home Affairs Funds (HAF) are security related activities.
- Art 7.3 states that The Commission shall provide technical guidance on the methodology referred to in p 2 to determine the categories and corresponding gender equality scores, aiming to ensure consistency **across all programmes**. Due to the indefinite term of ‘programme’ it is unclear the content of the technical guidance the Commission shall provide. There is no deadline for the Commission to provide such guidance and this may hinder the development of the NRPs. For the timely launch of the financial period, the definite guideline must be provided to the MSs as soon as possible in future months. **Unless** the guidance is provided in Annex IV but in that case the article 7.3 must refer to this annex.

- Art 11, p 3 “Member States shall carry out at least one interim evaluation covering the entirety of their plans no later than three years after the start of their implementation.” What is considered as the ‘*start of their implementation*’ in the context of the requirement that Member States shall carry out at least one interim evaluation no later than three years after this point?
- Art 10 states that the Commission is responsible for evaluating programmes or activities, whereas Art 11 assigns Member States the task of evaluating measures. What is the rationale behind this distinction (programme or activities evaluated by COM and measures by MS)?
- Art 13 p 3 states that Each Member State or third country shall provide a gender equality assessment for each activity in their plans as follows. Is the Commission considering a gender equality assessment guideline that includes relevant definitions (e.g. gender equality) and would take into account the specific nature of certain domains, e.g. security and defence. If yes, when? The assessment is to be submitted at the moment of the submission of plans.
- Art 19.3 requires MSs and their subcontractors, who according to Art 11 are assigned to evaluate measures, process personal data of persons within "control group" who have not participated in the activities financed from funds but possess similar sociodemographic characteristics compared to participants. Would processing of personal data of unrelated persons in that level of detail not violate the GDPR rules?
- For implementing the Home Affairs Funds an exemption of processing personal data is needed due to specificities of the activities that will be potentially carried out. The derogation from the performance framework regulation should be allowed in fund-specific regulations and this mandate should be clearly stated in the current act.
- Annex I: The output indicator “Number of projects” has been used very frequently. We would like to request clarification on why it is deemed appropriate RACER (relevant, accepted, credible, easy to monitor and robust) indicator and what this actually reflects? In case of Home Affairs Funds funds where the beneficiaries are public authorities who carry out the projects at the EU external border, we claim that to carry out 10 smaller scale projects or 1 large project might essentially have the same output and impact. Is the use of that indicator dependent on the negotiation with the Commission according to Art 14(2)?
- Output indicator “Number of Schengen recommendations implemented” and/or impact indicator “Share of addressed Schengen evaluation recommendations out of total”. A Schengen recommendation is considered implemented once it has been approved by the relevant EU-level working group. The work of the group can take a very long time. Does this mean that the MS will not receive the funding if the recommendation was in fact implemented during the program period but is only formally considered implemented after the program period ends? Will the funding be lost if the recommendation was initially planned to be addressed through the fund but is ultimately financed from the state budget instead, and therefore cannot be reported under the fund?

- Art 2. The proposals for Performance Framework Regulation and NRP Regulation are closely linked. It appears that the definitions of the same terms are different, for example, term „operation“, “measure”. The proposal for Performance Framework Regulation introduces the term “activity”, which has been used in proposal of NRP Regulation mainly with regard of agriculture. Why the same terms have different definitions and why is needed term “activity” that seems to be covered by term “operation”?
- Art 11, p 1. What is meant by “the start of implementation of a plan”? Considering experiences from previous programming periods, there might not be much to evaluate after the three years. It takes time to select and implement the operations. Why the Commission proposes interim evaluation, which can only address process evaluation rather than evaluating the results of finalised operations?
- Art 13, p 1. The NRP Plans contain chapters and measures. What is meant by activity? What is the difference of this assessment and the assessment required by the Directive 2001/42/EC?
- Art 16, p 3. This seems to be relevant to all management modes. Why is it specifically mentioned only under direct management?
- Art 18 paragraph 1 establishes general visibility requirements for all beneficiaries, with exception of beneficiaries of area- and animal-based interventions under the common agricultural policy. Does Commission consider that it is proportional apply the same requirement to the beneficiaries implementing large infrastructure operations and natural persons receiving small amounts of support? For example, should fisherman and other natural persons use the EU emblem and funding statements on their private property?
- Annex I. Should all CFP measures under NRP Plans be covered only by the level 2 policy area “*Fisheries, aquaculture and ocean*“ and intervention fields 41-58?
- What does „*emblem of excellence*“ mean? Could you give an example of „*emblem of excellence*“? Page 9: “*operations with high potential that have received special distinctions or an emblem of excellence*“. Is it related to Seal of Excellence or Competitiveness Seal?
- What is the difference of between „*measure*“ and „*activity*“? Page 8: „‘*activity*’ means the specific initiative undertaken to contribute to the achievement of an objective set, which may correspond to a measure in plans drawn up by Member States or by third countries“
- What is „*the end of the activity*“? Is this the end of the operation under the intervention or the end of the last payment? Page 20: „*Personal data shall be stored no longer than necessary to demonstrate the compliance with this Regulation and, in any event, no longer than ten years from the end of the activity.*“

- What is the meaning of „level 1“ and „level 2“ (*ANNEX I Intervention fields and indicators, page 1*) and how they are linked with *Annex. The 2028-2034 Multiannual Financial Framework – Tabela*s). How are activities linked to funding?
- In *ANNEX I Intervention fields and indicators* (page 5) there is „*innovation in agriculture*“ and „*agricultural advisory service*“ (*Agriculture and fisheries (level 1); Agriculture (level 2): # 25 Agricultural advisory service; # 26 Enhance access to innovation in agriculture*), But „*knowledge exchange*“ is missing. *Innovation in agriculture, agricultural advisory service and knowledge exchange* are related to AKIS activities (in the NRP regulation they are mentioned).
- *The Member States shall make that information available to the Commissions in an interoperable way through the electronic data exchange system between the Member States and the Commission referred to in Annex XVI to Regulation* - Based on current practice, it is extremely important for the EC to start with IT developments as soon as possible and to coordinate it centrally. So far, links between the Commission’s information system SFC and Member States’ information systems have largely failed over two periods. Monitoring requirements must be supported by information systems solutions.
- *One output indicator defining the final milestone or target for that measure and selected from Annex I corresponding either to the assigned intervention field or, where appropriate, to a different intervention field, or in duly justified cases and in agreement with the Commission an output indicator not included in Annex I;* - We support common indicators, but there can be no restrictions on setting specific indicators outside from Annex I, as Member States’ interventions vary in content and may require a specific indicator. In the case of very general indicators, the result of the activities is not reflected in practice and complicates the evaluations.
- *The Member States and the Commission shall be allowed to process personal data only where necessary for the purpose of carrying out their respective obligations under this Regulation and under Regulation .../... [National and Regional Partnership Plans], in particular for monitoring, reporting, communication, publication, evaluation, financial management, verifications and audits and, where applicable, for determining the eligibility of participants.* - The obligation to ask for data must be included in the legislation, otherwise we will be in conflict with data protection rules and the Member State will have problems f.ex. developing its information systems to meet the need of monitoring. The level of detail of the social indicators in Annex I is too high, it must be very clear that a person who refuses to provide his or her data but is clearly in need for help, can also participate. Data protection representatives must also assess data collection requirements in order to ensure that there is no conflict between monitoring requirements and data protection rules.

Own resources decision

- Why has the Commission decided to not go forward with ETS2 as an OR?

- Why is the solidarity mechanism – that was included in the Commission’s earlier proposal for ETS-based OR – not proposed anymore for ETS? Is it because all the exceptions and derogations have been eliminated? But in ETS1 the MS shares compared to GNI can differ in magnitudes, the differences of such scale cannot be compensated with other own resources in the OR package.
- How reliable and comparable are the statistics on electrical and electronic waste compared to the statistics on plastic packaging waste? Are they comparable and reliable enough to be a basis for calculating financial contributions? Which specific data sources will be used as the basis of statistics on electrical and electronic waste based OR?
- Tobacco excise duty based OR is stated to be applicable to minimum national rates of the MS? A minimum rate has been established at the EU level. Does the Commission’s proposal mean that the TEDOR would apply to different rates in the MSs?
- Which EU legal acts, and/or amendments to those, are intended to be developed and established to provide the necessary legal basis for the proposed Own Resources – including, specifically, the CORE, TEDOR, handling fee linked to e-commerce? In which WPs will they be discussed in?
- Is there a plan to assess not only the EU-wide impact of the new own resources, but also their impacts on individual Member States?

Erasmus+ regulation

- In the draft regulation of the Erasmus+ programme, it is stated that it will contribute to raise the level of basic skills and increase the volume of skilled professionals, including in key strategic sectors for EU’s competitiveness. The funding support for skills in strategic sectors is also referenced in the draft of the Competitiveness Fund.
 - When, where, and how will these strategic sectors be agreed upon, considering that they may change over the next seven years? Currently, various EU strategic documents highlight different strategic sectors.
 - Will skills development in strategic sectors be supported through the Erasmus+ programme, the Competitiveness Fund, or both?
- How will the annual work programmes of the new Erasmus+ programme be adopted? This procedure was outlined in the 2021-2027 Erasmus+ programme regulation but is missing from the new draft regulation. Member States must be included in the decision-making process. Is there an intention to agree on the adoption of work programmes across programmes in a horizontal manner?
- Does the Commission have a plan for the criteria by which the reduction of administrative burden will be monitored, and how will it ensure that this monitoring does not itself create additional administrative burden for businesses? In which act will these criteria be established?

- What are the Commission's plans to reduce the administrative costs of EU-funded initiatives, such as the COST network and institutionalised European partnerships?
- What is the reason for the exclusion of the Euratom programme from the gender equality list in Annex IV?

European Competitiveness Fund regulation and Horizon Europe regulation

- **Art 4:** which is the interrelation between the proposed distribution of ECF budget between the General objectives (Art 4.2.a)) and the 4 windows of the ECF Art 4.2.b) to 4.2.e)))? Will the 11 bln „general objectives“ budget be distributed between the objectives of the 4 windows; if yes then based on which considerations and criteria will this be done? Will there be any flexibility in relation to the distribution of the ECF budget between Art 4.2.a) to 4.2.e)?
- **Art 4 (Budget) and Art 21 (InvestEU Instrument):** Which is the interrelation between the proposed distribution of ECF budget between Art 4.2.a) to 4.2.e) and the 70 bln stipulated under art 21.3 as maximum amount of the budgetary guarantee? Will there be any flexibility in relation to the maximum 70 bln for the budgetary guarantee – which flexibility is foreseen?
- For the purpose of clarity, proposal to include the stipulation concerning the maximum amount of the budgetary guarantee also in **art 4 Budget**.
- **Art 5.2 and Art 24:** voluntary contributions of the Member States to the MS Compartment are mentioned as a possibility in the EFC Regulation. At the same time, in the proposal for NRP Regulation, the possibility for such voluntary contribution/transfer into InvestEU Instrument is mentioned in Art 11.2, however, we could not find in the proposal for NRP Regulation the stipulation linking such possible transfer with the MS in question. would the Commission please clarify how the planned objectives and intervention logic of the of the transferred MS contribution would be maintained through the planning, management and use of such transfer? Which stipulations of which regulation (ECF and/or NRP Regulation) and to which extent would govern the use of the voluntary transfer from the NRP into InvestEU Instrument? What would be the interrelation of such voluntary transfer and the policy window(s) of the InvestEU Instrument?
- **Art 8 (and Art 52):** In the case of projects that have been awarded the Competitiveness Seal) under ECF, how will equal treatment be ensured under the NRP (implemented in shared management) in relation to the state aid framework? (E.g. for some applicants/beneficiaries, currently high – up to 100% - EU support rate is permissible under ECF while up to e.g. 50% support rate is permissible under the state aid requirements within MS managed programmes of Cohesion Policy Funds)

- **Art 10:** considering the security considerations, it is important to maintain the possibility for procuring (products, services) produced outside the EU „unless those supplies and materials cannot be reasonably sourced from those eligible entities“ – Art 10.2.c. In the case of the legal persons established by the third countries within the EU it may be difficult to establish whether and to which extent such legal persons may pose threat to EU sovereignty. Which methods will be used to deal with and manage such risks?
- **Art 12.8** – It is stipulated that eligible cost reimbursement would be used as an exception (“**Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise.**“). However, considering that e.g. in the case of blending projects submitted under the transport and energy infrastructure projects (TEN-T and TEN-E) within the Connecting Europe Facility (CEF) ECF should be used for obtaining budgetary guarantees,, it should be taken into account that for such projects cost-based financing is necessary and justified (e.g. due to the fact that construction cost may change due to changes in the global economic environment). In order to facilitate the use if ECF financing possibilities for TEN-T and TEN-E projects, the possibility to use cost-based financing for such projects should be included in the regulation.
- **Art 15.1.d (Work Programmes):** “**a single co-financing rate per action for actual cost grants;**“ is stipulated. Considering the wide variety of ECF sectors, objectives, and windows, it would be feasible to foresee the possibility for differentiating the co-financing rate in justified cases of especially high priority projects – for example, in the case of projects aiming to improve defence capacities involving more than x Member States (or more than y Member States + associated states), the co-financing rate of +10% (or higher) could be used, or the use of EU guarantee under more favourable conditions (than the “regular” conditions) could be permissible.
- **Art 19** stipulates the possibility for supporting projects related to IPCEI. However, it is not clear which ways for supporting IPCEI project may be used under ECF, and which co-financing rates will be applied?
- **Art 21.3 and 21.4:** what is the rationale behind foreseeing such huge range between the proposed minimum and maximum use of the budgetary guarantee (17 to 70 bln €)?
- In the case of applying for financial instruments under e.g. the CEF or Global Europea Regulation, **how will the combination of the [CEF or Global Europe] fund regulation and ECF Regulation related rules** (incl. under the InvestEU Instrument part of it) **work in practice?** Under which regulation and based on which evaluation criteria will the evaluation of application be performed?
- **Art 45.8** stipulates that in the case of **European Defence Projects of Common Interest**, some conditions related to the planning, construction and operation of related production facilities may be considered an imperative reason of overriding public interest while „the remaining other conditions set out in these provisions are fulfilled.“. Please clarify which conditions relevant to

the Directives 92/43/EEC and 2000/60 may be overridden in the case of such projects and which conditions would need to be fulfilled.

Horizon Europe regulation, incl. Widening

- Please clarify the criteria distinguishing Widening countries from Transition countries. Please explain the rationale behind using European Innovation Scoreboard as a criterion instead of composite indicator that was used to establish the Widening countries in Horizon 2020.
- Please define clearly what “capacity” means in this context, does it refer to R&I infrastructure, human resources, governance systems, or financial absorption capacity? What is the measure of sufficient capacity in this case?
- What evidence supports the assumption that Transition countries do not require capacity-building support, despite the structural challenges related to leadership capacity-building?
- What mechanisms are in place during economic crises or recessions, when real R&D spending might decline? Will ECF or Horizon Europe adapt their widening and transition support criteria in response to macroeconomic downturns?

ECF and Horizon Europe regulation: comitology

- Please clarify the comitology procedures for: 1) adopting the ECF work programmes under each policy window, and 2) adopting the Horizon Europe work programmes under II pillar windows. Which committees (advisory or evaluation) will be responsible, and how will Member States be involved in decision-making?
- How will the evaluation process for the projects in ECF windows be structured? Who will be responsible for maintaining the operational procedures of calls and call evaluations? In the case that ECF windows will be evaluated separately from Horizon Europe, will the evaluation be harmonised?

ECF and Horizon Europe regulation: performance framework

- Both ECF and Horizon Europe refer to a performance framework and retrospective evaluation. Which KPIs will be used to measure the effectiveness of ECF-Horizon Europe linkages and impact on competitiveness?

- How will results attribution work, will outcomes be reported under ECF, Horizon Europe, or both?

ECF and Horizon Europe regulation: EIC vs ECF

- The ECF proposes to mobilise private and institutional investments with loans, equity, and guarantees. Will there be an EIC-to-ECF pipeline, including eligibility rules, application procedures, and prioritisation mechanisms?

ECF and Horizon Europe regulation: Competitiveness Seal

- Will the Competitiveness Seal function similarly to the Seal of Excellence in terms of access to national/regional or top-up funding?
- How will the Competitiveness Seal interact with the funding rules under the MFF Member State envelopes?

ECF and Horizon Europe regulation: Dual-use vs defence

- Will dual-use or defence proposals follow the same evaluation pipeline as civil R&I projects, or will there be a separate dedicated process? Will there be a uniform process for dual-use themes going forward?

ECF and Horizon Europe regulation: Synergies

- How are synergies planned between the ECF, Horizon Europe, other MFF pillars, other EU programmes, and national programmes?
- Are there synergies foreseen between dual-use/defence research, ECF policy windows, and Horizon Europe pillars? How are they implemented?

ECF and Horizon Europe regulation: Missions

- What is the rationale behind keeping the missions in Horizon Europe instead of moving these under the ECF policy windows? The life cycle of missions has reached a stage where RDI activities are no longer taking place and the main focus is on implementation.

Connecting Europe Facility regulation

- **Art 4 Budget:** Considering the priorities related to the development of the TEN-T network and military mobility network of the EU, as well as of the TEN-E network, we **strongly support the proposal for a sizeable budget. However, due to challenges of the EU in the current geopolitical and economic situation, and the scale of needs** related to the development of these mentioned networks in the coming decade, **an even larger budget should be foreseen for CEF.**
- **Art 4:** In the Annex to the MFF Communication (published on July 16, 2025), the size of the **military mobility part of budget within the CEF transport budget** (art 4.2.a) is specified (at € 17.651 in current prices). **For the sake of coherence and clarity**, and considering the priority of supporting the development of EU military mobility, this **military mobility part of proposed budget should also be stipulated in art 4 of the CEF Regulation.**
- **Art 10.6 and 10.7.b :** **In view of achieving the convergence of regions within the EU and facilitating the development of the TEN-T and TEN-E network in all parts of the Union, we strongly support the support rate** specified for the „Cohesion Fund“ Member States.
- **Art 5.2:** the possibility for voluntary contribution/transfer from the shared management programme (NRP) into CEF is mentioned, however, we could not find in the proposal for NRP Regulation the stipulation linking such possible transfer with the MS in question. Would the Commission please clarify how the planned objectives and intervention logic of the of the transferred MS contribution would be maintained through the planning, management and use of such transfer? Which stipulations of which regulation (CEF and/or NRP Regulation) and to which extent would govern the use of the voluntary transfer from the NRP into CEF?
- **Art 8.3** stipulates that „Where Union support is provided in the form of a budgetary guarantee or a financial instrument... it shall be exclusively provided through the ECF InvestEU Instrument ... and implemented in accordance with the applicable rules of the ECF InvestEU Instrument“. In such case, **which stipulations of which regulation (CEF and/or ECF Regulation) and to which extent would govern** the project selection process and the use of such financial instrument? Will there be any limitations to the use of budgetary guarantee or a financial instrument in relation to CEF projects?
- **Art 8.3 and 8.5:** in the case of projects related to EU associated countries and CEF related project proposals, it is mentioned that the Global Europe delivery mechanism would be used. In such cases, which stipulations of which regulation (CEF and/or GE regulation) and to which extent would govern the project selection process and the use of such EU support or financial instrument? How will the related administrative load and complexity be minimized (while securing the EU financial interests)?
- **Art 12 (Work Programme) and Art 15 (Committee procedure):** In the 2014-2020 and the ongoing 2021+ period, the **Work Programmes** as well as the **selection decisions are approved by the CEF Committee based on the examination procedure.** However, in art 12 of the proposal, the use of the advisory procedure is proposed by the Commission for the 2028+ period.

What is the rationale behind proposing to change the model which has proved to be effective and efficient?

- **Art 16:** the proposal is to change the current approach that the EU infrastructure requirements apply to dual use projects supported under CEF, so that these infrastructure requirements apply to dual use projects would become valid under the TEN-T regulation regardless of the source of financing for infrastructure projects. What is the assessment of the Commission concerning the proportionality of such proposal – for example, considering the potential renovation or reconstruction of road bridges supported Under the Member State or (regional or) municipal budget, including due to the damage of such bridge caused by exceptionally high rainfall and flooding?

Global Europe regulation

- **Implementation in practice – request for step-by-step overview:**
We would appreciate a simple step-by-step explanation/graph of how the new instrument will operate in practice (especially for enlargement countries). Including:
 - Key stages with estimated timeframes (meaning basically what stages are needed to eventually get to payments - from pol guidelines/steering to multiannual programming to national plans/strategies, action plans, measures, etc)
 - How will various types of support and programming mechanisms of the Global Europe instrument be coordinated and connected (e.g. action plans, national/regional plans and strategies, measures, etc).
 - Will you please specify the role of the Council for each step (in the process mentioned in the previous point) .
- **Implementation of the planning and disbursement process (especially for enlargement countries):**
 - How long should the preparation of national/regional strategies or performance-based plans take?
 - How much are the beneficiary countries directly involved in the development of these plans and strategies? (this question applies also to regional plans)
 - Realistically, how long will it take from plan preparation to the first disbursements?
 - How frequently are the plans updated or revised? To what extent does the pol steering impact the agreed plans, especially with respect to enlargement countries?
- **COM reporting to Council on enlargement countries' reform efforts**
It is important that the Council is regularly informed of the progress made by enlargement countries in implementing reforms and their respective national plans. How does the Commission foresee keeping Council up to date on reform implementation under the new instrument?

- **Comitology** – **Art 32:**
 Art 32 of the regulation mentions that the Commission is assisted by a committee, which may meet in different formats. Could the Commission clarify:
 - What exactly is meant by "different formats"?
 - Are there separate formats or configurations for different geographic pillars?
 - Who decides, and on what basis, which format the committee will meet?

- **Allocation methodology:**
 How is the overall financial allocation for a specific (enlargement) country determined? Is it based on performance? Will there be a predefined distribution key that sets the maximum or minimum annual or multiannual allocation per country under the MFF?

- **Programmable vs non-programmable, loans vs grants proportions**
 Particularly in the context of enlargement countries, what proportion of the support is foreseen as programmable (e.g. under national or performance-based plans) versus non-programmable (e.g. rapid response or thematic actions)? What proportion is foreseen for loans vs grants?

- **Council involvement and oversight – enlargement countries:**
 It is important that the Council is regularly informed of the progress made by enlargement countries in implementing reforms and their respective national plans. How does the Commission foresee keeping Council up to date on reform implementation under the new instrument?

- Ukraine's financial support is expected to be provided above the MFF ceilings. Could the Commission please clarify how this will be structured and what legal and financial implications this has for the rest of the instrument?

- According to the text, the Ukraine Reserve shall be mobilised annually through the budget procedure. Could you please specify this procedure?

- What conditionality is Ukraine subject to for payments from the Ukraine Reserve?

- What is the procedure to provide budgetary guarantees for Ukraine as per Article 24 of the regulation?

- How will the flexibility of the instrument work in practice? Which procedures are required to reallocate finances between geographic and thematic envelopes?

- What is the role of the Committee under Art 32 in the decision-making process, if any?

- What is the role of the **External Action Service** and how is the coordination of the instrument's implementation ensured?

- **Art 3, 6, and 24:** We would appreciate a **more detailed fiche** including the comparison of proposed GE budget (distribution between geographical pillars, share of budgetary guarantees) with the relevant parts of the MFF 2021-2027 External action Heading (incl. NDICI) budget - per year in both current and 2025 prices.
- **Art 5 (Consistency, coherence, synergies and complementarity):** We would appreciate examples on which way the Global Europe contribution to e.g. „actions that are established and implemented under European Competitiveness Fund; Horizon Europe, or Connecting Europe Facility would be applied for, managed, implemented and reported in practice – which criteria and requirements under which regulations would be applied? What would be the expected impact on the workload of involved parties, including applicants/Beneficiaries from the third countries?
- Which way will the reasonable balance between the flexibility and predictability of the Global Europe contributions be achieved: for which periods will the multiannual work programmes (referred to in **Art 16 and 17**) be compiled? Which way will the timeframe for the initial adoption and ad hoc review enable the Member States to be meaningfully and sufficiently involved in the process of Multiannual Work programmes?
- According to **Art 24**, the Global Europe assistance is foreseen in the form of a budgetary guarantees or financial assistance implemented as macro-financial assistance (in the form of loans and as policy-based loans). Do we understand correctly that the option of borrowing from the financial markets by the EU and lending to third countries is not foreseen within the Global Europe instrument?
- How is the functioning of the Global Gateway ensured and what is the deadline for setting up the Global Europe Investment Board?

IRELAND

Fiches requested

From the MFF communication, please provide the two tables in the Annex in terms of payments on a programme by programme basis (both 2025 and current prices). The tables only show commitments. Please provide a payment forecast for Ukraine Reserve. It was excluded from both the MFF payment forecasts as well as the Long-term inflows and outflows publication's forecast for 2027 payments.

Descriptive outline of the proposed governance for Global Europe re-allocations and delegated sanction.

Description of concrete actions and allocations envisaged under each of the non-programmable headings, and a clear explanation of how these will interact with the budget allocations under the different geographic pillars.

Detailed explanation on how the Global Gateway strategy rollout will be supported through the GE instrument and align with the 90% ODA target.

Comparison of the amounts proposed for the Global Europe instrument 2028-2034 compared to programmes in the current MFF, including breakdown between country level and regional level programming.

MFF Regulation

Article 7 Single Margin Instrument: Please provide an explanation regarding the removal of the cap for the "Global Margin for Commitments" 0.04% of EU GNI at (Art11 (2)(a)) of current MFF Reg?

Please provide an explanation regarding the increase of the cap for the "Contingency Margin" from 0.03 EU GNI at (Art11 (2)(b)) current MFF Reg) to 0.04% EU GNI at (Art 7(4) of draft MFF Reg 2028-2034)?

Article 8 Flexibility Instrument: Please provide details of any caps or limitations for the use of fines etc in the Flexibility Instrument in the draft MFF Reg 2028-2034?

Please provide details regarding any caps or limitations on the level of decommitments which would be available as additional amounts for the Flexibility Instrument?

Interinstitutional Agreement

Part 1 A – Single Margin Instrument: Please provide an explanation for the changes to the references at paragraph 9?

In the current IIA (para 12) the corresponding paragraph cross refers to mobilisation of the "Global Margin of Commitments" and the "Contingency Margin" in the MFF Reg, but the draft IIA only refers to Contingency Margin cross ref in MFF Regulation.

Budget Expenditure Tracking and Performance Framework

- Simplification

How does the Commission propose to simplify and reduce the Admin Burden for smaller Member States and administrations and Member States and other beneficiaries with small allocations?

Are there any plans to engage with the audit authorities so that there is a better understanding of performance based systems and to address and resolve concerns raised by the ECA?

How is the Commission ensuring that lessons learned from the RRF are systematically integrated into the new framework?

What role will national and regional authorities play in setting targets and reporting on performance?

There are 540 intervention fields in the regulation (but the Commission refers to 700 indicators). What is the interaction between output and result indicators especially as there are multiple indicators per intervention field?

- Strategic Integration

How does the performance framework under the new MFF ensure alignment between budget allocations and EU policy priorities? Is this sufficiently accomplished through percentages of funding requirements?

- Performance Indicators and Results Orientation

How will the new common indicators or methodologies better capture outcomes and impacts across programmes?

How will qualitative outcomes be captured alongside quantitative indicators?

- Monitoring and Evaluation

What role will mid-term reviews and evaluations play in adjusting budget allocations based on performance?

What digital platforms or tools are being used to support performance monitoring and expenditure tracking and what will this mean in terms of interoperability with existing MS digital systems?

- Accountability and Transparency

What safeguards are in place to ensure the credibility and independence of performance reporting?

- Risk Management and Corrective Measures

How does the performance framework address underperformance or misuse of funds?

How will underperformance be addressed—will there be financial penalties, reallocation of funds, or technical support?

- **Cross-Cutting Priorities**

How is the performance framework capturing cross-cutting priorities such as gender equality, climate, rule of law and digitalisation? Is this sufficiently accomplished through percentages of funding requirements?

How will the new performance framework be operationalised across different EU programmes and Member States? What mechanisms are in place to ensure that performance-based budgeting is embedded across all MFF programmes?

What mechanisms are in place to ensure consistency in data collection and reporting across sectors and regions?

- **Transition**

What is the timeline for full implementation of the framework, and how will it align with the 2028–2034 MFF cycle?

How will the transition from the current performance systems to the new framework be managed to avoid disruption?

Will appropriate account be taken of the way the funds are currently managed and reported on? Will there be two parallel systems in place, a new system and the current system for funds from the current MFF that are being disbursed in the early part of the post 2027 MFF?

How will the framework affect the administrative burden for beneficiaries and intermediaries?

Are there plans to integrate this framework with national performance budgeting systems?

NRPP Regulation

Can the Commission provide further information on how it sees this working in practice?

How does the NRPP Regulation align with the Commission's simplification commitments?

Can the Commission provide details of how these specific funds will be treated within the NRPP, particularly bearing in mind the objectives of the CAP in the EU Treaties.

Same question re EMFAF which provides crucial supports for the fisheries sector.

Please provide details regarding how the NRP regulation (COM 565 + Annex) interacts with the performance framework regulation (COM 545 + Annex). This understanding is crucial to assessing how this system can be operationalised by Member States.

There will a requirement to provide data regularly (ART 9 545 Reg) on performance – is this to accompany claims for reimbursement?

Claims for reimbursement can be submitted up to 6 times per year (question – have all headings in the NRP to be claimed together in every claim? – important considerations for Agriculture on funding and borrowing requirements for Direct payments (currently we claim monthly Pillar one).

Please provide additional information on how financial corrections would be applied – is there an increased risk that e.g. flat rate corrections could be applied at fund level as opposed to chapter?

The Commission has identified specific funding streams / amount within the NRPP for CAP Farmers and Fishers income support, the Social Climate Fund and the 14% proposed for social objectives. Is it the case that the Commission is requesting proposals from the Member State for use of the remainder of the proposed Member State allocation (i.e. in line with the priorities and chapter structure of the NRPP)?

Please provide further information regarding the allocation formula provided in the annex and what indicative breakdown was obtained for each component?

Of the total indicative allocation how much of this equates to CAP (Pillar I)?

Can more detail be provided on the meaning of ‘social objectives’? Is it reasonable to say the term broadly aligns with the priorities of the ESF?

In the MFF does Article 5 intend that amounts suspended will be decommitted after n+2 – and is it envisaged that this approach will also apply to funds within a plan where a Horizontal Condition remains unfulfilled?

Will Member States have flexibility on allocations of balances?

Can more detail be provided on allocation of flexibility amountg?

If milestones / targets are not met in a particular chapter, what are the correction mechanisms? Are these at chapter level rather than National Plan level?

How will NRPPs and reporting on same take account of headings 2/3?

Please provide an explanation of the difference between current agricultural reserve and the union safety net in amounts and functions.

NRPP related sectoral proposals

Please confirm that there no plans for a Just Transition Fund or a European Agricultural Rural Development Fund regulation at the current time?

If no regulations are developed, is it the case that existing JTF and EAFRD style interventions will be programmed using the provisions of the ERDF regulation?

Please advise if there will be a special allocation for PEACEPLUS or is it the case that the Commission’s proposed funding for PEACEPLUS is included in the INTERREG allocation proposed for Ireland?

Art 3(b) of AMIF Regulation notes "...contributing to countering irregular migration by preventing and combating migrant smuggling and trafficking in human beings as well as instrumentalisation and weaponisation of irregular migration;". We note this objective differs to previous AMIF programmes and is expanded to include migrant smuggling and trafficking in human beings. We would welcome further information on this objective.

Art 3(c) of AMIF Regulation notes "...during the early phases of settlement;". Can we ask what time period an early phase of settlement is envisioned as by Commission?

"Art 7 Third countries associated to the Union support" of AMIF Regulation; we would welcome further information about working with Third Countries to achieve the objectives of AMIF.

Rule of Law

Please provide clarification on whether all recommendations will be subject to Rule of Law reforms?

What level of breach/severity of issue will have financial implications?

Would NRP's then need to be updated annually to reflect that year's recommendations or would it happen in the context of the mid-term review?

How does CION intend to deal issues related if transfer of funds if a breach of one of the two horizontal conditions remains unresolved? Can CION elucidate the rationale behind the approach set out in their factsheet?

Further clarification needed on the mechanisms envisaged in Article 8 and what these might entail?

The Commission is to adopt the implementing decision in relation to the Charter horizontal condition but the Council is to adopt the implementing decision in the context of the Rule of Law horizontal condition? What are the different role for the CION and the Council in adopting implementing decisions in Article 8 (Charter) and Article 9 (RoL) is simply a policy choice?

Welcome further information on why specificity was not included in the last line of Article 9(6), as is the case in Article 8(6), for example – "The Council shall adopt the implementing decision repealing or amending the decision referred to in paragraph 4 within four weeks of the adoption of the Commission proposal."

Article 8(6) includes the following paragraph, which is not included in Article 9(6) "Where the Commission disagrees with the Member State regarding the fulfilment of the Charter horizontal condition, it shall inform the Member State thereof and set out its assessment." What is the reason for this approach and why this paragraph is not included in Article 9.

Please explain the alignment and interaction the Rule of Law related provisions in the NRPP Regulation with the existing Rule of Law Regulation.

European Competitiveness Fund

Request further detail on digitalisation initiatives and how these will be programmed under the European Competitiveness Fund.

In terms of the four windows identified under the ECF, will there be separate funding streams. with particular themes and dedicated criteria i.e. will there be some level of ringfencing for certain thematic areas?.

Please provide details regarding flexibilities in the indicative distributions? How strict are rules for transfers between windows? Where will the rules for transfers be found?

Of the €234.3bn fund, €51.5bn has been allocated to Digital Leadership. This will cover all digital areas including big areas such as AI, cyber, advanced applications, infrastructures, capacities and interoperability. Is there any more detail and how the digital fund will be broken down amongst the different topics? How will digital funds be broken down between different topics

InvestEU

InvestEU fund has a budget of between €17-70bn to address market failures. Is this a separate part of the overall fund or would any identified digital shortcoming come from the digital leadership allocation?

Simplification

The process of applying for funding is to be simplified. When reviewing simplification, will a common understanding of how beneficiaries should handle applications be considered?

The fund aims to attract private investment. Under the current mechanisms, applying for funding is difficult and complicated. How would the simplification encourage interest? How will security guarantees, ownership control be handled? Are there any rules outside the European Competitiveness Fund Regulation and Financial Regulation?

Horizon Europe

Question for Council Presidency. If the ECF is primarily focused on Pillar 2 of the Horizon Europe proposal, does this mean that all other Pillars (including Pillar 3 which provides for the European Innovation Council) will be progressed through the Research Working Party?

If and when regulations are agreed on the ECF and Horizon Europe, how will the subsequent programming of the regulations be managed? Will there remain a Horizon Europe Specific Programme Committee with jurisdiction over the entire programme? Or if there is coordination with the ECF, how will this work? Will it apply to Pillar 2 only?

More clarity on the proposal to support dual use and defence funded projects in both the ECF and Horizon Europe. Is there a clear definition (what is it?) and distinction between a dual-use programme and a defence programme. Will there be a clear distinction between dual-use and defence oriented activities? It is not clear that this will be the case or how it will be managed.

More information on how Partnerships will be “radically simplified”. Will this be done by ECF or HE provisions? When will this happen? Which Working Party will be responsible (question for Council Presidency)?

Connecting Europe Facility

For projects that acquire Project of Mutual Interest (PMI) status, are they still eligible to apply for CEF funding if CION considers that the primary beneficiary is a Third Country? If the answer is yes, are there changes then to the application process for PMI in CEF?

Can projects which have Projects of Common Interest (PCI) or PMI status still apply for other funding mechanisms, for example Capital Expenditures (CAPEX), in addition to CEF?

For Interconnection projects going through Third Countries, is it possible for CION to develop an understanding around complementary projects being supported, for example, grid and associated works which support Offshore Energy and Interconnection?

Could Cion explain the difference between the current selection procedure for projects where the comitology procedure is used and the selection procedure in the Proposal where no comitology procedure is used please?

ERASMUS+

How does the Commission intend to position Erasmus+ within its “Union of Skills” initiative?

As with Horizon Europe, there is concern as to how the proposal and eventual regulation will be managed and operated. Welcome greater clarification on structure, comitology and how this will be managed.

There is a proposal to include the European Solidarity Corps within the Erasmus+ programme – how will this work in practice?

AgoraEU

Given the “cross-sectoral” nature of the proposed AgoraEU programme, it will require coordination across three Working Parties and two Council Configurations at EU level, including between COREPER I and II. How will the negotiations and implementation will be coordinated at EU level? Council/Pres
The proposed cross-cutting activities in the proposal would support activities across culture, media and civic space. The current cross-sectoral strand only supports culture and media projects, so this is a new area. We are interested in more information to understand better how this cross-cutting strand will be implemented, particularly noting that there is no allocation for it in the proposal? Clarify

The main mechanism for Member State oversight of implementation of the current Creative Europe programme is the Programme Committee. There is no provision in the proposed regulation for the committee. Will this model be retained? If not, what oversight model is proposed to replace it?

There is no provision set out for the ongoing monitoring and periodic evaluation of and reporting on the programme. What is envisaged?

Can information be provided on the circumstances under which a budgetary guarantee or financial instrument through ECF InvestEU would be used under the programme. Is this just for particular strands, eg. Audiovisual?

Under previous iterations of the Creative Europe Programme, Programme Desks were set up to provide information, promote, and assist with the Creative Europe programme. We are keen to understand if this role will be extended to deal with CERV successor and Media News funding or if current CERV structures will be maintained for this strand of AgoraEU.

Global Europe

Development Cooperation

We are concerned that there is a significant deemphasising of principled development cooperation in favour of mutually beneficial partnerships and conditionality. Can the Commission explain why the proposal outlines a significant de-emphasis on targeted poverty reduction and sustainable development cooperation, in particular in the context of Article 208 TFEU which states that “Union development cooperation policy shall have as its primary objective the reduction and, in the long term, the eradication of poverty”? In this context, how does the Commission propose to ensure continued respect of the principles of untied aid and a needs-based approach?

We are also concerned about the minimal levels of safeguards and governance mechanisms to manage the level of flexibility between instruments, which creates a risk of blurring fundamentally different objectives within external action. How does the Commission propose to avoid this? What will be the specific role of the Council in the governance and oversight of funding envelopes, in particular exercising its political steer ex-ante and regarding the re-allocation of funding between pillars? Can the Commission confirm if a midterm review of the GE instrument will be conducted?

Can the Commission elaborate on how it proposes to strike the right balance between flexibility and predictability in the GE instrument, particularly given the lack of ringfencing and targets? How will geographic allocations be sustained over the MFF period, if full flexibility is sought to move funds within and between envelopes?

Ireland is concerned that the indicative humanitarian allocation of €25 billion is not ring fenced and contains no specific targets within geographic envelopes. How does the Commission propose to ensure that humanitarian principles are respected in the implementation of this funding? Will DG ECHO retain oversight in relation to this funding?

We request clarity on how the 90% ODA target would be applied in the context of merged instruments. The target was 93% in the NDICI regulation and Ireland would like to see this maintained. We are also concerned that the proposal allows the Commission to change this percentage through delegated sanction – can the Commission please explain why this is proposed? Can the Commission explain why the 90% ODA target in Article 6(5) does not include a reference to the OECD DAC specifically?

How does the 3% reduction from NDICI ODA target stack up, given the absorption of IPA/Moldova Facility into the Global Europe instrument?

Can the Commission please explain how the proposed geographic allocations were arrived at? What criteria were used?

Given that the proposed geographic allocations are only ‘indicative,’ how will the Commission ensure that sufficient attention and resources are devoted to the contexts with the greatest needs, including Sub-Saharan Africa and the Middle East, alongside continued prioritisation of Ukraine and candidate countries?

Can the Commission please clarify the definition of ‘programmable’ and ‘non-programmable funding’? Under Article 3 (Scope and structure) non-programmable actions are listed under five headings. What concrete actions and allocations are envisaged under these headings, and how will they interact with the budget allocations under the different geographic pillars?

Under Article 14 (2) (geographic programming principles) a ‘framework for cooperation’ is set out: can the Commission clarify if the intention is for programming to be based on these elements, or dependent on these elements being in place?

There is no mention of a migration-related spending target (which was 10% under NDICI), although migration features significantly in the proposal. Why has this not been included?

Ireland is concerned that the tailored, responsive approach outlined in the GE proposal will be undermined by the downsizing of the EU Delegation network and presence in country with partners. Can the Commission please explain further?

Mobilisation of private finance, and engagement with the EU private sector, is a major theme in the proposal. Can the Commission explain how the issue of tied aid will be avoided, and EU competition law adhered to?

Can the Commission provide clarity on how Global Gateway scale-up will be supported through the GE instrument and complement other priority areas, particularly given the 90% ODA target which would limit funding to EU private sector?

Ukraine

Recital 19 of the Global Europe Regulation states that “The Instrument should provide the framework for assistance for the fast recovery, reconstruction and modernisation of the country, to mobilise investments and enhance access to finance, as well as to facilitate Ukraine’s alignment with Union standards and values on its way to accession to the Union”. If funding is ring-fenced, but implemented ‘through Global Europe’, how will this work, given that Regulation 2024/792 (Ukraine Facility) will no longer be extant under the new MFF? Where will the governing principles for the Ukraine Facility come from, as they do not appear to be in the draft Regulation?

In light of the overall approach taken to consolidate and align different funding streams in the next MFF, why are there several different avenues for EU support to Ukraine?

Will ODA targets for Global Europe (eg 90% or ultimate agreement) apply to the additional €100 Billion earmarked for Ukraine?

Public Administration

Please provide a more detailed business case in terms of the 2,500 additional staff, inclusive of rationale, skills needs, role profiles and the intended distribution of the 2,500 additional staff.

Please provide a breakdown of the pay costs associated with the proposal and also those for non pay.

Please clarify what measures the Commission intend to use to ensure regional balance in respect of the proposed increase in staffing.

Own resources

How does the extraordinary crisis response mechanism relate to the Own Resources ceiling? Can the Commission clarify how it calculated the increase to the Own Resources ceiling relation to the borrowing instruments?

CORE

What is the legal basis for CORE? What happens if a company refuses to pay the contribution? Are we to expect a further detailed proposal on the CORE element of the proposal that will also contain a separate legal basis?

How will turnover thresholds be verified, especially for third-country permanent establishments?

What is the data source for the CORE calculation? What company annual net turnover data did the Commission use to forecast CORE revenues?

Given the Commission is proposing for MS to collect CORE contributions, will MS competent authorities be reimbursed for admin costs?

The CORE contribution is dependent on whether an in-scope company or permanent establishment is tax resident in a Member State and the financial contribution payable is based on turnover. Is this a turnover tax in all but name? Delete

The CORE proposal is to be applied at entity level, for the avoidance of doubt, can you confirm it is not to be applied at group / parent level?

Will the CORE proposal apply to companies who happen to make a loss in a particular tax year?

CORE represents a new cost on doing business in the EU. Has there been any analysis done on how CORE will impact competitiveness in the EU, something we know is already a challenge and that we are all working to enhance?

Has the Commission engaged with any business groups on CORE and how has it been received?

E-waste and Plastics

E-waste and plastics and the link to inflation – we see this as an excessive complication, difficult to forecast and providing no additional benefit or added value. Can the Commission provide an explanation for the proposed link it to inflation?

Given plastics and e-waste call rates will be indexed by EU GDP deflator, could the Commission provide its forecasts for annual GDP deflator throughout 2028-2034? We understand that the most recent GDP deflator will be available when the draft budget is drawn up but we need to understand how to project own resources across the entire MFF.

How is it proposed to calculate this? The only detail available to date is that the OR will be calculated as the annual average weight of electrical and electronic equipment placed on the market during the three preceding years (N-1, N-2, N-3) reduced by the weight of waste electrical and electronic equipment collected in year N. There are a number of assumptions associated with this calculation, and it is unclear if these will be adjusted for i.e. this assumes that equipment placed on the market is reaching its end of life within a defined timeframe. Will there be an adjustment factor (per category?) that will take into account the average lifespan of certain types of equipment?

How does this proposal align with the negotiations on the Circular Economy Regulation, which is expected for publication in H2 2026 and which has the stated intention of “making collection methodology and targets fit for purpose”.

TEDOR

On TEDOR – what is the base for applying the 15% call rate – is it minimum excise duties or actual national rates?

Has the Commission considered that by reducing Member State tobacco tax receipts this proposal could negatively impact the ability of Member States to maintain and increase budgets which are directed to public health tobacco cessation programmes? How does this promote public health policy?

Would this proposal result in some Member States being disproportionately affected compared with the counterfactual of raising the same amount of revenues for the EU budget through the national contributions mechanism? Can the Commission conduct an exercise in this regard to show the different impacts on the Member States? Has the Commission considered using a different mechanism which would also be aimed at ensuring fairness in the member state contributions?

Handling Fee

What happens to handling fee between 1 November 2026 when it is expected to enter into force and 1 Jan 2028?

If other MS introduce a handling fee in advance of the 1 Jan 2028, can we confirm that this will only be treated as an ‘own resource’ from that date?

GREECE

Proposal for a Council Decision on the System of Own Resources of the European Union (COM 2025/574)

1. The factsheet on 'New Own Resources' indicates that the five new own resources, together with the adjustment of the current own resources system, are expected to generate annual revenues of approximately €58.2 billion, of which €43.9 billion derive from new own resources. Could you kindly provide detailed fiches outlining the estimated annual contributions per Member State and per new own resource?
2. In Article 3, paragraph 1(b) of the proposed decision (COM (2025) 574 final), the annual contribution from companies is based on their annual net turnover. What is the reason for setting a fixed amount for each of the four scales? Wouldn't it be more appropriate to have a contribution as a percentage of net turnover, instead of a fixed amount for the entire scale?
3. The percentage of customs duties that Member States retain for their collection costs is proposed to be reduced from 25% to 10%. What is the basis for this sharp reduction? Is the new rate adequate to cover the associated national costs?
4. In the present own resources system, the plastics-based own resource is in line with the provisions of Protocol No 28 of the Treaty on the Functioning of the European Union, taking into consideration the contributive capacity of individual member states. From this point of view, how will the absence of correction mechanisms in the proposed existing and new own resources will ensure fairer burden sharing for less prosperous member states?
5. Could you provide further clarifications regarding the handling fee for goods sold in distance sales, which will be part of the traditional own resources?

Proposal for a Regulation of the European Parliament and of the Council establishing a European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security (COM 2025/265)

1. What will be the interplay between the NRPs and the Interreg plan with regard to the allocation of funds? How will that affect the Commission's monitoring given that specific rules are provided for on the NRPs in the respective draft regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 while, on the contrary, monitoring rules pertaining to the Interreg plan are not so clearly defined in the respective draft regulation establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund (COM 2025/552)?

Proposal for a Regulation of the European Parliament and of the Council establishing the Connecting Europe Facility (COM 2025/547)

1. Article 7 of the Proposal for a Regulation establishing the CEF for the period 2028-2034 provides for Association Agreements with third countries interested in participating to the Programme ("CEF"). However, the said provision does not appear to establish any specific conditionality or eligibility criteria

for such engagement, particularly in relation to alignment with EU values and well-established political commitments provided for by the EU acquis. Which procedure will be applied for the conclusion of such Association Agreements? How is the eligibility of third countries, including candidate countries, intended to be assessed and regulated, especially in the absence of clear conditions or benchmarks within the text of the Regulation?

2. Since the Union's transport and energy objectives must be achieved in a way that ensures competitiveness, cohesion and security, as clearly stated in Section 1 of the Explanatory Memorandum of the Proposal, in combination with Article 9(4) stating that Award procedures affecting security or public order, in particular concerning strategic assets and interests of the Union or its Member States, shall be restricted in accordance with Article 136 of Regulation (EU, Euratom) 2024/2509, how will security interests of Member States neighbouring a third country be taken into consideration in case of participation of a third country in cross-border projects funded by the CEF? Does the Commission intend to incorporate into the draft Regulation a set of general and transparent eligibility conditions for legal entities from or controlled by third countries, alignment with EU values and standards, compliance with EU strategic interests and adherence to international law and EU acquis? What safeguards are effectively foreseen to prevent participation of entities that pose a risk to EU's and Member States' strategic interests, particularly in high-risk and sensitive sectors inextricably linked to sovereignty and territorial integrity?

3. What will be the impact on the funding of projects with third countries in case the latter obstruct other projects of common/mutual interest (PCI or PMI) in which it does not participate? Is there a mechanism foreseen in the Proposal for setting relevant conditionality for funding on the basis of the overall approach of third countries towards Union's PCIs or PMIs?

4. Article 11 of the draft Regulation provides that the Commission shall conduct, at least once a year, a selection of cross-border projects in the field of renewable energy based on criteria that it will define. While this approach offers flexibility to address evolving needs and priorities, it is necessary to consider how transparency and objectivity in the selection process will be safeguarded. In this context, the Commission should consider providing further clarity on the methodology for setting such criteria and the establishment of safeguards in the selection process.

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas (COM 2025/541)

1. Providing quality services to visa applicants is a prerequisite for the timely issuance of visas and facilitation of legitimate travel. What kind of actions in this direction are envisaged to be supported through this financial instrument?

2. Regarding ETIAS, will the Commission provide further guidelines for setting up national systems to identify operating costs?

3. Recital 10 mentions that in duly justified cases relevant resources of the EU Delegations will be supported by this regulation. How will this affect allocations to the member-states?

4. Article 8 provides for the financial contributions to the Annual Solidarity Pool. Could the reasoning behind including such a provision in this specific regulation be provided?

Proposal for a Regulation of the European Parliament and the of the Council establishing Global Europe (COM 2025/551)

1. Global Europe intends to merge different instruments with starkly different objectives and governance, which many MS have opposed. Given such inherent differences, how does the Commission envisage that a “one size fits all” approach will perform better than existing fit-for-purpose instruments which the impact assessment has found to be effective, such as the IPA III and NDICI?

2. What conditionalities will be in place in the context of Global Europe, and, in particular with regard to pre-accession assistance? The proposal does not address conditionalities in the operative part, except for Article 23(6) on budget support, which is a very specific tool under Article 241 of Regulation 2024/2509.

3. As far as the Western Balkans are concerned, for the time being, they are benefiting from the IPA III with a total budget of €14.162 billion for the period 2021-2027 as well as from the Reform and Growth Facility for the Western Balkans that amounts to €6 billion (€2 billion in grants and €4 billion in concessional loans) for the period 2024-2027. Regarding the Global Europe Instrument, there is no dedicated financial mechanism for the Western Balkans. In financial terms, €43.2 billion (21% of the Instrument) will be allocated to the Europe region, including candidate countries and potential candidates (Neighborhood and Enlargement) in the Western Balkans. In this respect to which extent will the new budget affect the funds allocated to the Western Balkan partners (reduction)?

4. Insufficient socio-economic convergence between the Western Balkans and the EU has been a long-standing issue and it actually served as the driving force for the establishment of the Reform and Growth Facility for the Western Balkans in line with its four pillars. Given the EU’s continued commitment to economic integration within the WB region as an essential stepping stone towards integration of the region with the EU Single Market, to which extent will this commitment continue to be supported as a priority after 2027?

5. The Reform and Growth Facility for the Western Balkans is financing the ambitious Reform Agendas as submitted by each Western Balkan partner, based on their own set of priority reforms, and local ownership is promoted with progress depending on each candidate country’s and potential candidate’s implementation of the necessary reforms to align with the Union acquis. In which way will local ownership be encouraged in terms of holding candidates and potential candidates accountable for the progress of the reforms and their effective implementation, especially in the areas of political reform, economic and social development and convergence towards the EU acquis?

6. In terms of beneficiaries, to which extent will both types of financing be maintained, i.e. one addressed to central and local authorities of the Western Balkan partners in line with the principle of reversibility and the merit-based approach and another towards civil society organizations and stakeholders under the clear supervision and examination of the member-states?

7. In which way will the principle of reversibility be maintained along with strong conditionality? It is important to guarantee that payments will continue to be based on the promotion of reforms and most important on their implementation, particularly as regards the fundamentals cluster.

8. While recognising that “balancing the performance assessment with the fair share principle had limited the financial reward to well-performing beneficiaries” [proposal for a regulation for establishing Global Europe p. 7], would it be appropriate to seek a way to introduce a specific clause for a minimum allocation of funds to each partner, as well as a ceiling on funding (either in absolute terms or as a percentage of the total funding provided) that a country could claim, regardless of population or economy size?

9. “The proposed Instrument (Global Europe) contains derogations from the provisions of the Financial Regulation, which are justified in several recitals, namely Recitals 68 and 69 – on the possibility to provide support in the form of grants in a flexible and timely manner without the need for a call for proposals, including to private sector entities from Member States”. Could you elaborate on this derogation especially in terms of the selection process of private sector entities and the way they will be supervised?

10. “The Proposal for a Regulation of the European Parliament and of the Council refers to the establishment of a Global Europe Investment Board (the ‘Investment Board’) that shall provide strategic and operational guidance to the Commission and shall adopt its rules of procedure”. Could you elaborate further on it, especially in relation to the member states’ and the Council’s role? Also, given that the Board’s prime role will be to “provide strategic and operational guidance to the Commission in the implementation of the budgetary guarantee referred to in Article 24 and blending, to which extend is the Commission of the opinion that the possibility to include contributors, eligible implementing entities and counterparts, partner countries, relevant regional organisations and other stakeholders as observers will contribute positively to the whole process? To what extent will their participation not contradict the fact that all these entities will also be monitored for their progress?

11. How will the effective financing for migration purposes be guaranteed? Will there be a dedicated specific percentage (e.g. the current indicative of 10%)?

12. How will the relevance of the funded programmes to migration be assessed? Will this take place in accordance with the markers (1, 2, 3) used today (1 in cases where migration is the main objective of the programme)?

13. Will the comprehensive partnerships (that underpin the Union’s migration policy in its external dimension) be funded by Global Europe? Are there other funding options given the increased needs, especially in the Southern Neighborhood?

14. How will the new €200 billion Global Europe Instrument tailor its funding approach to effectively address foreign information manipulation and interference (FIMI), hybrid threats, and communication challenges linked to conflicts in the EU’s neighbourhood and beyond? What dedicated financial instruments will ensure long-term support for EU strategic communication and counter-FIMI actions within the Global Europe framework? Will there be earmarked funding for the EEAS Strategic Communications activities and related public diplomacy tools under the “Global Europe”?

15. How will the MFF 2028–2034 concretely reinforce funding for democratic governance, media pluralism, and civic space in both MS and candidate countries and potential candidates for accession to Union membership—particularly in fragile or authoritarian contexts—and what specific mechanisms or conditionalities will ensure that support is tied to respect for democratic standards and resilience against disinformation and FIMI?

16. How will the MFF 2028–2034 and the Global Europe Instrument ensure targeted funding mechanisms for cultural mobility, decentralised creative networks, and cultural diplomacy initiatives?

17. How does the MFF support a whole-of-society approach to strengthening a trustworthy information space, particularly through youth, media, civil society and local actors? How is support for media freedom, pluralism, and the independence of the news ecosystem reinforced through the MFF, especially in the context of disinformation threats and platform dominance?

18. Which Global Europe investments will be specifically directed toward AI, digital infrastructure, and trustworthy data ecosystems — particularly within universities, AI hubs, and research centers — and how will public–private partnerships be leveraged to deliver them? What are potential complementarities or synergies between MFF and the Digital Europe Program & GSC-EDIC in order to facilitate governance and deployment of multi-country digital infrastructure projects, such as AI Factories, secure data networks, etc.?

19. How is cybersecurity embedded in EU strategic planning and funding, particularly to strengthen internal resilience among MS and to enhance cooperation with third countries? How will Global Europe address more specifically the digital divide and promote secure digital connectivity across the EU and in partner countries? What specific budget lines support the development of cyber capacity and defenses across both the EU and candidate countries and how this may happen in a more coordinated and cost-efficient way?

SPAIN

QUESTIONS TO THE COMMISSION AND REQUEST OF FICHES

FICHES ON GENERAL ISSUES

- Comparison of current (2021-2028) and Commission's proposal of the 2028-2034 MFF regulation and IIA
- GNI estimates for the EU as a whole and by Member State.
- Table with the amounts for each programme, in current and constant prices.
- Table of equivalences of current and future programmes.
- Detailed information of all special instruments: purpose of the instrument volume, content, procedure for mobilisation.
- Detailed information on pre-assigned and non-pre-assigned amounts
- Explanation and detailed information on Member States to which the safety net or the maximum amount will be applied (80%/105%).

HEADING 1. NATIONAL AND REGIONAL PARTNERSHIP PLANS

- Could the COMM clarify who the beneficiary will be in the NRPPs? Is it the Member State (as in the RRF) or the person/entity carrying out the operation/expenditure?
- Allocation criteria for the funds in the NRPPs: reasoning for the inclusion of each of the indicators?
- Fiche on the allocation to Member States under the NRPPs, per year, in current and constant prices. Including the breakdown per area of expenditure (cohesion, agriculture (direct payments and rural development, fisheries, and migration and security)
- Data sheets for all variables used to estimate national envelopes (General Key and Home Affairs Key), by Member State.
- Data sheets on the application of the formulas (General Key and Home Affairs Key).

HEADING 2. EUROPEAN COMPETITIVENESS FUND

- The total amount foreseen for the Fund according to the Communication is 397.753 million euro. However, when adding the amounts of the different programmes included in the EFC is 397.755 million euro.
Could the COMM confirm which the right amount is?
- Data sheets used for estimating the Competitiveness Fund: variables to be taken into account for its allocation.

HEADING 3: GLOBAL EUROPE.

- Fiche with the distribution of the total volume of Global Europe among the geographical areas and sub areas. Comparison with the current MFF.
- Fiche on the funds related to migration in the MFF- both internal and external dimensions (Headings 1 and 3)

HEADING 4: ADMINISTRATION

- Fiche on administrative expenditure in all headings of the MFF proposal-

OWN RESOURCES

1. Data sheets used for estimating own resources and estimates by year and by Member State.
2. Contribution by each Member State per year, in current and constant prices.
3. E-waste

- Within the framework of the proposed new own resource on uncollected electrical and electronic waste, we would like to know how the uniform and harmonized calculation of non-recycled waste will be guaranteed, in order to avoid the problems highlighted by the Court of Auditors regarding the calculation of plastic waste. How will guarantees be ensured or incentivized?

- The decision establishes that:

"The weight of electrical and electronic equipment not collected in a Member State in a given year (N) shall be calculated as the average annual weight of electrical and electronic equipment placed on the market in the previous three years (N-1, N-2, N-3), reduced by the weight of waste electrical and electronic equipment collected in year N. If the difference is negative, the weight of electrical and electronic equipment not collected in a Member State shall be considered to be zero."

Could you confirm that the weight of the equipment collected can exceed the average weight of the equipment placed on the market in the previous three years?

- How will the incentive to reduce waste be guaranteed and will inspections be carried out on large suppliers regarding the volume of electronic and electrical waste not collected?

2 – Own resource in the area of Special Taxes on Tobacco (TEDOR).

- Is there no difference between traditional and electronic cigarettes?
- Please provide a fiche with the details on how the calculations will be made.

3- VAT based own resource

- Could you please confirm that the 50% GNI capping is eliminated

4- Non-recycled plastic packaging waste own resource.

- Could you please confirm that the flat-rate reductions applied to the own resource will be eliminated?

OTHER ISSUES

Crisis response mechanism

- Will there be a maximum level of loans that could be requested by MS?

DETAILED QUESTIONS ON THE REGULATIONS

Regulation of the fund COM(2025) 565 final, establishing the European Fund for Economic, Social and Territorial Cohesion, Agriculture and Rural Development, Fisheries and Maritime Affairs, Prosperity and Security for the 2028–2034 period, and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509.

1. The annex to the Commission Communication to the Parliament... COM(2025) 570 final, establishes in its first table commitments at current prices of 452.965 mill € for social, territorial and economic cohesion, including fisheries, rural communities and tourism. Meanwhile, Article 10.2.a.i) of the Fund Regulation COM(2025) 565 final lays down at least 217.798 mill € for less developed regions. There is a difference of 235.167 mill €:
 - What can this money be allocated to? Cohesion policy? Common Agricultural Policy (Article 10.2.a.ii))?
2. Article 10.2.a.ii) of the Fund Regulation COM(2025) 565 final states that at least 295.700 mill € shall be allocated to the Common Agricultural Policy for the interventions defined in Article 35 from points (a) to (k) and (r), as well as the Common Fisheries Policy:
 - How much money is for the CAP and how much for the CFP? What share of the CAP allocation does each Member State receive?
 - Are the interventions in Article 35 that are not included in this amount those from (l) to (q) (LEADER, ...)?
 - Where does the EU funding for those interventions come from?
 - How is the POSEI programme for the Canary Islands funded? What is the financial envelope or the amount that POSEI will receive?
3. Concerning the same article mentioned above:
 - What factors has the Commission taken into account in establishing this ring-fenced amount of 295.700 mill €?
 - What variables were used?
 - What calculation methodology did it follow to adopt this decision and what factors justify it?

4. Article 51.1(g) states that payments of aid must be made no later than 80 days after the application:
 - Does this apply to all CAP aid?

5. Concerning Annex I to the Fund Regulation COM(2025) 565 final and specifically the methodology for calculating EU financial contributions:
 - Variables to be considered (second paragraph, bullet 7). We request clarification on the choice of these variables and the time gap between them, since it is proposed to consider estimated direct payments for 2027 against eligible area in 2022 (previous CAP period). Can the Commission justify this selection?
 - Formula for calculating the “Agri prosperity GAP” (page 2 of the annex)
 - Is this the formula the Commission plans to use as the distribution key for the ring-fenced income support under the CAP?
 - Does this formula in itself imply consideration of an external convergence mechanism of per-hectare payments across Member States? Is this the convergence the Commission foresees?
 - In other parts of Annex I, the data sources to be used are indicated. Why are they not listed here?
 - Are the estimated 2027 direct payments per Member State those referred to in Annex V of Regulation 2021/2115 at current prices <https://eur-lex.europa.eu/legal-content/ES/TXT/PDF/?uri=CELEX:02021R2115-20240525> or will the Commission use another data source? Will the calculation be made at current or constant prices?
 - Are the hectares declared as potentially eligible in 2022 those found in this report to be used by the Commission for this gap https://agriculture.ec.europa.eu/document/download/8707d160-1fed-45b1-aba8-bc9a6eca9846_en?filename=summary-report-implementation-direct-payements-claim-2022_en.pdf??
 - Safety net to avoid resource concentration (last paragraph of page 2 of the annex):
 - Within the pre-allocations considered, what does the Commission understand by relevant funds?
 - In addition to EAGF and EAFRD, will the Commission consider EMFAF a relevant fund?
 - Can the Commission confirm the data source it will use for these pre-allocations?
 - Will the data used be those published in the report following approval of the 2021–2027 MFF “The EU’s 2021–2027 long-term budget and NextGenerationEU – Facts and Figures”?

6. Annex XV to Regulation COM(2025) 565 final (page 48) – Actions supported under the “Facility”
 - Among these supported actions, section (g) includes those related to animal and plant health, such as disease eradication plans:
 - Does the Commission intend to establish a ring-fenced budget for these actions?
 - Will the current budget planned, e.g. for the eradication plans adopted by Commission decision for biannual periods, be maintained?
 - In section (j), a broader safety net called “Unity Safety Net” has been created to support farmers in case of market disruptions, with an allocation of 6.300 mill € over seven years, doubling the crisis reserve available under the current CAP:
 - Would it be possible to assign more resources for this purpose in case of financial decommitments?

- Could this reserve be used to provide direct and specific support to farmers affected by climate-related disasters involving market disruptions?
- Farmers may also be eligible for crisis aid under Article 38 to cover losses caused by natural disasters or extreme weather events:
 - Would this funding come solely from the SINGLE FUND, or could it also come from the share allocated to the CAP?

Regulation COM(2025) 560 final, laying down the conditions for implementing Union support to the CAP in the 2028–2034 period

1. Can the Commission clarify how the aid for transition actions set out in Article 10(1)(b) is to be funded, particularly in light of the 200.000 € limit per farmer and per programming period established by the proposal for the single fund regulation? Will it be financed from CAP funds or through a specific additional source?

Regulation COM(2025) 553 final, amending Regulation (EU) No 1308/2013 as regards the EU school scheme, sectoral interventions, creation of a protein sector, hemp requirements, possible marketing standards for cheese, protein crops and meat, application of additional import duties, supply availability rules in times of emergency and serious crisis, and guarantees

1. From which funds are the sectoral interventions under the Common Market Organisation financed?
2. Does the Commission plan to establish a specific budget for certain sectoral interventions, whether or not they are mandatory (with the current proposal, the wine sector intervention would not be mandatory unlike the current period, whereas it would be mandatory for beekeeping and fruit and vegetables)?
 - In particular, for the fruit and vegetables sector, there is currently no financial ceiling on Union aid. Will a financial limit be set, which could significantly restrict the funding of operational programmes in this sector?
3. For the first time, the possibility of co-financing operational programmes of sectoral interventions with national funds is introduced:
 - What percentage of financing will come from EU funds? And what economic effort will be required from the sector or national administrations?
4. Following up on the previous question: How and under what conditions will the school schemes, now included under the CAP chapter, be funded? Will Member States be required to contribute a percentage or minimum amount to these programmes?

5. Where are current investments in irrigation improvements financed from? The Cohesion Fund? The Competitiveness Fund?

Regulation COM(2025) 545 final, establishing a monitoring framework for budgetary expenditure and performance, and other horizontal rules applicable to Union programmes and activities

1. Article 4.2 of Horizontal Regulation COM(2025) 545 final states that 35 % of programme spending shall be invested in climate and environmental measures. Annex III of the same regulation states that this amount must be 43 % for the national and regional partnership plan:
- What is the difference between the two percentages?
 - Which one applies to CAP measures?

Questions écrites sur la proposition de cadre financier pluriannuel 2028-2034 – France

Règlements transversaux

- I. Proposition de règlement du Conseil établissant le cadre financier pluriannuel pour les années 2028 à 2034 & proposition d'accord interinstitutionnel
- La Commission pourrait-elle fournir une estimation exhaustive de la capacité d'action financière du budget de l'Union européenne sur la période 2028-2034 par programme ? Pour cela, pourrait-elle présenter, outre les montants de crédits budgétaires alloués à chaque programme dans le cadre des plafonds CFP, la Commission pourrait-elle présenter :
 - Une estimation de l'effet de levier total résultant de la mobilisation des instruments financiers des boîtes à outils, à la fois pour les programmes internes et pour l'action extérieure de l'UE ?
 - Les montants prévisionnels complets alloués aux programmes de la programmation 2028-2034 incluant les prévisions de recettes extra-budgétaires (notamment les recettes externes affectées) ?
 - La Commission peut-elle préciser quelle est son appréciation de la sinistralité des prêts à l'Ukraine pour la période 2028-2034 garantis sur la *headroom* ?
 - La Commission peut-elle préciser le fonctionnement concret du « *steering mechanism* » ? En particulier : la Commission peut-elle présenter un calendrier détaillant le rôle de chaque institution dans ce mécanisme, et la façon dont il s'articulerait avec la procédure budgétaire annuelle ?
 - La Commission peut-elle détailler dans quels cas spécifiques aller au-dessus des 20% de flexibilité dans la programmation pourrait être justifié conformément au point 10 de l'accord interinstitutionnel ? (« *unless duly justified new circumstances arise, including in relation to the Union's policy priorities* ») ?

[Demande de fiches explicatives]

- Une fiche permettant d'établir la correspondance entre la structure du cadre 2021-2027 avec celle de la proposition de la Commission pour 2028-2034, et de comparer les montants entre le cadre actuel et la proposition de la Commission, programme par programme, à périmètre constant, avec les montants 2021-2027. Cette fiche devra également inclure NGEU, tout en permettant de l'isoler.
- Une fiche permettant d'estimer l'évolution entre le cadre 2021-2027 et le cadre 2028-2034 de la capacité d'action financière de l'Union tenant compte de l'ensemble des ressources extrabudgétaires (prêts, garanties, fonds fiduciaires ou extrabudgétaires, recettes affectées) et d'une évaluation de l'effet de levier des instruments financiers.
- Une fiche détaillant la façon dont la proposition de CFP 2028-2034 répond aux recommandations du rapport Draghi.
- Une fiche présentant l'évolution des contributions nationales par Etat membre sur 2028-2034 par rapport au montant moyen de ces contributions nationales sur 2021-2027.
- Une fiche détaillant l'ensemble des mécanismes permettant de réorienter ou réallouer les fonds du CFP 2028-2034 entre les différentes rubriques (fongibilité des fonds entre rubriques).
- Une fiche récapitulant les dispositions prévoyant la flexibilité et les modalités de gouvernance des fonds, en précisant les références juridiques pour chaque disposition (règlements de base des piliers ou règlements sectoriels des fonds).
- Un tableau comparatif détaillant chaque changement proposé sur l'AII par rapport à l'AII de 2020 et expliquant les raisons et les effets de chacune de ces modifications

- Une fiche détaillant les dispositions légales et budgétaires, les implications budgétaires, le périmètre et les modalités de mise en œuvre des instruments spéciaux non thématiques proposés pour 2028-2034 (instrument de flexibilité, instrument de marge unique) ainsi qu'un bilan de leur utilisation en 2021-2027.
- Une fiche relative à la flexibilité du cadre 2028-2034, en détaillant les différents dispositions de flexibilité, incluant une approche graduée : fongibilité entre rubriques / entre programmes / entre années.
- Une fiche présentant le montant prévisionnel des paiements pour chaque année de la programmation 2028-2034, et décomposant ce montant (1) entre RAL et paiements découlant des nouveaux engagements, et (2) par programme ;
- Une fiche avec les profils de paiements (deux chiffres après la virgule) du CFP 2028-2034 :
 - programme par programme pour chaque année pour toute la durée du prochain cadre et au-delà de 2034 lorsque cela est pertinent.
 - pour chaque instrument hors plafond du CFP.
- Une fiche présentant le montant prévisionnel du RAL programme par programme pour chaque Etat Membre, au 31 décembre 2027, et la façon dont celui-ci serait liquidé sur la période 2028-2034.
- Un bilan détaillé programme par programme des dégagements de crédits au cours du cadre CFP 2021-2027, en isolant les crédits reconstitués.
- Une fiche comparant les règles de cofinancements nationaux obligatoires dans le cadre actuel et pour le cadre 2028-2034, programmes par programmes, en précisant la part du budget européen concernée.
- Une fiche présentant la nouvelle méthodologie proposée pour le déflateur sur 2028-2034 (déflateur dynamique hors de la fourchette d'inflation de 1% à 3%), comparant les plafonds effectifs du CFP 2021-2027 avec ceux qui auraient résulté de l'application de cette nouvelle méthodologie.

II. Proposition de décision du Conseil relative au système des ressources propres de l'Union européenne et abrogeant la décision (UE, EURATOM) 2020/2053

[Questions transversales]

- La Commission a expliqué lors de la présentation de sa proposition que l'adoption du paquet ressources propres permettrait une stabilisation des contributions nationales : la Commission peut-elle présenter ses estimations chiffrées ?
- La Commission pourrait-elle expliciter la façon dont est évaluée la soutenabilité de la *headroom* : comment le montant disponible est-il évalué, et comment les différents dispositifs garantis sont-ils imputés dessus ? Quel est l'impact des évolutions proposées (pérennisation de la possibilité de garantir des prêts à l'Ukraine sur la *headroom*, création d'un mécanisme de prêt en cas de crise garanti sur un top-up du plafond de ressources propres...) sur la soutenabilité à long-terme de la *headroom* ?

[TEDOR]

- La Commission confirme-t-elle que la ressource TEDOR devrait transiter par les contributions nationales, au regard de la dimension de calcul qu'elle implique (rebasage sur les minima de taxation par Etat membre ?)

[CORE]

- La Commission peut-elle confirmer si la proposition consiste à créer une nouvelle taxe sur les entreprises ou une ressource dite « statistique » ? La Commission peut-elle présenter son

évaluation juridique (besoin d'une base juridique dédiée, en plus de la DRP ?) ainsi que les modalités de mise en œuvre envisagées ?

[Redevance petits colis]

- Quelles sont les recettes attendues au titre des droits de douanes du fait de la suppression de la franchise de 150 euros sur les petits colis ? La Commission a évoqué lors du Groupe Ressources Propres de juillet 2020 un potentiel effet d'éviction entre la mise en place de la redevance petits colis (*handling fee*) et la hausse des droits de douanes résultant de la suppression de cette franchise : la Commission peut-elle préciser quel serait l'impact chiffré de cet effet, et quelles seraient les recettes attendues par Etat membre au titre de la redevance et au titre des droits de douanes ?

[Demande de fiches explicatives]

- Une fiche sur les hypothèses macroéconomiques utilisées (taux de croissance du RNB, taux de croissance du PIB, niveau de RNB, niveau de PIB, déflateur du PIB, déflateur du RNB, inflation) pour toute la période 2028-2034, par an, par Etat membre et pour UE 27.
- Une fiche sur toutes les propositions de nouvelles ressources propres (ETS1, MACF, TEDOR, CORE, déchets électroniques non-recyclés) détaillant :
 - 1) les hypothèses utilisées pour chaque année sur 2028-2034 pour la prévision de chaque ressource (assiette de la ressource, prix du carbone pour ETS1 et MACF, tarif minimum d'accise par Etat membre et quantité de tabac et produits liés au tabac mis à la consommation dans chaque Etat membre pour la ressource TEDOR, nombre d'entreprises assujetties par Etat membre pour la ressource CORE, quantités de déchets électroniques non-recyclés par Etat membre pour la ressource E-waste...);
 - 2) Le montant par année sur 2028-2034 qui en résulte pour chaque Etat membre. Pour la ressource TEDOR, détailler l'impact d'une absence d'adoption de la révision de la directive tabac ;
 - 3) Les modalités de mise à disposition envisagées pour chaque ressource (quelle ressource est affectée directement au budget de l'UE ? quelle ressource transite par les contributions nationales ?)
 - 4) Les conséquences relatives aux contrôles douaniers de la ressource propre fondée sur les accises tabac (TEDOR).
- Une fiche sur l'impact des évolutions proposées sur les RPT, détaillée par Etat membre et par facteur d'évolution (suppression de la franchise de 150€ pour les droits de douanes, affectation de la redevance petits colis, hausse du taux d'affectation de 75% à 90%, etc.).
- Une fiche sur le mécanisme de prêt en cas de crise grave (modalités détaillées de mise en œuvre, définition d'une « crise grave », modalités de gestion une fois qu'il a été activé, etc.)

III. Proposition de règlement du Parlement européen et du Conseil établissant un cadre de suivi des dépenses budgétaires et de performance, ainsi que d'autres règles horizontales pour les programmes et activités de l'Union

[Questions transversales]

- Concernant les quatre objectifs transversaux de référence (CCM, CCA, ENV, SOC), la Commission peut-elle détailler la méthodologie utilisée pour fixer la participation d'une activité à la réalisation de l'un de ces objectifs (0%, 40%, 100%) ?
- Quelle articulation est envisagée entre, d'une part, la nomenclature budgétaire proposée et, d'autre part, la structuration du cadre de performance ? Comment la Commission entend-elle

garantir une lisibilité par programme, dans la mesure où un même domaine d'activité peut relever de plusieurs programmes ?

- Les paiements seront-ils exclusivement conditionnés à l'atteinte d'indicateurs de réalisation (*output indicators*) ? Dans ce cas, comment la Commission justifie-t-elle que les bases, cibles et échéances (conformément à l'article 14.3 du règlement) ne soient exigées que pour les indicateurs de résultat (*result indicators*) ?
- Quelle marge de manœuvre est laissée aux États membres pour déterminer une cible ou un jalon ?

[Climat et biodiversité]

- La Commission peut-elle justifier son choix de recourir aux actes délégués pour modifier les objectifs précisés en annexe III ?
- Outre le contrôle du niveau de dépenses en faveur du climat et de la biodiversité, la Commission a-t-elle prévu d'autres dispositifs dans le cadre des autres règlements sectoriels concernés par un objectif précis pour garantir l'atteinte de ces objectifs ?

[DNSH]

- La Commission peut-elle expliquer le choix du recours à des lignes directrices (« *guidance* ») pour la mise en œuvre du « principe de ne pas nuire significativement » à l'environnement et au climat ? Quand ces lignes directrices seront-elles présentées ? Peut-elle préciser comment les États membres seront associés à la rédaction de ces lignes directrices ?
- Dans le cadre financier pluriannuel 2021-2027, des listes d'exclusions de dépenses figuraient dans certains règlements. Pourquoi la Commission a-t-elle choisi de ne pas reconduire ces dispositions dans ses propositions ?

[Annexe I – Domaines d'intervention et indicateurs]

- Peut-elle donner davantage d'informations sur la méthode ayant conduit à l'attribution des coefficients et comment éviter la surestimation de la contribution de certaines dépenses aux objectifs climatiques et environnementaux ?
- Que recouvre exactement le coefficient environnement de l'annexe 1 : quels objectifs environnementaux sont-ils inclus ?
- La Commission peut-elle détailler la définition exacte du critère « social » (art. 6) et son articulation avec l'objectif relatif à l'égalité de genre (art.7) ?

[Demande de fiches explicatives]

- Une fiche sur l'estimation par programme des dépenses en faveur de l'action climatique et environnementale ;
- Une fiche expliquant le fonctionnement du nouveau cadre de performance (domaines d'intervention, indicateurs, coefficient) avec les différents modes de gestion, en particulier la gestion indirecte ;
- Une fiche sur le lien entre le règlement performance et les règlements sectoriels ;
- Une fiche sur les échanges de données anticipées entre les États membres et le portail unique.

Rubrique 1 – Cohésion économique, sociale et territoriale, agriculture, prospérité et sécurité rurale et maritime

- I. Proposition de règlement du Parlement européen et du Conseil instituant le Fonds européen pour la cohésion économique, sociale et territoriale, l'agriculture et les zones rurales, la pêche et les affaires maritimes, la prospérité et la sécurité pour la période 2028-2034

[Questions transversales]

- La Commission peut-elle préciser l'assiette prise en compte pour la réserve de flexibilité de 25% ?

- La Commission peut-elle expliciter ses choix quant aux indicateurs retenus dans la clé d'allocation ?
- Quels seront les critères d'éligibilité des entités bénéficiaires du fonds ? De quelle manière la contribution du fonds à l'autonomie stratégique européenne sera prise en compte dans la conception des plans nationaux ?
- Sur les conditionnalités : quel serait le périmètre et dans quelle mesure les conditions horizontales s'articuleraient avec le règlement 2020/2092 ? Que deviendraient les fonds dégagés au titre de ce mécanisme ? En particulier : que deviendraient les crédits du CFP 2021-2027 gelés au titre de ce mécanisme et désengagés au début du prochain CFP ?

[Contenu des plans de partenariats]

- Quelle sera la marge de manœuvre des Etats-membres dans l'allocation des fonds entre priorités ? Un Etat membre pourrait-il par exemple choisir d'allouer l'intégralité de ses fonds à un seul domaine de politique publique ? (PAC, Cohésion, affaires intérieures)

[Modalités de paiements et de financements]

- Comment la Commission définit-elle les non-conformités qui peuvent conduire à des interruptions de paiements, des suspensions des paiements ou des corrections financières (articles 66, 67 et 68) ?
- Commission peut-elle préciser sur quelle(s) base(s) serait fondé l'échéancier de paiement aux autorités de gestion (nombre/valeur des jalons et cibles) ? La méthode correspondra-t-elle à celle utilisée dans le cadre de la facilité pour la reprise et la résilience (FRR) ?
- La période prise en compte pour le dégageant d'office est ramenée à 1 an au lieu de 3 ans : Quelles sont les montants prévisionnels de dégageants d'office anticipés par la Commission sur 2028-2034 ?
- Le règlement impose des minimums de contribution nationale, existe-t-il un niveau maximal de cofinancement d'un Etat membre ?
- Article 65 : Pourquoi la Commission peut-elle mettre jusqu'à 10 mois pour payer les 5% de financement restants quand la norme de délai de paiement est de 60 jours pour les 95% initiaux ? La proposition indique par ailleurs que les 5% ne seront pas versés en cas d'interruption des paiements : cela comprend-il les 5% ne reposant pas sur la mesure faisant l'objet d'une interruption ?
- Comment la Commission européenne prévoit-elle la compatibilité entre une approche basée sur la performance (indicateurs) et une vérification de gestion fondée sur les risques (dépenses) ?

[Révision des plans de partenariats]

- L'article 24 prévoit une révision simplifiée du Plan de partenariat national et régional pour toute évolution inférieure à 5% de la cible (6.a) : l'évolution porte sur la cible ou le montant de la mesure comme actuellement dans le cadre de la FRR ?

[Autorités nationales]

- L'article 52 limite à une seule autorité de paiement au niveau national : est-ce au niveau du Fonds unique ou par Fonds sectoriels ?

[Facilité EU]

- La Commission a indiqué que les modalités de mise en œuvre de la Facilité seraient définies au regard des besoins précis (gestion directe ou partagée, etc.) : selon quelle procédure décisionnelle ? Sur la base de quels critères ?

- Pourquoi les compartiments de la facilité (instruments thématiques de politique intérieurs, FSUE, réserve agricole) font-ils l'objet d'une enveloppe commune non ventilée dans le règlement ? Ces compartiments sont-ils étanches ?

[Agriculture]

- La Commission a indiqué lors de la présentation de sa proposition que « le budget de la PAC était préservé » : la Commission peut-elle présenter une comparaison chiffrée et détaillée des montants alloués à la PAC en 2021-2027 et en 2028-2034 à périmètre constant ?
- Comment l'enveloppe spécifique de 300 Md€ au niveau UE27 réservée à l'aide au revenu sera-t-elle répartie par État membre ? Cette répartition se base-t-elle sur une clé d'allocation précise, et si oui laquelle ? Quel est le calendrier de publication de l'annexe XVIII ?
- La Commission peut-elle indiquer les modalités retenues pour l'application du plafonnement et de la dégressivité à l'aide au revenu, le cas échéant en l'illustrant par des cas pratiques ?
- Quelles sont les modalités de prise en compte de la convergence externe ?
- La Commission peut-elle apporter des précisions sur les taux de co-financement qui seront appliqués aux différentes mesures de la PAC (au sein du ring-fencing, et en dehors) ?
- La Commission peut-elle confirmer que toutes les interventions actuellement financées par la PAC (FEAGA et FEADER) resteront mises en œuvre par des organismes payeurs agréés ?
- S'agissant du mécanisme de paiement, les États membres pourront-ils continuer d'abonder les fonds européens par des crédits nationaux de manière variable selon les mesures et les filières comme c'est aujourd'hui possible pour le POSEI, ou le système va-t-il reprendre celui du FEADER avec un cofinancement national systématique ?
- Sur le décaissement des paiements directs de la PAC, comment seront-ils articulés avec le calendrier de décaissement global du plan ? La Commission peut-elle confirmer une spécificité du mécanisme de décaissement d'office pour certaines aides de la PAC ?
- La Commission européenne peut-elle indiquer à quel article figure le budget minimal de soutien au revenu dédié au renouvellement des générations ? Le Commissaire Hansen a annoncé que 6% du budget serait dédié à cet objectif, où figure cet objectif ?

[Réserve de crise agricole]

- Comment sera constituée la réserve de crise établie à l'article 14 ?
- L'article 34 indique que la réserve de crise est limitée à une catastrophe naturelle ou assimilée (maladie végétale ou animale) : est-ce une définition stricte ?

[Pêche]

- La Commission peut-elle donner davantage de précisions sur les mesures de soutien aux pêcheurs qui sont incluses dans l'enveloppe sanctuarisée de 296 Mds€ ?
- Comment la Commission envisage-t-elle de synchroniser l'entrée en vigueur du nouveau CFP et la révision éventuelle des réglementations sur la politique agricole commune (PAC) et sur la politique commune de pêche (PCP), dont l'indépendance, prévue par le TFUE (articles 38 et 42), est rappelée dans les projets de règlements ?
- Dans quelles conditions, les États membres pourront-ils maintenir un financement sur la base des coûts réels (annoncé comme possible pour l'agriculture et la pêche notamment) et non sur la logique de performance ?

[Cohésion]

- La Commission peut-elle justifier le niveau des planchers/plafonds fixés pour le montant alloué aux régions moins développées ?

[Fonds affaires intérieures]

- La Commission peut-elle expliquer les sous-jacents amenant à une augmentation différente sur les trois « Union supports » ?
- Quelle est la part de l'enveloppe allouée à la mise en œuvre du Pacte Asile et Migration ?
- La Commission peut-elle expliquer les changements d'indicateurs pour la clé d'allocation par rapport à la programmation 2021-2027, et comparer les résultats des deux méthodes ?
- Comment la logique de cofinancement par région s'articule avec ces fonds ? Plus généralement, quelles sont les modalités de mise en œuvre de ce volet et leur articulation avec le reste du fonds ?

[Objectifs climatiques et environnementaux]

- La Commission pourrait-elle préciser quelles actions relevant auparavant du programme LIFE, en particulier en matière de biodiversité, sont désormais financées par le pilier I, notamment via la Facilité UE, et quelles actions relèvent du pilier II et du fonds de compétitivité ?
- Article 22 : Pourquoi fixer le pourcentage minimum de la dotation totale du plan contribuant à des objectifs climatiques et environnementaux en fonction des progrès réalisés par l'État membre et de la trajectoire prévue pour atteindre ses objectifs au titre du règlement (UE) 2018/842 (règlement relatif à la répartition de l'effort) ? Peut-elle préciser comment elle évaluera le caractère suffisant des pourcentages de dépenses alloués à ces objectifs, notamment en matière de restauration de la nature en l'absence d'objectif transversal de référence à l'échelle du CFP en matière de biodiversité ?

[Régions ultrapériphériques]

- La Commission peut-elle donner des précisions sur les modalités des souplesses prévues pour les RUP (article 46) ?
- Sur les RUP, l'article 6 du règlement FEDER vise-t-il le même périmètre que l'allocation spécifique prévue dans le CFP 2021-2027 ? La Commission peut-elle confirmer qu'il n'est pas prévu de dispositions spécifiques en matière de préfinancement et de cofinancement pour les RUP, en dehors du cofinancement sous le chapitre Interreg (baisse de 5 points du taux de cofinancement) ?
- Quel est le devenir des dispositions du règlement POSEI actuel et de l'articulation entre les dispositions multisectorielles prévues pour les RUP dans le PPNR et celles propres à la PAC ? la responsabilité de flécher les fonds pour les RUP au sein du PPNR puis entre les secteurs ultramarins reviendra-t-elle à l'État membre ?

[Articulation avec d'autres fonds]

- Quelle sera l'articulation entre le règlement général et les règlements sectoriels : en quoi la disposition visant à faire primer le règlement général sur les règlements sectoriels en cas de conflit d'interprétation est-elle nécessaire ?
- Les synergies prévues entre le FEDER et le fonds de cohésion et les autres rubriques sont-elles synonymes de fongibilités ? Si oui, ces fongibilités sont-elles symétriques ou asymétriques ? Quel sera alors précisément le rôle de l'Outil de Coordination et de Compétitivité ?

[Demande de fiches explicatives]

- Une fiche détaillant les différents indicateurs retenus (avec les données) dans la méthode d'allocation des enveloppes préallouées cités en annexe de la proposition de règlement en comparant ce calcul au CFP actuel ;
- Une fiche comparant la PAC avec le CFP précédent, incluant les taux de cofinancement par actions
- Une fiche détaillant les surfaces pour chaque Etat membre éligibles aux aides aux revenus en 2022
- Une fiche détaillée sur le montant de paiement directs minimum par Etat membre
- Une fiche détaillant les spécificités prévues pour les régions ultrapériphériques (RUP)
- Une fiche sur les RAL cohésion ventilés par programme et année
- Une fiche détaillant l'effet des planchers/plafonds fixés pour le montant alloué aux régions moins développées (*safety net*).

Rubrique 2 – Compétitivité, prospérité et sécurité

I. Proposition de règlement du Parlement européen et du Conseil établissant le fonds européen pour la compétitivité

A. Sujets transversaux

[Financements et dispositions budgétaires]

- Comment les montants alloués aux différents piliers thématiques seront-ils répartis entre les différentes sections/actions de soutien, et selon quelles modalités décisionnelles entre les comités et la procédure budgétaire annuelle ?
- Quelles sont les règles de fongibilité envisagées entre les différents volets et à l'intérieur d'un même volet thématique ?
- Comment la coordination entre les différentes fenêtres est-elle organisée afin d'éviter les doublons et optimiser les ressources ?
- Quelles sont les activités transversales prévues dans le cadre de fonds d'innovation ?
- S'agissant du fonds d'innovation : comment expliquer le profil heurté de la trajectoire de CE qui est présentée dans la communication de la Commission (niveau faible de CE jusqu'en 2030, puis très forte hausse à partir de 2031 ?) ?
- Comment les engagements post-2034 sont-ils définis ?
- Quelle est la part et quels plafonds sont associés aux dépenses administratives ?

[Gouvernance]

- Quel rôle jouera le Conseil de l'UE dans la définition des orientations du Fonds de compétitivité et son fonctionnement/sa mise en œuvre ?
- Quel est concrètement le rôle des États membres dans les programmes de travail ?
- Quels sont les mécanismes de sélection des membres des comités ?
- Quels sont les mécanismes de transition entre les programmes actuels et le nouveau fonds ? Quelle duplication éventuelle il y aura-t-il au niveau de la gouvernance et quels organes seront reconduits ?

[Préférence européenne et critères d'éligibilité]

- Comment seront intégrés les critères d'éligibilité dans le règlement et quelles seront les modalités d'application du principe de préférence européenne ?

- Comment se traduiront les principes de mérite et d'excellence dans les critères d'éligibilité ?
- La Commission pourrait-elle préciser la portée du principe de neutralité technologique ?

[Mise en œuvre]

- La Commission peut-elle confirmer qu'en l'état du projet de règlement, les crédits dégagés au sein du Fonds européen de compétitivité seront fléchés vers l'instrument de flexibilité ? Seuls les crédits dégagés correspondant à des projets de recherche financés sous Horizon Europe pourront-ils être directement reconstitués en faveur du programme de recherche en application de l'article 15 alinéa 3 du règlement financier ?
- Quels sont les domaines critiques notamment en matière d'infrastructure, de transitions verte et numérique, et de capacités industrielles ?
- Quel est le degré d'exhaustivité de la liste des domaines proposés, incluant l'intelligence artificielle, les semi-conducteurs, l'informatique quantique, les réseaux de communication avancés, les jumeaux numériques, les mondes virtuels et les infrastructures clés ?
- Comment la Commission compte-t-elle préciser l'article sur les PIIEC ? Y a-t-il des enveloppes et une méthode d'allocation dédiées ?
- La Commission peut-elle fournir des éléments supplémentaires sur les outils et indicateurs retenus pour le reporting et le suivi de la performance du fonds afin d'assurer une transparence et une efficacité des différents financements mobilisés ?

[Boîte à outils financière]

- Quelles sont les modalités concrètes pour la "boîte à outils" et chaque type d'intervention, y compris les critères d'éligibilité, d'évaluation, et les mesures de sécurité des informations ?
- Comment les interventions nationales et européennes sont-elles coordonnées afin d'optimiser l'utilisation des aides d'État ?
- Sur les 11 Md€ prévus pour les activités contribuant aux objectifs généraux visés à l'article 3 (notamment des activités transversales telles que le soutien non thématique de l'instrument InvestEU du Fonds européen pour les entreprises, le conseil en matière de projets, la collaboration entre PME, le développement des compétences et l'accès au financement (article 4 §2), quelle est la part qui serait dédié à l'instrument InvestEU ? Et comment l'enveloppe allouée au soutien à l'instrument InvestEU serait répartie entre les quatre volets thématiques ?
- Quel rôle le Conseil possède-t-il dans l'ajustement du taux de provisionnement de l'instrument InvestEU ?
- Quels sont les mécanismes de solidarité et de plafonds sur l'instrument InvestEU ?

[Articulation avec d'autres instruments]

- Comment la Commission envisage-t-elle de garantir une articulation claire et efficace entre le FEC, Horizon Europe et le Fonds d'innovation, afin d'assurer la complémentarité des soutiens à l'innovation, à la R&D, au déploiement industriel et à la transition technologique ? Comment éviter les doublons entre les deux instruments ?
- Quelles seront les modalités de coordination entre les PPNR et les volets du fonds de compétitivité ?

[Demande de fiches explicatives]

- Une fiche sur l'instrument InvestEU, y compris les règles de provisionnements et d'utilisation des reflows ;
- Une fiche sur le mécanisme de financement mixte/blending dans le cadre d'InvestEU

B. Défense et espace

- Défense

[Budget]

- Les spécificités du domaine de la défense impliquent un besoin de prévisibilité budgétaire, nécessaire pour mener à bien des investissements de long terme. Dans cette optique, les financements alloués à ces politiques sont-ils garantis sur l'ensemble de la durée du CFP ?
- Une clé de répartition budgétaire entre les différentes composantes du soutien à l'industrie de défense, présentées à l'article 44, est-elle également envisagée ?
- Un fonds de réserve est-il prévu pour le volet thématique « Résilience, industrie de défense et espace » ? Ce dernier serait-il mutualisé avec l'ensemble des volets thématiques du fonds de compétitivité ?
- Quelles sont les fongibilités prévues en faveur de la défense ?

[Gouvernance]

- La Commission pourrait-elle préciser la mise en lien des différents comités spécifiques et thématiques ?
- Un programme de travail spécifique à chaque pan du « soutien à la politique industrielle de défense » (recherche et développement, soutien à la mobilité militaire, etc) est-il prévu ?

[Critères d'éligibilité et préférence européenne]

- Quelle sera la possibilité de prévoir des critères renforcés progressivement au fur et à mesure du CFP, en lien avec le renforcement progressif de la BITDE ?
- Quelles seront les possibilités en termes de restrictions d'usage des matériels de défense financés par le CFP par des Etats tiers (le règlement mentionne les « Etats tiers non associés » ?
- Confirmez-vous que le financement de l'ensemble des actions de soutien à l'industrie de défense (présentées à l'article 44) sera soumis à des critères d'éligibilité minimum (présentés à l'article 51) que les programmes de travail ne pourront pas remettre en question ?
- Pourquoi les actions de soutien à la recherche et au développement en matière de défense (article 44(1) point (b)) ne sont pas soumises aux mêmes critères de préférence européenne – notamment concernant les dispositions mentionnées aux paragraphes 12 (plancher de 65% de composants UE) et 13 (autorité de conception) de l'article 51 ?

[EDPCI]

- Comment s'effectuera l'évaluation des EDPCI par la Commission ? La Commission prévoit-elle de financer plusieurs EDPCI par catégorie ? Quels seront les critères d'éligibilité retenus pour les différentes actions comprises dans un EDPCI, i.e renforcement des chaînes de production, acquisition... ?

[Articulation avec d'autres instruments]

- Comment les boîtes à outils et instruments financiers de nature transverse du Fonds de compétitivité, tel qu'InvestEU, seront-ils mobilisables pour les objectifs spécifiques du volet thématique « Résilience, industrie de défense et espace » ?
- Comment fonctionnera l'articulation entre Horizon Europe, notamment l'approche DARPA, et le fonds de compétitivité - via les actions de soutien à la « recherche et au développement collaboratifs en matière de défense, innovation et supériorité technologique » (article 46) ? Peut-on imaginer que les appels à projets d'Horizon Europe liés à la défense soient intégrés aux programmes de travail du fonds de compétitivité ?
- Comment s'articuleront les actions de facilitation et de soutien à la logistique militaire (présentées à l'article 49) avec les autres initiatives de la Commission européenne en matière de mobilité militaire ?

- Espace

- Quels seront le périmètre et les modalités (calendrier, discussions) de la proposition législative à venir pour les systèmes spatiaux de l'UE et quelle gouvernance sera envisagée à ce titre ?
- Quelle sera la prise en compte de la dualité intrinsèque du Programme spatial et des enjeux de défense, notamment dans la gouvernance opérationnelle de ses composantes ?
- Comment sera envisagée et régie la répartition des compétences (rôle de l'EUSPA, des Etats membres et du CSUE – SATCEN – notamment) pour chacune des composantes ?

[Demande de fiches explicatives]

Une fiche sur les différents critères d'éligibilité applicables pour chacun des cinq champs d'action dans le domaine de la défense, et leur évolution par rapport aux critères existants dans les instruments précédents (FEDef...).

C. Santé, biotechnologies, bioéconomie et agriculture

- Quels seront précisément les types d'activités effectivement financés dans le champ de la santé publique (en matière de médicaments critiques notamment) ?

II. Proposition de règlement du Parlement européen et du Conseil établissant Horizon Europe, le programme-cadre pour la recherche et l'innovation, pour la période 2028-2034, et fixant ses règles de participation et de diffusion

[Gouvernance]

- Quel est le rôle du *Competitiveness Coordination Tool* ? Quels seront ses modalités d'applications ?
- Comment sont sélectionnés les *Moonshots Projects* et par qui ?

[Pilier 2 – Compétitivité]

- Quelle sera la comitologie en matière de recherche collaborative, en l'absence de comités de programme dédiés dans le cadre du Fonds de compétitivité ? Les États membres seront-ils associés à l'élaboration des appels à projets ? Comment sera élaborée la programmation scientifique, de manière plus générale ?
- La Commission peut-elle confirmer que les montants du pilier 2 du FP10 seront bien cantonnés du Fonds de compétitivité ?
- Dans la mesure où les Partenariats étaient jusqu'ici financés par le pilier II d'Horizon Europe, cela signifie-t-il qu'ils seront également intégrés au Fonds européen de compétitivité ? Qu'est-il entendu par un alignement des Partenariats sur les priorités du Fonds ?
- Les "Challenges" de l'EIC devront-ils être alignés sur les thématiques du Fonds de compétitivité ?
- Le « *single rulebook* » tiendra-t-il compte des spécificités de la R&I, en particulier pour la recherche fondamentale ?
- Par quel volet du pilier 2 la recherche collaborative portant les connaissances amont sur les questions environnementales va-t-elle être financée ?

[Dual use]

- Concernant la composante défense de l'EIC, les financements liés à cette composante seront-ils issus du Fonds de compétitivité ou d'un budget spécifique ? Quelle est la base légale pour financer des activités de défense, allant ainsi au-delà du principe de dual-use ?
- Des garanties supplémentaires en matière de sécurité de la recherche seront-elles mises en œuvre alors qu'il est envisagé d'étendre le principe de "dual-use" à l'ensemble du programme-cadre ? Une liste spécifique de pays associés sera-t-elle établie pour Horizon Europe et une autre pour le Fonds de compétitivité, ou une approche commune est-elle envisagée ?

III. Proposition de règlement du Parlement européen et du Conseil établissant le Mécanisme d'interconnexion européen pour la période de 2028 à 2034

[Budget]

- Quelles sont les règles de fongibilité envisagées entre les différentes enveloppes du MIE ?
- Quelles sont les possibilités de réallocation des fonds MIE vers le financement de projets sélectionnés dans le cadre d'autres programmes (ie article 6(1)) ?

[Gouvernance]

- Les volets « Transports » (Article 3(2)(a)(i)) et « Mobilité militaire » (Article 3(2)(a)(ii)) du MIE Transport auront-ils chacun un programme de travail et un comité de programme dédiés ?
- Les programmes de travail auront-ils une base annuelle ou pluriannuelle ?
- La Commission peut-elle justifier le choix d'envisager en comitologie la procédure de consultation (article 4 du règlement 182/2011) pour les plans de travail, qui seront adoptés par des actes d'exécution ?

[Critères d'éligibilité]

- Pourquoi, à l'instar du Règlement MIE 2021-2027 (article 12), la proposition de Règlement n'inclue pas des critères d'éligibilité spécifiques pour le financement de la mobilité militaire ?
- Sans article dédié dans la proposition de règlement, comment s'assurer que les critères d'éligibilité des entités réalisant des actions financées par le volet mobilité militaire soient plus stricts – situation nécessaire au regard de la sensibilité du secteur de la défense ?

[Transports]

- Quelles dispositions la Commission prévoit-elle pour la définition précise des actions et projets éligibles au MIE-T, notamment dans les plans de travail ?
- Comment la Commission envisage-t-elle la répartition de l'enveloppe allouée aux transports avec la mobilité militaire ?
- Est-ce que la Commission pourrait préciser si les enveloppes mobilité civile et mobilité militaire sont distinctes ou fongibles, et quelles seraient les règles en la matière ?

[Energie]

- Quelle sera la part du volet énergie destinée aux projets d'énergies renouvelables transfrontaliers ?

[Articulation avec d'autres instruments]

- La Commission peut-elle fournir des précisions sur les lignes de partage entre le MIE-T et le plan de partenariat national et régional, voire le Fonds européen de compétitivité, en termes de projets finançables ? En particulier, comment s'articuleront actions de facilitation et de soutien à la logistique militaire financées par le fonds de compétitivité ?
- Comment l'instrument InvestEU sera-t-il mobilisable pour les objectifs spécifiques couverts par le MIE ?

IV. Proposition de règlement du Parlement européen et du Conseil sur le mécanisme de protection civile de l'Union et le soutien de l'Union à la préparation et à la réaction aux urgences sanitaires

- La Commission pourrait-elle préciser quelles sont les modalités de mobilisation de l'instrument MPCU+ ?
- Quelles sont les modalités de définition des enveloppes indicatives allouées à la protection civile et aux réponses aux urgences sanitaires ?
- La Commission pourrait-elle expliquer comment elle compte prendre en compte à travers un même instrument des besoins budgétaires très différents : des enveloppes stables et planifiées pour la préparation aux crises (par exemple constitution de stocks) et des enveloppes rapidement mobilisables pour la réaction aux crises (par exemple catastrophe naturelle) ? Une ventilation similaire à celle proposée dans le cadre de l'instrument Global Europe est-elle prévue (séparation entre actions programmables et non programmables) ?
- La Commission prévoit-elle la possibilité de cofinancer à 100% des déploiements de capacités RescEU ?
- La Commission pourrait-elle préciser si elle prévoit de définir des programmes de travail pour les différentes actions du MPCU+ ? Si oui selon quelles modalités de gouvernance ?
- Quelles seront les modalités de gouvernance envisagées pour cet instrument, en particulier en ce qui concerne HERA ?

V. Proposition de règlement du Parlement européen et du Conseil établissant le programme Erasmus+ pour la période de 2028 à 2034

[Budget et fléchage des fonds]

- Comment la Commission justifie-t-elle la disparition de la répartition indicative de l'enveloppe financière du programme ? En l'absence de seuils minimaux, quelles procédures la Commission envisage-t-elle de mettre en œuvre afin de maintenir l'équité entre les chapitres et les secteurs ?

[Gouvernance]

- Pourquoi l'article 34 du présent règlement fait reposer, désormais, la gestion opérationnelle et financière du programme Erasmus+ sur les seules décisions d'exécution de la Commission européenne ?
- Comment la Commission entend-elle continuer à consulter et associer les États membres à ses prises de décisions notamment le rôle joué par le Comité Erasmus+ dans le nouveau programme ? Comment seront arrêtés les programmes de travail annuels ?

[Agences nationales]

- Au-delà de la question de la nécessaire prise en compte des spécificités nationales, la Commission peut-elle démontrer, chiffres à l'appui, la réalité des « économies d'échelle » permises par la réduction du nombre d'agences nationales ?
- Comment la Commission justifie-t-elle l'évolution en matière de co-financement des coûts de fonctionnement des agences nationale ?

[Dimension internationale du programme]

- Pourquoi la Commission souhaite-t-elle proposer une nouvelle modalité d'association (partielle) des pays tiers au programme et pour quels effets attendus ?

[Priorités du programme]

- Pourquoi les priorités transversales relatives aux transitions verte, au numérique et au multilinguisme sont-elles moins visibles dans ce projet de programme ? Quelles actions sont prévues pour mieux intégrer ces thématiques ?
-
- Pourquoi il n'est plus fait référence à la valeur ajoutée de l'UE sur les projets soutenus par Erasmus ?

[Articulation entre les fonds]

- Quelle articulation concrète est-elle prévue entre Erasmus+ et les autres programmes des rubriques 1, 2 et 3 ? Avec quelle comitologie et temporalité ?
- Quelle sera la place de l'Union des compétences dans le Fonds de compétitivité ?

[Demande de fiches explicatives]

- Une fiche détaillant la ventilation du budget, en comparaison avec le CFP 2021-2027

VI. Proposition de règlement du Parlement européen et du Conseil établissant le programme AgoraEU pour la période de 2028 à 2034

- Une annexe sera-t-elle ajoutée détaillant les actions financées par les programmes ?
- Quels sont les sous-jacents expliquant l'absence de comité dédié au programme ?
- Les enveloppes entre volets sont-elles fongibles ?
- Des synergies avec d'autres programmes, notamment Erasmus+, sont-elles envisagées ?
- Quelles seront les possibilités de financement de plateformes paneuropéennes permettant de lutter contre la désinformation, telle qu'ARTE ?

[Demande de fiches explicatives]

- Une fiche détaillant la ventilation du budget, en comparaison avec le CFP 2021-2027.

Rubrique 3 – L'Europe dans le monde

I. Proposition de règlement du Parlement européen et du Conseil établissant « Global Europe »

[Gouvernance]

- Comment la Commission prévoit-elle de répartir les fonds entre les enveloppes programmables et non-programmables et pourquoi une telle répartition ne figure-t-elle pas dans le règlement pour assurer la prévisibilité des financements ?
-
- Comment la Commission prévoit-elle concrètement d'associer le Conseil au pilotage de l'instrument, conformément à l'esprit de l'Equipe Europe ? Quelles sont les raisons justifiant le doublement des seuils pour les mesures étant exemptées de passage en comité (article 19(2)) ?
- Quelles raisons justifient le recours à des actes délégués pour pouvoir modifier certaines dispositions (pourcentage de la cible d'ADP, objectifs sectoriels poursuivis avec chaque région partenaire...) ?

[Priorités de financements et dispositions budgétaires]

- La Commission pourrait-elle expliciter quels sont les critères qui l'ont conduite à définir le poids relatif de chaque pilier géographique ?
- En l'absence d'une cible indicative alloué aux migrations, comment la Commission prévoit-elle de maintenir la priorité accordée aux objectifs migratoires et de garantir un pilotage stratégique suffisant ?

- La Commission peut-elle détailler les modalités de mobilisation du coussin de réserve d'urgence ? En particulier, la Commission peut-elle indiquer les différences, si existantes, avec la procédure de mobilisation actuellement en vigueur ?
- La Commission peut-elle confirmer la disparition de la possibilité de reconstituer les crédits dégagés directement sur la même ligne budgétaire (cf. article 30 du règlement NDICI) au sein du projet de règlement Global Europe, au profit de l'instrument spécial de flexibilité ?

[Principes de l'aide publique au développement et logiques de conditionnalité]

- Alors que les objectifs de l'UE en matière de soutien aux pays les moins avancés (PMA) sont rappelés au considérant 31, pourquoi le principe d'une affectation prioritaire des ressources aux pays qui ont le plus besoin d'aide, en particulier aux PMA, ne figure-t-il pas parmi les principes de programmation (article 14) ?
- Comment la Commission prévoit-elle de s'assurer de l'atteinte de ses engagements en matière d'enjeux globaux, notamment en matière de migrations, d'égalité des genres, de biodiversité, de climat et de développement humain ?
- L'article 21 précisant les activités exclues ne mentionne que les actions pouvant impliquer des violations des droits de l'homme. Pourquoi certaines actions précédemment mentionnées dans le NDICI ne sont-elles pas reprises, telles que les actions encourageant les investissements dans les combustibles fossiles ou ayant des incidences négatives notables sur l'environnement ou le climat ?
- Dans le cadre de la conditionnalité migratoire en matière de réadmission inscrite dans la proposition, comment la Commission prévoit-elle de mettre en œuvre cette disposition, sachant que les opérateurs ont des obligations légales à respecter dans la mise en œuvre des projets pour lesquels les financements européens ont été prévus, ce qui peut rendre une interruption des financements impossible ? Quel équilibre la Commission prévoit-elle entre mise en œuvre éventuelle de la conditionnalité dans un contexte spécifique et maintien d'un dialogue partenarial, vecteur essentiel d'influence ?

[Programmations géographiques]

- La Commission peut-elle apporter des précisions sur la façon de prendre en compte les priorités de partenariats ? Quel est l'objectif poursuivi par la Commission avec la dissociation entre le voisinage Est et le voisinage Sud ?
- La proposition de règlement mentionne un règlement d'exécution qui viendrait préciser ultérieurement les modalités d'exécution de l'instrument de pré-adhésion afin d'améliorer l'alignement de l'aide de préadhésion sur les programmes internes, quel est le calendrier de publication envisagé ?

[Aide humanitaire]

- Est-il envisagé de pré-affecter une partie de la réserve d'urgence de Global Europe à l'aide humanitaire, afin de garantir une capacité de réponse rapide en cas de crise majeure ?
- La Commission prévoit-elle de mettre en place des garanties spécifiques afin d'éviter que les financements attribués à l'aide humanitaire soient absorbés par d'autres priorités de l'instrument ?
- Comment les Etats membres seront associés à la définition des priorités de l'aide humanitaire ?

[Assistance macro financière]

- La Commission pourrait-elle préciser les modalités et critères d'attribution des aides macro-financières à des pays tiers ?
- Considérants (85) : Ce considérant évoque la possibilité pour la Commission d'accorder elle-même une assistance financière sous forme de prêts liés à des réformes (« policy-based loans »), alignés sur les conditions du soutien budgétaire et précédés d'une analyse de soutenabilité de la dette. La Commission pourrait-elle clarifier comment elle entend appliquer ces principes dans la pratique, en particulier dans un contexte où le reste du document ne fixe pas de limites explicites sur le volume total des prêts, au-delà du plafond prévu par l'acte de base ? La Commission envisage-t-elle de recourir à une approche au cas par cas, fondée sur les besoins spécifiques des bénéficiaires et les résultats des analyses de soutenabilité ? Et quelles mesures sont envisagées pour éviter un épuisement prématuré du plafond global de la garantie prévu à l'article 24 ?
- Comment la Commission envisage de s'associer au FMI dans la conduite des analyses relatives aux conditions d'octroi des aides budgétaires et à la soutenabilité de la dette des pays partenaires ?

[Interactions avec les opérateurs privés et les entreprises]

- Comment la Commission prévoit de mettre en œuvre le principe de préférence européenne ?
- Par quels canaux se tiendrait le dialogue avec les entreprises dans le cadre de subventions qui leur seraient directement adressées et comment la Commission assurerait-elle le respect des principes de transparence et de juste concurrence dans le processus de sélection des entreprises ?
- Sur l'introduction d'un Conseil d'investissement ayant vocation à donner des orientations stratégiques et opérationnelles pour la mise en œuvre des opérations de garantie et de mixage, comment la Commission compte-t-elle dans ces conditions garantir que les Etats membres puissent assurer pleinement leur rôle de pilotage stratégique et de suivi des actions proposées ?
- Une enveloppe dédiée, un pourcentage des différents piliers géographiques ou un pourcentage transversal à l'ensemble de Global Europe sont-ils envisagés pour la stratégie Global Gateway ?

[PTOM]

- La Commission peut-elle expliciter le champ d'éligibilité des PTOM au sein de la rubrique 3 "Global Europe", notamment en ce qui concerne son éventuelle éligibilité au coussin NDICI, au-delà du pilier Global tel que prévu à l'article 3 ?
- Serait-il possible d'avoir des précisions quant aux modalités et critères envisagés afin de permettre l'extension de la portée géographique de Global Europe aux PTOM prévue à l'article 29 ? Les EMUE pourront-ils notamment proposer des actions en ce sens et par quelle voie ?

[Articulation avec d'autres fonds]

- La Commission pourrait-elle expliciter comment elle compte concrètement créer des synergies entre le nouveau fonds européen de compétitivité et l'instrument Global Europe ?
- La Commission peut-elle détailler les modalités de transfert des crédits du pilier géographique "Global Europe" vers Interreg, en particulier au regard de l'architecture d'Interreg proposée (plan unique) ?

[Demande de fiches explicatives]

- Une fiche comparant, géographie par géographie, les montants alloués entre le projet de CFP 2028-2034 et le CFP 2021-2027.

- Une fiche comparant les montants d'APD entre le CFP 2021-2027 et le CFP 2028-2034 (sous les plafonds et hors plafonds CFP)
- Une fiche Ukraine décrivant les sous-jacents du montant proposé de 100 Md€ pour la réserve Ukraine par rapport au besoin de financement estimé ainsi que la répartition envisagée du soutien budgétaire et des prêts entre différentes catégories de soutien.
- Une fiche sur les priorités opérationnelles du volet humanitaire de l'instrument, notamment sur les aspects liés aux opérations de l'ERCC et à la logistique humanitaire ?

Rubrique 4 – Dépenses pour l'administration publique européenne

- Quel est le périmètre exact de la rubrique 4, en particulier en ce qui concerne les agences, les dépenses opérationnelles et les autres éléments inclus ? A l'inverse, la Commission peut-elle présenter une synthèse de l'ensemble des dépenses de rémunération dans le CFP 2021-2027 et le CFP 2028-2034, y compris ceux portés par les rubriques thématiques du budget ?
- La Commission sollicite un resoclage de la trajectoire de dépenses de personnel (*increase of the baseline*) en 2028 : conformément à l'effort de simplification de l'architecture budgétaire, pourquoi ce resoclage n'intègre-t-il pas le recentrage de l'ensemble des éléments de rémunération portés par le budget UE au sein de la future Rubrique 4 ? pour quelle raison la possibilité de financer certaines dépenses opérationnelles via les crédits des autres rubriques a-t-elle été maintenue ?
- La Commission a-t-elle évalué la possibilité d'introduire un plafond d'emplois annuel par direction générale, soumis à la procédure budgétaire annuelle ? Pourquoi n'a-t-elle pas fait ce choix ?
- Quelle part de l'augmentation de la Rubrique 4 est imputable, d'une part à l'inflation, et d'autre part aux dépenses nouvelles ?
- Quels sont les économies d'effectifs espérées liées à d'une part à l'harmonisation des règles et la diminution du nombre de programmes, et d'autres part à la revue globale de l'organisation de la Commission menée par le Commissaire au budget ? Ces économies surpassent-elles les nouveaux besoins identifiés par la Commission ? Comment la Commission entend-elle articuler les réflexions dans le cadre de la revue globale avec les négociations sur le prochain CFP ?
- Pourquoi les sous-plafonds spécifiques relatifs aux dépenses des institutions, aux pensions et aux écoles européennes n'ont-ils pas été reconduits ?
- Quels sont les éléments qui justifient la demande de renforcement des effectifs de 2 500 postes supplémentaires ? La Commission peut-elle fournir une présentation détaillée des besoins ? Combien d'entre eux sont liés à l'élargissement ?
- Quel est le montant total envisagé pour le financement des agences sur l'ensemble du cadre financier pluriannuel 2028-2034 ? Ce montant peut-il être ventilé par année, par rubrique et par agence ? Quelles sont les hypothèses sous-jacentes à ces prévisions ?

[Demande de fiches explicatives]

- Une fiche précisant les prévisions détaillées, ventilées par institutions, et par nature (membres, salariales, non salariales, pensions, écoles européennes).
- Une fiche précisant les hypothèses retenues pour l'estimation du montant des dépenses administratives et leurs conséquences budgétaires (dépenses salariales – augmentation des effectifs, progression de carrière, ajustement salarial - pensions, projets immobiliers...).
- Une fiche présentant un état détaillé des ressources humaines à date, et y précisant les 2 500 postes supplémentaires demandées avec une explication pour chacun des postes envisagés et récapitulant les effectifs par Direction générale et par grade. Cette fiche pourrait également préciser la part des 2 500 postes prévus dans l'hypothèse d'un élargissement.
- Une fiche précisant le détail des projets immobiliers et investissements envisagés (avec leur coût et leur ventilation par année).

- Une fiche sur les agences décentralisées, expliquant les hypothèses retenues et le montant ventilé par agence.
- Une fiche permettant d'avoir une vision consolidée des dépenses administratives prévue pour le prochain CFP (au sein de la rubrique 4 et dans les autres rubriques) détaillée par rubrique et par programme, en comparaison avec le cadre actuel, en euros courants et en euros courants.

PUBLIC

CROATIA

Pillar I – National and Regional Partnership Plans

Regulation on NRPP

1. In the ANNEX I Methodology for the calculation of the Union financial contribution for each Member State pursuant to Article 10(2), point (a)¹, the **Ci** should be explained (what is it, as all other factors are explained in the document)

The financial contribution available for each Member State is the consolidated amount for the implementation of the plan established as follows:

FCi =

Ai × amount available for Member States NRPs excluding amounts set out in Article 4 of Regulations [Migration], Article 4 of Regulation [Borders], Article 4 of Regulation [Internal Security] and Regulation (EU) 2023/955

+ Bi × amounts set out in Article 4 of Regulations [Migration], Article 4 of Regulation [Borders], Article 4 of Regulation [Internal Security]

+ Ci × amount available for the Social Climate Fund in accordance with Article 10(3) of this Regulation

2. NRPPs will cover different policies with different goals, beneficiaries, implementing bodies which could result in more complex programming and implementation process. In that regard, what is the reason for not conducting the impact assessment on option to implement existing funds currently governed by separate fund-specific regulations within a single plan for each Member State?
3. Given the significant changes proposed by introducing the NRPPs and performance based model, shortening of the decommitment rule seems counterproductive and risks generating higher rates of decommitted amounts. Does the Commission considers that more flexibility in implementation is needed by extending the duration of the n+ rule at least in the first years of implementing the new MFF?
4. In addition, since the new MFF will coincide with finalisation of the current MFF there will be a certain period of having parallel systems (old cost based and new performance based) and in that regard wouldn't it be plausible to opt for hybrid model of implementing the new MFF (retaining focus on performance based model while at the same time giving the possibility to use the cost based model for specific cases)?

¹ ANNEXES to the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509

5. Could you clarify if the quality of the impact assessment and its conclusions are affected as several sources on which the impact assessment is based are still not concluded?
6. Regarding the financial contribution methodology, please provide details regarding the variable Ci since it is not explained in the Annex of the Proposal.
7. Does the Commission consider to ensure more flexibility on disbursing additional tranches of prefinancing over longer period?
8. Could you please clarify the calculations of relevant amounts in the context of the decommitments (Art 14-17 NRPP Regulation)?
9. What is the reason for singling out Member States with a per capita GNI of less than 90 % In Article 22 para 2 (a) to particularly demonstrate contributions to policy areas such as social and affordable housing, tourism, sustainable agriculture and forestry management, efficient water management, etc.
10. Article 22 para 2 (n) introduces the obligation to justify coherence, complementarity and synergies between measures as well as description regarding the impact on more than one target group. How will this apply for measures impacting only one target group?
11. Article 23 para 2 specifies that in duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State. Could you give us an example and information what constitutes the duly justified case?
12. Can the Commission provide additional information on how the Steering mechanism will work in practice given its important role in identifying reforms and investments in NRPPs?
13. Most of the National medium term fiscal structural plans (NMTFSP) cover the period 2025-2028 and NRPPs need to be submitted in 2028. Will the new NMTFSP plans lead to amendment of the NRPPs? How will these documents be synchronised?

Performance framework

14. Will the Commission come out with the guidelines regarding the Annex I – Intervention field and indicators?
15. Since the output indicators in intervention fields #94 and #95 indicate that Destination Management Organisations are supported, the question is what is the definition of DMO at EU level. In addition, the Commission considers that the measures under scrutiny do not constitute State aid within the meaning of Article 107 (1) TFEU.
16. We would also ask for clarification if fields of intervention #94 and #135 include infrastructure. Since it does not explicitly say that infrastructure is excluded, would you please clarify if they include infrastructure, and if they do, are there any restrictions in terms of infrastructure works?
17. The document defines the policy areas of tourism and sport to which certain fields of intervention and output indicators are added. In the event that individual investment-reforms in tourism or sport cannot be linked to a specific field of intervention within those policy areas, can the investment-reform be linked to other fields of intervention and can the different fields of intervention be combined for a single investment-reform, e.g. can the investment in hotel or camping infrastructure be linked to the field of intervention Business development #66 since it concerns entrepreneurs?
18. In relation to Policy Area **Education and Skills**:

111- Early childhood education and care (excluding infrastructure)* -

² ESF+ mid-term evaluation [ongoing]; Mid-term evaluation of the ERDF, CF, JTF [ongoing]; Study on the assessment of the administrative costs and administrative burden in the management of the CPR funds 2021-2027 [ongoing]; Study on the new delivery model of the CAP [ongoing];

Output indicator - Number of teaching or learning equipment and digital means provided – Without clear guidelines, it is extremely difficult to determine what qualifies as a single unit of equipment. For example, in the case of furniture, it is unclear whether each individual item (e.g., every chair or desk) should be counted separately or if they should be grouped as sets. Similarly, with digital tools, there is ambiguity around whether accessories (e.g., chargers, keyboards, monitors) are counted independently or as part of a single device.

To clarify this indicator, we need detailed guidance on:

- What constitutes a single unit of teaching or learning equipment.?
- How to count bundled items or sets (e.g., classroom kits or furniture sets)?
- Whether digital means include both hardware and software, and how they should be disaggregated if necessary?

This lack of standardization risks inconsistent reporting across projects and implementing partners, making it difficult to compare or aggregate results meaningfully. Moreover, the indicator focuses solely on quantity, without capturing whether the equipment provided is sufficient, appropriate for the learning context, or effectively used.

Given these limitations, it may be worth considering alternative or complementary indicators that better reflect the nature and impact of the intervention. For example:

- “Number of classrooms equipped to minimum learning standards” could provide a more holistic measure of functional readiness.

*The comment is relevant to other areas where it is repeated (ie. Primary education (excluding infrastructures) -112, Secondary education (excluding infrastructures) – 113, Tertiary education (excluding infrastructures) – 114, Initial vocational education (excluding infrastructures)- 115, Adult Learning -134...)

Output indicator - Number of new childcare places created or maintained – The indicator lacks clarity on what types of interventions qualify, especially if infrastructure is excluded—raising questions about what should be counted?

Result indicators - Number of children benefitting from curricula developed and programme implemented; Number of children benefitting from teachers trained; Number of children benefitting from equipment's purchased; - clear guidelines should be provided in terms of what is to be reported under these indicators; more specifically, the term “benefitting” remains open to interpretation. It is unclear whether this refers to children who attend activities, those who demonstrate improved learning outcomes, or those who are simply exposed to the curriculum. A lack of clarity on this point may lead to inconsistent reporting. There is also the risk of double counting children exposed to multiple programme activities.

Primary education (excluding infrastructures) -112; Secondary education (excluding infrastructures) – 113; Tertiary education (excluding infrastructures) – 114

Output indicator - Number of new childcare places created or maintained - The indicator lacks clarity on what types of interventions qualify, especially if infrastructure is excluded—raising questions about what should be counted. Additionally, the term "childcare places" may not be appropriate for primary, secondary, or tertiary education contexts; we suggest using more precise terms like

"classrooms" or "equipped student learning spaces" to reflect the relevant education levels and type of intervention.

Education for refugees in third countries –118

Output indicator - Number of children benefitting – by level of education: pre-primary, primary, lower secondary level and upper secondary level – This output indicator appears as a result indicator used in other areas whereas the result indicator measures the **Percentage (national level) of refugees enrolled in school – by level of education: Pre-primary level, Primary level, Lower Secondary level and Upper Secondary level**. While the output indicator tracks absolute numbers, the result indicator focuses on proportion. However, calculating this percentage may present challenges in contexts where national education or population registries do not clearly identify or report refugee status, potentially affecting data accuracy and comparability. We recommend clarifying the distinction between the output and result indicators across the Annex and providing guidance on data sources and assumptions for calculating refugee enrollment rates.

Teacher training – education level unspecified - 119

In relation to output indicator **Number of participants to trainings by gender** and result indicator **Number of students benefitting by gender** - Accurately counting the number of students benefitting from trained teachers might be challenging, as it requires tracking all courses/subjects each teacher delivers and aggregating the total number of students across those classes with potential of overlapping enrolment (ie, Teachers, especially at the secondary level, often teach multiple classes across different grades or subjects. Counting all students across all these settings increases the risk of **double-counting** the same students). This process is further complicated by the lack of linked data systems, dynamic class lists, and the significant administrative burden it places on beneficiaries. Furthermore, there might not be direct evidence that the training received by teachers or staff led to improved student outcomes as changes in student learning may be influenced by multiple factors (e.g., acquiring knowledge through alternative open educational resources), making it difficult to attribute gains specifically to teacher training.

Early childhood education facilities, schools and universities – Development and construction of new zero-emission or nearly zero-emission buildings -121

Early childhood education facilities, schools and universities – Development and construction of other buildings - 122

Regarding output indicator **m² constructed combined and New capacity for education facilities (number of students)** separating "other buildings" from basic infrastructure is challenging because education construction projects often combine multiple components—such as classrooms, libraries, sanitation blocks, and administrative spaces—into a single integrated design, making it difficult to

disaggregate data by function. The lack of standardized definitions for what constitutes "basic" versus "other" infrastructure further complicates reporting, especially when spaces are multi-use or shared across functions. Most data systems do not track space use at a detailed level, leading to inconsistencies in reporting indicators like square meters constructed or student capacity. As a result, it is unclear whether to include only teaching spaces or also supporting facilities in output calculations, which can affect comparability and accuracy.

Non-formal and informal education and learning (excluding infrastructures) -136

Regarding result indicators: **Number of participants considering that they have benefitted from their participation; Number of participants considering that they have increased their key competences; Number of participants considering that they have an increased European sense of belonging** - Using phrases like "**participants considering that they have benefitted**" or "**considering that they have increased their key competences**" introduces a **subjective, self-assessed dimension** that can undermine the reliability, comparability, and measurability of the result. Without an independent or standardized assessment, it's difficult to determine whether participants actually improved in key competences or sense of belonging.

It provides perceived benefit, not demonstrated impact, weakening the strength of the evidence for programme effectiveness.

We suggest rephrasing indicators to remove subjectivity, e.g.:

- From: *“Number of participants considering that they have increased their key competences”*
- To: *“Number of participants demonstrating increased key competences, based on self-assessment and validated tools”*

*The comment is also relevant to other areas where it is repeated across the document.

General questions and remarks and questions in relation to Policy Area **Research and innovation**:

- Will additional details, descriptions and definitions of the proposed indicators be provided? Is there a planned timeline when such details will be provided? Is there a methodology defined on how these indicators will be measured?
- Is there an envisaged connection between output and result indicators (Theory of change)?
- Is the list of indicators finite, or will it be possible to propose changes to add, remove, or modify some of them? We have Smart Specialization Strategy in force until 2029 with its own set of indicators that are not present in proposed Performance framework. We also noticed, e.g., that areas related to collaboration and technology transfer do not include indicators concerning specifically these topics.
- How will the percentages relating to climate change, environmental and social be enforced and measured? Will it be required to cover all categories? What will be the consequences of not covering all defined categories?
- How will „Policy area (level 2)“ be applied? Does this mean that the planned interventions will need to specifically target these areas? How will this affect investments in the Smart Specialization priority areas? Does the sectoral body has the possibility to create its own Policy area (level 2) and intervention field by merging two or more areas? Is a Member State expected to plan interventions in all of the listed areas? Will it be penalized if all areas are not included?
- How will the performance-based component be enforced? What type of penalization mechanisms are envisaged?

Own resources

19. Regarding the proposals for own resources, we kindly request the submission of fiches on each individual own resource regarding the calculation methodology, data sources used for calculations, procedures for collecting the resources and making them available to the EU budget, reporting obligations, Commission control missions and methods of making projections. Furthermore, we kindly request receiving excel tables (in constant and current prices) with projected financial data for all types of own resources (current and new proposed) per Member State and per year for the whole MFF period as it was the case during the negotiations on the current MFF (fiche 53). Also, we kindly ask for long-term projections 'T+10 data' (real and nominal GNI growth, price deflator).
20. Please provide a more detailed explanation of the decision-making procedure and implementation in practice for the crisis mechanism.
21. What was the rationale behind the decision to use criteria of annual net turnover, rather than, for example, the annual net profit in CORE proposal? Please provide your views regarding the regressive nature of the CORE proposal since it doesn't take into account different profit margins of companies.
22. Is the CORE proposal in line with the simplification agenda in the area of taxation?
23. How does the Commission see the effect of the CORE proposal on the competitiveness of EU businesses, and the potential relocation of taxpayers to third countries to avoid paying this levy?
24. Please provide the data for calculation of estimated EUR 9,6 bn of annual revenue from ETS 1. Furthermore, please provide the Fiche for Croatia containing how much EU allowances (EUA) are planned for auction in annual terms for the purposes of MFF and what is the value of EUA used in the calculation.

Justice

25. Will the area of Justice and Public Administration be financed under the NRPP, as stated in the specific objectives in the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509 and/or through some other funds?

HOME

26. Proposal for a Regulation establishing Union support for asylum, migration and integration for the period 2028–2034 (2025/0540 (COD)); Proposal for a Regulation establishing Union support for the Schengen area, European integrated border management and the common visa policy for the period 2028–2034 (2025/0541 (COD)); Proposal for a Regulation establishing Union support for internal security for the period 2028–2034 (2025/0542 (COD))
The current proposals for the above-mentioned Regulations do not indicate that operational support would be included. Could you please confirm whether operational support (100% of financing) is foreseen for the upcoming period?

27. Proposal for a Regulation establishing a framework for monitoring budgetary expenditure and performance and other horizontal rules for Union programmes and activities (2025/0545 (COD)) We kindly request clarification regarding the proposed budget expenditure tracking and the performance framework through performance indicators. Will payments from the Programme be directly dependent on the results achieved? Specifically, if a set target (indicator) is not fully met, will the EU funding disbursement be reduced accordingly, and in what manner?

Cohesion Policy

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509 - 2025/0240 (COD), 16.07.2025. (NRPP regulation)

General

1. Taking into account that, according to the standard practice of the European Commission, translations of key documents into all official EU languages usually follow after the initial publication in English, **when can we expect the other language versions of the 2028–2034 MFF proposal to be published?**
2. With regards to the Article 1, what is rationale for naming subject matter of this Regulation – “the Fund”, when it's actually a set of rules for different sectors?
3. With regards to the Article 4 Definitions, what does ‘measure’ refer to in practice? Is it equivalent to the specific objective in 2021-2027 or like a priority? Or is it something else entirely? Namely, looking at both this Regulation and the one on the Performance Framework, it is clear that measure is above an activity, within the chapter, but still its level remains unclear.

Partnership

4. With regards to the Article 6, will the European code of conduct on partnership established by Commission Delegated Regulation (EU) No 240/2014 as a base for organization and implementation of the partnership be updated and modernized as announced?

Methodology

5. Comparing CAP interventions in article 10(2)(ii) NRPP regulation and in annex table of Commission MFF Communication, they both amount to 295.700 million euros in current prices, but in NRPP regulation article 10(2)(ii) Commission start with requirement ‘*At least EUR 295 700 000 000 for CAP interventions...*’ Is the indicated amount **maximum amount for concerned CAP interventions** (in accordance with the MFF Communication table at page 30)? I.e., is the amount of 295.700 million euros for CAP interventions planned to be further increased and from what programme source?

6. Could Commission publish **share of Union Contribution by 27 MS related to financial envelope of 782.879 million** EUR (article 10(2)(a)), as set out by methodology in Annex I, both with allocation share of MSs in concerned 2021-2027 shared management funds?
7. Based on **what assessment** did the Commission decide to include BDPpc on NUTS3 level (instead on NUTS2 level) in methodology formula for Union financial contribution?
8. Does requirement for **minimum LDR earmarking** amounted 217.798 million EUR in article 10(2)(i) **include rural development** (previous EAFRD support)? If it does, how could Commission present that there were no decrease in allocation for LDR when in that case then there is significant reduction in LDR allocation as in actual 2021-2027 ff 226.954 million EUR ([COMMISSION IMPLEMENTING DECISION \(EU\) 2021/1131](#)) were allocated to LDR without EARDF.
9. To be able to calculate the minimum LDR amount per MS we need MS allocations for article 10(2)(a)(ii) (CAP interventions) we do not have (for **ENV calculation**). When will Commission publish **all the necessary data** for calculations set up in NRPP regulations Annexes?
10. When will Commission publish **additional necessary explanations (guidelines)** regarding methodologies set out in NRPP annexes?
11. We ask Commission to make available all the necessary information/data for calculating the Union contribution on MS level!
12. Regarding the principle of using of the **most recent available data and forecast**, could we expect national allocations to be changed with new data inclusion? Or the Commission will guarantee the amounts disclosed in Factsheet MFF 2028-2034 National and Regional Partnership Plans allocations?
13. Regarding article 14(2) flexibility amount, could MS's corresponding 25% Union financial contribution (to be available in accordance with point 2 of Article 14) be subject to relocation outside of MS financial envelope?

Technical Assistance

14. Regarding Technical Assistance at the Initiative of the Member State, Article 13 (3) states that in the event of reduction of the Union financial contribution, including due to decommitment or a financial correction, the Member State shall, at the closure of the NRP Plan, return to the Union budget any resources paid for Technical Assistance in accordance with paragraph 1 that exceed the percentage of the Union financial contribution set out in paragraph 2 (3-8%). Does that mean that after the reduction, proportionate flat rate of Technical Assistance (proportionate only to the reduced part) will be returned?

Decommitment

15. Article 16(3) states that the amounts concerned by the decommitment, and the corresponding reduction shall be distributed in the NRP Plan based on the progress achieved in implementing measures across the chapters of the NRP Plan. Could the Commission please clarify the practical application of this provision? Specifically, does this mean that decommitted amounts may be proportionally deducted from any intervention or fund within the NRP Plan that shows insufficient implementation progress? Alternatively, is the intention that decommitted resources are withdrawn only from specific interventions which fail to meet their targets, while the overall allocation for the NRP Plan remains unaffected, allowing these funds to be reallocated to other interventions within the Plan?

Co-financing

16. Regarding point 2. of article 20., could you explain more precisely how the national contributions rate will be set up when it is not possible to determine the LDR implementation proportion (what co-financing rate would be implemented)?

Preparation and adoption of the Plan

17. In Article 22 (2.(a)) it is prescribed that the NRP Plan shall support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all specific objectives laid down in Article 3. In previous financial perspectives there was certain autonomy and flexibility for the MS to choose specific objectives that correspond to specific investments needs of MSs. Why are rules stricter for MSs?
18. How is flexibility for the MS with regards programming and amendments to the Plan (Article 23 (2) and Article 24 (3)) ensured if the EC, in duly justified cases, may request the inclusion of additional measures or the modification of measures proposed by the Member States?

Reporting

19. What is meant by ‘interim assessment reports’ in Article 25 (1)(c) in the context of the Mid-term review? Does this refer to available evaluations or something else? Evaluations or reports conducted by the MS or EC? Please clarify.
20. It is stated that the Mid-term Report submission deadline is 31 March 2031. How does this align with the Article 10 of PF Regulation that states that the Commission shall publish an implementation report for each programme or activity no later than four years after the start of its implementation?
21. In the context of simplification and reducing administrative burden, what is the added value of the implementation progress report on Plan measures referred to in Article 59 (1)(a) which must be submitted by 15 February for the previous financial year? Could you clarify the demarcation between this report and the Annual Performance Monitoring Report required under the PF Regulation?

22. Regarding to the Annual Performance Monitoring Report, will there be a harmonised template or reporting format agreed at the EU level for the submission of the Report? Clarity on this is essential so that MSs know exactly what is expected in terms of structure, content, and data delivery. In the previous programming period, the absence of an agreed template led to delays and inconsistencies in reporting.

Governance of the Plan

23. Who bears the overall responsibility for managing the Plan (Article 49)?
24. Is it possible to delegate some of the CB functions to the MA and to an Intermediate Body (Article 49)?
25. The division roles between the Monitoring Committees and the Coordinating Committee remains unclear (Article 54). While we welcome the idea of Coordinating Committee that would ensure the overview and the monitoring of the implementation of the Plan, we consider it an administrative burden if its roles and functions remain as proposed (the same as those of individual Monitoring Committees). For instance, what is the added value of approving selection criteria, methodologies, and procedures for selection of operations first at the MC and then again at the CC? Finally, if there is going to be duplication of representatives in both level committees, CC could include several hundred representatives, making its work impossible
26. Also, within the Preamble (22) it is stated that to ensure the continuity, the Fund will build as much as possible on existing programme structures with regional and local authorities, social partners, and other relevant stakeholders playing a key role in the design, management, implementation and monitoring of the supported measures under the Fund. How will existing structures be maintained if there are functions that the Coordinating Body shall perform, and that were performed in 2021-2027 by MAs or Ministry of Finance (ensuring financial flow, payment claims, financial prognosis etc.)? In many MSs the Coordinating body already exists across programming periods, but with a primarily strategic role (design, monitoring, evaluation, horizontal activities). How can the principle of continuity be upheld if operational responsibilities are shifted from existing institutions to a body whose mandate was originally strategic?
27. Taking into account Article 49(4) which states that “*The tasks delegated to intermediate bodies shall not be entrusted further to other bodies*”, could you please provide clarification on this provision in the context of cascade funding (umbrella projects). Is the possibility of further granting to recipients through cascade funding also planned for the post-2027 period or is the purpose of this provision in Article 49 to limit such practices and procedures?
28. What is the deadline for establishment of each MC (Article 54)?

29. One of the functions of the MC/CC concerns the ‘evaluation roadmap’. Could you please clarify whether this relates to an evaluation plan? Will there be guidelines as was the case in the 2021-2027 period?
30. What is the rationale for requiring the MC to approve not only the selection criteria and methodology for operations, but also the procedures for the selection of operations? Even under the 2021-2027 rules, this process proved to be burdensome and time-consuming. This addition may make it even slower and less efficient.
31. We would like to receive further clarification on the interdependence between the provisions of Article 51(1)(b) and Annex XII (Template for the management declaration). Article 51(1)(b) states that “(...) *for the purposes of drawing up the management declaration, the managing authority is not expected to verify the underlying costs of operations*”. Annex XII, point 3, states: “*The management and control systems in place function properly, ensure the legality and regularity of the underlying transactions and give the necessary assurances that the funds were managed in accordance with all applicable rules*”. From the template for the management declaration, management declaration confirms the legality and regularity of the transactions/costs, but according to Article 51(1)(b) management authority does not need to verify underlying cost. Does this mean that there is no need for verification of actual costs in post-2027 period? If the clarification of the provision in Article 51 is such, why is it necessary to confirm the same in the management declaration?
32. Annex IV lists the key requirements for the Management and Control System and Audit. Please clarify whether all the criteria listed apply to both systems (given that the audit is independent). If these are key requirements that are specific to the MCS or Audit, we propose to separate them in the relevant annex. Please clarify whether key requirements 3 and 4 include management verification activities that are not explicitly listed as a key requirement.

Just transition

33. From which funds will just transition be financed and in what direction will the investments go – socially just exclusively or including the economic just aspect as well?
34. Will the just transition areas be updated or do they remain the same as in the current financial perspective?

Integrated territorial development

35. With regards to the Article 45, it is not clear which areas the integrated territorial development includes, for example is it necessary for the territorial just transition strategies to apply an integrated territorial approach?

Other

36. In which sector is the financing of investments in strategic technologies foreseen? And in which sector is the financing of investments which is under Innovation Fund foreseen?
37. How will seals – Seals of Excellence, Sovereignty/STEP Seals and the Competitiveness Seals be financed under the NRP Plan?
38. Could you please provide us information/ clarification on whether additional acts are planned to address the cost eligibility provisions and, if so, which ones?
39. Who is responsible for assessing the fulfilment of milestones and targets related to the Plan? CB, MA, AA or EC?

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities - 2025/0545 (COD), 16.07.2025. (PERFORMANCE regulation)

1. Since there is no Cohesion policy area (neither on level 1 neither 2) and there are no codes of intervention and investment area (including indicators both output and result) dedicated to Cohesion policy, **how the role, results and the reduction of regional disparities will be assessed and measured?** How will success of Cohesion Policy be measured and enforced independently of broader NRPP success taking into account the overall structure where we don't see elements that would provide proof on CP implementation thus not providing significant impact that could in future additionally downgrade CP funding?
2. Having in mind all the above, as well as the commitment to promote economic, social and territorial cohesion stemming from the Treaties (TITLE XVIII, articles 174.-178.), we ask **whether the Treaties obligations have been integrated in a legislative proposal since Cohesion policy does not have an autonomous financial envelope and dedicated funds?**
3. Through the entire proposal, except in Article 2 (Definitions), references are made to 'programmes' instead of 'Plan' and its chapters. This includes the introductory part, where the text refers to 'programmes', although it is evident the entire proposal concerns NRPP. Article 2, on the other hand, recognises only the 'Plan', not the 'programmes.' Please clarify.
4. For instance, Preamble (17) states that in addition to retrospective evaluation in accordance with Article 34(3) of Regulation 2024/2509, the Commission should also publish a mid-term implementation report for each programme or activity in order to assess the progress made towards the achievement of their objectives. Is that the same report referred to in Article 25(1)(c) of the NRPP Regulation in the context of the MTR?

5. Also, at the same point in Preamble, it is stated that evaluations should be conducted in a sufficiently timely manner to feed into the decision-making process, and could cover programmes, activities, or groups of activities. Does this refer to Plan and/or its chapters?
6. Are all output and result indicators also considered performance indicators by definition?
7. Will there be a guidance document on Monitoring and Evaluation, as well as Indicator Fiches, similar to those available during the 2021-2027 programming period?
8. Article 10(2) states that the Commission shall publish an implementation report for each programme or activity no later than four years after the start of its implementation. What specific obligations and inputs are expected from the Member State in the preparation of this report?
9. Regarding the Evaluations by the Member States under shared management, in Article 11(2) it is prescribed that MSs shall carry out evaluations to assess the impact of measures implemented in shared management by means of quantitative techniques, including counterfactual approaches and findings from experimental design, where appropriate, at the latest two years after the end of the programming period. Where is the experimental design expected to be implemented and which type of findings does the text refer to here? Also, will there be guidelines and more details provided to MSs with regarding the experimentation?
10. Article 11(3) states that Member States shall carry out at least one interim evaluation covering the entirety of their plans no later than three years after the start of their implementation. What does the entirety of the plan mean in this context?
11. Additionally, does the phrase ‘three years after the start of implementation’ refer to the deadline by which the evaluation must be completed and submitted, or to the point by which the evaluation process should be initiated?
12. Finally, Article 11(4) requires MSs to draw up an evaluation roadmap and submit it to relevant MC and the EC no later than one year after the approval of their Plans. Does this imply that there should be a single evaluation roadmap (evaluation plan) covering the entirety of the Plan? What is the difference between the Evaluation Plan (2014-2020, 2021-2027) and Evaluation Roadmap?

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

1. Article 8.2. It should be stated that the Member State hosting the prospective Managing Authority shall submit an Interreg Plan chapter in coordination with said managing authority. Most of the requirements to submit the Interreg Chapter have been previously in the scope of programme, so we believe that the cooperation here is crucial.

2. According to Article 8.3., does one chapter means one programme? If this is the case, it should be clearly stated.
3. Article 8.3.(a) Does this give a Member State hosting the managing authority the ability to change geographical coverage of the programme?
4. Article 9.3.(b) Why is this pointed out, and why will some chapters have it, and some won't?
5. Article 10.4. states that the Managing Authority is assisted by the Joint Secretariat with staff representing States participating in Interreg Plan chapter. This should be further explained. In the 21-27 regulation, it was stated that the programme partnership should be taken into account, while this phrasing seems stricter.

Pillar II – European Competitiveness Fund and Horizon Europe

European Competitiveness Fund

1. How will the Commission ensure that ECF contributes to all Member States (geographical balance) if it relies only on market based principle and award procedures? This approach risks concentration of investments in the most developed Member States which will further risk of widening the competitiveness gap between Member States. In that regard, is the Commission open to amend the proposal to introduce pre-determined national envelopes? Furthermore, please provide further details regarding the widening measures and its contribution to addressing this issue.
2. What is the rationale for the reducing the envelope of EFC InvestEU instrument and how will additional contributions work in practice?
3. How will the open architecture help the ECF to respond quickly to new challenges and priorities?
4. How will the Commission link the ECF to legacy programmes?
5. Please provide more details on how the Competitiveness Coordination Tool will work in practice including its interplay with Steering Mechanism and European Semester.
6. Please provide more details on governance structure and role of Member States in defining the policy priorities.

Ensuring Geographical Balance in ECF and Innovation Fund

7. How will the management of ECF be reflected on Innovation Fund and future Decarbonisation Bank. With what funds will IF and Decarbonisation bank be financed?
8. How does the Commission plan to guarantee a fair and balanced geographical distribution of the funds, particularly ensuring strong participation from Member States with lower GDP and more limited innovation ecosystems?
9. Will there be specific quotas, earmarking, or targeted calls for proposals to support less-developed regions or countries with lower research and innovation capacity?
10. How will the Commission measure and enforce geographical balance throughout the lifecycle of the funds' implementation?
11. What steps will be taken to ensure that the funds are accessible to a wide range of beneficiaries, especially SMEs and public institutions in Member States with less experience in EU funding instruments?
12. Is there a plan to provide technical assistance or capacity-building measures for Member States with limited administrative or financial capacity to fully participate in these funds?

13. How will the Innovation Fund guarantee equal access to emerging technologies and innovations across all EU regions?
14. Will there be dedicated funding streams or support instruments to foster innovation in areas that currently lack critical infrastructure or innovation capacity?

Cybersecurity

15. As for the European Competitiveness Fund ('ECF'), there is no reference to the European Competence Centre, which is the implementing body for cybersecurity in DEP (Article 6/2 of the DEP: The actions under Specific Objective 3 shall be implemented primarily through the European Cybersecurity Industrial, Technology and Research Competence Centre and the Network of National Coordination Centers in accordance with the Cybersecurity Competence Centre Regulation).
Given that the Competence Center is not mentioned in ECF, could Commission clarify how it sees the further functioning of the Center and whether it will be necessary to change the legal act (the Regulation establishing the Competence Center).

Digital and Justice

16. We note that the funding rates for the Support for Defence Industry Policy are defined in a Section 2, Article 52 in Proposal for a Regulation of the European parliament and of the Council on establishing the European Competitiveness Fund ('ECF'). We would appreciate clarification on the envisaged funding rates for the *Support to Digital Leadership Policy* under the same framework.
17. We would appreciate clarification as to whether the European Competitiveness Fund (ECF) foresees dedicated national allocations within its framework or not.
18. Croatia has encountered certain challenges in the implementation of centralised EU programmes, such as the Digital Europe Programme, primarily due to the implications of state aid rules. Given the strategic importance of digital transformation for Croatia's economic resilience and competitiveness, could it be anticipated that the European Competitiveness Fund (ECF) will provide a more favourable and streamlined framework for the implementation of nationally important projects?
19. We would like further clarification on the future status of the Justice Programme, which in the current financial period was part of the Justice, Rights and Values Fund. Namely, it is not clear enough whether the Justice Programme will remain an independent program within the II pillar or whether it will coexist within the Agora program or another fund. Also, we have not yet received the Proposal for the REGULATION on the establishment of the Justice program for the new financial period. Are there any indications that we might soon receive that document for consideration?

Horizon Europe

20. In the proposal for the new HORIZON EUROPE there is no mention of cybersecurity (in the current one (2021-2027) it is mentioned several times, including in Pillar II “GLOBAL CHALLENGES & EUROPEAN INDUSTRIAL COMPETITIVENESS”, Cluster “Civil Security for Society”, section 3.1.3. Cybersecurity). Given that the European Cybersecurity Competence Centre (in Bucharest) including 27 national coordination centers have so far had access to funding from Horizon for cybersecurity research, could the Commission clarify why cybersecurity was not mentioned in the new proposal for Horizon Europe programme, and whether it could still be funded through EUR 16 854 000 000 for collaborative research and innovation activities under Chapter VI ‘Digital Leadership’ of the European Competitiveness Fund.

Pillar III – Global Europe

1. We welcome the simplified structure and innovative mechanisms introduced in the future MFF set up. In that sense, we recognise and welcome the need for more flexibility, coherence and more effective leveraging of the EU resources for the financing of the EU external action via proposed Global Europe Instrument. However, we find a few possible inconsistencies in the proposed financing instrument. In particular, introducing greater flexibility while removing spending targets for priority areas (f.e. external dimension of migration, etc. as has been the case in the current NDICI-GE) may have significant impact on predictability of funding and at the same time bear a risk of deprioritization, which could disperse the investment and make it harder to track performance and ensure accountability. In addition, the lack of predictability for partner countries may complicate their budget planning as well as their involvement in planning of “shared priorities”, which could undermine the EU’s credibility.

How does the Commission see the possible ways to balance the greater flexibility and agility with predictability, including transparency, and accountability?

2. The proposed Global Europe regulation under the 2028–2034 Multiannual Financial Framework introduces a significantly restructured external action financing instrument. It consolidates several instruments into a broader and more flexible architecture. This integrated model promises simplification, responsiveness to geopolitical volatility, and alignment with the EU's strategic objectives. However, the transition raises important questions regarding the protection of enlargement policy priorities, performance-based allocation, and equitable treatment of pre-accession countries.

Having that in mind, how does the Commission foresee to tackle following challenges:

- How will the Global Europe instrument ensure the continuation of tailored support for each IPA beneficiary, given the new integrated architecture that merges IPA III into a broader framework?
- What mechanisms are foreseen to ensure that the performance-based allocation principles of IPA III are preserved in Global Europe’s broader architecture?
- Given the proposed reduction of thematic earmarking and pre-set financial envelopes, how will fair access to pre-accession funds be ensured across all eligible candidates?

- To what extent will the instrument allow rapid budgetary reallocations between geographic and global pillars in response to evolving pre-accession needs, including unforeseen geopolitical developments (e.g., Ukraine)?
 - Will there be a dedicated monitoring and evaluation framework for the pre-accession strand under Global Europe?
 - What safeguards will be introduced to ensure that the strategic objectives of the enlargement policy — rule of law, economic alignment, public administration reform — are not overshadowed by broader global or thematic goals under Global Europe?
 - How will the Team Europe approach be leveraged specifically in the context of pre-accession assistance?
3. Regarding pre-accession assistance, we would appreciate more details/information from the EC on why it believes that the integrated instrument will better contribute to the objective of pre-accession assistance (which is primarily preparation for EU membership) than the current separate instrument (IPA). Also, it is not clear from the attached documents how much funding is foreseen for pre-accession assistance (out of a total of 43 billion for Europe)?

Programs

Regulation for UCPM

1. Question for the Commission concerning the governance of the UCPM: Article 12 of the Proposal (Regulation for UCPM) states that "the Regulation shall be implemented by work programmes referred to in Article 110 of the Financial Regulation (2024/2509)". This represents a significant change compared to the previous/current UCPM as well as the EU4Health Programme (which is now divided and integrated into the new UCPM and the ECF), where work programmes are adopted within the relevant Committees by means of implementing act in accordance with the examination procedure. This new proposal for UCPM does not include Member States in any form (advisory/examination/voting) during the decision making process for the work programme - could you please clarify the reasons for suggesting this type of approach?

Erasmus+

2. Which activities or parts of activities from the Erasmus+ programme do you plan to finance through the European Competitiveness Fund, will these be implemented through centralized or decentralized calls, and how will educational institutions have an equal chance in such calls if they are competing with companies?

AgoraEU

3. What proportion of the total AgoraEU budget is foreseen for administrative costs?
4. Will the administrative costs of each sub-programme (Creative Europe – Culture, MEDIA+ and CERV+) be covered from the overall AgoraEU envelope, or from the specific allocation of that sub-programme?
5. What percentage of national co-financing is expected from Member States under the AgoraEU programme?
6. Could the Commission explain the distribution of the AgoraEU budget between the three sub-programmes, particularly the fact that the Culture strand receives the lowest proportional increase of 123%, compared to 126% for MEDIA+ and 132% for CERV+, and the smallest share of the overall budget (20.9%)?

ITALY

NATIONAL AND REGIONAL PARTNERSHIP PLANS (COM (2025) 565)

- Could the Commission specify **the functioning of Article 21 of the Regulation**, which allows Member States to include specific national, sectoral, and, where relevant, regional and territorial chapters in their Plan, in a partnership-based approach? Is it possible to define a clear strategy, in the short term, between the "sectoral/thematic" and "regional" dimensions of the plans, given the distribution of responsibilities and the role of ESF+ Regional authorities in previous programming? This strategy should provide specific guidance on:
 - a) balance between European challenges and priorities (Semester, fiscal plans, NECPs, etc.) and regional needs to avoid dependence between the achievement of reforms and the CSRs envisaged by the European Semester.
 - b) methods for identifying/selecting reforms and investments, their milestones/targets, and estimating the costs associated with the measures;
 - c) clear distinction in terms of role and contribution to the chapters among the partners pointed out in Article 6 of the Regulation.
- Since 14% of the new NRP Plans' contribution must be directed to social objectives, could the Commission depict a clear **governance synergy between the ESF+ national/regional coordination system and the NRP Plans**? This is particularly relevant since ESF+ retains an autonomous legal basis (art. 162 TFEU) with respect to National and Regional Partnership.
- In line with the EU approach (performance-based, less administrative burden), could the Commission start a process of empowerment of regional authorities with respect to the definition of their own objectives/reforms/investments/milestones/targets (within a national framework), and on the other hand, emphasize the need for centralization simplification of the management and control system?
- Regarding the *Commission Proposal for a Regulation establishing a budget expenditure tracking and performance* (COM_2025_545_1), **may the Commission provide a specific analysis or an in-depth study on the "social target" principle set out in Article 6** of the proposal, also taking into account the weight of the ESF component and of the existing labor and social inclusion policies?
- Within the Plans, does the proposal set out the **automatic decommitment** for all measures that do not meet the deadline established in the National and Regional Partnership?
- Could the Commission take into consideration to **introduce "annual" adjusting mechanisms in order to amend clerical errors**, if no modifications are expected before the mid-term review of the Plan?

- **Methodology for determining the allocation for the CAP Income Support.** The proposal for a Regulation on the European Fund for Economic, Social and Territorial Cohesion, Agriculture and Rural, fisheries and Maritime, prosperity and security – COM (2025) 565 final – is set out in Art. 10 (2), par. 2, a) ii for a minimum amount of EUR 295,7 billion for CAP interventions, as referred also in Art. 35 (1), from (a) to (k) and (r) and paragraphs 10 and 11. This is in line with the European resources allocated only to direct payments, in the 2021-2027 programming period.

Since Art. 35(1) includes additional types of intervention in addition to direct payments, how is the CAP ring-fencing defined? Is the amount proposed for CAP ring-fencing consistent with the inclusion of certain relevant rural development projects?

- **The €295.7 billion ring-fencing management assigned to “CAP Income Support”.** The CAP agricultural sector has always had specific characteristics in terms of financial management interventions deriving from specific regulations (EAGF and EAFRD).

Will the Commission provide additional specific guidelines on financial management, in addition to the Fund Regulation and the CAP Regulation? For example, it is unclear whether there will be a specific Regulation for managing the amount allocated to ring-fencing “income support” (as a fund dedicated to income support under the CAP).

- **CAP interventions co-financing.** We ask the Commission to clarify Article 20. In particular, is there any national contribution for support types a), b), c) and g) (Article. 20, par. 4, PPNR Regulation)? What does the sentence “*Any contribution rate derogating from those of paragraph 1 set out for interventions referred to in Title V, including where no national contributions are requested, shall only apply to a total amount of interventions not exceeding the Member State’s share of the amount set out in Article 10(2), point (a)(ii), as laid down in Annex I*” imply?
- **Article 34 introduces the option of changing the NRP Plan if crises occur.** Par. 2 describes the specific mechanism of operation. May the Commission provide an example of the application of the new “crisis reserve” by the means of a simulation (with figures)?
- **The Regulation’s Annex contains the formula for calculating the financial allocations due to each Member State.** “ $FC_i = A_i * \text{amount available for Member States NRPs excluding amounts set out in Article XX of Regulations (Migration), Article X of Regulation (Borders), Article X of Regulation (Internal Security) and Regulation (EU) 2023/955} + B_i * \text{amounts set out in Article XX of Regulations (Migration), Article X of Regulation (Borders), Article X of Regulation (Internal Security)} + C_i * \text{amount available for the Social Climate Fund in accordance with Article 10 of this Regulation}$ ”. In order to ensure technical and operational verifiability, with particular attention to the agriculture and cohesion component, confirmation is required on the following:
 - the accuracy of the following interpretation: $FC = 782,879 \text{ billion (NRP allocation)} + 50, 10 \text{ billion (Social Climate Fund)} = 832.9 \text{ billion}$;

- how the A_i coefficient is calculated for Member States and in particular for Italy (including the normalization);

- what NRPP amount multiplies A_i ?

- confirmation that the available amount A_i^* to NRP Member States, excluding the amounts referred to in Article XX of the Regulation (Migration), Article X of the Regulation (Borders), Article X of the Regulation (Internal Security) and Regulation (EU) 2023/955, equals to the CAP (income support) + economic, territorial and social cohesion (including fisheries, rural communities and tourism) – Climate Social Fund (Regulation (EU) 2023/955).

- which is the actual allocation per Member State?

With regard to the A_i , the technical annex to the proposed regulation provides a certain degree of detail on the main statistical and operational steps for calculating the coefficient. This coefficient determines the distribution of a large part of the EU budget (for each headings) among Member States. Without considering each individual indicator, it should be noted that the Annex includes the statistical sources necessary for the calculation of the coefficient. However, there are still unclear technical steps. We ask for a clarification on the following:

- unlike all other indicators, there is no specific data source (and no specific reference to an open-access database) to be used for calculating the D_{pi} variable in the “agri prosperity gap” component;

- the statement “The A_i of all Member States is normalised to ensure that the sum of all A_i equals 100%” lacks adequate technical specification regarding the mathematical-statistical normalisation procedure and does not allow for a precise calculation of the A_i coefficients amount to be assigned to each individual Member State;

- the statement “to avoid an excessive concentration of resources, a cap and safety net applies for the general allocation key A_i ” introduces threshold and capping objective elements that do not appear to be explicitly stated in numerical terms in the proposal. It remains unclear how these elements may influence the final calculation of the A_i coefficient, which therefore does not seem to be replicable.

- **Is it possible to provide an explicit calculation support (e.g. a spreadsheet) containing all the necessary statistical information and an illustration of the estimate of the A_i coefficient, and how this coefficient generates the allocations per country?**
- **Decommitment procedures.** The CAP Regulation states that the Commission shall proceed with discharge by 31 October of the year following the commitments, shifting from three years for the 2014-2022 programming period, and two years for the 2023-2027 programming period, to 10 months for the future programming period. How can such a rapid process be justified in light of current spending procedures?
- **Ring-fencing for fisheries and aquaculture:** could the Commission specify whether the 2 billion ring-fencing for fisheries and aquaculture includes all the measures referred to Article 35(11)

and how this thresholds is calculated, taking into account the EMFAF 2021/2027 measures not included (e. g. CLLD)? The Commission should also clarify whether Article 35 (11) also includes fisheries data collection.

- **Comparison with 2021-2027 allocations.** In relation to the financial data published by the Commission, it would be useful to receive a comparison between the resources of “Component A” and the 2021-2027 allocations for the relevant funds, indicated separately for each fund, in current prices and in 2025 prices, in aggregate and by Member State.
- **Annex I: calculation of the Union financial contribution for each MS.** The new methodology seems not to consider key variables, such as those related to labour market, demography, education. Taking into account the Cohesion policy’s objective, as defined in the Treaty, such substantial simplification in the methodology compared to those of past cycles does not consider the various challenges that influence the development of European territories, which remains persistent and wide, as highlighted in the European Commission’ reports on Cohesion policy. Regarding the methodology, we also ask the Commission to explain the ratio of the inclusion of NUTS 3 level data instead of NUTS 2 level data for the calculation of the Union financial contribution.
- **On the same topic, with specific reference to the agricultural sector,** we note that the main statistical surveys on agriculture (e.g. Structure and Production of Agricultural Holdings, SPA, and Integrated Farm Accountancy Data Network, FADN) release data at European level with a maximum level of disaggregation of NUTS-2 regions.
- **Annex II: minimum amount for less developed regions (LD).** Regarding the methodology for the calculation of the minimum amount of resources for less developed regions, we observe that it is based only on one indicator that is average population. LD regions in MS with GNIpc between 75% and 100% are treated on an equal basis compared to those within relatively most prosperous MS. In both cases, the multiplier is equal to “1”. Please explain the ratio behind this choice.

Using only LD average population, the methodology does not consider the phenomenon of demographic decline, which affects many lagging regions.

Moreover, the methodology does not consider key variables, such as those related to labour market.

For Italy the minimum amount for LD regions is 27,079 billion, which is exactly 90% of 2021-2027 structural funds allocation (30,088 billion ERDF/ESF+). Given the application of the cap and safety net rule (allocation for less developed regions not lower than 90% and not higher than 112,5%), please confirm that the minimum amount for LD regions as defined in Annex II refers exclusively to Cohesion policy?

- **Article 22(2), point (f) and Annex VII.** In connection with the previous point, Article 22(2), point (f) “reduce economic, social and territorial disparities”, appears to refer exclusively to cohesion policy funds (ERDF/ESF/FC). We ask the Commission to confirm this assumption.

Please confirm also that Annex VII is dedicated only to Cohesion policy funds.

In Annex VII, the reference to Article 22(2), point (h) (ii) is incorrect.

- **Article 10 (5).** Please clarify which funds contribute to the minimum amount of the financial envelope for social objectives (14%).
 - **21. NRP Plan.** Will the Commission provide additional criteria or guidelines for the allocation of the umbrella Fund resources among the different funds that will finance the NRP Plan?
 - **22. Art. 65.** The bimonthly frequency of **submission of payment applications** seems to replicate the provisions of current cohesion policy regulations, which are based on the declaration of expenditure, while the declaration of milestones and targets takes place on a biannual basis in the experience of RRF. This may determine a costly exercise and an excessive administrative burden.
 - **23. Flexibility and EU Facility.** Will the Commission provide a *fiche* to explain the functioning of the flexibility mechanism and of EU Facility?
- ***Please find in the Annex additional questions regarding the Agrifish-related provisions of the Regulation***

“COMPETITIVENESS, PROSPERITY AND STABILITY” HEADING

- **Governance of the European Competitiveness Fund.** Clarification is needed on the relationship between the governance of the ECF, as governed by the ECF Regulation [COM(2025) 555 final] (Stategic Stakeholders Board, Advisory Board on ECF InvestEU Instrument and Investment Committee) and the Competitiveness Coordination Tool envisaged by the Competitiveness Compass [COM(2025) 30 final], but not yet defined in its functioning (coordination procedure? representative body? which council branches will be involved?).
- The proposed Regulation establishes that “Competitiveness will also receive support from Member States' national and regional partnership plans and external policies.” May the Commission explain in detail **how it intends to coordinate the two pillars** (National and Regional Partnerships and ECF)?
- A **synergy with the Savings and Investments Union** is also foreseen. How is this mechanism intended to be developed practically?
- It is expected that “A simplified application of the performance framework will be used for the budgetary guarantee and financial instruments.” **How will the performance framework be applied to the ECF?** What will this simplification consist of?
- When will the **Annexes** to the Regulation be published?
- The table below shows the amounts of the Fund, as resulting from the combined provisions of the ECF Regulation and the Communication on the Multiannual Financial Framework 2028-2034

[COM(2025) 570 final]. Concerning the Clean Transition and Industrial Decarbonisation objective, a quota of the funds will be available through the Innovation Fund, while the others will be MFF's components. For the other three sectors, **where are the resources not attributable to the MFF components (yellow cells) drawn from?**

Objectives		Source	Total 2028-2034 (EUR million, current prices)
Specific objectives	support to Clean Transition and Industrial Decarbonisation	MFF component	26,21
		Innovation Fund	41,206
		Total amount	67,416
	support to Health, Biotechnology, Agriculture and Bioeconomy	MFF component	20,393
		Other funds	2,2
		Total amount	22,593
	support to Digital Leadership policy	MFF component	51,493
		Other funds	3,3
		Total amount	54,793
	support to Resilience and Security, Defence Industry and Space policy	MFF component	125,204
		Other funds	5,5
		Total amount	130,704
European Competitiveness Fund (excluding Innovation Fund)			234,300
Horizon Europe			175,002
European Competitiveness Fund (including Innovation Fund and Horizon Europe)			450,508

- **ECF InvestEU Instrument** . Provisions regarding the ECF InvestEU Instrument are contained in Section II (Articles 21-25). Does the Commission intend to present a dedicated Regulation replacing or amending the InvestEU Regulation (EU) 2021/523?
- Could the Commission provide tables and related data in order to **better illustrate InvestEU resources**?
- **Provisioning of the budgetary guarantee under the EU compartment of the ECF InvestEU Instrument** (Article 21 ECF Regulation proposal). In the Commission's proposal, the budgetary

guarantee under the EU Compartment of the ECF InvestEU Instrument shall be provisioned at the rate of 50%. However, the proposal includes EC faculty to introduce changes to both the guarantee ceiling and the provisioning percentage. Could the Commission provide further information on the reason behind the planned provisioning and the possibility of modification?

- **Multi-tranche structure of the guarantees of the ECF InvestEU Instrument:** the Regulation (Articles 21 and 24) provides the chance to create synergies between EU and national compartments within the ECF InvestEU Instrument. The Commission should clarify whether and how continuity is ensured with regard to the possibilities, currently provided for in the InvestEU Regulation (Articles 9(2) and 10(3) of Regulation (EU) 2021/523), to combine the two compartments in a single operation with selective risk allocation between different levels (tranches).
- **Inclusion of Private Entities in the Implementing Partners Community (Article 25.3):** article 25.3 of the Regulation introduces the possibility of entrusting the implementation of financial instruments or budget guarantees to private entities as well, provided they have adequate financial guarantees. Could the Commission provide more details on how these private entities will be selected?
- **Could the Commission explain why they did not provide a direct allocation of a share of InvestEU to EIB, as seen in the past?** Considering the strategic role of the EIB, the past results achieved and the certainty in the programming provided by such provision, it would ensure in the next MFF operational continuity, efficiency in implementation and a stable institutional oversight for the achievement of the Union's objectives of competitiveness and strategic autonomy. If the EIB has ex-ante certain resources, it can prepare/accept financing of a certain type (riskier) than if it did not know its possible guarantee envelope.
- **“Scale-up Facility” in cooperation with the EIB Group and other financial partners:** article 22 of the Regulation introduces the possibility of setting up a “Scale-up Facility” with the aim of providing tailor-made financial instruments for European growth companies. Could the Commission clarify the process through which these instruments are proposed, evaluated and approved? In particular, the following should be better defined: the criteria by which the Commission approves new instruments proposed by the EIB, which has operational autonomy with regard to its own resources; the degree of autonomy of the EIB in the technical design of the instruments; the way in which other financial partners are involved; and the mechanisms for transparency and accountability in the selection and implementation. Furthermore, it is not specified whether there are quantitative or qualitative limits to the facility's intervention, nor whether evaluation tools are envisaged.
- **Governance and Autonomy of Research (Art. 179 TFEU and Horizon Europe Regulation).** How does the Commission aim to ensure that the financial and operational integration of Horizon Europe into the ECF, through the “*single rulebook*” and the integrated *Work Programmes* - provided for in the ECF Regulation (Article 7) - and the Horizon Europe Specific Programme (Article 2) – preserves scientific autonomy and thematic freedom in the research sector, in accordance with Article 179 TFEU on the scientific basis of European policies?

- **Structural Coordination and Prevention of Overlaps (Art. 5 TFEU).** Are specific mechanisms envisaged to ensure the coordination between Horizon Europe (€175 billion), the European Competitiveness Fund (€410 billion), Innovation Fund and other EU Programmes, preventing duplication and ensuring the effectiveness of investments, in accordance with the principle of subsidiarity (Article 5 TFEU) and of non-duplication?
- **Democratic Access and Equal Treatment (Art. 18 TFEU).** How will the new ECF Single Gateway (Articles 12-15 of the ECF Regulation) and the simplified procedures of Horizon Europe guarantee equal access to SMEs, start-ups and less structured research organisations, in accordance with the principle of non-discrimination under Article 18 TFEU and State aid legislation?
- **Dual-use technologies (Articles 173, 182 and 189 TFEU).** How will the Commission balance the systematic financing of dual-use technologies through the ECF Defence Industry Committee and the Specific Programme for Defence with the principles of civilian and peaceful use of EU resources (Articles 173, 182 and 189 TFEU)?
- **Comitology and Member States Participation.** How will the eight new ECF Committees (art. 83 ECF Regulation) and the Strategic Stakeholders Board (art. 14) be able to ensure effective participation of the Member States in strategic decisions, preserving the role of the Horizon Europe Program Committee Configurations (although there will be a reduction of these Configurations compared to the present ones), according to the current procedure, especially with regard to ERC, EIC and MSCA areas?
- **Competitiveness Seal and coherence with national policies:** what criteria will guide the allocation of the Competitiveness Seal provided for Horizon Europe Regulation and how will the coherence with Smart Specialisation national strategies and the regional programs be guaranteed, while respecting concurrent competences in the research field?
- **Competitiveness Coordination Tool.** What structure will the Competitiveness Coordination Tool have, with particular reference to the level of accessibility to the data and information contained therein, also in relation to the methods of sharing data with national authorities?
- **Integration Monitoring and Evaluation.** What indicators (Smart: Specific, Measurable, Accessible, Realistic, Time-bound) will be used to value the effectiveness of the ECF-Horizon Europe integration and which feedback mechanisms will be carried out to correct any distortions in access to funds or in research freedom?
- We ask the Commission to set up a more in-depth discussion on the **synergies between the ECF Fund and Erasmus +** (with an estimated total budget of over €40 billion), as well as other directly managed programs?
- How will the Regulation specifically address the need for a **combined effort in skills development** and the pursuit of the Union of Skills objectives?
- The ECF proposal barely mentions the concept of **civil protection**, but does not mention at all **civil protection risk** and **disaster risk management**. How the Commission plans to address this issue?

- How it will be possible to maintain **separate the different areas and chains of responsibility between national and European civil protection systems**, considering that these issues have been merged with Security and Defense?
- With reference to security industry policies support, mention is made of civil preparedness in relation to security threats, whether natural, anthropogenic, accidental, or intentional (Art. 80, paragraph 1(d)). **Many areas of civil protection expertise are thus encompassed within a security framework or, at least in the Italian case, within the civil defense area. How it will be feasible to combine this vision with different MS legal systems, which could not necessary be in line with this approach?**
- Considering the ECF proposal, the initial Explanatory Memorandum refers (on page 3) to **consistency and complementarity of the ECF with other funds** (UCPM, Union support for health emergency preparedness and response), and Article 7 also refers to implementation consistent with other funds (Framework Programme for Research and Innovation, Innovation Fund). How does the Commission propose to achieve this goal, considering the merger with Security and Defence issues?
- **How will the declared ECF consistency and complementarity with the UCPM Regulation be reflected in practice in the next work programme?**
- Which mechanisms will be set up in order to **avoid duplications of investments** and to maximize the impact of civil protection's resources?
- Considering ECF Regulation proposal and HERA Regulation (2024/2202), what will be the specific **link and synergies between actions financed by the ECF and activities carried out under the regulation 2024/2202?** How will investments' complementary and efficiency be guaranteed?
- What will be the **correlation between activities financed by ECF and 2013/1313/UE Decision revision**, especially focusing on capacity building and emergency preparedness at EU and national level?
- **How will ECF priorities and investments support or complement the objectives and actions outlined in the revision of the 2013/1313/EU Decision?**
- Focusing on civil protection relevant sectors, what will be the **coordination mechanisms between Horizon Europe and ECF to maximize synergies** on research, innovation and policy implementation?
- The Clean Transition objective includes LIFE projects and decarbonization policies, however the proposal does not considered the **link between these topics and civil protection issues**. How it should be managed?
- Focusing on “**resilience**”, it is only considered in terms of raw materials (Art.42, strengthening research, extraction, recycling). How will the Union Disaster Resilience Goals (UDRG) be part of this context?
- The Regulation under consideration provides the largest amount of funding to the fourth objective. However, it also includes particularly costly areas of activities, such as the arms industry and

space technologies. Which will be the **funding allocation**? and what consequences could this have for civil protection systems?

- Considering the “**Space**” objective, this is the only area in which civil protection activities are taken into account (EO and EOGS activities). In Articles 57-60 of the proposal on the ECF Regulation, civil protection, prevention, and preparedness, as well as emergency management, are finally addressed alongside decision-making support services, but these are only a limited number of instruments. How will the other scientific and technological activities related to disaster risk management be considered?
- How will be possible to **ensure civil protection operational needs on the development of Copernicus services funded by the ECF**? How will public civil protection agencies (including Copernicus core users) be involved in defining priorities and developing Copernicus Services (emergency management, prevention, and preparedness) in the ECF context? What mechanisms will ensure that complementary information provided by EOGS fully meets civil protection needs?
- Art. 13 of the proposal refers to **classified and sensitive information**. How does the Commission plan to manage such information considering the sharing needs of the civil protection and risk management sector?
- In addition to "democratic and transparent safeguards," which concrete mechanisms will be implemented to ensure that **dual-use technologies** financed by the ECF effectively benefit the civil protection sector through their transfer and adaptation?

OWN RESOURCES

Quantitative information request

- The Commission ought to deliver accurate quantitative data. Is it possible to provide **specific fiches for each own resource with technical details on legal and financial aspects**, as well as preliminary information regarding the **implementing acts on the administrative management of these resources** (Regulation as regards implementing measures for new own resources - IMSOR and Making Available Regulation - MAR)?
- With regard to financial information in particular, is it possible to **estimate the contribution per resource, by Member State and by year**?

Questions on individual own resources

Traditional Own Resources (TOR): the Commission should produce an analysis containing estimates of the costs incurred by Member States in establishing, collecting, and monitoring TOR. Once provided, will the proposal to reduce the premium in favor of Member States from 25% to 10% be adequately and objectively justified (also in light of recent and foreseeable future changes to customs rules, including handling fees)?

- **Emission Trading System 1 (ETS 1)**: would 30% of auction revenue be paid directly to the EU budget during the centralized management of these auctions, as envisaged in the 2021 and 2023 proposals, or are different disbursement methods foreseen?
- **Corporate Resource for Europe (CORE)**: may the Commission provide a detailed legal and tributary analysis to clarify the non-tax nature of this resource?
- **European Travel Information and Authorisation System (ETIAS)**: what administrative costs would Member States incur to implement the European visa? Will it be possible to provide a premium/vig (?) like the TOR one, given that Member States would contribute very differently to this other revenue? Highly touristic countries, like Italy, should have significant revenues but also potentially higher operating costs.

ANTI-FRAUD ARCHITECTURE REVIEW

- **The proposed new MFF aims to create a new financial governance**, which must be considered in conjunction with the launch of the strategic review of the European anti-fraud architecture (AFA), presented at the same time as the proposal and linked to the new MFF by the Commission itself. In this regard, the texts use the adverb “*swiftly*” to indicate the need for Member States to promptly report the detection of potential fraud to the Commission (OLAF) and for criminal cases to be referred immediately to the European Public Prosecutor's Office. Against this backdrop, how can it be ensured that the **confidentiality of preliminary investigations** is protected and that only formalised data, albeit on a preliminary basis, in terms of possible liability and the amount of the alleged fraud, is entered into the Commission's statistical systems (IMS Irregularity Monitoring System), if, according to the proposal, the data should be entered promptly and without delay, and not at the time of the request for referral to trial?

GLOBAL EUROPE

- How does the Commission intend to preserve the geographical balance in Global Europe funding, considering that the geographical subdivision is only indicative? Why didn't the Commission opt for proper ring-fencing?
- Which resources of Global Europe will be accessible for Ukraine support, and what limits (if any?) will exist in order to preserve the other priorities?

- How does the Commission intend to preserve funding to strategic enlargement candidates such as Western Balkans countries?
- On financing extra-EU components of TEN-T, TEN-E networks, SMEs and crisis preparedness and response, what financing mechanisms are envisaged, and how do they compare to those available to Members States under Heading II (ECF, CEF)?

ANNEX - Questions on Agrifish-related elements within the Regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509 {SWD(2025) 565 final}		
Article	Text	Questions and comments
Article 4 Definitions	For the purposes of this Regulation, the following definitions apply: (3) ‘beneficiary’ means: (...) c) In the context of the CAP, a farmer who is: (i) a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or (ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.	This definition does not include beneficiaries for some CAP interventions such as rural businesses start up, LEADER, and Knowledge sharing. Is it possible to clarify this exclusion?
Article 7 Horizontal principles	3. Payments under interventions referred to in Articles 35(1), points (a) to (f) and points (o) and (p), to the extent that they concern support for local agricultural products shall be subject to compliance with “farm stewardship” as laid down in Article 3 of Regulation (EU) 202X/XXXX [CAP Regulation]. Payments subject to the farm stewardship requirements referred to in Annex I, parts A and C, to Regulation (EU) 202X/XXXX [CAP Regulation] shall be deemed to comply with the principle of “do no significant harm” as set out in Article 33(2), point (d), of Regulation (EU, Euratom) 2024/2509.	In which way the compliance with the principle of “do no significant harm” will be verified? Is it possible to have some examples of payments that in the Commission’s view don’t comply with this principle?

<p>Article 8 Respect of the rights, freedoms and principles set out in the Charter of Fundamental Rights</p>	<p>4. Where the Commission concludes that the Charter horizontal condition is not fulfilled, it shall adopt an implementing decision determining the non-fulfilment of the Charter horizontal condition and identifying the specific measures of the NRP Plan affected by the non-fulfilment, within two months of receiving the Member State's observations referred to in paragraph 3.</p>	<p>Is it possible to have some examples of non-fulfilment of the Charter horizontal condition and indication on the criteria that will be followed to identify the specific measures of the plan affected by the non fulfillment?</p>
<p>Article 10 Budget</p>	<p>2. The financial envelope shall be allocated as follows:</p> <p>(a) EUR 782 879 000 000 shall be allocated to the NRP Plans referred to in Title III in accordance with Annex I [Allocation key], of which:</p> <p>(i) At least EUR 217 798 000 000 for less developed regions by establishing minimum amounts per Member State based on the methodology set out in Annex II;</p> <p>At least EUR 295 700 000 000 for CAP interventions referred to in Article 35(1) [types of support], paragraph 1, points (a) to (k) and (r) and paragraph 10 and for interventions listed in article 35 paragraph 11;</p> <p>ANNEX 1</p> <p>The resources to be allocated to less developed regions in accordance with Article 10(2)(a)(i) shall not be counted against the amounts set out in Article 10(2)(a)(ii).</p>	<p>According to Annex I the resources to be allocated to less developed regions in accordance with Article 10(2)(a)(i) shall not be counted against the amounts set out in Article 10(2)(a)(ii), it means that for cap interventions in less developed regions additional appropriations should be allocate for interventions referred to in Article 35(1) paragraph 1, points from d) to r)?</p>

<p>Article 20 National contribution to estimated costs</p>	<p>1. The minimum national contribution rate to the estimated costs of a measure of the Plan shall not be lower than:</p> <p>(a) 15% for less developed regions;</p> <p>(b) 40% for transition regions;</p> <p>(c) 60% for more developed regions.</p>	<p>Does this minimum national contribution apply also to article 35 paragraph 1 point (r) Support for interventions in certain sectors referred to in Title X of Regulation (EU) No 1308/2013?</p>
<p>Article 22 Requirements for the NRP Plan</p>	<p>(...) By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature 2. Restoration Regulation), in accordance with the Nature Restoration Plans.</p>	<p>Which criteria will be followed by the Commission to request lower or higher minimum percentage of the total allocation?</p> <p>It is appropriate to define clear criteria in order to ensure the same approach and treatment to all the MS</p>
<p>Article 24 Amendment of the NRP Plan</p>	<p>6. The adoption of the decisions referred to in paragraph 5 shall not be required:</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments.</p> <p>Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>for amendments in accordance with Article 31(7).</p>	<p>Since the procedure for amendments of the NRP is quite long, it is deemed appropriate to identify “non- strategic” changes for which a simplified procedure is permitted such as notification without decisions and with reduced procedural time</p>

<p>Article 38 Crisis payments to farmers following natural disasters, adverse climatic events and catastrophic events</p>	<p>1. Member States may provide crisis payments to farmers that are affected by natural disasters, adverse climatic events or catastrophic events. Those payments shall aim at ensuring continuity of the agricultural activity of those farmers and shall be subject to the conditions set out in this Article and as further specified by the Member States.</p>	<p>The financial resources for crisis payment are additional to the cap resources? Is it necessary to modify the NRP when the events occur with the procedure defined in article 34, or can the intervention be included in the plan and activated if necessary, reallocating the financial resources if no adverse events occur in a given year?</p> <p>It is necessary to amend the NRP when the events occurred or is it possible to include the intervention in the plan and activate it if necessary and reallocate the fund if in a certain years no adverse event occurs?</p>
<p>Article 49 Plan authorities</p>	<p>7. Member States shall accredit paying agencies responsible for the management and control of the measures referred to in Article 35(1) and the Union actions referred to in Annex XV, paragraph 1, points (h) and (j), of this Regulation [Union actions], implemented under shared management and may entrust their functions, as referred to in Article 52 [functions of the paying agency], to the managing authority or to another body.</p>	<p>Paying Agencies are not responsible for crisis payments to farmers of article 38?</p>
<p>Article 52 Functions of the paying agency</p>	<p>Each Member State shall, taking into account its institutional provisions, restrict the number of its accredited paying agencies to a single paying agency at national level or, where applicable, one per region.</p>	<p>In MS with more than one paying agency is it possible to have coordination authority for the Paying agencies?</p>

<p>Article 62 Control System for farm stewardship and common fisheries policy</p>	<p>Member States shall as part of the controls referred to in Article 58 [Responsibilities of Member States] verify the compliance of beneficiaries with the requirements of the farm stewardship referred to in Article 3 of Regulation (EU) 202X/XXXX [CAP Regulation] and with Article XX paragraph XX of Regulation (EU) 202X/XXXX [CFP Regulation].</p> <p>Where the area eligible for the support referred to in the first subparagraph, as declared in the geo-spatial application referred to in Article 70 [IACS], does not exceed 10 hectares, the beneficiaries shall be exempted from controls and penalties under this Article.</p> <p>(...)</p> <p>2. Member States shall make use of their control and enforcement systems in the areas of climate and environment, public health, plant health and animal welfare, social and employment legislation, applicable labour standards, fisheries and aquaculture to ensure that beneficiaries of the support comply with the requirements set out in the first paragraph.</p> <p>3. The managing authority or paying agency shall be notified where relevant at least once a year of cases of non-compliance where enforceable decisions in that respect have been made under the applicable control and enforcement systems referred to in paragraph 2. That notification shall include an assessment and grading of the severity, extent, permanence or reoccurrence and intentionality of the non-compliance concerned.</p>	<p>The procedure for control system for farm stewardship seems to be very complex since it involves many institutions and requires a flow of information between them that is not yet in place.</p> <p>So further clarification is needed and also simplification of the proposal.</p>
<p>Article 68 Financial corrections by the Commission</p>	<p>The Commission shall apply financial corrections to reduce proportionately the Union financial contribution and, where applicable, recover from the Member States any amount due to the Union budget, or, in respect of loan support, take any measure available under the loan agreement, where it determines that one of the following situations exists:</p> <p>(...)</p> <p>(e) a milestone or target, for which a payment has been disbursed, has been found to be reversed after the last payment made under the Plan and corrective measures were not taken by the end of the Plan.</p>	<p>The case described in point e) is not clear. Is it possible to clarify and give example of milestone and target reversed after a payment?</p>

CYPRUS

GENERAL QUESTIONS

1. Publication of Fiches

Request for the publication of a set of explanatory fiches, similar to those prepared during previous MFF negotiations.

2. Macroeconomic Assumptions

What specific macroeconomic assumptions underpin the Commission's proposed allocation methodology for the MFF 2028–2034?

3. Price Presentation of Allocations

Request that the proposed allocations under the MFF be presented in both current prices and constant prices for transparency and comparability purposes.

4. Allocation Profile per Pillar

Could the Commission provide a fiche detailing the allocation profile per pillar, including elements outside the ceilings of the MFF?

5. Detailed Structural Comparison

Could the Commission prepare a fiche comparing the new structure of the MFF 2028–2034 versus MFF 2021–2027, including all headings and sub-headings, their allocations and ring-fenced amounts?

6. Fiche – Political Steering Mechanism

Could the Commission provide a fiche that explains, step by step, how the proposed political Steering Mechanism will operate in practice, including the interaction with the European Semester and the safeguards to endure full democratic participation of Member States?

Pillar 1 - NRP Plans

- Request fiche for how the ringfenced amounts (CAP, fisheries, and migration) will be mirrored to Member States' single plan allocations.
- How will Member States that don't fall under the less developed regions, but fall under the scope of the art 174 of the Treaty, be given due attention when it comes to the allocation methodology proposed, having in mind the Regional Prosperity Gap key.
- What are the eligibility rules for loans under CatalystEU? Can loans be used for co-financing? Are there any conditions or ceilings?

- We would like more information on how the NRPPs and the European Semester Cycle will be aligned in practice during the programming and implementation cycles. Are other competent authorities involved in the NRP Plans be also involved in the European Semester process?
- How is shared management ensured in the approval of the Plans by the Council, based on a proposal by the European Commission?
- What is the rationale behind placing the NGEU repayment under Pillar 1?
- Request a fiche explaining how the 25% unallocated flexibility within NRPPs can be mobilised. Will the initial programming and subsequent approvals of the Plans include only the 75% of the Member State's allocation?
- If the first 5% provisioned for crisis is not used, can it be used for the MTR?
- The commitments from the MTR are backloaded. Given the n+1 decommitment rule how will it work in practice? Also, in conjunction with the provisions on evaluations in the performance regulation. What are the consequences if the NRPP approval is delayed in regard to pre-financing and decommitments?
- Could one of the managing authorities serve also the role of the coordinating authority? According to Article 51 "The managing authority shall be responsible for managing the Plan or a part of the Plan".
- How are suspended funds due to possible Rule of Law or Charter of Fundamental Rights breaches reprogrammed and reused?
- In case of suspensions, does the proposed framework envisage a full blockage of the National Plans or only partial withholding? Is it going to be proportionate?
- In the case of the third countries associated (Article 28) how is it ensured that the associated countries, receiving indirectly EU funds from the NRP Plans, respect the Rule of Law and Charter of Fundamental Rights horizontal conditionalities?
- Support to Eastern border regions is reflected in home funds allocation formula. How will other external borders of the EU (southeast Mediterranean border) be addressed within the regulation?
- We would like more information regarding the methodology for thematic concentration e.g. social and environmental in relation to the performance regulation. - Considering that no dedicated financial support or thematic concentration requirement has been foreseen for ERDF/CF (similarly to ESF where a minimum threshold of 14% is required in the NRPP), how will equal treatment be safeguarded towards all Treaty-based funds?

Flexibilities

- Could the Commission clarify how the Crisis Response tool is activated and whether there is a uniform definition of “crisis” across instruments?
- How will the Flexibility Instrument operate in conjunction with decommitted amounts, and will smaller MS be eligible for access under similar conditions as larger MS?
- What sequence of events is envisioned for activating the flexibility instruments, step by step?

Deflator

- Does the new proposed deflator create discrepancies with sectoral regulations, and how would these be resolved?

Own Resources

- Request for a fiche analysing the financial impact of the proposed Own Resources Decision per Member State per year, as well as the assumptions underlying the relevant calculations.
- Clarification in relation to the proposed CORE own resource: Will State Owned Enterprises be considered as companies that fall under the obligation for contributions, and if so, what is their definition.
- In respect to the prospect of applying the revised ESA for GNI own resource purposes and for calculating the relevant ORD ceilings, what are the expected changes and corresponding implications? How will this provide for predictability and clarity on expected national contributions.
- In relation to the proposed e-waste own resource, what will the assurances be in relation to the reliability and comparability of data and the corresponding calculations of the national contributions, in order to avoid similar flaws as pinpointed in the relevant ECA Special Report for the plastic waste OR?
- Clarify in proposed TEDOR own resource, the calculation of the contribution as there is reference to both “harmonised minimum rates” and “minimum rate applicable to each Member State”.

Common Agricultural Policy

- Please provide the rationale behind the Family farming definition change.
- How do earmarked amounts for agriculture intersect with crisis instruments?
- Request for a Fiche on the Farmers income formula breakdown.

Ukraine reserve

- Is there an upper limit on Ukraine lending backed by the MFF headroom?
- Request for a Fiche providing a more detailed breakdown between grants versus loans under the Ukraine Facility.

LATVIA

General / horizontal questions

- Commissioner Serafin explained during the presentation of the MFF in the Parliament that the allocation formula provides support for Member States bordering Russia and Belarus for economic development. Could you please explain how this is reflected in the proposal besides the HOME funds?
- In light of the support outlined in CEF and ECF regulations for transport decarbonisation and military mobility, we would like the Commission to elaborate on the support for transport outlined in the NRPP regulation regarding the completion of the TEN-T network, support for green and digital transformation in transport sector; strengthening of military mobility, particularly through dual-use TEN-T infrastructure; strengthening of energy and transport critical infrastructure and cybersecurity.
- Please clarify whether there are plans to set specific thematic enabling conditions.
- To support the Member States in reaching the climate and restoration targets the NRPP Plans should allocate 43% of funds to these goals. Please clarify whether this goal can be achieved through climate investments alone.
- We would like to ask the Commission to provide a detail explanation on how the new regulations on MFF are expected to strengthen the territorial dimension of the relevant EU policies? As stressed in the joint declaration adopted in the Informal meeting of ministers responsible for Cohesion Policy, Territorial Cohesion and Urban Matters (meeting in Warsaw on 21 May 2025), the coordination of EU policies should take into account the territorial dimension of relevant EU policies. As all such policies are implemented in places, they should be designed, implemented and assessed through a place-based approach.

MFF regulation

- Communication on the MFF states that the new deflator will be "*based on actual inflation, ensuring that the ability of the EU budget to deliver is not unduly affected*". Is it correct to understand that the annual technical adjustment as usually will concern ceilings and special instruments but will not have an effect on operational programmes and pre-allocated funds? How will the new method improve the agility of the budget?
- Repayment of the NGEU – why is it in the Heading 1? The explanation given by the Commission (because currently the EURI budget line is in Heading 2 where the Cohesion Funds and RRF are), is not entirely accurate. Besides cohesion, the future Heading 1 includes CAP and Home funds. They are currently in Heading 3 and Heading 4 respectively. In case there is intention to apply the logic of the current state of play, repayment of the NGEU should be above the ceiling as the NGEU is above the ceiling. The NGEU repayment could be a separate and independent Heading. Its size - 168 billion EUR is almost the size of the proposed Heading 3 of 190 billion EUR and bigger than Heading 4 (Administration) of 117 billion EUR. Therefore, an eventual argument of the limited size for a proper heading would not be exact.

Interinstitutional agreement

- Annual budget - how will the political guidance be considered during the budgetary procedure? What will be the future timeline of the budgetary procedure?

National and Regional partnership plans

- Please provide a breakdown by Member States for different policy objectives and funding minimums and maximums in line with Article 10. para 6.
- Please provide a schematic explanation of the flexibility within the plans between all the policy objectives and all the funds and min and max allocations. Is it possible to transfer DG HOME funds to other policy objectives? Is it possible to transfer Social Climate fund resources to other policy objectives, for example, DG HOME objectives and so on?
- Please provide a more detailed explanation of the EU facility and flexibility amount, how is it linked to national envelopes and NRPPs?
- Please explain how the 25% flexibility financing will work? We understand that the plan must cover estimated costs for the full national envelope, meaning that all the resources in the national plans are allocated and planned within M&T. Is it mandatory to reprogramme during the MTR? If circumstances change, can the plans be amended beforehand without waiting for the MTR?
- Given the N+1 restrictions, very granular programming and the broad policy fields covered, will the Member States be able to submit programme amendments ongoingly without waiting for a Council decision for the previous amendments?
- Will there be an updated regulation annex with allocation per Member State, according to stated amounts in regulation article 10 and different paragraphs?
- In a row, is it correct to understand that, for example, amounts for Interreg plans are not included in the factsheet published with the Member States' allocations? Since allocations do not have a reference to specific para of budget article of NRPP regulation, it is not clear which amounts correspond to which parts of the budget article.
- Considering the proposed shift to a single 'European Fund' and the strong emphasis on simplification, integrated programming, and digital solutions, how will the Commission ensure that the new framework truly reduces the administrative burden for national and regional authorities, such as those in Latvia, especially in terms of data interoperability and reporting requirements, while simultaneously facilitating tailored regional development strategies and supporting multi-level governance in practice for specialized areas like smart administration initiatives?
- The proposal outlines a strong performance-based approach, linking the provision of funds to the achievement of milestones and targets. What specific guidance and technical support will the Commission provide to Member States and their regions, including Latvia, to effectively design, monitor, and report on these performance indicators, particularly in the

context of integrated regional and smart administration projects where outcomes can be complex to measure?

- Considering that the amendment process for the National and Regional Partnership (NRPP) Plan, as set out in Article 24 of the Common Provisions Regulation, is estimated to take approximately 8-10 months, and considering the experience gained with amendments to the Recovery and Resilience Facility (RRF) Plan, which suggests that the new regulation is similar in nature to the RRF, Member States may require additional time to prepare and gather detailed information to justify the amendments, potentially extending the overall NRPP amendment process to approximately one year (up to 12 months). We would like to clarify whether the Commission has taken into account that this process could create a significant administrative burden for both the Commission itself and the Member States' administrations? Furthermore, what measures are planned to alleviate this burden and ensure a more efficient and faster approval of amendments in the future?
- Article 15 of the NRPP Regulation states that the Commission shall decommit any amount in an NRPP Plan and the Interreg Plan chapter which has not been used for pre-financing or for which a payment application has not been submitted by 31 October of the calendar year following the year of the budgetary commitments. Could you please confirm whether this means that the decommitment rule is effectively changed to an N+1 system?
- In accordance with Article 56(2)(e) of the draft Common Provisions Regulation, territorial development strategies (development programmes) shall be approved by the Monitoring committee. According to the Latvian Regional Development Law, territorial development strategies (planning region development programmes) are developed by planning regions in cooperation with local governments, but they are approved by the Planning Region Development Council, which consists of representatives of local governments and is best acquainted with the challenges and development needs of the respective territory. The regulation proposal is expected to generate additional administrative burden and limit flexibility. Question: How does the European Commission propose to resolve this contradiction between the EU regulation and the Member State's national regulation, to ensure effective and harmonised implementation of NRPP plans, while respecting national governance specificities? In this case, would the monitoring committee approve a list of territorial development strategies corresponding to the NRPP plan, or is another solution foreseen?
- We would like to ask for a more detailed explanation on Article 75 which relates to integrated territorial and urban development. In this Article point 3 states that "Strategies implemented pursuant to this Article shall be selected by managing authority(-ies) in view of providing support, including for its preparation". Could you provide an explanation on the role of managing authority(-ies)? In our opinion obligation to involve managing authority(-ies) in preparation and selection of integrated territorial development strategies will definitely increase administrative burden.
- Additional overall question on integrated territorial investments. Could the Commission provide more information regarding integrated territorial investments? Will there be any

specific limitations or preconditions on where and how integrated territorial investments should be used?

- How will the performance/ results oriented framework, applicable to the ERDF and Cohesion Fund under the 2028-2034 MFF, be designed to accommodate the diverse nature of regional development projects, from infrastructure, including dual use infrastructure, public spaces to smart administration and innovation, digitalisation and cybersecurity initiatives, ensuring that data collection and reporting are efficient, meaningful, and do not impose disproportionate administrative loads on Latvian regional authorities responsible for monitoring complex outcomes?
- Please clarify whether there are any plans to significantly improve cooperation between the Member States and the European Commission services during the coordination of simplified costs. We point out that the current procedure is inflexible and time-consuming, however, the proposal to increase the simplified cost threshold from 200,000 to 400,000 euro will increase the number of investment measures to which this provision will apply. Therefore, an administrative burden on institutions will increase significantly.
- Article 8 establishes that Member States shall put in place and maintain effective mechanisms to ensure compliance of the measures supported by their Plans and their implementation with the relevant provisions of the Charter of Fundamental Rights of the European Union. Additionally, Article 9 states that Member States shall ensure the respect of the principles of the rule of law as set out in Article 2, point (a), and Article 3 of Regulation (EU, Euratom) 2020/2092. Meanwhile the template in Annex V of the regulation asks to include a description how Member States will ensure the implementation of these horizontal requirements. Are we right in understanding that there will be no implementation criteria for these two horizontal principles and it will be based on self-assessment?
- When establishing the NRPP, how will the Commission ensure balance between the required funding for reforms, budget limitations and the impact of the new own resources?
- Regarding the issue of strategic public procurement (i.e., innovative, social, green) – is there a plan to include clear and measurable criteria for the inclusion of specific aspects in public procurement as a part of the reform of the procurement directives, in order to achieve strategic procurement objectives while avoiding the risk of non-compliance with EU funds through the inappropriate application of these criteria?
- Is there a plan to develop a uniform methodology/united approach for Member States to assess the impact of irregularities on the EU fund budget (more relevant to procurement, but can be viewed more broadly)?
- Could you please clarify whether the 3% flat rate for technical assistance, as set out in Article 13 of the National Plan Regulation, is applied to the National Plan as a whole, or separately to each chapter of the Plan — for example, 3% for the CAP chapter, 3% for the common fisheries policy chapter, etc.?

- Definitions – why some definitions are defined in several regulations? For example, definition for “operations” is included in budget and performance framework regulation and in the Fund regulation. “Measure” has 2 different definitions.
- The Regulation refers to the financial year, however it does not clearly indicate when the financial year begins and ends. We kindly ask for a clear definition of the financial year to be provided in the Regulation.
- Article 55 determines the composition of the monitoring committee. Why there is no composition set for a coordinating committee? Does the coordinating committee include also representatives of the partners referred to in Article 6 [partnership]?
- Article 54 states that the coordinating committee shall approve all elements listed under Article 56(1) [functions of the monitoring committee]. Isn't this duplication of actions? For example, if a monitoring committee approves the territorial development strategies, why it is needed that a coordinating committee also approves them? And does the coordinating committee have all the competence needed to approve the territorial development strategies?
- Is a transitional period foreseen for the implementation of the new Regulation's requirements?

Agricultural policy

- Article 23 – Why is a separate Commission's financing decision needed after the approval of a Council implementing decision instead of a single document that is approved by the Council? Which Council formation would be in charge of adopting the implementing decisions? What role will the AGRI Council have in this regard?
- Article 24 NRPP amendments – Why is it possible to amend only the entire NRPP plan rather than its sections set in accordance with the breakdown of instruments in Article 1(1a) of the Fund Regulation? The CAP strategic plans and its process of amendments have proven the effectiveness of notifications. Why the notification option is not provided for a NRPP plan amendments especially in cases where amendments do not concern changes in financial allocation and/or indicators?
- Article 35 CAP interventions - why crisis payments are not included in Article 35, paragraph 1 (COM(2025) 565 final) if it is fixed in CAP regulation?
- Article 4 - Will the other definitions that are laid down in the Regulations during this period, such as permanent grassland, arable land, etc., be further defined in the delegated acts, in the NRPP plan or left to the Member States for implementation?
- Why the generational renewal strategy is requested only for agriculture? This is very broad topic where synergy of several policies is need. This cannot be stand-alone topic only for agriculture.
- Annex V paragraph 1.6. requests comprehensive overview of support to generational renewal with an included table. Please confirm that all requested information in the table

should be provided only regarding young farmers. It is not clear why this table includes specific lines for small farmers (point c) and cooperation interventions (points f and g).

- According to Article 51 of the Regulation, for CAP interventions (such as direct payments, area-based payments, market measures, etc.), support must be paid no later than 30 June of the year following the year in which the payment claim was submitted. Could you please clarify from when these payments may be made?
- Article 52 of the National Plan Regulation sets out the functions of the Paying Agency and states that in the Member State there shall be only one Paying Agency. Could you please confirm whether the Paying Agency referred to in Article 52 applies only to the CAP (Common Agricultural Policy) interventions, and whether, for the other funds, the relevant functions are to be carried out by the Managing Authority or a designated intermediate body?
- Article 70(6) and (7): Member States shall establish the European land monitoring system - is this system to be set up by each Member State individually? Is this system intended as a continuation of the FAST system? Will such a system be mandatory for farmers to use?
- Article 74 - In Article 74.1(e) support is foreseen for “quality schemes recognised by the Union or by the Member States, and their use by farmers.” Unlike Article 77(7) of Regulation 2021/2115, the proposed provision does not include a 7-year limit on the duration of support. Does this mean that, under the current proposal, support could continue to be granted for the same products participating in a quality scheme beyond 7 years, provided they remain eligible? Please clarify whether this reflects a change in policy or whether a time limitation should still be applied at national level.
- The Regulation contains references to the new Common Fisheries Policy (CFP) Regulation. At present, the proposal for the new CFP Regulation is not yet available, and its development timeline is unknown. We kindly request to provide information on the planned timeline for the development of the new (or revised) CFP Regulation.

Interreg

- Article 10(5) of the NRPP Regulation states that at least 14% of the financial envelope referred to in paragraphs 2 and 4 shall be dedicated to meeting the Union’s social objectives. Could you please clarify how this 14% minimum requirement is applied in the context of Interreg programmes? Does this obligation apply to each Interreg chapter individually, or is it calculated across the entire national programme?
- According to Article 17(2) of the NRPP Regulation, pre-financing for Interreg programmes is foreseen at 4% for the first three years. Is there no further pre-financing foreseen after year three, and how is programme liquidity ensured in the subsequent years?
- Art. 13 (2) of the NRPP Regulation states that the flat rate shall be 10% for Interreg Plan chapters supporting cooperation on external borders. Could you please confirm whether a cross-border Interreg programme that chooses a priority supporting regions on external borders is eligible to claim the 10% flat rate for technical assistance.

LIFE

- The Commission notes that the new NRPPs should build on the experience of the LIFE programme to support innovative, stakeholder-driven projects that enhance environmental and climate resilience. What does this mean in practical terms for Member States? Will the Commission provide guidance or minimum standards to ensure that national authorities reflect the LIFE-type priorities (e.g. biodiversity, nature restoration) in their plans? Will there be thematic templates or example LIFE best practices we are expected to embed or scale up?
- There is considerable uncertainty around how LIFE will be integrated under the new MFF, prompting a range of concerns and questions:
 - What guarantees are there that nature restoration, biodiversity, and small-scale environmental innovation will retain visibility in the new MFF structure?
 - Will there be a clearly earmarked or ring-fenced budget for LIFE-type objectives within the NRPPs or EU Facility? If so, how will it be monitored?
 - Who will manage future LIFE-type funding - national authorities, or will there still be a role for CINEA or DG ENV? This question is particularly relevant to the parts of the LIFE Programme that are being integrated into the European Competitiveness Fund.
 - How will inconsistencies between Member States in prioritising environment and climate projects be avoided?
 - Will there be a dedicated stream or simplified track within NRPPs or the EU Facility for small and civil society applicants? LIFE served as a critical funding channel for NGOs and small-scale applicants driving innovation in the nature sector. In the absence of LIFE or dedicated safeguards within the new MFF, these stakeholders risk being entirely cut off from EU-level financing.
 - Will there be a centralised funding envelope or joint calls to support environmental cooperation at the EU level? LIFE projects have promoted cross-border cooperation across the entire EU, without limiting the focus to collaboration only between neighbouring countries

European Fund for Regional Development and Cohesion Fund

- How important is the linking of the Plans with national planning documents, considering that investment plans are based on EC guidelines (CSR, Semester documents)?
- Recital 13 of the ERDF/CF Regulation refers to the need to allow the ERDF to support both infrastructure investments and related activities (such as training and integration) under Interreg, specifically in connection with the social objectives outlined in Article 3(1)(c) of the NRPP Regulation. Why is this clarification on infrastructure investment provided only in the context of social objectives? Could the infrastructure investments be addressed in relation to other objectives not linked to the social domain?

- In Recital 13 of the ERDF/CF Regulation, it is stated that the ERDF should contribute to additional specific objectives such as 'better cooperation governance', 'a safer and more secure Europe', and 'more resilient regions bordering Russia, Belarus and Ukraine'. However, Article 7(4) of the Regulation uses the term 'shall' in relation to these same objectives. Could you please clarify whether the inclusion of all three additional specific objectives in Interreg programmes is mandatory or recommended?
- Recital 14 of the ERDF/CF Regulation states that the decision approving the relevant Interreg Plan chapter should constitute a financing decision. Could you please clarify to what extent the approval timelines for all elements of the NRPP Plan are interlinked? Is there a binding connection between the national plan approval and the approval of Interreg Plan chapters, or can each Interreg chapter be approved completely independently? Furthermore, what will be the approach towards chapters that fall behind compared to the frontrunners.
- In Article 4 and also in other regulations proposals it is said that Member States shall pay special attention to addressing the challenges of disadvantaged regions, which include regions bordering Russia, Belarus and Ukraine. Taking into account that Executive Vice-President for Cohesion and Reforms of European Commission Raffaele Fitto have stress that EU's eastern border regions also need the EU's maximum support, we would like to ask the Commission to give more information on planned support measures for EU's eastern border regions. Will support for EU's eastern border regions be only provided through Cohesion policy or will there be any additional funds for support EU's eastern border regions? In addition, we would like to ask can all types of investments and all types of measures be supported by EU funds in the EU's eastern border regions? Or will there be any restrictions?

European Social Fund

- Article 2 states that ESF support will be based on the guidelines for the employment policies of the Member States. Should these guidelines be based on a single document or can it be a package of documents?

CAP Regulation

- Article 5 of the proposed CAP Regulation (COM(2025) 560 final) outlines the types of support under CAP Strategic Plans. While LEADER is included under point (d), other forms of cooperation interventions (e.g. support for producer groups, quality schemes etc.), as provided for in Article 74 of the Single Fund Regulation (2025/0240 (COD)), are not explicitly mentioned. Could the Commission clarify why cooperation interventions are not listed as a distinct intervention type in Article 5? Does this omission reflect a change in legal structure (e.g. merging under other types), or will cooperation be listed separately in future legislative texts?
- Article 3 and part B of Annex I: Should the approach of this period be continued with regard to the social conditionality - without additional controls and with sanctions applicable only for enforceable decisions already taken by the Member States' institutions?

- Article 3(4) and part C of Annex I: Could it be possible for Member States to extend the scope of the protective practices identified in Part C of Annex I, in order to continue the current approach of setting additional GAEC standards at the national level — for example, by extending the protection of ecologically sensitive permanent grasslands beyond Natura 2000 sites?
- Article 9: Will the support for disadvantages resulting from certain mandatory requirements be applicable to ecologically sensitive permanent grassland listed as a protective practice in Annex I, Part C, as well as to areas located outside Natura 2000 sites?
- Article 10: Will it be possible for the current eco-schemes to continue under agri-environment payments?
- Article 11: Taking into account that both the pig and poultry sectors are listed in Annex I to Regulation (EU) No 1308/2013 as well as in Annex II of the proposal, it would be useful to clarify whether coupled income support could also be granted to these sectors. In particular, how should the limitation of per-animal payments to specific sectors, as set out in the third paragraph of the provision, be interpreted in relation to pigs and poultry?
- Article 12 - Risk management tools:
 - Why there is no set maximum support rate for risk management tools?
 - Why for all risk management tools Member States shall establish the methodology for the calculation of losses and triggering factors for compensation in their NRPP Plan? We understand such need in the case of state created mutual fund. But in the case of insurance, losses are calculated and triggering factors are defined by each private insurance company, so there is not one unified methodology.(Article 12, COM(2025) 560 final.)
 - Why only farms that received crisis payment are included as result indicator for risk management instruments? (No 28) (Annex 1 of Performance Framework regulation, COM(2025) 545 final)
- Why financial instruments are not mentioned as a form of support in Article 5 of the CAP Regulation (COM(2025) 560 final). Article 13 and Article 14 of the CAP Regulation (COM(2025) 560 final) mentions that the support may also be provided in the form of financial instruments. However, there are no more detailed provisions on the application of financial instruments in agriculture. Currently, “Financial instruments” is stipulated only in Article 71 of the Single Fund Regulation (2025/0240 (COD)).
- Article 18 LEADER - Please explain the cases where the LEADER support areas referred to in Article 18(3) and (4) of the draft CAP Regulation should be applied. What is meant by ‘projects implemented by local action groups (LAG)’ referred to in paragraph 3, does it mean that the LAG itself must implement the projects?

Regulation on expenditure tracking and performance framework

- Will specific, comprehensive output and result indicators be developed for integrated territorial investments that cover multiple policy areas (e.g., economic development, social inclusion, and environment), in order to better reflect their holistic impact and ensure monitoring beyond a single sector?
- For certain policy areas, output indicators are defined but result indicators are not. If a policy area has both output and result indicators defined, are result indicators mandatory? (In the context of the implementation of the new Regulation, are result indicators mandatory in all policy areas where both output and result indicators are defined? If, in certain areas, only output indicators are defined, will Member States be required to develop their own result indicators, and if so, how will their consistency at the EU level be ensured?) For example, intervention field 88 “Physical regeneration and security of public spaces” includes a result indicator “Number of annual users,” which, in the view of MoSARD, is not always possible to determine in the case of a public spaces/outdoors - has the Commission foreseen alternative measurement methods or flexibility, considering that such an indicator is often not precisely determinable in outdoor public spaces and can create additional administrative burden?
- Regarding the implementation of the 'Single Gateway' system:
 - Considering the varying levels of digital readiness among Member States and their institutions, what practical measures will the Commission provide to guarantee a smooth and effective submission of data to, and access to, the 'Single Gateway' system for all Latvian institutions and beneficiaries?
 - Will appropriate transitional periods and technical support be foreseen?
 - What will be the precise data submission deadlines and frequency within the new system, and how will their integration with existing national reporting cycles be ensured to avoid double reporting and ensure data consistency and efficiency?
- Although the regulation foresees a reduction in administrative burden for final beneficiaries, it is likely to change the workload and required skills for civil servants in the planning and strategy development phase. Question: What kind of technical assistance, training, and detailed guidelines will the Commission provide to support Member States’ (Latvian) civil servants in adapting to the new, detailed planning, monitoring, and reporting requirements under the new regulation?
- How much flexibility will the new regulation allow Member States, such as Latvia, to adapt the harmonized indicators and intervention fields to national and regional specificities, especially concerning smaller-scale projects or very specific regional needs? Will adaptations be possible in certain situations?
- In ANNEX II List of codes for the territorial dimension Part 1: CODES FOR THE TERRITORY TYPE DIMENSION (I) include sparsely populated areas. How does the European Commission plan to define and operationally identify “Sparsely populated areas”? Will European Commission prepare any methodology on defining sparsely populated areas? Additional question regarding codes for the territorial dimension, can

Member states choose only one type of territory, or is it possible to combine several types of territories?

- Article 11 Evaluation – it is set that Member States shall draw up an evaluation roadmap. Should this roadmap include all elements of NRPP plan or Member States can make such roadmap separately for each of instruments set in Article 1(1a) of the Fund Regulation
- Annex 1 – what is output indicator “number of smallholders in third countries”? Why is it attached to agricultural interventions?
- Annex 1 – there are multiple output indicators for some of the intervention fields. Does that mean that, when choosing the intervention field, all indicators must be applied or is it possible to choose one output indicator from the field?

EU School scheme

- The new NRPP plans and the NRPF regulation is to enter into force on January 1, 2028 – when the current national School scheme strategies for the period of 2023/2024-2028/2029 will still be in force. This means that the current 6-year period will be affected significantly, in particular, if the EU financing for the scheme will be affected. Will Member States be obliged to revise their strategies or will those strategies have to be finished by the end of 2027?
- What about the requirement for evaluation of the School scheme envisaged currently in the CMO Regulation (Art.23) and regulation 2017/40 (Art.9) – will this requirement be discontinued? The new school scheme proposals only provide for EU support for product distribution and awareness-raising measures.
- Is any action from the Commission expected also regarding the secondary regulations – Implementing Regulation 2017/39 and Delegated Regulation 2017/40 – are those to be amended or repealed since some articles are taken over in the NRPF Regulation and the CMO amending regulation? To this regard, do we understand correctly that the Member State decisions stemming from those two regulations, for example, on setting the rules for aid applicants or for setting application deadlines and aid payment deadlines are left completely upon the Member States?
- Article 1, point 12 of the CMO amendment regulation – proposed Article 28(2) of the CMO regulation - could the Commission provide clarifications/explanations on products containing no more than 10% free sugars and 30% fats? Such criteria are not in force under current legislation.
- Article 1, point 12 of the CMO amendment regulation – proposed Article 28(4)(b) of the CMO regulation – could the Commission explain its proposal for allowing only skimmed or semi-skimmed milk?

Support for interventions in certain sectors

- Considering that the amendments to Regulation (EU) No 1308/2013 foresee the establishment of a separate protein crop sector, does the European Commission intend to introduce a dedicated Union financial support envelope for recognized protein crop

producer organizations, similar to what is provided for the fruit and vegetable sector, in order to encourage the formation of such organizations and support protein crop production within the European Union?

- In light of the proposed new version of the Regulation, which defines the intervention framework for specific sectors, it is currently unclear how Union financial support will be allocated to different sectors (e.g. fruit and vegetables, protein crops, and others). Could the European Commission clarify whether, in the next programming period, separate Union financial envelopes will be allocated to different sectors — as is currently the case for the fruit and vegetables sector — or whether all sectors will receive support from a common fund?

Connecting Europe Facility

Transport

- We note that the annex for the CEF III proposal no longer lists the Via Baltica highway (but includes Rail Baltica). At the same time the CEF III regulation notes that it will support projects of common interest relating to interconnected, interoperable, decarbonised, smart, safe, sustainable, resilient, secure and multimodal transport networks in accordance with TEN-T regulation. Meanwhile the CEF III climate support is foreseen at 70%. In light of this, we would like a detailed explanation regarding the foreseen support from CEF for TEN-T highway network.
- Are we right in understanding that CEF III will not establish a transfer from Cohesion fund as established in article 4, p.2 of regulation 2021/1153 (current CEF regulation)?
- Article 9, p. 6 of CEF III proposal states that grant proposals shall be submitted by one or more Member States or with the approval of the Member States concerned by the project of common interest or project of mutual interest. Does that mean that every project submitted for CEF military mobility funding will have to receive approval from both the Ministry of Transport and the Ministry of Defence (that the project complies with EU military transport network)?
- When deciding on support for CEF transport projects, will a priority be given to fund common interest TEN-T cross-border projects or projects that are related to smart, resilient, sustainable and decarbonised TEN-T network completion?

Energy

- What is the interplay of CEF with the Competitiveness fund, which also has a significant emphasis on energy infrastructure?
- Current developments show that a significant attention should be paid to the protection and strengthening the resilience of existing and new energy infrastructure. What is the place of protection of critical energy infrastructure and strengthening the resilience of also existing energy infrastructure in the MFF in general and in CEF proposal in particular? Article 3 that defines the programme objectives includes the reference to ensuring resilience of energy infrastructure. How this should be interpreted?

- Are there any synergies between energy projects and military mobility? Can you please elaborate if you see any energy dimension in the dual use of infrastructure?
- What other elements of the MFF address the energy policy challenges related to energy transition, development of infrastructure etc.?

Global Europe

- It is mentioned that the new instrument will contribute to the competitiveness of the EU. In this context, e.g., are there plans for some kind of special instrument to involve small and medium-sized enterprises, or a review of the public procurement procedure so that EU companies have more opportunity to apply for funding?
- Given that a single instrument combines different areas with different priorities, how will the transparency and governance ensured in line with priorities, how will the decisions on the allocation of funding be taken, where will the Council be involved and when will decisions be taken by the Commission? In this context, could you also provide more information on the relation between Article 19 and Article 32(2) – can it be understood that comitology is not foreseen in cases, e.g., “(a) action plans and individual measures for which the Union’s funding does not exceed EUR 10 000 000; (b) special and support measures for which the Union’s funding does not exceed EUR 20 000 000”?
- Will the Council be informed annually about the use of funding and what results have been achieved?
- Could the Commission explain what are the reasons behind the slightly lowered 90% ODA target and why the Commission is granted the power to adopt delegated acts to amend the percentage set out in paragraph?
- Will the Commission change the current process of decision-making in order to improve the transparency?

Ukraine

- Please specify the planned funding structure for Ukraine (e.g., grants, loans, guarantees, etc.) and how do they sit in relation to the funding being inside Global Europe and outside of MFF.
- Is it planned that the new instrument and the *Ukraine Reserve* will work like the *Ukraine Facility*, meaning that part of the funding would be disbursed to Ukraine after certain goals are met based on the Ukraine Plan? Accordingly, is it planned to make new a Ukraine Plan based on the current situation and Ukraine’s reform progress?
- In this light, we would appreciate if the Commission could elaborate on the principles that are to guide the implementation of the Instrument and will exceptional circumstances (like the ongoing warfare) be taken into account?
- It has been mentioned that the support under the Instrument should, to the extent possible, be integrated into international efforts towards a financial architecture for the recovery of

Ukraine. We would appreciate a more detailed picture on synergies with other actions and international efforts aimed at helping Ukraine.

- Will Ukraine be able to also benefit from other strands of funding outlined in Global Europe regulation?

European Competitiveness fund

- What instruments in the MFF can be used to finance critical energy infrastructure resilience projects? What is the amount of available financing for such projects under the European Competitiveness fund?
- We would ask the Commission to elaborate on the types of support that overlaps between ECF and CEF. Specifically, how will these sectors be funded? ECF foresees support for transport decarbonisation, investments in digital infrastructure and military mobility while CEF also establishes support for the decarbonisation of the TEN-T network and military mobility.
- Will the ECF support for digital infrastructure will be aimed to support the same initiatives as in 2021-2027 CEF digital programme?
- What will be the funding rates in ECF for transport decarbonisation, digital infrastructure (5G, 6G), military mobility, cybersecurity? Article 52 references only article 44 which outlines only specific activities to support defence industry policy.
- How is the Commission going to govern the work programmes for the specific windows and for the Digital Leadership window in particular? The Explanatory memorandum of the ECF proposal sets out that the ECF includes activities currently carried out under 14 Union programmes, including the Digital Europe Programme – which will now be covered by the Chapter VI “Digital Leadership” of the ECF. Unfortunately, the Chapter VI “Digital Leadership” includes just two articles in the draft ECF regulation, providing only very general information on the “Digital Leadership” including specific provisions (art. 38) and list of specific activities (art. 39). This Chapter is very limited compared to other chapters containing much more detailed information - for example, Chapter VII on resilience, security, defence, industry, and space.
- Will there be periodic strategic reviews to assess whether the fund remains aligned with geopolitical and industrial shifts?
- How will funding be distributed what are the expected co-financing requirements for Member States or industry?
- What is the main rationale behind establishing the ECF, and how does it differ strategically from the existing programmes? While ECF has cross-sectoral coverage, it doesn't reflect clear divisions for investments in particular sectors (for example digital), especially in a situation where it has been announced that investments in digital are going to be increased.

Horizon Europe II pillar

- In the context of the proposed policy windows, how will the ringfencing of the collaborative research be ensured?

- Wouldn't the Horizon Europe rules be better placed to ensure excellence and impact for research and innovation projects?
- How does the interwinding of Horizon Europe and the Competitiveness fund justifiable in the context of the policy objective of simplification?
- Why can't the same approach be applied for the "competitiveness" part of Horizon Europe Pillar II as for the "society" part?

Erasmus +

- We would like the Commission to prepare an overview that compares both the Erasmus+ and European Solidarity Corps programmes of 2021-2027 and Erasmus + of 2028-2034 in order to better understand the differences and which activities will be continued, renamed, created new etc. We would also like to see indicative estimates of the share of funding for specific activities.
- How will an indicative financial envelope ensure implementation and planning of the programme, if the funding is indicative?
- We would like the Commission to elaborate on the full and partial association of third countries. Why such an approach?
- How will the programme be supervised and steered if there will be no programme committee (as is the case now)?

AgoraEU

- Does the Commission intend to partially keep the name and identity of the existing sub-programmes under the common AgoraEU brand?
- Will there be more detailed information on how the increased funding will be distributed between the individual sub-programmes and calls within AgoraEU? Will the Commission take into consideration differences between low and high application intensity of different sub-programmes?
 - As the mid-term evaluation shows, some calls have had relatively lower activity, while others have had a significantly higher number of applications than available funding.
- What is the Commission's view on the future role of current National Contact Points regarding AgoraEU? Are there plans to maintain or increase their capacity, and are improvements foreseen to simplify administrative processes?

Flexibility

- Crisis Response Mechanism – the activation mechanism would involve a decision by the Council and the EP. Currently, an extraordinary instrument has been activated in accordance with Article 122 of the TFEU, and the EP was not involved. Please explain how the new proposed procedure allow for a faster decision making in case of a crisis, when speed is essence?

Heading 4 (Administration)

- The MFF proposal underlines the simplification and harmonisation of provisions. Could the Commission elaborate in detail - what changes at the level of EU administration will be put in place to this aim – including regarding NRPP and Anti-Fraud Architecture (AFA)?
- As a general rule, harmonisation and simplification of work processes as well as merger of structural units or programmes, translate in reductions of resources necessary for the management. What savings - in precise numbers expressed in euros, staff units and structural units, are envisaged on the side of the Commission services? Does the Commission apply the same resource-saving logic to its own structures/ DGs etc when consolidating functions/ processes and creating synergies for work with national plans/Pillar I.
- Could the Commission draw the table on how the 2500 new posts will be distributed by structural units, agencies, offices etc. In case of new duties and function deriving from amendments in mandate of institutions, please indicate it clearly.
- Regarding NRPP – it could be presupposed that for the sake of efficiency the work with NRPP will be centrally managed. Which will be the leading DG (Regio, Agri) or perhaps, a new unit - Single Access Point for Member States, will be created?
- Control and audit - has the Commission consulted ECA on the future ex-post controls-methodology, feasibility, and novelties?
- Boost of financing for border agencies vs AFA. On what basis the decision to increase financing for Frontex was taken? Was there an impact assessment carried out? White paper on AFA intends to "*maximising the impact of every euro spent*". How will the same logic apply to Frontex? What KPIs lie behind and are expected to be reached by boosting its financing.
- Were the anti-fraud agencies taken on equal terms with border agencies? Although according to the White Paper for the AFA Review which was published on 16 July 2025, the same date as the MFF 2028-2034 proposal, legislative amendments to the mandates of OLAF, EPPO, Europol, Eurojust are expected in 2026, the added value of OLAF and EPPO in preventing and fighting fraud as well as protecting the interests of the EU budget, cannot be denied.
- Legislative Financial and Digital Statement (LFDS) Section 2.3 of the NRPP regulation indicates that OLAF "*has the power to carry out administrative investigations*" and EPPO "*is competent to investigate and prosecute fraud and other criminal offenses affecting the financial interests of the Union*". Does the Commission consider that they are sufficiently equipped to carry those duties at the maximum expected level?

Own resources

- We would appreciate to get statistics from the Commission in the breakdown per Member State regarding all own resources (existing and new). In particular:

- companies subject to CORE in the following breakdowns - number of companies in each subgroup of turnover, business sector.
- TEDOR - table on current minimum tobacco taxation rates, amounts collected.
- Could the Commission confirm whether the CORE amounts will be collected from companies by the competent authorities of the Member States? Could you clarify on which year's (n-1, n-2, etc.) net turnover data the CORE calculation of year n will be based? Will public entities, such as state-owned hospitals, be included within the scope of CORE?
- How will the inflation adjustment of the call rate for the plastic resource and e-waste resource be carried out? Will this be integrated into existing forecasting procedure as additional exercise?
- TOR - please provide Impact Assessment which justifies the proposal to lower the share of collection costs of customs from 25% to 10 %.

The handling fee

- o Please provide information which justifies the EC view that handling fee (the amounts related to e-commerce as established under the Union Customs Code (UCC)) falls into the category of traditional own resources.
- o Since the proposal determines that handling fee is a traditional own resource, please explain if and what part remains for the Member States? If a part remains with a Member State, will it be 10% as it is for the TOR? Where does the remaining collected part go – to the EUCA budget?
- o Please explain the legal status of the handling fee.
- o Handling fee is supposed to become TOR from 01/01/2028 (eventual date of entry into force of the ORD). Most probably the Handling fee will come into effect earlier and when the Commission IT solution is operational, i.e. on 01/11/2026 in accordance with Article 264(3)(b) of the new Union Customs Code (UCC). What will be the legal status of the handling fee between its entering into force and becoming a TPR? Will it be “external assigned revenue” accruing to the EU budget?

Additional Requests for fiches

<i>MFF 2021-2027 comparison with MFF 2028-2034</i>	Information where current MFF 2021-2027 is compared to proposed MFF 2028-2034, in constant prices (2025) or most important in comparable prices.
<i>NUTS 2 and NUTS 3 regions</i>	Used list of regions for eligibility – list of NUTS 3 regions (for allocation key and Interreg calculations) and list of NUTS 2 regions (calculations for support for LDR).

<p><i>The “Do No Significant Harm” Principle</i></p>	<p>Regarding the interpretation and clear practical application of the DNSH principle, a unified approach, guidelines, and perhaps practical tools and easily understandable examples (templates) are necessary. This would facilitate DNSH assessment and documentation at the investment and project level, not only across different member states but also within various investment areas.</p>
<p><i>Territorial Investments</i></p>	<p>Regarding territorial investments, we kindly request the development of clear and practical guidelines, as well as targeted technical support for Member States. This is to ensure the effective planning and implementation of territorial investments within the new MFF 2028–2034, especially concerning ad hoc territorial development strategies.</p> <p>A clarification is necessary on how to plan investments for these territorial development strategies, which are anticipated to be developed as part of the measures of the National and Regional Partnership Plan (after the approval of the Plan). This is crucial given the implementation mechanism of the Plan, which requires the definition and inclusion of specific, measurable output and result indicators, along with corresponding pay-out values. Applying policy-specific indicators <i>before</i> the integrated place-based strategy is developed is not appropriate, as the content of the strategies and the breakdown of investment volumes by policy area will be defined during the development of the territorial development strategy itself (after the approval of the Plan). We would need one or more applicable indicators (cross-sectoral) for integrated investments.</p>
<p><i>Green Tagging</i></p>	<p>Regarding <i>green</i> tagging we would like to ask that a methodological explanation be developed on the way in which the amount of <i>green</i> funding is determined, and specifically with regard to EU fund programmes.</p>
<p><i>Life Projects</i></p>	<p>The proposals for the Funds Regulations state that Plans should be developed, considering the experience of the LIFE programme. Please explain how this is intended and what specific experience should be adopted.</p>
<p><i>Methodology for the calculation of the Union financial contribution for each Member State under the</i></p>	<p>NPR Regulation Annex 3 outlines the methodology for allocating EUR 10,264,000,000 to the Interreg Plan, with criteria based on population and border proximity.</p>

<i>Interreg Plan (NRPP Regulation Annex III)</i>	European Commission Fiche would be very much appreciated on the Member State-specific Interreg allocations based on this methodology.
<i>Own resources</i>	Information regarding new own resources - the calculation methodology for revenues broken down by resource, by Member State, by year. We would like the Commission to prepare a fiche with detailed calculations regarding the new own resources proposals with Commission's estimates per Member States for every own resource separately, and an overall table about the share that goes to EU budget from each Member State.
<i>Heading 4 (Administration)</i>	Administrative expenditure and information regarding new staff members – number of new staff for Commission (DGs), agencies and institutions.
<i>Statistics</i>	Where appropriate in <i>fiches</i> we would request concrete data sets from <i>Eurostat</i> for statistical information.

LITHUANIA

Written questions and requests for Commission fiches on 2028-2034 MFF

FICHES:

1. Calculation of MS national envelopes for ringfenced allocations for agriculture (incl. separate allocations/calculations for direct payments, showing the pace of external convergence of direct payments).
2. Possible additional sources of financing/synergies for agriculture and rural areas (in addition to ringfenced envelope for income support)
3. Financing instruments/mechanisms for risk management for agriculture and rural areas (market disturbance, other (e.g. damage of adverse climate events))
4. Governance system of NRP plan, including the role/function of sectorial paying agencies (e.g. exclusively responsible for the CAP), which currently have separate management, control and payment systems
5. NRPP envelopes for MS – more detailed explanation of the allocation criteria, list of statistics used and comparison of allocations in current and constant prices with the 2021-2027 MFF.
6. Support for Ukraine – functioning of the Ukraine reserve, grants and loans proportion and possibilities of receiving support for Ukraine from other EU budget programmes (Erasmus, HUMA, etc.) and their calculation – in the overall amount of Ukraine reserve or as additional top-ups.
7. Simulation of the current MFF with the new proposed deflator.
8. Overall picture of support for defence from various EU budget headings and programmes.
9. Changes in conditionality mechanism as compared to the 2021-2027 MFF.
10. NRP framework architecture (*Member States find it difficult to identify the logic behind the various deadlines and processes outlined in the complex structure of the NRP. We would appreciate it if the Commission could provide structured guidance—preferably in the form of visual schemes—illustrating the architecture of the NRP from the planning stage through to the finalisation of the plans*)
11. Cost-based and performance-based system separation (*if the NRP framework is performance-based, why are elements of cost-based system still mentioned (e.g., NRP reg. artcl. 7 paragraph 5)? Are all of the definitions going to be revised? How it will be ensured that the system would be switched into performance-based one?*)
12. Reforms (*We would appreciate if the definition of reform as well as the costing methodology for reforms would be provided (including zero-cost reforms). It should also be explained whether Member States will be obligated to address all of the Country Specific recommendations. Finally, the scope of the reform should be defined – will reforms in the areas that EU does not have an exclusive competence (e.g. social affairs, taxation system, defence system).*)
13. Performance framework (*We support performance-based framework; however, it is yet unclear how it will be implemented. We would appreciate clear guidelines on*

reporting on milestones and targets - what conditions makes milestone and target fulfilled. There should also be a methodology for auditing achievement milestones and targets. Finally, the methodology on financial corrections should be provided, especially regarding how the correction will be applied for the qualitative milestones and targets, as well as to those milestones and targets that have been partially achieved. Retaining certain cost-based elements would result in a substantial administrative burden.)

14. Horizontal condition on Charter of Fundamental Rights *(To enable Member States to fully fulfil this condition, more specific guidance is needed. The guidelines should provide information on the type of information to be provided about fulfilment of the Charter, as well as the applicable criteria and their scope.)*
15. Calculation of the contribution to climate targets at the Member State level.
16. Practical application of the ‘do no significant harm’ principle.
17. Principles and calculation methodology of EU budget contribution to the social target.
18. Implementation of Interreg plan and synergies with the NRPP.
19. Synergies of the European Competitiveness Fund with other EU programmes and funds – for example, CEF, the Innovation Fund, Horizon and NRPP.
20. How the new Global Europe instrument will enable the Global Gateway strategy, support the involvement of the private sector, and facilitate the participation of smaller EU Member States’ SMEs.
21. Synergies between the external dimension of migration in HOME area (migration, borders, and internal security) and the “Global Europe” instrument.

QUESTIONS:

- In what way is special attention to the Eastern border regions reflected in National and Regional Partnership Plan and what measures are proposed to address the economic, social and security challenges and consequences of the war of aggression in Ukraine these regions face?
- What steps will be taken to integrate local and regional stakeholders into the planning, monitoring, and execution of National and Regional Partnership Plans?
- We welcome the suggestion that Horizon Europe will remain a self-standing programme, nevertheless, we would like more clarity on how the governance and structure of Horizon Europe and the ECF will be defined and articulated especially around collaborative research (Horizon pillar II), which should have at least some level of scientific autonomy.
- Are there any measures planned to address the potential funding gap between the two financial periods, to ensure uninterrupted deployment of fiber optic infrastructure in rural areas? A 2–3 year pause in network development could have serious negative consequences for Lithuania’s digital connectivity and regional development.
- The same situation is for CEF transport part due to the gap of depleted CEF transport programme for 2021-2027 until the start of new generation CEF programme for

2028-2034 – how to ensure the continuity of big infrastructure projects as Rail Baltica?

- Is VAT considered an eligible expenditure?

National and Regional Partnership Plans implementation

- NRP reg. art. No. 21 .: “Only measures whose implementation started from 1 January 2028 shall be eligible for financing <...>” How is the start of implementation measures defined? Is there a start and end for eligibility expenditure in the performance-based framework? Is it eligible to include already finished projects into the Plan?
Some measures may begin receiving financing from the state budget before January 1st, 2028, and could subsequently continue to be funded through the Fund. In the case of reforms, it is particularly challenging to determine the exact start date of implementation.
- NRP reg. Art. No. 72.: “Managing authorities and audit authorities may rely on the results of the Pillar Assessment conducted in accordance with Article 157 of Regulation (EU, Euratom) 2024/2059.” What does Pillar Assessment in terms of financial instruments provide? What does the part “may rely on” in this provision mean?
- Is it going to be eligible to use both national and Commission provided SCO and FNLC schemes in the next financial period?
- Are flat rates going to be applied in the next financial period?
- What is the rationale behind establishing a Coordinating Monitoring Committee for the entire NRP? Why wouldn’t separate Monitoring Committees for each chapter serve the purpose? We are concerned that creating a Coordinating Monitoring Committee would increase the administrative burden and risk creating an imbalance among social and economic partners, as only a limited number of representatives from each chapter-specific committee would be able to participate.
- NRP reg. Art. No. 22: “The NRP Plan shall: (a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3 <...>” Some specific objectives may not be relevant to all Member States. Therefore, the provision should be adjusted to ensure that NRP plans are not required to contribute to all specific objectives.
- Recital 5 indicates that the Commission will develop Technical Guidance on the application of DNSH by 1 January 2027. It is essential that the guidelines include:
 - A precise and specific exclusion list
 - Monitoring - exactly what will be checked and how, so that MS can apply those methods in advance in project planning
 - It is important to know what contribution to the objectives of the CLs projects will be scrutinised: 100, 40, 0 or all.

We believe that the deadline for the DNSH guidelines should be brought forward to allow sufficient time for their proper integration.

- Will all the calls for expression of interests and calls for proposals be required to be published on “Single Gateway” website? If so, what is the intended purpose of this requirement? We believe that such an obligation would impose an additional administrative burden on Member States and the managers of the information system. It would be more reasonable to require publication only for calls that are open to participants from other Member States.
- The regulation refers to a new type or form of financing – the “budgetary guarantee”. However, as no definition is provided, questions arise regarding the nature of this mechanism: what exactly does it entail, and is it related to financial instruments at all, or is it a separate form of support?
- What is the relationship between ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ and other funds that goes under the NRP (e.g., Cohesion fund, European Regional Development Fund, European Social Fund +)? What kind of function will smaller funds under the Fund perform? Will it specify fixed amounts for particular activities, or will it only define thematic areas and eligible types of investments?
- In the event of a crisis, what is the order of the activation for the available instruments — the EU facility instrument or the 25% of unprogrammed NRP funds reserved for crisis response?
- NRP reg. Art. No. 22 : “ensure that the NRP Plan contributes to the Union’s social objectives. At least 14% of the total Union contribution and loans shall be dedicated to meeting these objectives <...>“What kind of investments is included into 14%?
- Social Climate Plans are to be adopted by early 2026. How will these plans be integrated into the overall National and Regional Partnership Plan?

Critical energy infrastructure

- Does the European Commission foresee the possibility of establishing a dedicated budget line or thematic priority for the protection and resilience of both existing and new critical infrastructure, particularly in the energy sector, in light of growing cyber, physical, and hybrid threats? For Lithuania, located at the EU’s external border, bordering an aggressor country – Russian Federation, that is waging war against Ukraine and uses targeted strikes on Ukrainian energy facilities as one of its military strategies, such risks are particularly high. Strengthening the protection of energy infrastructure is vital for both national and EU security. A dedicated funding line would ensure predictability, demonstrate solidarity, and enhance resilience across the Union.

- Considering growing security challenges and understanding the critical importance of timing, how does the Commission see merit in establishing a distinct pillar within CEF-Energy specifically to the protection and resilience of existing and new critical energy infrastructure?
- If critical infrastructure protection activities were also be eligible under the Competitiveness fund, how would the following issues be addressed:
 - Project selection and priority-setting – would this be done at the EU or national level?
 - Governance and implementation – would responsibilities lie with the European Commission, national agencies, or a shared approach?
 - Possibility to combine funding (blending) with other EU instruments such as CEF or Cohesion Funds?
- How the geographic balance could be ensured in the distribution of funding for existing and new critical infrastructure protection – especially in EU border regions or Member States exposed to elevated strategic threats, such as Lithuania and the Baltic region?

Request for fiches in the area of OR:

1. GNI estimates per Member State and per year (in 2025 and current prices)
2. Inflation estimates per Member State and per year.
3. Estimated projected revenues from new OR and from the existing OR per the category (separately for the handling fee) of OR, per Member State and per year (in 2025 and current prices).
4. Estimates of Other revenue per years and per the category (in 2025 and current prices).
5. Assumptions underlying the Commission's estimates for the revenue from the new OR.
6. Repayment costs of NGEU and combined budgetary needs from 2028 per year (in 2025 and current prices).
7. Functioning of extraordinary crisis response mechanism.
8. Information on the Own Resources ceiling, including the methodology of calculation, elements under the Own Resources ceiling for payments in 2028-2034.

Questions as regards the COM proposal on the ORD:

1. In order to understand the principles and mechanism of operation and calculation of the new Own Resources (especially CORE, TEDOR and E-waste) and to form a national position accordingly, it is necessary respectively to get from the Commission the proposals on MAR and IMSOR. When does the Commission plan to submit them?
2. The methodology for generating waste from electrical and electronic equipment (e-waste) based on the supply to the market of the last 3 years does not reflect the actual generation of e-waste:
 - some equipment has a life cycle significantly longer than 3 years - e. g. due to the development of renewable energy (specifically solar power plants), the use of photovoltaic panels has increased - the life cycle of photovoltaic panels is 25–30 years.
 - the unaccounted export of e-waste for reuse - therefore e-waste will not become waste in the country where it was supplied to the market.

How would these issues be addressed in this OR calculation methodology?

3. Can the Commission provide further clarification on the administrative and accounting requirements for handling fees as part of the TOR? How does this coincide with the aim of this fee to cover administrative costs related exclusively to e-commerce and with the fact that the level of the fee should be in line with these costs? Would the rules of MAR and IMSOR be applied, e.g. interests (applicable for TOR) for the late making available?
4. Have the COM assessed the influence of CORE on the EU competitiveness?

LUXEMBOURG

I. General topics

- Can the Commission elaborate on its macro-economic assumptions and provide more precise data, on:
 - the Gross National Income?
 - the Gross Domestic Product?
 - inflation?

- Can the Commission provide a more detailed breakdown of the financial architecture underpinning the MFF proposal, including:
 - Program-by-program allocations;
 - Distribution across headings;
 - Distinction between commitment and payment appropriations;
 - Corresponding figures in both current and constant (2025) prices.
 - A comparison table of the current MFF (2021–2027) with the proposed new MFF (2028-2034);
 - Clarifications on the policy justifications for the proposed changes.

- Why have the provisions on interinstitutional coordination been moved from the operative part of the Regulation to an annex?

- What is the legal or procedural rationale for such a change?

- What are the implications for transparency, enforceability, and institutional balance?
- What explains the Commission's change of position regarding the adjustable deflator, especially considering the Commission's reluctance to push for a dynamic deflator during the previous 2018-2020 MFF negotiations?

- Can the Commission confirm that the dynamic deflator aims to avoid triggering a mid-term revision and to reduce technical adjustment volatility?

- How will the mechanism operate in practice?

- Can the Commission elaborate on the non-transferability of appropriations beyond year n+2 under the conditionality mechanism? What does this imply? What will happen to uncommitted appropriations after n+2?

- Could the Commission clarify the legal basis, operational framework, and interaction of the Ukraine Reserve with existing external action instruments? How will its volume and activation criteria be determined and reviewed?
- Why have references to “unforeseen circumstances” as a justification for a MTR of the MFF been removed? Would a mid-term revision (MTR) still be automatically triggered in the event of serious unforeseen circumstances?

II. National and Regional Partnership Plans (NRPP) Proposal

- Which concrete shortcomings of the current system does the NRPP aim to address?
- How will the proposed changes effectively reduce administrative burden and improve efficiency?
- What methodology will be used to assess whether simplification objectives have been met?
- Can the Commission provide a comparative overview or fact sheet illustrating the expected simplification gains compared to the current system?
- How does the Commission justify that fewer programs will lead to genuine simplification in practice?
- How does the Commission address disproportionate administrative burden for smaller Member States with very limited pre-allocated envelopes and a single-region structure?
- What will the Commission be offering to Member States in terms of guidance and assistance under the NRPP architecture?
- Can the Commission elaborate on its internal organization when it comes to NRPPs? Who will be the main Commission interlocutor for Member States and their respective management authorities?
- How will the Commission ensure a coherent and streamlined approach for monitoring and dialogue?
- How can Member States with limited national envelopes be expected to meaningfully contribute to all general objectives under Article 3 of the regulation?

- Is a flexible or prioritized approach foreseen allowing Member States to focus on objectives most relevant to their national circumstances?
- How will funds be allocated across the thematic windows within each NRPP? Will the distribution be centrally guided or left to national discretion, subject to compliance with minimum thresholds or indicators?
- To what extent will the Commission give due consideration to those Member states with smaller cohesion envelopes that can only partially contribute to achieving relevant reforms?
- How will the new system effectively prevent the duplication of control efforts, i.e. the checks on costs incurred and the checks on results achieved?
- Can the Commission confirm:
 - whether the construction of new nuclear fission power plants is eligible for financing under the NRPPs or in any other fashion through the EU budget?
 - whether the Member States can access EU budget-backed guarantees via the Catalyst Europe program for such projects?
- How will the Commission ensure this funding does not hinder the necessary accelerated deployment of renewables, energy efficiency measures, grid electrification, and flexibility? (As a reminder, the 2040 climate objective impact assessment by COM indicates a 90% share of renewable energy in electricity production and a 75% share in final energy consumption.)
- What lessons learned from the Recovery and Resilience Facility does the Commission intend to integrate?
- How is the new decommitment rule (n+1) compatible with multiannual project cycles?
- How will *ex ante* conditionality linked to CSRs and the European Semester be applied in NRPPs?
- How will NRPPs align with or differ from National Reform Programs (NRPs)?
- How is the 14% social spending threshold calculated (eligible expenditures, baseline, reference period)? Which monitoring and reporting mechanisms will ensure compliance?

- What will be the amount ringfenced for the CAP measures per Member State? Based on which criteria will this envelope be calculated (historical spendings, external convergence...)?
- What role will DG Home play for the Home Affairs Funds under the proposed NRPP architecture?

III. European Competitiveness Fund (ECF)

- Regarding InvestEU, what is the rationale behind reducing the provisioning envelope to EUR 10 billion (a 30–40% decrease) without secured top-ups?
- What are the expected implications for leverage and geographical balance?
- Why does the InvestEU proposal no longer provide a dedicated envelope for the EIB Group, previously holding 75%?
- How will the Commission ensure coherence and critical mass while allowing fair competition among implementing partners?
- Why does the draft ECF Regulation not provide for the combination of legacy instruments from previous programming periods?
- How will the logic of the Investment Simplification Omnibus be reflected in the regulation?
- What are the sources of funding for research and development in the field of new energy technologies (e.g. fusion, next-generation nuclear, energy storage, renewables, energy efficiency)?
- Will Horizon Europe and the new LIFE program continue to fund social innovation and research into innovative citizen-led projects in the field of energy?

IV. Global Europe

- Can the Commission clarify what specific simplification benefits for EU external action are expected from the proposed architecture in comparison to the current MFF?
- To what extent has the Commission assessed the risk that the proposed streamlining of the Global Europe architecture may in fact lead to a dilution of key international commitments and objectives, such as sustainable development goals (Agenda 2030) and Official Development Assistance (ODA)?

- The percentage of funding that needs to fulfill ODA criteria has been reduced from 93 % to 90 %. Can the Commission clarify the rationale behind such a decrease, the criteria used to determine the new percentage, as well as the modalities and implication of the Council in potential future adjustments?
- How does the Commission respond to concerns about the reduced visibility of certain policy areas, in particular humanitarian aid, given the absence of a dedicated pillar under article 3 of the regulation proposal? How does the Commission respond to concerns about the reduced visibility of certain thematic priorities such as gender equality or climate change, embedded previously in NDICI targets? 5
- Could the Commission clarify the role foreseen for the European Investment bank, especially given the open architecture?
- Which criteria have been used by the Commission for the proposed indicative breakdown of allocations under article 6 of the draft regulation? Can the Commission give additional information on the interplay between the regional and the global envelopes, including on potential transfer of funding?
- How does the Commission intend to ensure an appropriate balance between increased flexibility and reinforced strategic governance by the Council in the implementation of this heading, both in terms of programming as well as for the allocation of the cushion? Can the Commission illustrate to what extent recurrent and recent demands by Member states have been taken on board in this context?
- Can the Commission outline which lessons learned of the flexibility tools' implementation under the current MFF (e.g. cushion) have been considered in the new proposal?
- Considering the significant non-programmable components of the funds, could the Commission explain how it will prevent competition between the EU's strategic priorities?
- How does the Commission justify the increased use of delegated acts?
- What specific control, audit and conditionality mechanisms are foreseen under this heading?

- Can the Commission elaborate on its programming assumptions when it comes to the debt sustainability of Ukraine? Under which scenario (status quo, reconstruction, etc) have different budgetary forecasts been established?

V. European Public Administration

- The issue of geographical balance in the EU institutions remains a major concern for several Member States. Can the Commission outline how it intends to address this issue in the next programming period?

VI. Performance Framework

- When will the Commission publish concrete guidance on control and audit requirements (including cost verification and performance indicators)?
- How will the approach adapt to the policy-based budget structure and the role of the Single Gateway?
- How will the single audit principle be applied in practice to beneficiaries and final recipients?

- What will be the impact of simplified reporting on the proportionality of audit/control requirements for recipients?
- What actions is the Commission taking to ensure legal certainty for beneficiaries before program launch?
- How will the Commission be engaging with audit stakeholders and promoting loyal cooperation?

VII. Own Resources

- Why were certain new elements not discussed more transparently with Member States or further aligned with policy priorities before the proposal was made ?
- Can the Commission provide a detailed breakdown in constant and current prices by Member State of:
 - Annual contributions per Own Resource;
 - the suppression of all correction mechanisms;
 - Methodological assumptions (bases, call rates, adjustments);
 - Net effects on national contributions (in % of GNI and in euro terms)?

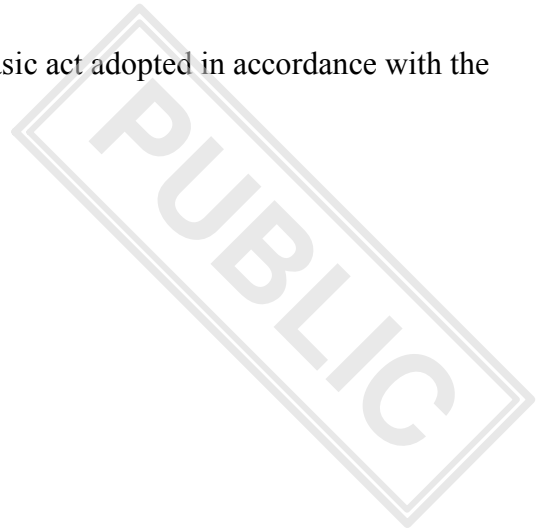
- Can the Commission provide an assessment including a comparison table with the current system?
- Can the Commission explain why the headroom under the MFF – including the potential use of borrowing – is being allocated to broad objectives, while specific operational needs remain underfunded?
- How does the Commission justify presenting new Own Resources as "genuine", whereas most of them imply taking away revenue from national public finances?
- Could the Commission provide detailed information on the methodologies used to establish the revenue forecasts for each own resource?
- Why have previous concerns on statistical reliability, fairness and administrative burden not been addressed?
- What improvements are foreseen to enhance equity and transparency?
- Can the Commission clarify the link between the TEDOR proposal and the ongoing or upcoming revision of the EU Excise Duties Directive, especially in the fiscal policy context? • What is the legal and methodological basis for the "purchasing power alignment" concept?
- Do the plastics and ETS own resources include a correction mechanism? If so – as a matter of coherence – should they not be excluded?

- On CORE specifically, we would like to request further information on the following elements:
 - o In the context of the overall thriving for more competitiveness of EU companies, we wonder what the reflections of COM are, as regards the CORE measure, to not take account of the profitability of different companies and sectors, when defining a pure revenue based levy. This approach seems very punitive, in particular for low margin or even loss-making companies.
 - o In the view of the COM, is the “annual contribution” to be considered a tax?
 - o Is our understanding correct that this “annual contribution” must be paid by the relevant companies in scope of the measure, meaning that a Member State may not pay the calculated amount of the “annual contributions” out of its own national budget?
 - o What is the procedure to collect the “annual contribution” from relevant companies? What happens if companies in scope of the measure refuse to pay the contribution?

- o Are Member States expected to implement the Council Decision into their national legal framework or would the Council Decision be considered to have direct legal effect for companies in scope of CORE?
- o The recitals mention that it is “appropriate to exclude from the scope of the CORE certain entities, which based on their particular purpose and status generally do not carry on a trade or business for profit purposes”. How are the concepts of “governmental entities, international organisations and non-profit organisations” to be applied in practice, in the absence of a more detailed legal definition in the proposed Council decision?
- o Can the Commission provide further details on the definition of a 'company' in this context? Does the scope cover company groups as a whole, or should sub-groups be treated separately? Are holding companies also included in the scope?
- o Can the Commission provide Member States with information on how the figure of 28,500 companies concerned by CORE was estimated and a breakdown of this number per Member State?
- o How will the correct overall amount of CORE be established and controlled?
- o For purposes of determining the correct amount of “annual net turnover”, what benchmark and year is to be taken into account? Should Member States only consider the annual net turnover as published in the annual accounts of the company or the Central Balance sheet database? What happens if the annual accounts are not published in due time (out of omission, negligence, etc of the company)?
- o What is the due time of the “annual contribution”?
- o Is there a mechanism foreseen to adjust the brackets to inflation?

- o The definition of “net turnover’ refers to the relevant definition of net turnover of Directive 2013/34/EU or to the relevant definition under national law. Does this mean that a national definition of net turnover may take precedence over the relevant definition in the accounting directive for purposes of defining and calculating the due amount under CORE?
- o If the contribution was to be considered as a tax, what should the legal procedure be for adopting the measures referred to in article 12, letter c) (implementing measure based on

article 311, subparagraph 4 TFEU, or rather a basic act adopted in accordance with the relevant procedure and legal basis?



HUNGARY

Horizontal questions

We would like to request detailed clarification about the possibility of providing support for Ukraine or Ukrainian entities in each and every program. In each and every program separately we would like have a clear understanding about 1) the theoretical maximum amount of support, 2) the Commission's estimate on the level of support, 3) the source of the support (MFF/above the MFF from the headroom/etc.) for Ukraine.

What is the Commission's estimate about the theoretical maximum amount for the financial support to Ukraine in the form of loans allowed by the Article 2.3 of the draft MFF regulation (without taking into account the upper limit defined in Article 6.2 in the draft Global Europe regulation)?

Currently the timeframes/timelimits of financial assistance to Ukraine are clearly stated in the MFF regulation. Why did the Commission decide not to include this time timeframe/timelimit in the Article 2.3 of the draft MFF regulation?

Currently the maximum overall amounts of the financial support to Ukraine in the form of loans is capped in the MFF regulation. Why did the Commission decide not to include this time an upper limit in the Article 2.3 of the draft MFF regulation?

Could the Commission clarify the meaning of Article 6.1 of the draft MFF regulation?

Mobilising the Ukraine Reserve is the only possibility to finance expenditure for Ukraine under Global Europe?

What consequences will there be if Commission does not keep the deadline for the proposal for the next MFF (article 13 of the draft MFF regulation)?

What is the reason for the drastic decrease of the level of the commitment appropriations of the Heading 1 (from 61% to 47%)?

In the tables on the page 30 and 31 in the MFF communication why does the Commission refer misleadingly as "European Competitiveness Fund" to the sum of the European Competitiveness Fund, Horizon Europe and Innovation Fund? Why did the Commission decide not to include the reference amounts of the European Competitiveness Fund separately in these tables?

Single Plan

CAP

After seeing the lengthy procedures of the adoption of the current CAP strategic plans, the RRF plans, the national plans, and their lengthy negotiations with the Commission, it's impossible to predict the time needed for these exercises of merged huge funds – what will happen if one part of the plan is not ready in time, or one part is not accepted by the Commission – how will it be possible to initiate payments (most importantly the direct payments to farmers) on the other parts of the plan?

Weeks after the official presentation of the package it would be essential to know the exact Member States allocations, but the relevant Annex of the NRPP regulation is still missing. Without the Member States' breakdown, it is not possible to assess fully the proposal. When will the Commission finally finalize the national allocations of the ringfenced CAP parts?

As important elements of the draft regulation are still missing, would it be necessary to adopt the final proposal again by the College?

How will the proposed formula – based on the agricultural prosperity gap – influence the distribution of CAP funds among the Member States? The range in case of direct payments was historically defined and was more or less unchanged in the past decades.

The proposed rules for degressivity and capping seem to be way too strict. The reduction would start at such a low hectare level, which would cause serious problems for a lot of farmers, including family farms. As the Commission promised to protect family farmers, could the Commission elaborate the definition of family farmers/farms?

As regards the support for CAP investments, the scope should be clarified, as it's not clear, which currently supportable investments will be eligible for support in the future. We need further clarification especially with regard to the investments in the food processing industry (which are currently financed in CAP Strategic Plans).

Cohesion

Could the Commission clarify the budget of the Cohesion Fund? How is the proposal in line with TFEU Article 177?

If a milestone/target is not fulfilled according to the planned timing defined in the decision approving the Plan, is it possible to submit the subsequent payment request without that particular milestone/target? Could the Commission disburse payments based on such a payment request?

Would it be possible to circumvent the decommitment rules of Article 15 with modifying the NRRP and postponing the date of the fulfilment of that particular milestone/target?

NRP Regulation, Annex III - Methodology for the calculation of the Union financial contribution for each Member State under the Interreg Plan

According to the table the share of the allocated amount for HU is 3,1%. What does this mean in terms of figures?

Why COM proposes the same allocation method as in 2021-2027? As we already highlighted during the previous negotiation process this allocation method (population living within 25

km of the borders as criteria) is unfavourable for those countries which has rarely populated border regions and it would serve rather a counter-purpose (less developed, rarely populated should receive more support to balance disparities).

Regional development, Interreg plan, Article 11 Provisions for non-Member States

What is the methodology to contribute to the amount of the financial envelop to Interreg programmes with non EU members? (*In the 2021-2027 period, .."support from the ERDF shall be granted to individual external cross-border programmes provided that at least equivalent amounts are provided by IPA III CBC and NDICI-CBC..."*)

NRP Regulation, Article 15 Decommitments

Did the Commission examine the applicability (and pertinency) of the N+1 rule (which seems in practice rather N+10 month) in case of Interreg in more details?

Performance Regulation, ANNEX I Intervention fields and indicators

Output indicators referring to cooperation (i.e. Interreg), in several cases (e.g. in Policy level 1 Education and Skills) reflect to transnational cooperation, while their result indicator pair reflects to cross border cooperation (e.g. „Number of organisations involved in transnational cooperation activities” vs „Number of organisations benefitting from their participation in cross-border cooperation activities”). How shall this be understood? What is meant by transnational cooperation? Why not cooperation across borders?

JHA

How does the proposed substantial budget increase for the agencies (Europol, Frontex) align with the most recent Strategic Guidelines, endorsed by Heads of State and Government? Can the Commission clarify how this allocation reflects the long-term priorities defined in the Strategic Guidelines?

With regard to the support of innovative solutions in the field of asylum, it remains unclear who determines what qualifies as innovative. Could the Commission clarify the criteria and the decision-making procedure for this? Similar questions arise concerning instrumentalisation and weaponisation of migration.

Conditionalities

Given that the Proposal applies to Interreg Plan, does it mean that suspensions based on horizontal conditions would affect the contributions to neighbouring countries as well? How consistency is ensured given that according to the Proposal decommitments would follow suspension of payments instead of suspension of commitments?

Rule of law report

What is the legal basis for linking the rule of law report and the recommendations thereof to the access to EU funds?

In its presentation the Commission refers to this element as a positive incentive. Does it mean, in light of in particular Article 22(2)p), that if the Member State decided not to include any measure in its Plan as a follow-up to all or any of the recommendations in the Rule of Law report, it could not lead to negative consequences, and the Commission could not deny to propose the approval of the plan due to the lack of commitments to implement rule of law recommendations?

Relation with conditionality regulation

The mechanism based on the new horizontal condition on the respect for the principles of the rule of law (in particular Article 9) seems to unnecessarily duplicate the Conditionality Regulation making the latter basically meaningless at least in case of funds under shared management. (Same legal definition, but easier application, fewer guarantees concerning the link to budgetary risk and the rights of the Member State concerned to defend itself.) Under these conditions, is there any rule of law breach in relation to the Single Plan, which cannot be addressed by the new mechanism in the NRPR, only by the Conditionality Regulation as a last resort? If not, what would be the reason to keep the latter regulation in force?

How does the Proposal ensure that a sufficiently direct link between breaches of rule of law principles and risk to the sound financial management of the budget and financial interests of the EU is a necessary precondition for any measure/suspension taken on the basis of the horizontal condition under Article 9? In this regard, how does the Proposal ensure compliance with the Treaties and the judgements of the Court of Justice, in particular in cases C-156/21 and 157/21?

Smart conditionality

Given that Article 15(4) of the Proposal extend the applicability of the so called “smart conditionality” to appropriations corresponding to decommitments in accordance with Article 7(3) of Regulation (EU, Euratom) 2020/2092, does the Commission intend to submit a proposal for amending Regulation 2020/2092 in order to align it with these new rules? If not, how legal certainty would be ensured?

Without prejudice to the above question, does Article 15(4) apply also to suspended budgetary commitments under the current MFF? Does it mean that suspended appropriations

of the last two financial years of the current MFF could be made available again under the new MFF for use under Union instruments or programmes implemented under direct or indirect management?

Infringement procedures

What is the reason behind the change in the wording on the suspension related to infringement procedures under Article 67(1)d) of the Proposal compared to Article 97(1)d) of the Common Provisions Regulation (CPR)?

Can the Commission confirm that based on Article 68(1)a) in conjunction with Article 67(1)d) of the Proposal, the Commission could unilaterally take away the corresponding allocation from a Member State after only a 6-month period due to its differing view in an ongoing infringement procedure? How does this provision ensure respect for the Treaty-based rules on infringement procedure, in particular Article 258-260 TFEU, and the institutional prerogatives thereof, which ensures the exclusive competence for the Court of Justice to impose financial penalties on Member States due to infringements. What guarantees exist to ensure that the Member State concerned receive sufficient compensation in a case where the Court, years later, decides in favour of the Member State, while the Commission has already reduced its financial contribution based on its reasoned opinion? In theory and should the NRP Regulation be adopted as proposed (quod non), would the Commission intervene in support of the co-legislators in a case seeking the annulment of the Regulation, in order to defend this circumvention of the Treaties?

Competitiveness Fund

How does the Commission intend to ensure the geographical balance among Member States, as this is a long-standing issue with the excellence-based programs?

Please explain the mechanics of the implementation of the defence/military part of the Competitiveness Fund and the synergies with Horizon Europe and with Connecting Europe Facility.

Could Commission prepare a fiche on the practical alignment between the policy windows of the Competitiveness Fund and the competitiveness component of Horizon Europe's Pillar II, how it is expected to work, especially concerning the single rulebook, toolbox, joint work programme, and comitology arrangements?

What does the proposed flexibility between the different policy windows entail, and what type of decision-making procedure will govern any such reallocation or adjustment?

How will the independence of collaborative research be preserved within this structure, while also ensuring that Member States' interests are duly represented and safeguarded?

What is the reason for the fact that the proportion of administrative costs within the policy windows is not maximized in the draft?

What is the Commission's intention with the bodies created in the current programming period? For example, in the cyber area with the European Cybersecurity Competence Center (ECCC), the network of National Coordination Centres (NCCs) in the Member States, or the National Contact Points (DEP NCPs), since the draft does not mention them, while the European Digital Innovation Hubs (EDIHs) and the European Digital Infrastructure Consortiums (EDICs) are mentioned.

How many work programmes does the Commission plan, what topics and what time intervals, what will be the organizing principle for these within the Digital Leadership window and how will they cover the specific objectives of the digital policy window?

How does the Commission justify its intention to have the work programmes adopted by the Member States through an advisory procedure and not through an examination committee procedure?

Under LIFE, there were four subprograms, which suggested a fairly even split of resources across them. Is Commission planning to maintain this balanced distribution across environmental areas like nature and biodiversity, air, water, soil, and circular economy? Can Commission give us any indication of how the funds might be allocated for these goals?

Regarding legal certainty, the LIFE regulation clearly references specific environmental laws. For example, LIFE regulation indicates in article 11 that, projects under the subprogramme 'Nature and Biodiversity' concerns the management, restoration and monitoring of Natura 2000 sites in accordance with Directives 92/43/EEC and 2009/147/EC. The current ECF proposal, however, talks about halting and reversing biodiversity loss but doesn't cite specific legislation. This makes it difficult to understand the legal basis or precise objective for the funding. It gets even more complicated with broad statements like “contributing to the shift towards a sustainable, circular, energy-, water-, and resource-efficient, climate-neutral, and resilient economy.” What is the definition of “resilient economy” in relation to the environment acquis? Could Commission clarify the legal framework and objectives here? We request a comparative analysis on how the current EU4Health Programme is integrated into the Competitiveness Fund, what are the differences compared to the current EU4Health programme (e.g. regarding the scope, financial resources, etc.).

Global Europe

How will the proposal ensure the involvement and the steering role of the Council in the decision-making process of the Global Europe?

How will the proposal ensure that the amounts provided for the geographical pillars are predictable, and are not merely artificial numbers? How can indicative amounts in general ensure predictability?

How does the Commission intend to ensure that the new instrument will increase the funds to meet the EU's enlargement objectives and the resources allocated to them (IPA, Western Balkans Growth Facility), or at least maintain them at their current level? Is excessive flexibility not overly risky, as it would allow the reallocation and use of resources that are essential for candidate countries' preparations for EU accession? How would the Commission guarantee the fair share of the candidates for their preparation?

What will happen with the current ongoing projects under the Western Balkans Growth Facility, once the proposal enters into force?

According to the proposal, the Global Europe would serve a wide range of policies, namely enlargement, neighborhood, international partnerships and humanitarian aid policies. How the Commission would ensure that the enlargement objectives (the preparation of candidate

countries and potential candidates for future accession) and their implementation remain priority?

The recital (39) states that all kind of Union support to Ukraine other than in the form of loans should be financed by the Ukraine Reserve, while in several presentations the Commission mentioned that Ukraine is eligible for non-repayable support from the MFF (e.g. HUMA, Erasmus+, Competitiveness Fund). Could the Commission clarify this contradiction?

Are the policy-based loans, MFAs are covered by the maximum amount for the financial support to Ukraine in the form of loans defined in Article 6.2? What exactly is covered by this upper limit?

How is it ensured that reconstruction and pre-accession assistance for Ukraine will be financed fully above the MFF ceilings?

As the Ukraine Facility disappears in the proposal, it is not clear, where the conditions of the support for Ukraine will be set out. Could the Commission elaborate the details?

In general, more detailed explanation is needed on the financing of the external dimension of migration. What are the changes as compared to the current period? Why did the Commission decide to delete the current 10% migration target under the NDICI regulation? Why did the Commission decide not to include the fight against irregular migration under the general objectives of the proposal? Given its relevance to both internal security and the internal dimension, it seems like a significant omission. How does the Commission intend to ensure that the current policy shift in migration (as endorsed by the October European Council conclusions and the Strategic Guidelines) will be duly taken into account and continued?

Administration

Following up the presentation at the Working Party meeting on 30.07.2025, could Commission provide a detailed and full breakdown of the nationalities of high-level and executive level Commission officials regarding the geographical balance between Member States (not only the underrepresented ones)?

Could the Commission detail in a fiche the detailed breakdown to DGs and to tasks and the envisaged timeline of hiring regarding the additional 2500 posts proposed?

Could the Commission detail in a fiche all the foreseen administrative expenses of the other headings than Heading 4?

What is the reason for the fact that the proportion of administrative costs within the policy windows of ECF is not maximized in the draft?

Could the Commission elaborate the needs of other institutions and the calculation method which led to their need of 2500-1666=834 additional FTEs?

Revenue side – Own Resources Decision

It is enshrined in Protocol 28 of the TFEU that it is intended to take greater account of the contributive capacity of individual Member States in the system of own resources and to examine means of correcting, for the less prosperous Member States, regressive elements of the system. How does the Commission evaluate the proposal from this perspective?

How does the Commission ensure in its proposal to avoid any unnecessary administrative burden regarding the proposed new own resources?

How does the Commission evaluate the proposal for new own resources from the perspective of tax sovereignty?

When will the Commission propose a single MAR, consisting of both the existing MARs and the proposed new making available provisions?

Could the Commission elaborate that how the CORE proposal is in line with the objective of improving competitiveness in the EU?

Why does the Commission state that TEDOR is not legally dependent on the adoption of the recast of the related Council Directive?

The own resource based on e-waste is very similar to the existing own resource based on non-recycled plastic packaging waste, which is a statistical own resource. Several Member States and the European Court of Auditors have also pointed out some issues with statistical own resources, as for example the comparability of data is not sufficient, it has to be improved.

This is also acknowledged by the Commission regarding the proposed e-waste own resource.

The plastic own resource has been in application for 4 years, and there are still issues with data comparability, so how would the Commission ensure to have perfect data comparability for the proposed new own resource in only 2,5 years?

We need detailed reasoning why it is needed to increase the call rate for the plastic own resource. As this own resource already disproportionately burdens certain Member States, would not the increase in the call rate and the abolition of the corrections worsen the situation? Is the proposal in line with Protocol 28 of TFEU?

What is exactly the role of the European Council in the activation of the crisis mechanism?

What does it mean in practice that when activated, its implementation will follow the rules set in the most relevant programme or instrument?

What would be the practical and financial/budgetary effects of the possible changes envisaged to the European System of National and Regional Accounts ('ESA 2010')?

The requirements for the repayment of the liabilities stemming from the NextGenerationEU are the following: 1) All liabilities incurred by the exceptional and temporary empowerment to borrow funds should be fully repaid by 31 December 2058. 2) The schedule of repayments should respect the principle of sound financial management and cover the entire volume of funds borrowed under the empowerment of the Commission with a view to achieving a steady and predictable reduction of liabilities during the overall period. Do we understand correctly that there is no legal requirement to start the repayment from 2028?

THE NETHERLANDS

Pillar 1 – NRPP:

General Questions Pillar 1

1. Will all topics mentioned in article 22 (a)-(r) be transformed into milestones?
2. The proposal does not explicitly mention that there will be supermilestones. Can the CION confirm that there will be supermilestones on Rule of Law, how will these be established?
3. Why are there only Rule of Law and Charter conditionalities/safeguards in Pillar 1 and not in other funds?
4. Will there still be separate budgets for funds such as the ERDF and ESF on a Union level (considering placeholder in the ESF regulation) or will this depend entirely on the plans submitted by member states? And will Member States have to allocate NRPP resources to all [NUTS2] regions?
5. How does the Commission envision the process of filling in a NRPP for member states, while the final negotiations of the MFF simultaneously take place?
6. How does the Commission want to ensure the balance between level playing field for cross-border challenges with regards to i.a. the environment, climate and nature?
7. How does the Commission want to ensure a balanced effort on urban, rural and coastal areas in NRPP?
8. Thematic concentration on innovation, as currently exists within the ERDF (PO1 a smarter Europe), is being abandoned in the NRPP, while for other policy objectives budgets remain earmarked. Innovative projects are essential for strengthening the EU's competitiveness. Taking into account the NRPP's broadly defined specific objectives, how will CION ensure that enough resources

within the NRPP are directed towards innovative actions? Especially as the NRPP is also expected to finance projects with a *seal of excellence* for which the ECF lacks sufficient funding.

Concerning specifically the European Social Fund

1. Will there be earmarking within the ESF? If so, what will be the percentages for this earmarking?
2. Should Member States focus on all investment priorities within the ESF?

Concerning specifically the ERDF/CF/Interreg

1. Will the Commission provide guidance regarding the allocation of resources between the four different Interreg strands, as was the case in the 2021-2027 period?
2. To what extent does the integration of Interreg programmes into the performance framework imply that a greater role is now expected from the Member State (and region) hosting the managing authority?

Specific questions	Performance Framework	
Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
Chapter 2, Article 4; Climate and biodiversity, p.9	<i>The contribution from the budget to climate and biodiversity shall be monitored by means of the budget expenditure tracking and performance framework laid</i>	<ul style="list-style-type: none"> • In the current MFF, there are separate spending targets for climate and biodiversity. Can the Commission elaborate on why the proposal for the next MFF has

	<i>down in Article 8, including by means of EU coefficients.</i>	one target for both climate action and biodiversity objectives?
Chapter 2, Article 4; Climate and biodiversity, p.9	<i>Programmes and activities shall be implemented with a view to achieving an overall spending target of at least 35% of the total amount of the budget on climate action and environmental objectives ('climate and environment spending target') over the entire 2028-2034 multiannual financial framework, calculated by using the highest coefficient amongst climate mitigation, climate adaptation and resilience, and environment of the framework referred to in paragraph 1.</i>	<ul style="list-style-type: none"> • Since the Innovation Fund and Social Climate Fund are not under the MFF, they will not contribute to the 35% climate spending target?
Chapter 2, Article 5, 'Do no Significant Harm' to environmental objectives	<i>A streamlined application of the 'do no significant harm' principle as referred to in Article 33(2), point (d), of Regulation (EU, Euratom) 2024/2509, shall be facilitated by a single and simple guidance ('do no significant harm guidance').</i>	<ul style="list-style-type: none"> • Will there be an exclusion list to streamline the application of the DNSH-principle?
Annex I; Intervention fields and indicators		<ul style="list-style-type: none"> • Could the Commission provide an overview of which indicators have changed in respect to the MFF 2021-2027, including the reason behind this?

Annex I; Intervention fields and indicators	<i>Result indicators</i>	<ul style="list-style-type: none"> • If multiple result indicators are mentioned, are they all relevant to assess whether an investment has achieved its claimed result? Or is one of the indicators sufficient?
Annex I; Intervention fields and indicators	<i>CCM, CCA, ENV, SOC</i>	<ul style="list-style-type: none"> • Since there will be separate tracking for adaptation, mitigation and environment, will the Commission monitor and report on these different fields as well?
Annex I; Intervention fields and indicators	<i>Policy area 'Agriculture and Fisheries</i> <i>#3 support to farmers in sectors in need, protein crops and their mixture with grass</i> <i>#4 support to farmers in sectors in need, grasses and other herbaceous forage</i>	<ul style="list-style-type: none"> • The performance framework states that additional income support per hectare for eligible farms – by sector – contributes 100% to climate change mitigation. Could the Commission please elaborate on how this focus on additional income will contribute to CCM?
	<i>Policy area 'Agriculture and Fisheries</i> <i>#26 enhance access to innovation in agriculture</i>	<ul style="list-style-type: none"> • The performance framework states that preparing, implementing innovation projects contributes 100% to climate change mitigation. Could the Commission please elaborate on how this, without reference to climate, will contribute to CCM?

	<p><i>Policy area 'Agriculture and Fisheries'</i> <i>#51 support to create and maintain attractive fishery, aquaculture and processing sectors</i></p>	<ul style="list-style-type: none"> • The performance framework states that the creation and maintenance of an attractive fishery, aquaculture and processing sector contributes 40% to climate change mitigation. Could the Commission please elaborate on how this will contribute to CCM? Especially since indicator 54 'support to sustainable fisheries and aquaculture practices, including climate resilience measures' does not at all?
	<p><i>Policy area 'Agriculture and Fisheries'</i> <i>#48 permanent cessation of fishing activities</i> <i>#55 temporary cessation of fishing activities</i></p>	<ul style="list-style-type: none"> • Both of these measures contribute 100% to CMM according to the performance framework whilst the impact on climate mitigation is very different. Can the Commission please explain why these both contribute 100% to CMM?
	<p><i>Policy area 'Business support'</i> <i>#68 Extraction and processing of critical raw materials</i></p>	<ul style="list-style-type: none"> • The performance framework states that the extraction and processing of critical raw materials contributes for 40% to CMM – could the Commission please elaborate on this?

	<p><i>Policy area ‘Business support’</i> #84 <i>Manufacturing of electrolyser</i></p>	<ul style="list-style-type: none"> • According to the performance framework, the manufacturing of electrolyser contributes for 100% to CMM. This is only in the case of green electrolysers, could the Commission please clarify this?
	<p><i>Policy area ‘Air transport’</i> #491 <i>Airport terminal capacity</i></p>	<ul style="list-style-type: none"> • Could the Commission elaborate on how additional airport capacity (both in number of passengers of cargo in tonnes) will contribute to climate adaptation?
<p>Annex III; Specific climate and environment spending targets</p>	<p><i>The following programmes and instruments are expected to contribute at least the following percentages of their overall financial envelope to climate and environmental objectives:</i></p> <p><i>(1)National and Regional Partnership Plans: 43%</i></p> <p><i>(2)European Competitiveness Fund: 43%</i></p> <p><i>(3)Framework programme for research and innovation: 40%</i></p> <p><i>(4)Connecting Europe Facility: 70%</i></p> <p><i>(5)Global Europe Instrument: 30%</i></p>	<ul style="list-style-type: none"> • Can the Commission elaborate on the method used to calculate whether a programme and/or instrument complies with the specific climate and environment spending percentage as part of their overall financial envelope. For instance, for CEF all energy projects contribute to CMM for 100%, does that imply that other CEF projects, (i.e. transport projects) can contribute for less than 70%, if the overall average is 70% at least?

		<ul style="list-style-type: none"> • Is this calculation method the same for all programmes and instruments mentioned in annex III?
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Specific questions Pillar 1		
Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
<p>Title I, article 7(1)(a); Horizontal principles, p. 42</p> <p>and</p> <p>Title I, article 9(1); Respect for the principles of the rule of law, p. 44</p>	<p>1. Member States shall design the measures in the NRP Plan and Interreg Plan in a way that ensures respect of</p> <p style="padding-left: 40px;">(a) the principles of the rule of law as set out in Article 2, point (a), and Article 3 of Regulation (EU, Euratom) 2020/2092;</p> <hr/> <p>1. Member States shall ensure the respect of the principles of the rule of law as set out in Article 2, point (a), and Article 3 of Regulation (EU, Euratom) 2020/2092 throughout implementation of the Fund (the ‘rule of law horizontal condition’). They shall inform the Commission of any modification impacting the fulfilment of that condition.</p>	<p>There is a cross-reference to the definition of Rule of Law in the conditionality regulation, but during the AHWP MFF it was stated that the conditionality under the NRPP proposal is less broad than under conditionality regulation. In what way is it less broad / what was meant by that?</p>

<p>Title I, article 8(2); Respect of the rights, freedoms and principles set out in the Charter of Fundamental Rights, p. 43</p> <p>Question also applies to Title I, article 9(2); Respect for the principles of the rule of law, p. 44.</p>	<p>2. Where the Commission considers that a Member State does not fulfil or no longer fulfils the Charter horizontal condition, as provided for in paragraph 1, it shall notify the Member State concerned of its assessment, based on information provided by the Member State concerned in its NRP Plan, in response to Commission observations, and taking into account relevant information, including the Rule of Law and European Semester country-specific reports.</p>	<p>During the AHWP MFF, it was indicated that the procedures under articles 8-9 and articles 22-23 are not separate. Does that mean that the CION <u>is only obliged</u> to assess whether the Charter and Rule of Law horizontal condition is fulfilled at the moment a MS submits its plan?</p> <p>And is the CION allowed to assess, at any time and at its own initiative, whether a MS still fulfills the Charter and Rule of Law horizontal condition?</p> <p>And how does this relate to the existing Rule of Law Mechanism and the role of the Council therein?</p>
<p>Title I, article 8(4); Respect of the rights, freedoms and principles set out in the Charter of Fundamental Rights, p. 43.</p> <p>Question also applies to Title I, article 9(4); Respect for the principles of the rule of law, p. 44.</p>	<p>4. Where the Commission concludes that the Charter horizontal condition is not fulfilled, it shall adopt an implementing decision determining the non-fulfilment of the Charter horizontal condition and identifying the specific measures of the NRP Plan affected by the non-fulfilment, within two months of receiving the Member State's observations referred to in paragraph 3.</p> <p>For that purpose, the following aspects of the non-fulfilment of the Charter horizontal condition shall be taken into consideration:</p>	<p>Why did the CION decide to grant the implementing powers under article 8(4) to the CION, but the implementing powers under article 9(4) to the Council? Why is there a difference in the procedure for adopting implementing acts?</p>

	<p>(a) the actual or potential impact on the sound financial management of the Union budget or on the financial interests of the Union;</p> <p>(b) the nature, duration, gravity and scope.</p>	
<p>Title I, article 8(7); Respect of the rights, freedoms and principles set out in the Charter of Fundamental Rights, p. 43.</p> <p>Question also applies to Title I, article 9(7); Respect for the principles of the rule of law, p. 45.</p>	<p>7. The Commission shall reduce proportionately the Union financial contribution of the Member State as regards the specific measures concerned or, in respect of loan support, take any measure available under the loan agreement, where the decision referred to in paragraph 4 has not been repealed within one year of its adoption.</p>	<p>Does this imply that funds may be permanently lost if a MS has not remedied the situation within one year of the adoption of the implementing decision? Can these funds then be reallocated to the same MS? If so, why can the same MS receive these funds for other programs?</p>
<p>Title II, article 10(5); Common provisions, p. 46</p>	<p>At least 14 % of the financial envelope referred to in paragraph 2 and of the amount referred to in paragraph 4 shall be dedicated to meeting the Union's social objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) [Performance Regulation]. The amount set out in paragraph 2, point (a) letter (ii), as well as the external assigned revenue from the Social Climate</p>	<p>What is the base amount used to calculate the 14%? Could you please provide a more detailed explanation?</p> <p>Is the following correct?</p> <p>Calculation Base = (total paragraph 2 – CAP interventions (paragraph 2(a)(ii)) + loan support)</p> <p>Calculation Base (865.076 billion – 295.7 billion) +150 billion = EUR 719.376 billion.</p>

	Fund, shall be excluded from the basis for the calculation of this minimum allocation.	Or would the base calculation still include CAP interventions, where these aren't eligible to contribute to the 14%.
Title II, article 15 (1); Decommitments, p. 49	The Commission shall decommit any amount in an NRP Plan and the Interreg Plan chapter which has not been used for pre-financing, in accordance with Article 17 [pre-financing] or for which a payment application has not been submitted in accordance with Articles 65 [submission and assessment of payment applications], by 31 October of the calendar year following the year of the budgetary commitments.	Why was it decided to work with n+1 instead of n+3? How does the Commission view the increased decommitment risks that this entails?
Title III, article 22(2)(p); Requirements for the NRP Plan, p. 57.	(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.	Do <i>all</i> country-specific recommendations from the Rule of Law reports and European Semester need to be addressed in the plan? And will <i>all</i> country-specific recommendations from the Rule of Law reports and European Semester become a milestone? If not, how will be decided which recommendations are the most relevant?

		Will it be specified ahead of time which specific CSRS must be included?
Title III, article 22(2)(p) and 2(b)(i); Requirements for the NRP Plan, p. 53 and 57.	See above for 22(2)(p), and for 22(2)(b)(i): (i) in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;	What is the difference between the obligation in article 22(2)(b)(i) that all or a significant subset of the country-specific recommendations of the European Semester should be addressed and the requirement in article 22(2)(p) that the plan should specify how follow up will be given to these same recommendations? How do the standardized output and result indicators correspond to addressing the country-specific recommendations?
Title III, article 22, (2k & l); Requirements for the NRP Plan, p. 56	(k) explain how the Member State's system and arrangements are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies;	The proposal does not appear to offer a direct solution to the dual accountability structure, which many Member States consider to be one of the main causes of high administrative burdens. How will it be ensured that the new system does not lead to even higher administrative burdens, given that duplication of checks will remain in place?

	(l) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;	
Title III, article 22(2(q); Requirements for the NRP Plan, p. 57	ensure that the NRP Plan contributes to the Union's social objectives. At least 14% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.	Considering the broad nature of the coefficients listed, how will it be ensured that enough of the 14% social investments will contribute to the key social priorities such as labour market participation, skills and social inclusion? What was the reasoning behind determining the social coefficients?
Title III, article 24(8) and (9); Amendment of the NRP Plan, p. 60.	8. The specific measures identified in the implementing decision referred to in Article 9(4) or subject to a decision imposing measures for the	- Why are the criteria for amendments to measures that are identified in regards to non-compliance with the charter horizontal condition, pursuant to Article 8(4) of the proposal,

	<p>protection of the budget under Regulation (EU, Euratom) 2020/2092 shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to the fulfilment of the Rule of Law horizontal condition or to addressing the situation that led to the adoption of the aforementioned decisions.</p> <p>9. The specific measures identified in the implementing decision referred to in Article 8(4) [Charter conditions] shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to:</p> <p>(a) the fulfilment of the Charter horizontal condition;</p> <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p>	<p>different from the criteria for amendments to measures that are identified in regards to non-compliance with the Rule of Law horizontal condition, pursuant to Article 9(4).</p> <p>- What does subsection (b) of article 24(9) mean exactly? When does the CION consider that there are “significant changes in the priorities of the Union”?</p>
<p>Title X, article 65; Submission and assessment of payment applications, p. 101-102.</p>	<p>Regarding entire article.</p>	<p>Why is fulfillment of the horizontal conditions (as laid down in articles 8 and 9) not part of the assessment by a Member State as to whether a payment request can be made?</p>
<p>Title X, article 69; Durability and reversals, p. 105</p>	<p>The Member State shall ensure that the fulfilment of any of the relevant milestones and targets remains</p>	<p>As a rule, result indicators often depend on multiple variables, including variables outside one's sphere of</p>

	ensured for at least five years after the date of the Commission payment corresponding to the achievement of the milestone or target.	influence (“exogenous variables”). How will this requirement to ensure milestones and targets for five years work for milestones relating to (for example) certain result indicators?
Title V, Chapter 1, art. 35 d)		Does this article allow for support related to water level management in peat meadow areas (peilopzet in veenweidegebieden), a measure applied in the Netherlands to reduce CO ₂ emissions and counteract soil subsidence?
Title V, Chapter 1, art. 35 e)		Could you please clarify whether support for disadvantages resulting from certain mandatory requirements, also extends to ensuring sufficient funding opportunities for transition areas surrounding Natura 2000 sites? We would appreciate clarification on whether these transitional zones—given their ecological importance and potential restrictions—can be considered eligible. We would welcome confirmation that this article also emphasizes its underlying purpose—namely, to provide reimbursement or compensation for the delivery of ecosystem services in such areas.

Title V, Chapter 1, art. 35 m)		To what extent is the proposed CAP providing scope and incentives for forestry measures that contribute to carbon sequestration and climate mitigation?
Title XII, Article 80 (6); Social Climate Fund chapter	<i>Member States may, when preparing or amending their National and Regional Partnership Plans, programme all or part of their available resources under the Social Climate Fund to other measures contributing to the objectives laid down in Article 3, point (c)(vi), including through measures set out in Article 8 of Regulation (EU) 2023/955, within their Social Climate Plan chapter.</i>	Why has this article included in this proposal and does this change anything about the objectives of the Social Climate Fund as laid down in Regulation 2023/955? Does this article broaden the eligible measures under the SCF as set out in article 8 of Regulation 2023/955?:
Title XII, Article 81; Transfer of resources	<i>Member States may request in their initial Plan to transfer amounts from their 2026 and 2027 allocations under the Social Climate Fund. Such amounts shall be programmed within their Social Climate Plan chapters. These amounts shall constitute external assigned revenue in accordance with Article 21(5) of Regulation (EU, Euratom) 2024/2509 and contribute to the objectives laid down</i>	Can the Commission explain what is meant by “to transfer amounts”?

	<i>in Article 3, point (c)(iv), including through measures set out in Article 8 of Regulation (EU) 2023/955.</i>	
Title XII, Article 83; Amendments to Regulation (EU) 2023/955	<i>Full article</i>	What is the legal base for amending Regulation (EU) 2023/955 with this proposal? The SCF is not under the scope of the MFF.
[NRP] Chapter 2, article 20 (4) National contribution, p. 52	Any contribution rate derogating from those of paragraph 1 set out for interventions referred to in Title V, including where no national contributions are requested, shall only apply to a total amount of interventions not exceeding the Member State's share of the amount set out in Article 10(2), point (a)(ii), as laid down in Annex I.	Do the specific minimum co-financing rates for certain CAP interventions (30%) only apply if the EU funding falls within the ring-fencing? If you spend more than the minimum on the CAP, do the percentages in paragraph 1 apply to all CAP interventions?
Proposed CAP Regulation, article 10, Agri-environmental and climate actions, paragraph 1, point (b), and paragraph 4 concerning support for voluntary transition actions	<i>Member States shall pay the support to farmers in instalments over the period of implementation of the transition action plan. The payment of the last instalment shall be conditional upon completion of the implementation of the transition action plan. Member States shall ensure that the payments are recovered if the farmer fails to implement the transition action plan.</i>	What are the conditions, what will a transition plan look like, what is the amount and duration of the compensation, and how do these compensations compare to other compensations that support a transition to a more sustainable agricultural system?

<p>Article 9 of the proposed CAP Regulation</p>	<p><i>Member States may provide area-based support in agricultural and forest areas for disadvantages resulting from the implementation of: (a) Council Directive 92/43/EEC¹⁵ and Directive 2009/147/EC of the European Parliament and of the Council¹⁶; (b) Directive 2000/60/EC of the European Parliament and of the Council¹⁷. In addition to the areas referred to in the first subparagraph, point (a), Member States may decide to support other delimited nature protection areas with environmental restrictions applicable to farming or forestry which contribute to the implementation of Article 10 of Directive 92/43/EEC, provided that those areas do not exceed 5 % of the designated Natura 2000 areas covered by the NRP Plan.</i></p>	<p>Compared to Article 72 CAP Regulation (2021/2115), the proposed CAP Regulation Article 9 no longer specifies that support must be targeted at Natura 2000 areas. This new approach means that member states will be allowed to compensate for restrictions stemming from the Water Framework Directive and the Birds and Habitats Directives across all agricultural land – and not just within Natura 2000 sites. Could the Commission confirm this reading?</p>
<p>Article 9 of the proposed CAP Regulation</p>	<p><i>Member States may provide area-based support in agricultural and forest areas for disadvantages resulting from the implementation of: (a) Council Directive 92/43/EEC¹⁵ and Directive 2009/147/EC of the European Parliament and of the Council¹⁶; (b)</i></p>	<p>Could the Commission clarify whether there is a specific reason why the Nature Restoration Regulation has not been included among the European legal frameworks under which Member States may provide support?</p>

	<i>Directive 2000/60/EC of the European Parliament and of the Council</i> ¹⁷ .	
Article 1(d)(v) of the proposed NRPP Regulation, Article 2, 4, 10 of the proposed CAP Regulation	N.A.	Article 1(d)(v) of the NRPP Regulation states that one of the objectives of the Fund is to support biodiversity conservation and <u>restoration</u> . In line with this, Member States must explain how their NRPPs align with national restoration plans under the Nature Restoration Regulation ((EU) 2024/1991). Given that a significant portion of the Fund is allocated to CAP interventions—and that the CAP includes biodiversity among its objectives—could the Commission clarify how the proposed CAP framework addresses ‘nature restoration’, specifically? For example, Articles 2, 4 and 10 of the proposed CAP framework do not cover nature restoration explicitly.
Article 4(1) of the proposed CAP Regulation	<i>Member States shall provide support to farmers and other beneficiaries at least in each of the following environmental and climate priority areas:</i>	The proposed Article 4 states that Member States shall provide support to farmers and other beneficiaries <u>at least</u> in each of the listed environmental and climate priority areas. Could the Commission clarify whether this wording allows Member States to designate and support additional environmental and climate priority areas beyond those explicitly mentioned in the article?

<p>Article 4(1)(d) of the proposed CAP Regulation</p>	<p><i>preservation of biodiversity, such as conservation of habitats or species, landscape features, reduction of use of pesticides;</i></p>	<p>In the current wording, the reduction of pesticide use is presented under the broader objective of biodiversity preservation. Could the Commission consider addressing this as a distinct priority area, given that reducing pesticide use is also highly relevant for human health and broader environmental conditions? Grouping it solely under biodiversity may risk overlooking these important cross-cutting benefits</p>
<p>Article 6(7)(c) of the proposed CAP Regulation</p>	<p><i>Member States may decide to include in the ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (b), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel.</i></p>	<p>Could the Commission clarify how this approach differs from how landscape features were previously featured in GAEC 8?</p>
<p>Article 8(2)(b) and (3) of the proposed CAP Regulation</p>	<p><i>The surface of the areas designated pursuant to paragraph 2, point (b), shall not exceed 2% of the utilized agricultural area of the Member State concerned.</i></p> <p>3. <i>The payments per eligible hectare shall be limited to the additional costs or loss of income related to undertaking agricultural</i></p>	<p>Two questions:</p> <p>1. Could the Commission provide further elaboration on the the 2% threshold in light of the ‘natural or other area-specific constraints’? For instance, does ‘natural’ refer exclusively to areas that have been downgraded or reclassified as non-productive (‘afgevaarderd’)? Furthermore, does this</p>

	<p><i>production in the designated areas compared to production in non-designated areas.</i></p>	<p>provision affect the inclusion of landscape features, which typically remain part of agricultural land rather than requiring conversion to 'natural ground'? If so, this could potentially conflict with the existing targets for landscape features under current policies and may also have implications for achieving Nature Restoration Regulation (NRR) objectives on agricultural land.</p> <p>2. We refer to the text 'non-designated areas'. Many farmers are also increasingly integrating agroforestry practices into their land management, a trend also recognised in the Nature Restoration Regulation, where agroforestry is identified as a landscape feature. Given that agroforestry combines productive use with ecological benefits, could the Commission clarify how such systems are treated under this article — specifically in terms of their classification as agricultural production, while also potentially incurring the constraints and costs typically associated with natural features?</p>
<p>Article 10 (1) of the proposed CAP Regulation</p>	<p><i>Member States shall provide incentives for the following actions beneficial for the climate,</i></p>	<p>The current formulation appears to distinguish 'sustainable forestry' from agriculture. In this context, could the Commission clarify how agroforestry — which integrates</p>

	<i>environment, animal health and welfare and sustainable forestry:</i>	elements of both forestry and agriculture — is addressed within the CAP framework?
General proposal (performance framework)	NRPP, art 3, lid d iii: improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;	How will the Commission incorporate the objectives for the attractiveness and living standards of rural areas in the performance framework?
Art 76 (p. 112) and 77 (p. 113) NRPP Art 18 (p. 17) CAP	CAP, art 18 lid 1: Member States shall provide support for LEADER to prepare and implement LEADER local development strategies under the conditions laid down in Article 76 of Regulation (EU) [...] [NRP] and as further specified in their NRP Plans.	What does the obligation to implement LEADER in the NRPP as mentioned in the CAP mean? When will member states meet the requirements for the obligated implementation of LEADER? How does this relate to the disappearance of the ring fencing for this instrument?
Art 76 (p. 112) NRPP, general objectives ECF		How will the proposal of the NRPP and Competitiveness Fund contribute to the goals of the Long-Term Vision for Rural Areas (LTVRA)? Since the European Commission announce an action plan as follow-up on the LTVRA.
Art 76 (p. 112) (Community-led local development)		How will the European Commission want to implement the concept of 'rural proofing'?

NRPP, article 10 (5)		<p>The expenditure and performance framework outlines which measures contribute to social objectives and to what extent. The NRPP states that 14% must contribute to social objectives. The press release indicates that 14% should be used to finance reforms and investments that improve skills, combat poverty, promote social inclusion, and support rural areas. However, the expenditure and performance framework does not specify how this 14% should contribute to rural areas. How is it ensured that this 14% effectively supports the vitality of rural areas?</p>
NRPP article 76, CAP article 18		<p>Instruments for community-led development and LEADER are included in both the NRPP and the CAP. The NRPP states that Member States <i>may</i> support territorial and cooperative interventions such as LEADER, whereas the CAP stipulates that Member States <i>must</i> support LEADER. How do these two provisions relate to each other?</p>
CAP article 18		<p>How does the obligation to implement LEADER under the CAP relate to the removal of ringfencing? Is there a minimum funding requirement, or are Member States instead required to establish certain enabling conditions?</p>

CAP Article 35 (3)		<p>In Article 35(3) of the proposed NRP Regulation, it is stated that: “The planned average aid per hectare for degressive area-based income support referred to in the first subparagraph shall not be less than EUR 130 and not more than EUR 240 for each Member State [...].” Could the Commission clarify whether this average aid per hectare refers to:</p> <p>the overall average for all support measures under Article 6 of the CAP-regulation combined, or an average calculated per area-based intervention or “area”?</p>
NRPP article 59		<p>Article 59(1) states that the annual assurance package concerning the payment claims submitted for the previous financial year must be submitted by 15 February of each year after 2028. Can the Commission clarify the period covered by 'the financial year'? Could the Commission provide an example to explain in which year, at the latest by 15 February, a Member State must report on the payment claims submitted for the previous financial year?</p>
NRPP article 78		<p>For which measures (in accordance with Article 4(10)) under Title V concerning CAP expenditure does Article 78 apply?</p>

		Is it correct that it is being proposed that Article 78 should be mandatory for Member States?
NRPP article 4 (3) (a) and (c)		Point (c) refers specifically to farmers as defined in Article 4(3)(c) of the CAP Strategic Plan Regulation (Regulation (EU) 2021/2115). Point (a), however, covers beneficiaries under the NRPP more generally. Does point (a) also include CAP beneficiaries who are not farmers but who carry out activities eligible for payments under Article 35(1)(f)? It is worth noting that under the 2023–2027 CAP programming period, beneficiaries under the Integrated Administration and Control System (IACS) financed by the EAFRD are covered (see Article 70 of Regulation (EU) 2021/2115)
NRPP article 4 (3) (a) and (c)		Point (c) is limited to farmers as defined in Article 4(3)(c) of the CAP Strategic Plan Regulation (Regulation (EU) 2021/2115). Point (a), on the other hand, covers beneficiaries under the NRPP more broadly. Are CAP beneficiaries who are not farmers, but who carry out activities eligible for payments under Article 35(1)(i), also covered under point (a)?

NRPP article 4 (22)		<p>Article 4(22)(c) establishes that a farmer must have disposal rights over the agricultural area in order to be eligible for subsidised hectares. It appears that this requirement is now being explicitly applied to all area-based payments where the beneficiary is a farmer. Notably, in Regulation (EU) 2021/2115, such a provision was limited to area-based direct payments.</p> <p>Does Article 4(22)(c) apply to all area-based payments, but only insofar as the beneficiary qualifies as a farmer in accordance with Article 4(3)(c) of the CAP Strategic Plan Regulation?</p>
NRPP article 22 and 23 (1) and CAP article 2 (1)		<p>When submitting the plan, the Commission will issue country-specific recommendations based on the objectives referred to in Article 2(1) of the CAP Strategic Plan Regulation. However, it is not clear how these objectives are determined — whether qualitatively and/or quantitatively. Can the Commission confirm that the objectives against which plans will be assessed must be laid down in applicable law</p>
NRPP article 22(1) (k) and article 23 (1) and (8)		<p>To ensure the protection of the Union’s financial interests, the proposal appears to rely on an ‘ex ante assessment’ of the</p>

		<p>key requirements of the management and control systems established by the Member State to manage and verify expenditures. Should the Commission identify indications of a serious deficiency in these management and control systems, payments will be suspended until such deficiencies are remedied (Article 23(8)). Could the Commission clarify how this ‘ex ante assessment’ will be conducted in practice?</p>
NRPP article 25, 49 (10) and 69		<p>During implementation, the plan may be revised, with annual reviews and a mid-term review foreseen. However, the Member State must be able to confirm that, at the end of the programming period, the total payments from the Commission to the Member State do not exceed the total payments (from Union funding) that the Member State has disbursed to beneficiaries. The Commission reserves the right to recover amounts previously paid for intermediate steps of a measure if the final milestone or objective of that measure is not achieved; additionally, the Commission may take action in case a milestone or objective is ‘reversed’ up to five years after the date of the respective payment by the Commission. The Durability and Reversals mechanism will be</p>

		<p>implemented through the application of Payment Deadline Interruption, Suspension of Payments, and Financial Corrections.</p> <p>This mechanism is not yet known in the implementation of the CAP and requires clarification and confirmation from the Commission that it will not lead to double correction (see point 2.4.5 of the Commission Communication on Guidelines for calculating financial corrections under the procedures for financial and compliance approval of accounts, C/2024/5991).</p>
NRPP article 48-55		<p>"It is noticeable that neither the competent authority as referred to in Article 8 of Regulation (EU) 2021/2116, nor its function, is defined in the proposal. However, this function must still be fulfilled by the Member State, namely the identification of an accredited paying agency and an audit authority.</p> <p>Can the Commission confirm that the accreditation function for the paying agency and the designation of the audit authority (known in the CAP as the certifying body) will continue to exist; and whether the competent authority is still considered suitable for this purpose?</p>

NRPP article 52 (5)		<p>Paying agencies could also be conditionally accredited; however, the withdrawal of accreditation no longer appears to be an option. What are the consequences of a conditional accreditation if the measures taken fail to remedy the identified deficiency</p>
NRPP article 58 (2) (a), (b) and (l)		<p>The proposal appears to resemble the New Delivery Model known from the CAP, particularly regarding the concept of expenditure eligibility (see Articles 37 and 59 of Regulation (EU) 2021/2116). However, at first glance, there also seems to be a reference again to an ‘effective’ management and control system, whereas under the New Delivery Model only an ‘efficient’ management and control system was envisaged.</p> <p>With an ‘effective’ management and control system, there is, in principle, no margin regarding what is considered eligible expenditure vis-à-vis the Commission for the Member State and vis-à-vis the beneficiaries for the Member State (which, according to Article 58(2)(l), does seem to be intended).</p> <p>Could the Commission clarify what is meant by an ‘effective’ management and control system and how this</p>

		<p>relates to Article 58(2)(a), (b), and (l)? Article 58(2)(l) states: ‘Member States are not expected to verify the underlying costs of the operations and the measures when assessing the fulfilment of milestones and targets.’</p>
<p>NRPP article 60 (5), 68 and 69</p>		<p>Regarding financial corrections by the Commission, it is unclear for how long the Commission may ‘go back’ to recover amounts:</p> <ul style="list-style-type: none"> • Article 60(5) allows the Commission, based on its audits, to recover amounts up to three years after the last payment to the Member State. • Article 69(1) stipulates that milestones and targets must remain ‘in place’ for up to five years after the date of the respective payment by the Commission. If not, the Commission must take measures under paragraph 2, which may lead to recovery of amounts. Under the CAP, a period of 24 months was established in Article 55(4)(a) of Regulation (EU) 2021/2116. The proposal appears to extend this period well beyond three years. Can the Commission ensure, when exercising these

		<p>powers, that Member States are not overwhelmed and do not risk being unable to timely pay beneficiaries (see Article 22(2)(1))?</p>
NRPP and Performance framework		<p>It is unclear whether the Agricultural Funds Committee will continue to assist the Commission in the adoption of implementing acts (through the Advisory and Examination Procedures). The knowledge and experience that the Agricultural Funds Committee has gained regarding performance-based implementation of the CAP is essential for shaping the performance-based implementation of the NRPP, particularly the CAP. Will the powers of the Agricultural Funds Committee remain intact during the programming period under the NRPP?</p>
NRPP and Performance framework		<p>With the proposal for the Performance Framework Regulation, the Commission aims to present one consistent and coherent package for all expenditures under its management to account for the budget and the related performance to the European budgetary authorities. Member States will need to provide reporting data to the Commission for this purpose. This will be a significant task for Member</p>

		<p>States.</p> <p>The Performance Framework Regulation must therefore be well coordinated with the National and Regional Partnership Regulation to ensure that only information necessary to justify the expenditures is reported. Additionally, it must be avoided that parallel reporting systems need to be established by Member States.</p> <p>Can the Commission confirm that only one reporting system will be established for the annual accountability within the framework of the assurance package pursuant to Article 59 of the NRPP Regulation and for the reporting under the Performance Framework and that this is built on or fed by current monitoring systems in place?</p>
NRPP and Performance framework		<p>The Commission has translated a variety of monitoring indicators to performance indicators. The Netherlands believes these are not indicative of outcome directly related to the objectives of the Funds. Converting monitoring indicators such as amount of arrests to performance indicators can lead to negative motivations rather than qualitative improvement. Can the Commission elaborate on why they believe these monitoring indicators are an adequate</p>

		<p>indication for actual outcome related to the EU policy goals and how to prevent that these are not influenced by external factors or have negative impacts leading to steering on numbers rather than quality.</p>
NRPP and Performance framework		<p>The performance indicators 402 and 403 mention a EU and a national level of preparedness. Can the Commission confirm that the national level of preparedness cannot be a mandatory indicator, as this remains a national responsibility of the Member States.</p>
NRPP Annex 1b Home Affairs Key		<p>The Netherlands wishes to further study the Home affairs Key in the Annex as it is not directly related to the challenges MS face and does not account for certain relevant factors affecting MS.</p>
NRPP article 87 Delegated acts and Implementing acts		<p>The implementation of these proposals will take place under time pressure. We want to prepare as well as possible for this, which includes having a clear indication of the release of key components related to the NRPP. Could the Commission therefore provide a general timeline for the adoption of the Delegated and Implementing Acts?</p>

		<p>A maximum limit of 5% has been set for the expansion of areas contributing to the objectives of Natura 2000 sites. Could the Commission explain the rationale behind this choice?</p>
Regulation 2025/0235, Article 3(2) & Regulation 2025/0240, Article 35(11)		<p>Can Regulation 2025/0235, Article 3(2), be interpreted to mean that Member State costs related to data collection and control can be eligible for funding under the NRPP plan as contributing to the ‘environmental, economic and social sustainability of fishing operations and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member States’?</p> <p>These costs are not included as interventions in Article 35(11) of Regulation 2025/0240.</p> <p>Under Regulation 2021/1139, these costs were considered eligible under Articles 32 (data collection) and 33 (control), respectively.</p>
Regulation 2025/0240, Article 51(1)(b)		<p>For the preparation of the management declaration, part of the assurance package and referred to in Article 59(1)(c) of Regulation 2025/0240, it is stated that the underlying costs are ‘not expected’ to be verified. How should ‘not expected’</p>

		be interpreted in this context? Does this mean that the underlying costs must not be examined at all, or does it imply that such verification is not necessary in all cases?
2025/0542, Internal Security,	Recitals and main text (art 3b)	The Commission does not mention the links between the challenges as put forward in the preparedness union strategy and protectEU and the necessary synergy between the who. The Commission has stated multiple times (like in informal JHA council in June) the importance of the Synergie between the two strategies and the measures taken by MS. The Netherlands urges the CION to incorporate this synergy in the proposal.
2025/0542, Internal Security,	Article 3b	Can the Commission elaborate as to why the resilience goal in article 3b has a limited scope. The Netherlands believes this should be broadened to include Strengthening societal preparedness and resilience (incl. public communications and outreach on crises), comprehensive risk- and threat assessments (incl. use of satellite data such as Galileo).
2025/0542, Internal Security,	Recital 11 (amongst others)	The Netherlands interprets the list of serious crimes in the proposal non-exhaustive, so that ISF funding can also be

		allocated for crimes as environmental crime and account for a changing threat picture. Can the presidency confirm?
2025/0238, ERDF/CF/Interreg, Chapter II, Article 7(6)	Articles XX [Loan support], XX [Loan agreement and borrowing and lending operations] and XX [mid-term review] and Article 14(2) [25% flexibility amount] of Regulation (EU) [NRP] shall not apply to the Interreg Plan	Why has the Commission chosen not to introduce a flexibility amount within the Interreg Plan (chapters)?
2025/0238, ERDF/CF/Interreg, Chapter II, Article 10(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 the implementing act provided for in Article 9(1) [approval and amendment of the Interreg plan].	Why do the requirements for the MC of an Interreg Plan chapter not follow the requirements of the NRPP chapters and are these requirements laid down in an Implementing Act?

Specific questions Common Agricultural Policy		
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Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
Article 2; CAP national recommendations and steering	<p><i>The CAP national recommendations shall be based on the following:</i></p> <p>....</p> <p><i>(c) enhancing climate action, ecosystem services provision, circular solutions, the conservation of biodiversity and natural resources, sustainable farming and improve animal welfare;</i></p>	<ul style="list-style-type: none"> • What is the reasoning behind the wording “enhancing climate action”? Would it not be more fitting to say the CAP national recommendations shall be based on contributing to the climate-neutrality objective by 2050? • Why is restoration of biodiversity not mentioned?
Article 3; Farm Stewardship	<p><i>However, the conditions of farm stewardship listed in Annex I, Parts A and C, shall not apply to farmers receiving support under Article 5(1), point (g).</i></p>	<ul style="list-style-type: none"> • This article excludes small farmers from the Rules on farm stewardship concerning climate and environment, animal welfare, etc. Can the Commission elaborate on what the definition of a small farmer is (in addition to what is mentioned in article 6(5))?
Article 4; Environment and climate priority areas	<p><i>Member States shall provide support to farmers and other beneficiaries at least in each of the following environmental and climate priority areas:</i></p>	<ul style="list-style-type: none"> • How much flexibility is there within Member States to choose how much they spend on each of these priority areas?

<p>Article 10; Agri-environmental and climate actions</p>	<p><i>The management commitments referred to in paragraph 1, point (a), may be annual or multiannual and may have in particular the following objectives:</i></p> <p>....</p> <p><i>(b) climate change mitigation, including reduction of greenhouse gas emissions and carbon sequestration, climate change adaptation, including animal and plant diversity for resilient ecosystems;</i></p>	<ul style="list-style-type: none"> • In Article 4 carbon removals are mentioned as a priority area for environment and climate. Why is it not mentioned in article 10?
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Pillar 2 – ECF:

<p>General Questions Pillar 2</p>
<ol style="list-style-type: none"> 1. Regarding the integration of the ESC into Erasmus+, can the Commission clarify how it intends to preserve the distinct qualities and benefits of the ESC within Erasmus+? 2. Could the Commission elaborate why there is no mention of the <i>NATO Defence Planning Process</i>? This forms a crucial element in defence planning of most EU member states, and was also part of EDIP and SAFE. 3. The scope of the ECF is rather broad. How will the Commission ensure that the most excellent projects will be selected to find new and innovative ideas to strengthen Europe’s competitiveness? 4. The Commission speaks of synergy with NRPPs, Horizon Europe, the Connecting Europe Facility and Innovation Fund. How are these synergies safeguarded and implemented? 5. Can the Commission elaborate on how Horizon Europe and the ECF are linked? <ol style="list-style-type: none"> a. In particular in the area of the windows of the ECF linking to pillar II of Horizon? With special attention to how dual use and defense R&I will work, since the ECF regulation implies it will (also?) implement defence R&I?

- b. And is, in terms of budget allocation, governance and programming, a distinction made between research and innovation activities under Horizon Europe and activities implementing industrial policy under the ECF?
 - c. Are the cross-cutting criteria and issues for Horizon Europe, e.g. excellence and impact, but also multidisciplinary, ethics and open science, also directly applicable on the collaborative research implemented through the ECF?
 - d. How will the so-called 'moonshots' be funded and implemented through both Horizon Europe and the ECF?
6. Can the Commission elaborate on how the in the ECF announced Scale-up facility relates to the Scale-up Europe Fund under the European Innovation Council?
 7. Could the Commission elaborate on how the Industrial Decarbonisation Bank under the ECF will work?

Biodiversity:

- To what extent do you expect biodiversity-positive projects and activities to be funded under the ECF, in light of competing projects and activities oriented to other societal goals?
- How does the Commission ensure that biodiversity-positive projects and activities will be funded under the ECF? How does the Commission ensure that biodiversity projects and activities are able to compete with climate and circular economy projects that are generally more profitable and bankable in the shorter term?
- In this context, has the Commission considered earmarked windows or priority lines for green competitiveness linked to biodiversity?
- How will the ECF contribute to recently published Roadmap towards Nature Credits? Is there a role of EIB / InvestEU?

How does the Commission view a balanced use of the Competitiveness fund with regards to urban, rural and coastal areas and the challenges in these areas?

Regarding CEF:

- Can the Commission explain why the proposal for the new CEF regulation gives less direction to the priorities for funding compared to the current regulation?

- Will the Commission consider including a detailed list of priority investments in the CEF Regulation, as was previously the case with the priority core nodes (e.g. the port of Rotterdam)? To enable targeted investment in critical areas such as strategic transport?
- Will the Commission use the results of the Military Mobility Capability Plan to establish specific investment lists that can be included in the CEF Regulation?
- How does the Commission view the relationship between the subsidiarity granted to Member States through the NRPP and the objectives of the Competitiveness Fund?

Specific questions – Pillar 2

Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
Art. 37 c		In the 'UCPM and Health preparedness and response proposal' and in the ECF (article 37c) medical countermeasures are mentioned. Is there an overlap in the two proposals. Or is the UCPM more stockpile and EU-FAB oriented, and the ECF more manufacturing, production and innovation oriented?
P.4	As announced in the Clean Industrial Deal, the Industrial Decarbonisation Bank will be placed within the governance of the ECF	<ul style="list-style-type: none"> • Could the Commission elaborate how the IDB will work under the ECF? <u>Could the</u>

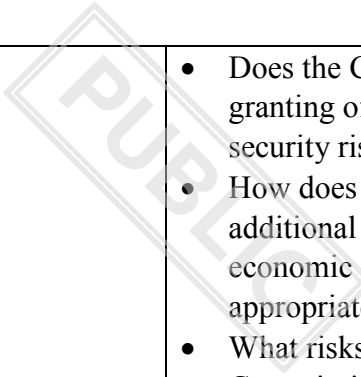
		<p><u>Commission elaborate what the forms of support under the IDB will be?</u></p> <ul style="list-style-type: none"> • <u>How will strategic considerations play a part in the framework of the IDB? What will be possible award criteria?</u>
Recital 11, p.15	<p>In order to foster synergies between actions under the ECF and the Innovation Fund, the work programmes of the ECF should ensure coherence with the priorities and types of actions that could be funded under the Innovation Fund. Together, the ECF, Horizon Europe, and the Innovation Fund will provide coherent support to the Union competitiveness.</p>	<ul style="list-style-type: none"> • Since the Innovation Fund is currently not under the MFF, what will the position be of the Innovation Fund in relation to the ECF? • <u>This also in relation to the eligible technologies and areas under the ECF that are not listed as eligible in the current Innovation Fund?</u>
Recital 41, p.22	<p>To ensure predictability for stakeholders and provide a sufficient level of certainty for investment planning, the ECF should set out an indicative budget distribution across the policy windows for the period 2028 to 2034 while maintaining flexibility to reallocate parts of the budget in accordance with new challenges and emerging priorities throughout the duration of the Multiannual Financial Framework. To this extent, it should be</p>	<ul style="list-style-type: none"> • Could the Commission indicate, quantitatively, the amount of flexibility within the ECF between the policy windows and how will shifts in budget be decided?

	<p>ensured that a certain minimum budget envelope is available for long-term planning and commitments broken down over several years into annual instalments in each policy window</p>	
Recital 53, page 25	<p>The ECF work programmes will include collaborative research and innovation actions, in a specific dedicated part. This may also include contributions to European Partnerships established under the Framework Programme for Research and Innovation</p>	<ul style="list-style-type: none"> • Is the budget for these research and innovation actions ringfenced?
Recital 62, page 25	<p>Where certain important projects could not be successfully implemented within the timeline for completion of regular competitive award procedures, the ECF should also provide for the possibility of directly taking-up excellent projects that remained unfunded under any Union programme or continue to financially support well-working projects seamlessly in their next steps along the investment journey, without imposing additional administrative burden for the recipients</p>	<ul style="list-style-type: none"> • What are the foreseen circumstances and requirements for such a measure?
Recital 65, page 26	<p>The ECF should allow for a more flexible and accessible way of identifying, selecting and supporting innovative projects and ideas, including by providing for</p>	<p>What are the foreseen details/workings for such a mechanism?</p>

	instrument-neutral award procedures that will allow researchers, entrepreneurs, companies and other citizens to propose their innovation solution without the initial artificial narrowing or limitation of Union support	
Article 3	N/a	We have noticed that, in general, the scope of the thematic windows is extremely wide, both with regard to the objectives and the activities that can be supported. How will the Commission later in the process choose what type of activities exactly get supported?
Article 3(2), p.36	Integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels	Could you please provide a rationale on how this funding within ECF will differ from funding provided through the proposed CEF regulation? How will this approach differ from the one set by AFIF within the current budget? E.g., will the ECF be more focused on technologies with a lower TRL than funding within CEF?
Article 4(2), point a, Budget	EUR 11 000 000 000 for activities contributing to the general objectives referred to Article 3, as implemented in particular through cross-cutting activities such as non-thematic support of the ECF InvestEU Instrument,	How does the €11 billion for, inter alia, InvestEU in this article relate to the €70 billion maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument (Art

	referred to in Chapter II, Section 2; Project Advisory, SME Collaboration, skills development and Access to Funding, referred to in Chapter III	21.3) and the €17 billion minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument (Art 21.4)
Article 4(2), point e, Budget	EUR 125 204 000 000 for the specific objectives referred to in Article 3(2), point (d)	This budget is for four section, Defence, Space, Resilience and Civil security industry. Will it be sub-divided for the four sections?
Article 4		The Performance Framework regulation (art. 4 + annex 1) stipulates that 43% of ECF-financing should contribute to overall 35% climate and environment goal of the MFF. Can the Commission give a clarification/rundown if and how this 43% will be ‘divided’ among each objective of the ECF (art. 3(2)a, b, c, d; art. 4(2)a-e)?
Article 7, Coordination	The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation, the Connecting Europe Facility and the Innovation Fund.	What does this imply for the award procedures, award criteria and governance of the Innovation Fund? How will the Commission in practice ensure this consistency between the programmes? How envisages the Commission the coordination between the work programmes of the ECF and closely related funds?

Chapter I, Article 8, Competitiveness Seal	Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).	<ul style="list-style-type: none"> • How exactly will the high-quality actions that are awarded a Competitiveness Seal be assessed, what is the process and how will the integrity of such an assessment be guarded? • How does this article relate to the applicable State aid rules? Will any support measure by MS under this Article still need full and separate assessment under the applicable State aid rules?
Chapter I, article 10, EU preference	N/a	<ul style="list-style-type: none"> • How does this Article relate to WTO-rules? • Based on what criteria will the Commission decide to include such eligibility conditions in The work programmes, the investment guidelines or the documents related to the award procedure? • Given the ambition set out in point 1 to protect the Union's economic security interests through the fund, what does the Commission see as potential risks to economic security arising from the granting of subsidies?



		<ul style="list-style-type: none">• Does the Commission have cases where the granting of subsidies had led to economic security risks?• How does the Commission assess where additional conditions to protect strategic and economic security interests are ‘necessary and appropriate’, as stated in point 2?• What risks to economic security does the Commission believe it can mitigate through the proposed conditions set out in points 2 and 3?• In point 2a it is stated that the Commission can require participating entities to be established, use facilities and perform activities in Member States and other eligible countries. How often are entities established, facilities used or activities performed outside of that scope right now?• Why does the Commission specifically require that, for five calendar years after the end of an action, no activities, results, or related access and use rights—including the granting of licenses—be transferred, in whole or in part, directly or indirectly, from an eligible Member State or associated country to an ineligible third country?• How will the Commission monitor this and how does this relate to national investment screening mechanisms?
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		<ul style="list-style-type: none"> ○ And, during monitoring, which exact definitions does the Commission apply when assessing entities for control and ownership restrictions? • How will the Commission assess whether supplies and materials cannot be reasonably sourced from eligible entities (2c)? • Could the Commission elaborate on the depths and responsibilities regarding the security reviews, risk assessments, security clearances and access rights restrictions that are stated in 3c?
Chapter I, Article 11, Association of third countries to activities under the ECF	ensure the protection of strategic, security, defence and public order interests of the Union and its Member States	<ul style="list-style-type: none"> • How will the Commission determine whether a third country meets this criterium?
Article 13		<ul style="list-style-type: none"> • How is cooperation between the ECF and instruments such as ProtectEU and IPCEIs organized?
Chapter I, Article 14, Governance and Advisory Boards	N/a	<ul style="list-style-type: none"> • Could the Commission elaborate more one the workings and role of the Strategic Stakeholders Board? And clarify how the independence of the board members is ensured?

		<ul style="list-style-type: none"> • What measures are in place to ensure that open calls for interest reach beyond the traditional stakeholders and actively include stakeholders from emerging and high-growth sectors?
Chapter II, Article 15.1, Work Programmes	The work programmes may set out	<ul style="list-style-type: none"> • The Commission indicates it <i>may</i> set out these conditions. How does the Commission interpret this room to deviate from this list?
Chapter II, Article 15.3 and 15.4, Work Programmes	<p>The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).</p> <p>The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</p>	<ul style="list-style-type: none"> • There seems to be overlap between these two points of Article 15. Both seem to include Article 3(2) point (d) (2), (3) and (4) within their scope. Is this on purpose or by accident?

Chapter II, Article 15.5, Work Programmes	On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.	<ul style="list-style-type: none"> • Why does the Commission consider this an <i>imperative grounds of urgency</i>. Does the Commission consider such a heavy procedure warranted?
Chapter II, Article 15.6, Work Programmes	On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).	<ul style="list-style-type: none"> • What kind of crises or emergencies does the Commission have in mind that are appropriate to address via the ECF? In other words, what would qualify as “crisis or other similar other similar exceptional and duly substantiated emergencies”?
Chapter II, Article 16, Single Market value chains builder	In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to	<ul style="list-style-type: none"> • How will such a dedicated call function? Will it force suppliers to merge?

	integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.	
Chapter II, Article 18, Production ramp up actions	By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions .	<ul style="list-style-type: none"> • Why does the Commission it necessary to fund actions that have already started? Is this proportionate, and what added value will EU funding be if the action has already started? How will the Commission determine what manufacturing projects are essential to support the general resilience objective?
Chapter II, Article 19, Top Ups for IPCEIs	The ECF may support: (a) projects directly participating in an Important Project of Common European Interest (IPCEI) approved by the Commission pursuant to Article 107(3), point (b), of the TFEU; (b) the follow-on projects based on results from IPCEIs, conditional on significant private investments.	<ul style="list-style-type: none"> • How will selection of IPCEI projects to be supported under the ECF work? • Would already approved IPCEIs (for example micro-electronics, hydrogen) qualify for funding under ECF or would ECF exclusively fund new IPCEIs?
Chapter II, Article 20, Accelerated and Targeted Actions for Competitiveness	N/a	<ul style="list-style-type: none"> • Could the Commission elaborate on the rationale and workings of these three interventions?

<p>Chapter II, Article 21, general framework</p>		<ul style="list-style-type: none"> • General question; Why is there no earmarking for the EIB foreseen as is now the case in art 13.4 of the current legislation? How can the EIB as well as other implementing partners make long term investment decisions without any certainty about financial resources? • has subordinated debt been used before? Can it pose any risk to the EU budget? What would be the (dis)advantage for the EU budget. Or in case of member state compartment for the MS? • What is the rationale behind adjusting the provisioning rate and the max amount by delegated act? What criteria will CION use for such decisions? Concerning the provisioning rate how does this relate to article 21.6.a?
<p>Chapter II, Article 22, Support to scaleups and startups</p>	<p>The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set</p>	<ul style="list-style-type: none"> • Could the Commission elaborate more on this facility? <ul style="list-style-type: none"> ○ How will it be funded?

	of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small midcap companies and Mid-cap companies.	<ul style="list-style-type: none"> ○ How will it relate to the Scaleup Europe Fund under the EIC and ETCI? ○ What exact role will be foreseen for the EIB Group?
Chapter II, Article 23, Exclusivity clause	The budgetary guarantee, within its maximum amount referred to in Article 21(3), and financial instruments, including when combined with non-repayable support in a blending operation, may be used to provide support under other Union programmes, including the EU ETS Innovation Fund and other Union programmes financed from sources other than the Union budget, in accordance with the objectives set out in those programmes.	<ul style="list-style-type: none"> ● Is it correct that funds from the ECF could be spent under other programmes, and according to those objectives, not the ones of the ECF? ● How does it work in practice? specifically when it comes to Innovation Fund which is funded by ETS..?
Chapter II, Article 24, member state compartment	The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment	<ul style="list-style-type: none"> ● will the financial instrument, set up now in Omnibus regulation still be in place? If so, where is that legal base?
Chapter III, Article 26 (6)	When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other	<ul style="list-style-type: none"> ● Given the size of the ECF, what is the Commission's view on improving governance in individual member states so they can

	Union or national public or private advisory and support service providers, including the EU for Business Network.	collaborate in a more coordinated manner, for example by appointing National Contact points for ECF (NCPs)?
Chapter IV, Article 33 (1)	n/a	<ul style="list-style-type: none"> • <u>What is the definition of “clean” technologies?</u> • Why are technologies or activities such as CCS, CCU or permanent carbon removals not mentioned in this article? • What is the exact role of nuclear energy under this window? What kind of nuclear (fission) activities can be supported and what not? • Does ‘industrial decarbonisation’ also include defossilisation of the chemical industry using sustainable carbon? • <u>How do these questions relate to specific interpretation of the technology neutral approach the Commission describes in recital 22 on page 17? Does it mean that all eligible technologies will be subject to similar criteria, or will they be tailored to reflect each technology’s specific contribution/characteristics and needs?</u>

		<ul style="list-style-type: none"> • <u>Does Art.33(1)n on market uptake also include further supporting and strengthening of the commercialization phase of clean industrial products and technologies within the ECF? And if so, could the Commission elaborate on this? And if not, how does the Commission want to support the commercialisation phase of clean industrial products & technologies?</u> • <u>In what way does Art.33 also take the clean transition of existing industries into account? Could the Commission elaborate on this?</u>
Chapter IV, Article 35, Competitive bidding mechanisms	N/a	<ul style="list-style-type: none"> • What is the reason for including such an article in this window but not in others? Is it related to the IDB? • <u>In what way do strategic considerations take place with regards to the award procedures under this chapter? How does the Commission foresee that chapter IV specifically supports viable, futureproof industries with the potential to become sustainable?</u>

<p>Article 39 (2) (b)</p>	<p>Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union’s digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors.</p>	<p>How will the Commission ensure that the knowledge and skills developed with help of EU financing will remain in the EU (and does not leave to third countries)?</p> <p>Why is cybersecurity-by-design not mentioned here as an important leading principle for cooperation within the digital sector, for both public-private partnership as civil-military cooperation?</p>
<p>Article 41</p>		<ul style="list-style-type: none"> • How does the Space and Defence Advisory Board (art. 41) relate to the Defence Industrial Advisory Board (art. 56)?

		<ul style="list-style-type: none"> • Article 41 refers to a 'Space and Defence Advisory Board'. What will the governance of this board be like?
Articles 44 and 45		<ul style="list-style-type: none"> • How is the implementation of the ECF organized in practice within Member States and at EU level? • Accelerated procedures: What guarantees are there that the accelerated support and intervention measures will be applied transparently, quickly, and effectively?
Article 46		<ul style="list-style-type: none"> • Could the Commission explain how the Multi annual Perspective and work programmes for a EDF 2.0 will look like? Will the Commission consult with EDA and the member states to maintain coherence with member states priorities? • Can the Commission explain how spin-in calls will be set up in article 46? • How will the Commission ensure cross-border industrial R&D cooperation in this program and make sure to support SMEs?
Article 47		<ul style="list-style-type: none"> • What does Union support for the strengthening of administrative capacities related to public

		<p>procurement of defence products entail exactly?</p> <ul style="list-style-type: none"> • Why can a Readiness Pool only be managed by a SEAP and not (a group of) MS?
Article 50		<ul style="list-style-type: none"> • Why has the Commission chosen not to automatically include countries with whom the EU has entered into a S&D partnership, similar to which was the case in SAFE?
Article 51		<ul style="list-style-type: none"> • For EDPCI's and Common Defence Procurement, Maintenance and Availability there are two types of rules for subcontractors (for subcontractors involved in an action, defined in art. 51.9, and for subcontractors involved in the common procurement, defined in art. 51.10). Could you elaborate on the difference between these two – when does which rule apply and why is there a difference between the two?
Article 52		<ul style="list-style-type: none"> • Art. 52 5: will there be bonuses to cover the (administrative) costs for more complex cooperation? For instance, cooperation among 6 MS is more complex than cooperation among 2 MS with regard to procurement, maintenance, etc. • In art. 52.7 there is a reference to art. 44.1.f, but this article does not exist. Could you explain what the purpose is of this article?

Articles 57–65		<ul style="list-style-type: none"> • What sources and conditions apply to attracting private capital, presumably via InvestEU, given that it is integrated with the ECF?
Article 60		<ul style="list-style-type: none"> • Could the EU take a more proactive role in ensuring that investments in satellite programmes—such as those targeting air quality and atmospheric emissions (e.g. Tropomi, Tango)—translate into concrete uptake of satellite data within relevant policy areas, thereby securing a fair return on investment for the European community?
Article 65		<ul style="list-style-type: none"> • Article 65 refers to a 'cohesive European approach' for access to space; what does this entail? • Article 65.4 refers to a Steering Board [...] to coordinate European activities in access to space. What will the governance of this steering board be like?
Article 74		<ul style="list-style-type: none"> • Article 74, how is the 'future EUSPA founding Regulation', which still needs to be addressed, related to the proposal?

Chapter VII		<ul style="list-style-type: none"> • Is there already an indicative allocation of budget within the cluster ‘<i>Support for Resilience and Security, Defence Industry and Space</i>’ between the various programme strands (such as defence, space, and security)?
Chapter VII, section 3 (Space systems and space policy implementation)		<ul style="list-style-type: none"> • How does the ECF ensure that Member States remain sufficiently involved in the programming, decision-making, and implementation of the space component, now that there is no longer a separate EU Space Programme with thematic configurations? • Can the Commission clarify how the division of roles between the European Commission, ESA, EUSPA and the Member States will be structured within the space component of the ECF – particularly regarding governance, technology development, and implementation? • How will it be ensured that civil space programmes (such as Galileo and Copernicus) retain sufficient priority and budgetary

		<p>allocation, in case of a broader emphasis on defence within Chapter VII of the ECF?</p>
Chapter VII, Article 80	N/a	<ul style="list-style-type: none"> • How does the support for, inter alia, prevention of and response to crime, in particular terrorism and violent extremism or the control of goods and persons at borders, the protection of borders and logistical hubs, maritime security and surveillance and customs security fit under the goals of the ECF and how does it ensure complementary with programmes under the MFF on internal security and border programmes.
In general		<ul style="list-style-type: none"> • How are ‘vulnerabilities’ and ‘dependencies’ within the ECF precisely defined, and if high-risk strategic dependencies or vulnerabilities are identified, how are these specifically financed and what options for action does the ECF offer? Is this clearly regulated in the ECF? • How does the ECF tie in with the financing and supervision of crucial control points within the industry?

		<ul style="list-style-type: none"> • Why is there no EU-wide mechanism for dealing with the bankruptcy of strategic companies? Who then takes responsibility? • Coordination of partnerships with third countries: How is cooperation in the ECF with like-minded third countries organized?
		<ul style="list-style-type: none"> • How will the impact on European competitiveness be measured or assessed, or is it assumed as soon as projects fall within the ECF?
		<ul style="list-style-type: none"> • Which examples of activities within the Critical Raw Materials Act, Net Zero Industry Act, Circular Economy Act and Bioeconomy Strategy could be financed through the ECF?
		<ul style="list-style-type: none"> • Can the Commission elaborate on how the multiplier effect presented in the Impact Assessment accompanied by the proposal looks for the different Member States? And make a comparison with the multiplier rates under the current MFF? Will there be member states possibly faced with a decrease in the multiplier? • Can the Commission elaborate on factors that cause differentiation in the multiplier effect as presented in the IA of the ECF proposal? And how this compares to the multipliers in the current MFF?

	Link ECF and CEF	Can the Commission clarify the exact link between the ECF and the CEF? Could the Commission specify which types of projects could be financed under the ECF in addition to those already eligible under the CEF? How will the synergy between ECF en CEF be developed and implemented in practice? What mechanisms or processes will be put in place to ensure effective coordination between the two instruments? How will the support from the ECF to the CEF will be structured? For instance, will it apply to all projects, or only to projects with synergies, such as between energy and transport, or energy and industry?
Art 76 (p. 112) NRPP, general objectives ECF	ECF article 33, lid 1 i: There is a need to foster the competitiveness, sustainability, resilience and fairness of the agricultural, fisheries, aquaculture and forestry sectors, of rural and coastal areas and to contribute to long-term food security in the Union.	How will the proposal of the NRPP and Competitiveness Fund contribute to the goals of the Long-Term Vision for Rural Areas (LTVRA)? Since the European Commission announce an action plan as follow-up on the LTVRA.
UCPM 2025/0223: Recitals 27, 28, Art 26. And p.6,10		The proposal seems unclear about the exact positioning/structure of the crisis coordination hub under/within ERCC. Is it a separate but joint entity, will the ERCC broaden as to be able to also function as? Please elaborate.

UCPM 2025/0223 Page 5.		The Commission indicates that the administrative burden for Member States will be minimal and limited to what is strictly necessary for the implementation of the EU budget. However, the proposal does not elaborate on how this will be reached. Can the Commission please elaborate.
Annex 1 performance framework.		The performance indicators 402 and 403 mention a EU and a national level of preparedness. Can the Commission confirm that the national level of preparedness cannot be a mandatory indicator, as this remains a national responsibility of the Member States.
UCPM 2025/0223 Annex 1 performance framework		At the moment it is not fully clear what the scope is of the horizontal approach to crisis preparation, which instruments this entails and how these relate to the current UCPM capacities and current regulations regarding cross-border threats.
UCPM 2025/0223 Art 4.2.c p 27 (a.o).		With regard to the development of the capacity pool, dual use and non-traditional response like medical supplies and military logistic capacities, the Netherlands wants to see a more concrete protection of information security and operational integrity laid down in prerequisites.
		The current text does not mention the program committee and the role that member states will

		<p>have in the governance structure. Can the commission elaborate on this point?</p> <p>The proposal mentions that additional scholarships will be allocated to 'strategic educational fields'. Can the Commission elaborate on the meaning of 'strategic' fields, and who will decide what fields are strategic or not?</p>
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Pillar 3 – Global Europe:

<p>General Questions Pillar 3</p>
<p><i>Governance</i></p> <ol style="list-style-type: none"> 1. Could the Commission elaborate how the programming processes and comitology will be influenced by Global Europe? 2. Could the Commission elaborate how Member States will be adequately involved in Global Europe decision making and how this will affect the roles of the different working groups and fora? What will stay the same, what will change? 3. Can the Commission elaborate on how Member States will have the same possibilities for strategic management based of Global Europe on thematic priorities, now that the markers for thematic programming have made place for a country approach? <p><i>Implementation</i></p> <ol style="list-style-type: none"> 4. Could the Commission elaborate how it will equip its organization to implement Global Europe and manage risks related to this new way of working? Has it considered outsourcing specific tasks?

5. Could the Commission give insight in how regional/global budgets will be allocated among different services and what procedures will guide it? What can be expected in terms of allocation of programmable and non-programmable funds?
6. Could the Commission describe how MS and other Team Europe partners will be involved in the instrumentalisation of Global Europe?
7. Could the Commission elaborate the resource allocation and safeguarding of resource spending on the promotion and protection of Human Rights, Democracy and the international legal order?
8. Could the Commission elaborate how it intends to allocate resources for human development? Is there room to base budget allocations on a combination of geographic and thematic considerations?
9. Could the Commission elaborate how consultation with civil society and will be incorporated into its programming?
10. Could the Commission describe how it plans to increase the involvement of the private sector and partners in relation to the proposed Global Europe Investment Board, to assure the coordination of public and private investment agendas?
11. Could the Commission give an indication of the role that Delegated Cooperation will play in realising Global Europe's ambitions? Will its role increase or decrease?
12. A potential budget for humanitarian aid of 25 billion euros is mentioned in the MFF communication but not in the Global Europe regulation. Could the Commission clarify this situation?

Lessons-learned

13. Could the Commission elaborate how lessons from NDICI (with for instance the cushion) will be taken into account?
14. Could the Commission elaborate how experiences and lessons-learned from previous instruments (like EFSD+) will be taken into account?

Support to Enlargement and Eastern Neighbourhood partners

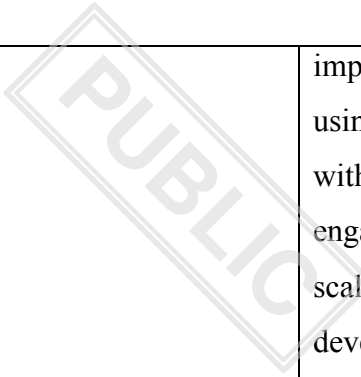
15. How will the distribution of funds between candidate countries and (other) Eastern Neighbourhood partners be determined? How is the amount of money per country being determined?

16. When will the Commission publish a more detailed proposal ('implementing act') establishing uniform conditions in relation to e.g. the design and content of the performance-based plans? How will the Council be involved?
17. How does the Commission guarantee that EU support to candidate countries will focus on adherence to the Copenhagen criteria?
18. Which consequences does the Commission foresee in case candidate countries do not take the necessary reforms? Does the Commission envisage a mechanism like the Growth Plan for the Western Balkans, in which support can be channeled to other Enlargement and Eastern Neighbourhood partners?
19. How does the Commission intend to shape financial support to candidate countries Türkiye and Georgia?
20. How is support to civil society in candidate countries being shaped?
21. How are clear risk analyses, mitigation measures and monitoring mechanisms being ensured?

OCT:

22. What are the lessons learned from the budget 2021-2027 with regard to projects in OCT under NDICI? Are there synergies possible with the special instrument for OCT?
23. Is the Commission taking into account inflation when considering the budget for OCT for the period 2028-2034?

Specific questions Pillar 3		
Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
Preamble: Recital 24, p5 – Global Gateway	The implementation of the Instrument should support the Global Gateway strategy	Could the Commission elaborate how it intends to use the new instrument to



		implement Global Gateway, without using a dedicated program? Specifically with regards to 1) private sector engagement and 2) for financing large scale and complex projects combining development impact and European interests?
Preamble: Recital 58, p. 12 - Migration	[... Migration-related actions under the Instrument should contribute to the effective implementation of Union agreements and dialogues on migration with partner countries by encouraging cooperation relying on a flexible incitative approach and supported by a coordination mechanism under the Instrument. ...]	The Commission mentions a ‘flexible incitative approach’ and a ‘coordination mechanism’. These are not further elaborated on in the rest of the text. Could the Commission provide more details on what the flexible incitative approach and the coordination mechanisms would entail?
Preamble: recitals 38, 65, 66, 69, 70, 82, p. 8, 13, 14, 16 – derogations financial regulation		To what extent are the proposed derogations materially different from the derogations in the existing NDICI regulation?
Preamble : recitals 69 and 70, p. 14.	(69) By way of derogation from Article 192(1) of Regulation (EU, Euratom) 2024/2509, the Union should be able to provide support	Could you clarify if this situation has already occurred in the existing MFF?

	<p>in the form of grants in a flexible and timely manner without the need for a call for proposals, for example, in difficult conditions and cases of urgency and crisis, to support human rights defenders and other civil society actors. Under the conditions set out in Regulation (EU, Euratom) 2024/2509, grants funded by the Instrument could also be provided to civil society organisations and other entities which do not have legal personality under the applicable national law.</p> <p>(70) Without prejudice to the use of competitive procedures wherever appropriate in accordance with Article 192(1) of Regulation (EU, Euratom) 2024/2509, grants could be provided to entities governed by private law from a Member State without a call for proposals where the relevant project is in the strategic interest of the Union and supports the objectives of the Instrument. Such a direct award could be justified, for example, to enable investments or finance feasibility studies in strategic areas such as critical raw materials, climate change resilience or digital and other infrastructure, in particular as part of integrated packages, to enhance the Union’s strategic autonomy. In accordance with Regulation (EU, Euratom) 2024/2509, any such award should</p>	<p>Are there evaluations on this, including the legality?</p>
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	<p>respect the general principles applicable to grants and be duly justified in the award decision.</p>	
<p>Preamble : recital 65 and 66, p. 13.</p>	<p>(65) While respecting the principle that the Union budget is set annually, external volatility requires to preserve the flexibilities already allowed under Regulation (EU) 2021/947 concerning carry-overs. By way of derogation from Article 12(4) of Regulation (EU, Euratom) 2024/2509, to ensure the efficient use of the Union funds both for Union citizens and the partner countries, thus maximising the Union funds available for the Union’s external action interventions, carry-overs stemming from the Instrument should be available to be reused under this Instrument. By way of derogation from Article 212(3) of Regulation (EU, Euratom) 2024/2509, revenue, repayments and recoveries from financial instruments established by external action programmes under this or preceding multiannual financial frameworks should be available to be reused under this Instrument. This will make available the necessary resources to fund the most pressing additional needs of the EU’s external relations of the moment.</p> <p>(66) To increase the resources available for the Instrument by assigning to it the surpluses related to the Guarantee Fund for</p>	<p>Do you have an estimate on these specific reflows? What is the source of the reflows?</p>

	<p>external actions established by Regulation (EC, Euratom) No 480/2009, the European Fund for Sustainable Development (EFSD).</p> <p>established by Regulation (EU) 2017/160155, the European Fund for Sustainable Development Plus (EFSD+) established by Regulation (EU) 2021/947, the Ukraine Guarantee established by Regulation (EU) 2024/792, the financial assistance in the form of loans established under Regulations (EU) 2024/1449, and (EU) 2025/535, and the budgetary guarantee and financial assistance under this Instrument, derogations from Article 216(4), point (a), of Regulation (EU, Euratom) 2024/2509 and from Article 31(8) of Regulation (EU) 2021/947 are is required. This will make available the necessary resources to fund the most pressing additional needs of the EU’s external relations of the moment.</p>	
<p>General provisions: Article 6.1, p. 22 - Budget</p>		<p>Regarding the resilience and competitiveness objectives of Global Europe, could the Commission elaborate on how budget allocations for regions relate to their diversification potential? For example, Latin America is an important region for diversification of</p>

		critical raw materials for the EU, to what extent is this a consideration for budget allocation?
General provisions: Article 6.4, p. 22 - Budget	The financial envelope referred to in paragraph 1 of this Article and the financial resources for Ukraine made available in accordance with Article 6 of Council Regulation [(EU, Euratom) 20XX/XXX * [MFF Regulation] referred to in paragraph 2 may also be used for technical and administrative assistance for the implementation of the Instrument, such as preparatory, monitoring, control, audit and evaluation activities, information and communication activities, including corporate communication on the political priorities of the Union in the external area, and corporate information technology systems and platforms, and all other technical and administrative assistance, including the financing of staff and staffrelated expenses incurred by the Commission for the management of the Instrument at headquarters and Union delegations.	Could the Commission clarify the absence of a cap on the use of assistance to Ukraine for administrative assistance, just like there is in the Ukraine Facility?
General provisions: Article 6.5, p. 23 - Budget	At least 90% of the expenditure under this Instrument shall fulfil the criteria for ODA (the ‘ODA target’), thus contributing to ODA collective commitments, including towards least developed countries	Could the Commission elaborate on the resource allocation and the safeguarding of resource spending on competitiveness

		and resilience objectives within Global Europe?
General provisions: Article 12, p. 26 – Migration and forced displacement	[...]Those actions shall be implemented in full respect of international law, including international human rights and refugee law, Union and national competences.	Could the Commission what ‘implemented in full respect of international law, including human rights and refugee law’ entails and how this will be monitored and upheld throughout programming and implementation of programmes?
General provisions: article 12, p. 26-27 – Migration and forced displacement	<p>3. In case the Commission services, in consultation with EEAS, identifies serious shortcomings in a partner country related in particular to the obligation to readmit its own nationals from the Member States, the Commission may suspend payments or the implementation</p> <p>4. To assess the existence of the serious shortcomings referred to in paragraph 3, and following consultations with the beneficiary country, the Commission shall rely on the assessments carried in accordance with Article 25a of Regulation (EC) No 810/200967 and with Article 8 of Regulation (EU) 2018/180668, while taking into account the Union’s overall relations with the beneficiary</p>	Could the Commission elaborate what it means that the measure proposed under article 12.3 will ‘rely on assessments in accordance with Article 25a of Regulation (EC) No 810/200967 and with Article 8 of Regulation (EU) 2018/180668 [...]’. In what way will the measure under article 12.3 and the referred regulations relate and interact with each other? Will these be implemented simultaneously or consecutively?

	country concerned, including in the field of migration, as well as the principle of proportionality.	
General provisions: Article 24.12, p. 36 - Budgetary guarantees and financial assistance, and Article 26 – Implementation of the policy-based loans	<p>12. The Commission shall be empowered on behalf of the Union to borrow the necessary funds to implement financial assistance provided under this Regulation. The Commission shall borrow the funds on the capital markets or from financial institutions in accordance with Article 224 of Regulation (EU, Euratom) 2024/2509.</p> <p>1. The Commission shall adopt decisions, by means of implementing acts, making available the policy-based loan amount to a partner country and setting out the availability period of the loan which shall not go beyond three years after the end of the multiannual financial framework. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 32(2). If that decision is part of an action plan or measure, Articles 18 and 19 shall apply.</p> <p>2. In addition to the elements laid down in Article 223(4) of Regulation (EU, Euratom) 2024/2509, loan agreements for policy-based loans shall lay down the maximum loan amount, the availability period, the maximum duration of each disbursement of</p>	<p>Do these provisions constitute a change from the current situation? If so, what will change compared to the current situation? In which situations could the Commission decide to borrow funds under this Regulation and to make available macro financial assistance in the form of a loan /policy based loans? What is the difference between these two concepts, also in procedure for making available the loans? Will the Commission provide an explanation of how it determined the maximum loan amount?</p> <p>Do you have an evaluation of the provisioning rates for the budgetary guarantee and financial assistance? (9% and 50%)</p>

	<p>the loan and the detailed terms and conditions of the support. Such agreements may also contain an amount of pre-financing and rules on clearing of pre-financing.</p> <p>2. The provisioning rate for the budgetary guarantee and financial assistance referred to in paragraph 1 shall range between 9 % and 50 % depending on the type of operations. The provisioning rate shall be 9% for the financial assistance and for budgetary guarantee covering sovereign risks associated with lending operations.</p>	
<p>General provisions: Article 25.6, p. 38 - Global Europe Investment Board</p>	<p>A Global Europe Investment Board (the ‘Investment Board’) shall provide strategic and operational guidance to the Commission in the implementation of the budgetary guarantee referred to in Article 24 and blending</p> <p>...</p> <p>The Investment Board shall be composed of representatives of the Commission and of the High Representative, of all Member States and of the EIB. The European Parliament shall have observer status. Contributors, eligible implementing entities and counterparts, partner countries, relevant regional organisations and other stakeholders may be given observer status, where appropriate.</p>	<p>Could the Commission elaborate how the Global Europe Investment Board will operate, where its mandate will be formalized, and how it will relate to working groups, such as the Global Gateway Working Group?</p> <p>Could the Commission describe how it plans to involve the private sector more in relation to the proposed Global Europe Investment Board, to assure the</p>

		coordination of public and private investment agenda's?
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MFF and ORD

General Questions MFF

1. Performance Framework: could the Commission clarify the accounting of indicators towards the 35% spending target for climate and environment where those indicators contribute to multiple goals (mitigation, adaptation and environment)? E.g., does financing for measures which have an EU-coefficient of 100% for both climate mitigation and adaptation account for 200% towards the 35% target, or is the 35% differently calculated?
2. European Globalisation Fund: could the Commission clarify why this special instrument is discontinued under the proposals?
3. Regarding the mainstreaming of gender throughout the MFF, could the Commission elaborate on what targets it will set? Does the Commission intend to include the NDICI and GAPIII targets of 85% substantial gender impact marker and 5% principal gender programming marker as a part of its performance mechanism? Will these targets also continue to apply for the upcoming MFF as a whole?
4. PF MFF Chapter 2 Article 4 (1) Climate and biodiversity: Programmes and activities shall be implemented with a view to achieving an overall spending target of at least 35% of the total amount of the budget on climate action and environmental objectives. Does the 35% also apply within the ringfencing?

Biodiversity

- When can we expect a Commission (draft) paper on how the Nature Restoration Law can be financed, including options within the MFF? How much do you expect the MFF proposal to contribute to the EU biodiversity financing need of EUR 65 bln/y and EU financing gap of EUR 35 bln/y?

- Does the proposal ensure sufficient funding to meet international biodiversity targets within the Global Biodiversity Framework (GBF)? According to a 2023 non-paper of the Commission, biodiversity spending within the current MFF should roughly double to fulfil the GBF obligation, especially Target 19.

Performance framework & biodiversity

- There is a spending target for climate and environment in a broad sense, encompassing the environmental goals of climate mitigation, climate adaptation, water and marine resources, biodiversity and ecosystems, pollution prevention, and circular economy. Will each goal be tracked separately? If so, how?
- Will the Commission continue to track and report on biodiversity-specific spending, also in light of the biodiversity spending reporting obligations to the Convention on Biological Diversity? If not, how will the reporting at EU level be managed?
- How will the Commission ensure that the 35% spending target incentivises that each Euro contributes to maximum impact across multiple environmental goals? Do separate spending targets for both climate and biodiversity provide more such incentives than one single spending target?
- Has the Commission considered more granular tracking of environmental spending than the current 0-40-100% Riomarker method?
- How can the Performance Framework further incentivise Member States to exceed minimum DNSH requirements?
- How will the Commission operationalise DNSH? Will sectoral exclusion lists play a role?
- Does the Commission expect a meaningful application of the DNSH principle in light of attenuations relating to feasibility, appropriateness, proportionality and exceptions?
- How will the Commission ensure and control solid implementation of the DNSH principle? Who is responsible to assess and check?
- At what amount of funding will DNSH be applicable?

- Is there overlap among ringfenced budgets? Can the Commission provide insight in how much funds are not yet ringfenced?
- Can the 25% flexibility pocket be used to fund environmental activities that help prevent climate and environment-related crises?
- How does the Commission ensure a smooth process considering the MFF negotiations are likely to be ongoing while countries should prepare their NRPPs and Nature Restoration Plans?

Specific questions ORD		
Chapter, article nr., article or chapter name, page number	Text related to question (if applicable)	Question(s)/ Comment
Recital 4, p. 1 – handling fee	Recent developments have demonstrated an increase of goods sold in distance sales. To cover the increasing costs of ensuring the release of those goods for free circulation by checking the data provided, carrying out risk analysis, performing documentary and physical controls when needed, new amounts of traditional own resources, based on other amounts or factors might be chargeable in trade with third countries, like a Union handling fee, commensurate to the services rendered for releasing those goods for free circulation. It is appropriate to specify that this Union handling fee, as traditional own resources, is only made available to the Union as of 1 January 2028.	The proposal clarifies that amounts related to the handling fee on e-commerce as established under the Union Customs Code fall into the category of traditional own resources. This means the proposal of the Commission will allow 10% of the revenue of the handling fee to reach the national customs administrations. How does the Commission relate this to the legal justification of the handling fee (art 18 in the new UCC) as a reimbursement for the services rendered



		for releasing E-commerce goods for free circulation by these Customs organizations?
Recital 4, p. 1 – handling fee		In the current system the EU’s entitlement to the TOR consists of all levies and duties that should have been collected (minus 25% collection costs). Does the Commission propose that this must also be the case for the handling fee?
Recital 4, p. 1 – handling fee		Being that the Commission clarifies that the handling fee on E-commerce is a traditional own resource, does this imply the revenues of this will go to the Union (minus collection costs) also if the fee is implemented before the new own resources decision is implemented? It seems that the proposed delay to 2028 will only become effective once a new ORD has entered into force.
Recital 4, p. 1 – handling fee		The making available of TOR is rather labour intensive because it is based on every single levy or duty instead of on statistics. Does the Commission envisage the same system for the

		handling fee (because it is deemed to be TOR)?
Recital 9, p. 2 & Article 3, p. 7 - TEDOR	The Council Directive 2011/64/EU has introduced harmonized minimum rates for manufactured tobacco released for consumption. The Council Directive [XXX] recasting Council Directive 2011/64/EC revises the structure of minimum rates and extends the scope of the Directive to tobacco related products. At the same time, smoking remains an EU-wide health policy challenge. To support relevant health policies and given competition-distorting cross-border shopping in these products, driven by differentials in taxation, it is appropriate that a call rate of 15 % to the revenue stemming from the application of those harmonised minimum rates to the products released for consumption is established as an own resource.	When can we expect a more in depth explanation on the calculation of the TEDOR? Could the Commission, for example, give a clarification on how the amount of products released for consumption will be determined?
Recital 9, p. 2 & Article 3, p. 7 - TEDOR		TEDOR: The current proposal of the TEDOR contains a reference to the recast of the TTD, proposed for 2028. What will be the financial implications for the TEDOR if the recast of the TTD is not agreed upon before 2028?
Recital 9, p. 2 & Article 3, p. 7 - TEDOR		TEDOR: could you explain why the support study of the Economist Association of the review of tobacco excise duty rules is not published (yet?)?

<p>Recitals 6, 7, p.2 & Article 3, p. 7 - CORE</p>	<p>A financial contribution linked to the corporate sector should be introduced as an own resource. The Corporate Resource for Europe ('CORE') should apply to companies that are resident for tax purposes in the Union with an annual net turnover exceeding EUR 100 000 000. Likewise, the CORE should apply to permanent establishments located in a Member State of entities resident, for tax purposes, in a third country. The CORE should apply to the net turnover of a permanent establishment, irrespective of the net turnover of the entity resident for tax purposes in a third country which is not generated by the permanent establishment.</p>	<p>many businesses are a conglomeration of several entities. This proposal seems to focus on entity level, which means that all entities have to be scrutinized. In our view, this method leads to unnecessary, extra administrative burden. Why hasn't the CION chosen for a consolidated approach at head office level?</p>
<p>Recitals 6, 7, p.2 & Article 3, p. 7 - CORE</p>		<p>If a corporate group operates via separate legal entities or permanent establishments across multiple Member States, each with turnover under EUR 100 million but collectively above that threshold, will they be liable under CORE as a group, or will each entity be evaluated separately?</p>
<p>Recitals 6, 7, p.2 & Article 3, p. 7 - CORE</p>		<p>If they need to be held liable as a group (and the head office is outside of the EU), how is determined which Member State is responsible (and liable) for collecting the fee?</p>

Recitals 6, 7, p.2 & Article 3, p. 7 - CORE		What administrative costs does the Commission expect for Member States for collecting CORE?
Recitals 6, 7, p.2 & Article 3, p. 7 - CORE		CORE: What is the rationale that pure national based businesses should pay the CORE as well? The international businesses clearly enjoy benefits from the Internal Market but that is far less the case for the national operating businesses.
Recitals 6, 7, p.2 & Article 3, p. 7 - CORE		As the MS are responsible for the collection, how will this work with the legislation/application/monitoring?
Recital 11, p. 3 & Article 3, p. 8 – e-waste	To yield positive environmental outcomes and strengthen the Union’s strategic autonomy in critical raw materials, the Union budget should contribute to increase the collection of e-waste. An own resource proportional to the quantity of non-collected e-waste in each Member State, with a call rate of EUR 2 per kg of non-collected waste, would incentivise waste reduction and encourage separate collection. At the same time, it should be left to the discretion of the Member States to take the most suitable measures to achieve those goals, in line with the principle of subsidiarity.	In 2023 the Commission has shared a staff working document in which this new own resources was analyzed. The conclusion of this report was that the quality of statistics would need to be further improved on several levels. Has the situation improved? It is important to have reliable and sufficiently comparable data.

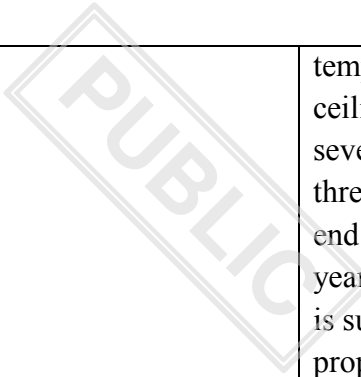
<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>Can the Commission elaborate why the calculation method of average weight of EEE placed on the market in the three preceding years in the Member State (hereafter: POM-method) was selected as the basis for calculating the new own resource?</p>
<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>How will the Commission take into account skewed collection rates with the POM method due to the increase in recent years of EEE place on markets with a lifespan exceeding 3 years (i.e. solar panels and heat pumps)? These products will not be collected for decades and will therefore be statistically listed as ‘uncollected e-waste’ with the POM-method whilst being functional EEE in reality.</p>
<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>To what extend does the Commission expect the new own resource based on the POM-method to have a detrimental effect on efforts by member states to increase the lifespan of EEE (> 3 years) prior to becoming waste by circular methods such as repairs and refurbishment?</p>

PUBLIC

<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>It remains unclear to us if the new own resource should be seen as a measure to reach the collection target stipulated in the WEEE Directive or also applies to member states who have reached the collection target? Will member states pay the €2 for <i>every</i> uncollected kilogram of e-waste (to 100% collection rate) or is it to be read as a levy of €2 for uncollected e-waste until the collection target of 65% POM-3 is reached?</p>
<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>The Extended Producer Responsibility on EEE places the responsibility of collection e-waste with the producers of EEE. To what extent are member states expected to interfere with the EPR on WEEE to increase collection rates? Does the Commission expect member states to take measures at national level to ensure producers are held financially responsible for the new own resource payments in some way as it would be in line with the ‘polluter pays’ principles of the EPR?</p>

<p>Recital 11, p. 3 & Article 3, p. 8 – e-waste</p>		<p>How do the new own resource and the planned revision of the WEEE Directive in 2026 interact? As the collection rate method in the WEEE Directive might be redefined in this process.</p>
<p>Recital 12, p.3 – call rate plastics and e-waste</p>	<p>The call rates related to the plastics packaging waste own resource and e-waste own resource should reflect the evolution of the general level of prices for goods and services and therefore be adjusted to annual inflation.</p>	<p>Why has the Commission proposed indexation of the call rate with a forecast of inflation instead of the most recent realization of inflation, given that the former is prone to error while the latter is not?</p>
<p>Recital 15, p.3 & Article 3, p. 8 - CBAM</p>		<p>How is the estimate of 1.2 billion EUR calculated by the Commission, and how does this figure look like broken down by member state?</p>
<p>Recital 13, p.3 & Article 3, p. 8 - ETS</p>		<p>In the ETS Directive is stated that Member States shall use those revenues, with the exception of the revenues used for the compensation of indirect carbon costs referred to in Article 10a(6) of the Directive, or the equivalent in financial value of those revenues, for certain climate policies. Could the Commission confirm that the new own resource</p>

		based on ETS-1 has no impact on this obligation? The new own resource will not lead to a lower amount for Member States to be spend on climate policies?
Recital 16, p.3 – VAT WAR		Does the Commission intend to propose to alter the ‘weighted average VAT’ at a later stage?
Recital 5, 10, 11, 16 – changes to correction mechanisms, increased call rate plastic & reduction collection costs		14,3 billion in the factsheet, could you clarify how much is due to the abolishment of correction mechanisms, increased call rate plastic and the reduction of collection costs?
Recital 17, p.4 & Articles 6,7,8 – own resources ceiling		The Commission argues that the ‘extraordinary and temporary increase in the own resources ceilings to address the consequences of severe crises, severe hardship or serious threat thereof’ is temporary as it will only last till 2034. Does the Commission believe that after 2034 there will not be a crisis anymore?
Recital 17, p.4 & Articles 6,7,8 – own resources ceiling		For how long does the Commission believe the ‘extraordinary and





		EFSM, SURE, Ukraine and SAFE? On what assumptions/calculations (e.g. interest rate and duration of loans) is this based?
Other – p. 28 of the Communication of the MFF – other revenue	The Commission will also continue working towards introducing new fees related to Union Policies	What fees is the Commission considering?

AUSTRIA

General questions

- Could the Commission provide a fiche comparing amounts of current programmes in current and constant prices with those in new programmes (transformation table) with both the 2027 level of planned expenditure and the 2021-2027 total?

MFF Regulation

- The Commission proposes to deviate from the well-established practice to use the 2% deflator to set the annual ceilings in current prices by proposing to use real inflation instead (n.b. if inflation <1% or >3%, otherwise 2% is used). This creates uncertainty for national budgetary planning and also contradicts the idea of long-term expenditure planning under the fiscal-structural plans. Also it is unclear how it would work in practice: how is the increase (or decrease) in headings translated into the respective programmes? In short: How will certainty about the “true” level of the budget for both finance ministers and beneficiaries of EU funding be ensured?

IIA

- We notice a couple of changes compared to the current IIA. Possible questions for the EC (orally or later in writing) regarding its proposal for a new IIA:
- Point 8: why has the COM dropped the current language that “all” possibilities for redeployment have to be examined?
- Point 10: we appreciate flexibility, but also predictability - please explain the rationale for the increase from 15% to 20% in possible deviation from planned amount.
- Point 11: the indicative financial programming, structured by heading, policy area and budget line should cover all 4 headings and not only headings 2 and 3.
- Where can we find a replacement for the need to update the estimates for payment appropriations (PA), which is currently still in point 8 of the current IIA? In connection with "budgetary transparency," please explain why there is no longer a reference to the annual report by the Commission on budget (point 16, current version) or the annual report on EURI (point 17)?
- In connection with the protection of the EU's financial interests, please explain why there is no longer a section on "protection of the Union budget, quality and comparability of data on beneficiaries" (points 30-33, current version)?
- In point 12 regarding decentralized agencies, the impact of the new agency is to be examined only on Union activities, but no longer on national activities. Why? What is the added value of introducing a new section “C” on a budgetary scrutiny procedure for Art. 122 measures? Art.122 is for the Council only to decide.

Administration

- A detailed overview of administrative costs across all headings, not only Heading 4, is needed.
- A detailed description of the evolution of pension costs is needed. Are pensions also subject to the solidarity levy or only active salaries?

- We wonder why the ceiling for Heading 4 in 2028, i.e. the first year of the next MFF, is 7% higher than the admin costs estimated in the recent financial programming for 2027, i.e. the last year of this MFF.
- Additional posts of 2.500 FTEs seem to be in contradiction to simplification efforts (e.g. merging of programmes, less rules). Additional posts are also in contradiction with MS having to save administrative spending at home.
- We note that no more sub-heading within the administrative heading is proposed and wonder about the reasons.
- According to figures in the draft budget 2026, a total of 60.0000 FTEs work for the EU institutions costing 8 bn € in salaries for the EU budget, i.e. an average annual salary of around 133.000 per person (FTE). What is the average tax rate applied? Do this figures include allowances? Please provide a more granular overview of individual items that make up total salary costs.
- Do the additional 2.500 posts include contract staff, or are these only those listed in the staffing plan? If not, could the Commission please provide a list of all future planned posts (i.e., established posts and those not listed in the staffing plan)?
- Isn't it a contradiction to want to achieve efficiency improvements on the one hand, but do so with an increased number of staff? How is efficiency defined here, could the EC elaborate the efficiency gains in terms of staff?
- Has the European Commission already taken into account the costs resulting from the application of the current Staff Regulations in its calculations for the appropriations under the administration heading? Is the 2% solidarity levy included in the estimates?
- Can the Commission provide information on the proportion of administrative costs when taking into account the administrative costs of all operating categories/headings (including agencies)?
- Can the Commission provide an overview of the calculations on how staff costs are evolving, given the evolution of pensions, institutions with European schools and ranks?
- The COM provided very useful fiches on administration in 2018 in the context of the MFF negotiations. We would kindly ask the Commission to provide updates of these fiches:
 - estimates of administrative expenditure under Heading 4 for the Period 2028-2034 as previously provided for the current MFF period in WK 8870 2018 and WK 9967 2018 (MFF 2021-2027 Fiche no. 25 and 41). This should ideally update for the current MFF period including DB2026 so allowing for a comparison of actual versus initially forecasted (not only in terms of salary increases but also actual number of FTE). This should also indicate the administrative expenditure changes presented in the Legislative Financial Statements in a compiled form. The latter should inform about the proposed increase by 2500 FTE. In this context, the Commission is invited to illustrate how the additional posts would ensure supporting Member States that are underrepresented in terms of geographic balance. We would expect this to include an overview of needs of the institutions.
 - The equivalent should be provided for the programme support expenditure envisaged for the Period 2028-2034, as previously provided in WK 8871 2018f or the current MFF period. It should not only provide an indication of the expected future costs, but also include the actually observed costs in the current MFF including DB2026. This fiche should aim to provide the information on individual agencies and other bodies of the Union as well.

- In order to better frame the development of pension liabilities based on staff members contributing, the Commission's overview of the active population of the “Pension Scheme of Officials and Other Servants of the European Union” (PSEO) as in WK 17080 2022, should be updated with the most current figures. In this context, the Commission is requested to provide the figures of all staff eligible for retirement during the period 2028-2024 specified on an annual basis.
- Lastly, to be able to have a full overview that gives the broadest possible basis for understanding the Commission proposal, we request information (updates) to be provided also on the costs for career progression, European Schools expenditure for the Period 2028 – 2034 as well as the application of the 2% Deflator to the Expenditure in Heading 4 (as in WK 9921 2018 WK 9922 2018 INIT and WK 13164 2018 respectively).
- We would also invite the General Secretariat of the Council to present, possibly in a closed session, its forecasted needs for the period 2028-2034 to include the full costs of the JL renovation project and any policy staff needs to maintain institutional balance (in particular on budgetary matters given the new approach provided by the EP rules of procedure). The latter costs should differentiate between the costs of compliance only as well as the preferred full renovation as well as the expected costs to the budget when covered by own resources or assigned revenue.

Own Resources

- In the EC proposal concerning the own resource “**CORE**” it is not very clear which companies or which level of the company is affected. According to Article 3(1)(b) and Recital 7 of the proposal, "companies", defined in Article 2(2), must pay an annual lump sum. How would this payment be calculated for groups of companies - at group level or at individual level = for all subsidiaries and (?) branches in each member state if they exceed the respective net turnover limits? Depending on the company structure, this would lead to different results with the same turnover.
- In general, we have doubts whether Art 311 TFEU solely is a suitable legal basis for introducing a measure like CORE and we would like to ask the Commission and the Council Legal Service to elaborate more on this issue. Furthermore, we want to address the envisaged IMSOR Regulation mentioned in Chapter 2.2. of the Proposal for a Council Decision on the system of own resources of the European Union and repealing Decision. According to the Decision proposal, the IMSOR Regulation is supposed to include relevant implementation aspects in relation to COREE. When will the proposal for the IMSOR Regulation be published? For us both the EC’s views on the suitable legal basis as well as the IMSOR Regulation at hand are key to assess CORE from a technical perspective.“
- Concerning the calculation method for **non-recycled waste electrical equipment** (Article 3(f) of the proposal we have question relating to the underlying definitions:
 - The current draft assumes that all equipment that is not collected separately is to be regarded as non-recycled. This is based on a three-year observation period. Is there any scientific evidence for this, or is it based on an incorrect calculation method that is no longer appropriate due to the longevity of the appliances placed on the market (e.g. PV modules, balcony power plants, heat pumps, etc. are expected to be in use for at least 20 years)?
 - When does the European Commission intend to propose a new, improved calculation method that takes into account the realistic lifespan of the appliances and enables Member States to realistically achieve their collection targets, as already

provided for in Article 7(4) and (7) of Directive 2012/19/EU on waste electrical and electronic equipment?

- When can we expect to receive the texts on the implementing Regulation (IMSOR) and on a merged **Making Available Regulation** for all categories of own resources? Note that, unlike written in the explanatory memorandum, we need one (merged) MAR and not “new making available provisions (...) at a later stage”
- Will the COM present a **report on the functioning of the system** as was done in 2018 (or an additional SWD)?
- Could the COM explain how the new own resources can “allow for stable national contributions despite the increase in the size of the budget”, broken down by OR categories and assigning them to “national contributions” or “other”? We took note of the fact that the COM in its fact sheet on the ORD proposal classified the WEEE (e-waste) as “national contribution” which is logical given that this is also the case for plastic, but we do not see how this could possibly be in line with “stable national contribution”.
- In the COM’s logic, new own resources are necessary to finance repayment and additional money for new priorities. Can we conclude from this approach that the COM would propose a **reduced envelope for the new priorities, if some of the proposed new own resources would not be introduced**?
- What is the rationale behind the proposed **very large increase of the own resources ceiling**? We ask the COM to provide the data supporting this rationale.
- What is the reason for the COM decision to skip **ETS2**?
- Concerning **traditional own resources**:
 - We welcome the COM’s proposal to bring the **collection cost** compensation down from an exaggerated 25% to a more realistic 10%. Could the COM provide evidence for the real level of collection costs?
 - We understand that the abolition of the de minimis rule is expected to generate considerable extra revenue. In that context, do we assume correctly that the **handling fees** for e-commerce will be classified as “other revenue” or would it be part of traditional own resources?
 - To facilitate an informed technical discussion in the next months we ask the COM to provide **updated versions of the fiches** provided since 2021, most importantly a fiche with an annual breakdown by own resource and MS (like the fiche 53 of 2019).

Linkages between Horizon Europe & ECF

The “Competitiveness”-parts of the proposed Pillar II of Horizon Europe will be closely linked to the ECF, esp. via the proposed comitology and the establishment of “integrated work programmes”. Therefore:

- AT asks the Commission to clarify how these integrated work programmes should be developed and how the Commission will ensure that R&I rules will apply (esp. based on excellence and open competition) and how R&I expertise will be taken into due consideration.
- AT is sceptical with regard to the proposed application of the “advisory procedure” in most of the ECF programme committees (see e.g. recital 87/ECF).

Budgetary implications:

- The Commission suggests indicative budgets for collaborative R&I projects within Pillar II of Horizon Europe, however details regarding the splitting of these budgetary provisions are missing and it is difficult to assess the implications on specific R&I fields. AT asks the Commission for more details on the proposed budget lines.

- With a view to the proposal to also fund R&I on defence applications via the EIC, AT asks the Commission for clarifications on the proposed budget for defence research within the ECF and if this budget will be (partly) allocated via the EIC (Art. 46(c) ECF).
- AT asks the Commission for clarifications regarding possible requirements for co-funding of actions implemented via the ECF/Horizon Europe and if these might also apply to R&I measures.
- AT asks the Commission for further information on the proposed “Moonshots” (see HE regulation, explanatory memorandum) and its suggestions for respective funding streams.

NRRP, ESF

- Does the European Commission have an overview, based on the latest available figures, showing the minimum financial contribution (in €) from the MFF that is to be allocated to measures under the European Social Fund (ESF) per MS? What is the minimum ESF contribution (= 14% for social reforms and investments?) in € per MS?
- How shall health promotion and prevention be included in the MFF 2028-2034?
 - Rationale: While response measures are undoubtedly important, health promotion and disease prevention should not be overlooked—especially in times of limited budgets, as they are essential components of health preparedness.
- What will be the procedure for the National and Regional Partnership Plans? How are these linked, for example, to the fiscal and structural plans or the recommendations of the European Semester (which include some health issues)?
- How are structural reforms in the social and health sectors taken into account in the MFF (apart from the National and Regional Partnership Plans)?
- In light of the new MFF, the question arises as to what role the EU4Health programme will play in the future. How is the programme specifically positioned within the new MFF, and what substantive, structural, or financial changes can be anticipated?
- What exactly does the EU Facility (social issues) look like?

NRP Regulation and related fund regulations (ERDF, CAP, CFP):

- Art. 14 (2) - “Flexibility Amount”:
We request an explanatory note detailing how the Commission arrived at the share of 25% of the funds - if available with figures/shares on current funds.
- Title IV - “EU Facility”:
We request an explanatory note on the implementation of the EU Facility components - e.g. lead DG and any interfaces to the NRPP. Please also provide a comparative table of the Union actions (Annex XV) and their equivalents in the 2021-2027 period (incl. budget allocations).
- Art. 49 - “Plan Authorities”
According to Art 49, one or more managing authorities (MAs), one or more paying agencies, and one or more audit authorities shall be identified for the NRP-Plan. Para 2 states that Member States may build upon the authorities entrusted for the implementation for the 2021–2027 Cohesion, the CAP or EMFAF period. However, under the Common

Provisions Regulation (CPR) for the 2021–2027 period, the role of a “paying agency” is not defined as such (Art. 71 CPR/Reg (EU) 2021/1060) but the accounting function (Art. 76 CPR) could be carried out by a managing authority. In this regard we would like to submit the following question: Is the accounting function under CPR the same as the proposed paying agency, or does the proposal call for a new authority to be set up for the ERDF, EMFAF and ESF in any case? Note: For the sake of simplicity, it would be preferable to retain the existing structures, i.e. to extend the term “paying agency” in para 1 to include the accounting function.

- Ineligibility of Certain Expenditures:
In the 2021–2027 period, the ERDF regulation included explicit exclusions for ineligible types of expenditure (Art. 7 ERDF/Reg (EU) 2021/1058), such as the manufacturing, processing and marketing of tobacco and tobacco products, undertaking in difficulties, the decommissioning or the construction of nuclear power stations, etc. Why is there no such list of ineligible expenditure types in the Commission’s current proposal? In particular, could the Commission clarify whether there are any changes implied in the proposal with respect to eligibility of investments in nuclear energy?
- Article 53(4) and Related Provisions (eg. Art 51 para 1 b), Art. 58 para 2 (1)– Verification of Underlying Costs:
Article 53(4), and similar wording in other parts of the draft, states that MS, MA, the Commission, and auditors are no longer expected to verify the underlying costs of operations for the purpose of audit work. However, Articles 53(1) and (2) emphasize that it must still be ensured that the underlying transactions are legal and regular, and that the financial interests of the Union are effectively and timely protected. Furthermore, Articles 58 and 59 – which refer to the responsibilities of Member States and the submission of the annual reliability package – require, among other aspects, confirmation that double funding is avoided. AT considers it necessary to develop a common understanding among the EC and all plan related authorities of how confirmation such as avoiding double funding effectively without examining individual verification of underlying costs. Measures aimed at simplification should not be undermined by in-depth audits! Are guidelines or information notes regarding these questions planned? If so, could you please provide a timeline and outline the process. Based on Art. 15 (Decommitments) and related changes to the reimbursement system, it is important to agree on a common understanding as early as possible!

- Detailed allocations for MS (NRPP) incl. ring-fenced amounts for CAP income support
We request an explanatory note detailing the amounts allocated to MS within the NRPPs and for Interreg. Especially Annex XVIII (Minimum for CAP income support interventions) is missing, but needed urgently in order to assess the implications of the COM proposal for each MS.
- Art. 35 – CAP types of interventions
Which maximum support rates for CAP interventions are proposed? The draft regulation seems to include only provisions for investments (75%) and young farmers (85%). E.g., which maximum aid intensity rate would apply for LEADER?
- Art. 85 – State aid
What is the rationale behind the proposed changes compared to the current period? For many current CAP (CSP) interventions and CFP (ex-EMFAF) measures, it seems that state aid exemptions do no longer apply.

EU Innovation Fund (EU IF)

- How does the EC envisage the integration of the EU Innovation Fund into the ECF at strategic level and at operational level?
- How can the very low funding for the years 2027 to 2030 and the sharp increase in funding for the years 2031 to 2034 be explained?
- How will the regional balance in the allocation of funds in the EU Innovation Fund in particular and the ECF in general be improved and guaranteed?

LIFE-Programme

- How were the funding priorities of the previous LIFE programme divided between the Competitiveness Fund and national plans? The previous funding objectives of LIFE – for project financing (see LIFE Regulation, Objectives) – should be covered in full.
- How can it be secured that transnational projects be funded across the EU according to the same criteria in this funding structure, e.g. transnational water protection projects on rivers?

Do-No-Significant-Harm-Principle (DNSH), Principle „Climate resilience by design“, Just Transition Fund, Social Climate Fund, ETS II

- How exactly is the “Climate resilience by design”-principle implemented in the MFF and what does it imply? The principle only appears as a vague concept in the recitals of the regulation, but is presented as one of the key elements in the EC’s factsheet Europe’s Budget, Delivering on the clean transition (July 2025). To what extent do investments need to have a positive impact beyond DNSH compliance?
- DNSH principle: The proposal suggests specific DNSH categories. Does the EC aim to ensure that DNSH criteria are generic enough to be applied to a wide range of programs, while at the same time not being too imprecise? Does the EC aim to set up broad or narrow exemptions from the DNSH principle (defense and security measures have already been mentioned)?

- What does the newly introduced structure of the MFF mean for 1) current programs and its monitoring and reporting process (like the Just Transition Fund) and 2) not yet implemented programs (like the Social Climate Fund)? Do reporting flows change due to the new structure of national plans and how?
- What is the forecast revenue of the ETS II? So far, we only see a revenue expectation of ETS I. Since ETS II will be introduced by 2027 and certainly affect revenues, will there be an additional forecast in the near future?

European Competitiveness Fund (ECF)

- How will the integration of the Competitiveness parts of Horizon Europe Pillar II into the ECF work in practice, and what changes can be expected compared to the present situation in Horizon Europe?
- How will the implementation of the relevant research and innovation topics be monitored, and how will Member States be informed on programme implementation?

On Horizon Europe and the Competitiveness parts of Horizon Europe Pillar II in the ECF

The ECF is intended to bring together 12 programmes and in addition significant competitive elements of Horizon Europe, which account for just under one-third of Horizon's current budget of €93 billion. The aim is to integrate research and innovation on technology topics such as energy, mobility, digital and key technologies, advanced materials, artificial intelligence, quantum technologies, etc. from Horizon Europe into the ECF. In light of this, how will the following important research and innovation concerns on these topics be addressed in future:

- Enabling European transnational cooperation at the highest level on the priorities of digital and key technologies and technologies for a green transition?
- Active participation of all European innovation actors, including industry, research institutions, stakeholders and society?
- Involvement of Member States with the aim of improving coordination, given that more than 90% of public expenditure on research and innovation is carried out by Member States.
- How can the goal of coordinating European research and innovation with that of EU Member States, as pursued by the European Research Area, be further maintained?
- How will Horizon Europe measures be monitored in the respective policy windows of the ECF, given the desired close link with other ECF measures? How will the impact of research and innovation remain visible?
- How can we ensure that the funds now earmarked for FTI are actually used as planned?
- Which committee will oversee the competitive parts of Horizon Europe? Will specific configurations be set up within the committees for the ECF's policy windows?
- Governance structure of ECF: Merging several previous programmes is welcome when it comes with simplification and flexibility in principle. However, the creation of such a “large animal” necessitates effective steering in committees with relevant sector expertise, including by MS and the EU Institutions incl. COM and its DGs. The administrative burden should not be increased. We would appreciate comments by the COM on its related ideas. What could an implementation framework relying on expertise look like? What does the proposal imply for the balance of competences between the COM and the Council? In what ways will the relevant council working parties and committees be consulted and involved at each stage of the process?

- Flexibility (Recital 16): the ECF sets out an indicative budget distribution across the policy windows for the period 2028 to 2034 while maintaining flexibility to reallocate parts of the budget due to the fast-changing economic, social, security and geopolitical environment. Could the COM provide more detail on how a balance between predictability/certainty vs. flexibility can be achieved?
- Industrial policy/ additionality/ private sector mobilisation: The ECF should not contribute to preserve inefficient structures with public money. Further analysis is needed to better understand the proposal in this regard. The draft-regulation emphasizes multiple times that additionality without crowding out private investors is one of the overarching goals – e.g. in recitals 3, 13, 51, 68 as well as in Articles 3 and 23 – its precise meaning is not defined. However, additionality has to be defined more explicitly. The mobilisation of private means is key and should be a result measurement indicator; the proposal does not provide for an estimation of the multiplier and hence not of the volume of investments mobilised.
- Competitiveness Coordination Tool (Recital 12): Could the COM explain the potential interplay of the ECF and the CCT under the EU semester more detailed?
- Budget Allocation (Article 4): The draft-regulation allocates by far the largest portion of the ECF budget to the “Resilience, Defence industry and Space”-policy window. What criteria are used to determine the budget allocation within this policy window and how will this be reflected in the work program or its implementation?
- Competitiveness Seal (Rec. 47 and Article 8): Can the COM explain the procedure for awarding the seal in more detail?
- EU Preference (Article 10): Could the COM elaborate a on how the restrictions designed to ensure EU preference will be implemented in practice? How will these restrictions impact procurement procedures at both national and international level?
- Mutual Insurance Mechanism (Rec. 60 and Art. 12 para 10): According to recital 60 the MIM should be open to use by actions under the ECF where relevant. Could the COM explain in more detail the scope and the process of the mechanism within the ECF?
- ECF InvestEU Instrument – Implementing Partners:
- Art 25 para 1 establishes an open architecture model that allows access to the ECF not only for the EIB, EBRD and national promotional institutions but also, more broadly, for international financial institutions (IFIs). However, in a comparable provision of the draft-regulation for the Global Europe Instrument (Art 23 para 7), IFIs apparently do not have access to the GEI. This suggests a potential inconsistency. Could the Commission explain the rationale?
- Rec. 70 emphasizes that the COM should be able to conclude agreements in indirect management with pillar assessed entities. Why does Art 25 para 2 then provide for a derogation of Art 211 para 5?
- According to Art 25 para 3 of the draft-regulation private entities may also act as implementing partners for the ECF InvestEU Instrument as long as they are pillar assessed entities. However, a comparable provision of the draft-regulation for the Global Europe Instrument (Art 25 para 2 and 3) stipulates that private entities would not have to be pillar assessed. This suggests a potential inconsistency. Could the Commission explain the rationale?

- In this regard it should also be mentioned that Art 7 para 3 of the draft-regulation explicitly emphasizes synergies between the ECF and the GEI. How does that translate into the governance of the according instruments?
- Equity (Art. 21 para 2): In general, the motivation behind the COM's intention to become shareholder of companies is well understood. At the same time, we caution against potential politics-induced misallocation of capital. Also, we do not see neither the COM nor the EIB exercising ownership rights. Hence, we could go along with indirect or quasi-equity, but have a strong reservation when it comes to direct equity.
- SMEs (Rec. 80 and 81 as well as Art. 27): The draft-regulation does not provide for a focused SME policy window. How will it be ensured that the proposed policy windows include targeted actions specifically addressing the needs of start-ups and SMEs? Could you provide more details on the specific role of the "EU Business Network" within the project's advisory architecture?
- Scale-up finance: In general, we support the COM plans to set up such a facility. We do not fully see how to merge existing instruments of other institutions, like the EIB's initiatives, into this facility.
- ECF InvestEU/ Guarantee: We see the provision of guarantees from the EU budget as efficient and effective way to mobilise private means. We do support to have one single vehicle for the implementation of financial instruments and budgetary guarantees, provided workstreams are clearly defined and ownership by MS is possible. Could the COM explain the rationale of the maximum amount of 70 bn Euro and how exactly the provisioning would be financed? How will absorption capacity and additionality be achieved?

On the involvement of Member States with respect to Horizon and the ECF

- EU Member States have been actively involved in the design and implementation of Horizon Europe to date. How will this continue to be possible in cooperation with the planned ECF Strategic Stakeholder Board and within the planned structure?

Space related questions

- Flexibility is good to a certain extent, but planning security requires an indicative budget – how much of the indicative budget for "Resilience and Security, Defence Industry and Space" will be earmarked for the implementation of the Space components?
- How will governance structure look like for each of the elements/ specific objectives referred to in Article 3 (2) point (a) to (d)?

Global Europe

- Governance structure (particularly reg. Article 13-19 and 31): Merging several previous programmes is welcome in principle. At the same time, the creation of such a "large animal" necessitates effective steering in committees with relevant sector expertise, including by MS. We would appreciate comments by the COM on its related ideas. What could an implementation framework relying on expertise look like? What does the proposal imply for the balance of competences between the COM and the Council? In what ways will the relevant council working parties and committees be consulted and involved at each stage of the process?
- Ukraine: Publicly announced support amounts to 100 bn Euro. In the MFF draft-regulation, Art 6 stipulates the creation of a so-called "Ukraine reserve" providing up to 88.9 bn Euro for guarantee and/or grants (prices 2025 translating to 100 bn Euro in current pricing); Art 24 para 3 of the GE draft-regulation suggests that of those 88.9 bn Euro only up to 48 bn Euro (with 70% provisioning) can be used for guarantees.

Furthermore, in Art 6 para 2 the GE draft-regulation provides for up to 100 bn Euro in loans (with no provisioning; see Art 24 para 3). Could the COM explain the exact modalities of Ukraine support, also in writing?

- Team Europe Approach: Regarding the implementation of actions in indirect management, we agree that teaming up along the comparative advantage of actors is central. Therefore, in accordance with the Team Europe Approach, the provisions in rec. 71 as well as Art. 23 para 7 allow for an “open architecture” in the implementation. However, it seems unclear whether those provisions also allow for the World Bank or other development financial institutions to access GE/the guarantee instrument?
- Article 27 proposes capital endowments for European and other DFIs. Could the COM explain the specific modalities and process? Does this provision also include international financial institutions like the World Bank?
- Rec. 82 and Article 25 para 2 and 3: Do we understand correctly that private sector entities and institutions from third countries will be able to access the Global Europe Instrument/budgetary guarantee? If so, which specific entities were envisaged? Could the COM explain the rationale? Why would those entities and institutions be exempted from a pillar assessment?
- [Art 25 para 3: By way of derogation from Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU, Euratom) 2024/2509, where financial instruments or the budgetary guarantee are implemented in indirect management, bodies which provide adequate assurance of their financial capacity and governed by private law of a Member State, a partner country benefiting from the financial instruments or the budgetary guarantee, or a partner country which has contributed to the financial instruments or the budgetary guarantee shall be eligible.]

Enlargement

- The proposed MFF regulation does not appear to explicitly account for enlargement, although we understand that a revision clause exists for that purpose. Could the Commission clarify how exactly the financial implications of future accessions would be operationalised under the current proposal? For example, would you introduce a new heading specially for the new member states, or would special instruments be used?”

POLAND

Governance

1. Please provide information on whether the **steering mechanism** (see SWD 570, pp. 36 and 39–40) will be part of the **annual budget procedure**? Request for more details on the rules that will govern this mechanism.
2. What is the reason for the **one-year postponement** of the publication of the next MFF proposal (for the period after 2034) – publication scheduled for **1 July 2033 instead of 1 July 2032**?

Decommitments

3. What is the reason for deleting the provision in Article 5 of the MFF Regulation (concerning the **re-budgeting of suspended commitments in the procedure based on the conditionality regulation**) concerning the increase of the MFF limit in the event of the re-suspension of funds?
4. We would appreciate **clarification on how the n+... rule** would function in the next MFF period.

Revisions

5. Why was one of the **revision options** previously included in Article 14 of the MFF 2021–2027 Regulation (revision of payment ceilings based on real implementation) **dropped**?
6. Does the Commission intend, as in the 2021–2027 MFF, to **present a declaration on the mid-term review**?

Flexibility and special instruments

1. Please provide explanation of the **increase of the limit to 20%** – point 10 of the IIA (in 2021–2027 this was point 18). In the 2021–2027 MFF, the threshold is 15%, and in the 2014–2020 MFF it was 10%.
2. Please clarify the term **“pure” flexibility** used in SWD 2025 570, page 6.
3. What will be the **legal basis for disbursing funds** under the **Crisis Mechanism**? Please explain in detailed steps the decision-making process.
4. Please explain **the rationale** for including the **EU Solidarity Fund (EUFS)** within the MFF ceilings. This implies the integration of approximately **EUR 10 billion** into the

EU budget. Is the **reason for this change the acceleration of payments** to affected Member States?

5. **Catalyst Europe** – please explain potential **similarity to RRF loan** component?
6. What are the **reasons** for deleting the provision in point 18 of the IIA (in the 2021-2027 MFF, it was point 7) regarding the **lack of a margin in the Cohesion sub-heading**
7. What is the **reason for not including** the provision in Article 7 of the 2021-2027 MFF Regulation on **the carry-over of budgetary commitments from the first year of the MFF?**

NRPP

8. What amount will a MS be able to **allocate to individual EU funds?**
9. Does the EC intend to **replicate the mechanism from the RRF** (Member States submitting payment applications with information on the achievement of milestones and indicators) for the settlement of NRPP Plans, or is a different payment mechanism planned for progress (and if so, which one)? What are the **lessons learnt from RRF, what are the main differences to Common Provisions Regulation (CPR)?**
10. Does the EC allow Member States to develop **separate partnership plans** for investments and reforms implemented at the **national level** and partnership plans for investments and reforms implemented at the **regional level?**
11. Should NRPP Plans have a **separate chapter** presenting how MFF 2028-2034 funds are to be used for **sustainable rural development?** How does the EC intend to implement the **rural proofing mechanism** in the MFF 2028-2034?
12. Will the EC develop **guidelines** dedicated to NRPPs regarding the **DNSH principle, control, rule of law, and public procurement?**
13. We would like to ask the Commission to clarify what is **the rationale behind imposing on the MS implementation of specific objectives** instead of letting them to decide to focus on country- and region-specific actions that are suited to the actual needs on the ground? (“The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).”).
14. What will be the **role of DG AGRI** in accounting, monitoring, and reporting on the implementation of investments and milestones financed from ringfenced funds for farmers' income support?
15. Some **instruments of the current CAP are beyond** the € 293,7 billion ringfencing, for example, training for farmers, cooperation, investments in rural infrastructure, jobs in

rural areas. What will the distribution of funds (amounts) for these “out of the ringfencing” measures and Cohesion Policy measures look like? Will it be only the decision of the MS or will the EC give recommendations/guidelines?

16. Will the EC specify a **minimum level of funds** from the 2028-2034 MFF to be allocated **to rural development**, or will this be left to the discretion of the Member State, which will make its own decision in this regard?
17. Will the **limit on expenditure on direct payments** and other CAP instruments in NRP Plans be determined by the EC or by the Member State?
18. Is the € 293,7 billion **ringfencing allocated to the CAP** (income support) a **minimum amount**, or can Member States **co-finance** it?
19. If it is possible to **increase these allocations, will it be limited**, e.g. due to the potential impact of such decisions on the level playing field?
20. Does the Commission's proposal take into account the call for **regionalisation of the Common Agricultural Policy**, and if so, how?
21. Does the Commission intend (e.g. within CAP national recommendations) to set a **minimum and maximum amount per hectare that a Member State** will be allowed to allocate in total to income support (i.e. interventions referred to in Article 35(1), paragraph 1, points (a) to (k) and (r) and paragraph 10 of NRPP proposal)?
22. How much money can MS allocate to direct payments within the ring-fenced amount indicated for the NRPP?
23. What are the main **rules (mechanism, allocation key) for the distribution of funds for the CAP among MS**, including area payments?
24. Why is it proposed that the maximum amounts referred to in Article 10(6) of the draft NRP regulation be specified in an implementing act of the European Commission? The specific nature of annual CAP area payments requires that both the rules for granting this support and the funding levels be known sufficiently in advance, i.e., so that their smooth continuation after 2027 is possible. It is therefore essential that funds for this purpose be separated and included as early as possible in the base act.
25. The initial years of implementation of the current CAP Strategic Plans have shown that, due to various circumstances affecting agricultural markets and farmers' financial liquidity, significant changes to these plans were necessary. These changes included, in particular, income support for farmers. Similar options for implementing changes should also be provided for after 2027. However, we are concerned about the ability to process such changes quickly enough, should this require amending the entire NRP. Will there be the **option of amending certain elements (sectoral parts) of the NRP, especially if such changes do not affect other elements of the NRP?**

26. Is the EC considering preparing **transitional provisions**, as was the case with previous CAP reforms?
27. What about the envelope **for direct payments in the 2027 campaign (2028 budget year)**? For Member States that transferred funds from the EAFRD to direct payments, the allocation for 2027 (the year not covered by the transfer) is significantly lower. What is the EC's proposal to address this situation?
28. Under which article of the NRP regulation will it be possible to **support investments in agri-food processing** outside farms?

Fisheries

29. The EC presentation given to the MFF AHWP group on July 25, 2025 (document WK 10300/2025 INIT, page 10) and the corrigendum to the EC communication on the MFF 2028-2034 (COM(2025) 570 final_2 corrigendum) included information about ringfencing funds for fisheries support at a minimum level of EUR 2 billion. **How will allocations to MS from funds covered by this ringfencing be determined?** Will there be a **specified percentage of funds allocated to fisheries in each NRP, or will it be a specific amount?**
30. Do we understand correctly that the **fisheries sector** will also be able to be financed from **other funds**?

NGEU

31. The MFF 2028+ foresees an annual allocation of EUR 24 billion (in current prices) for the repayment of NGEU (interest and principal). Could the Commission publish a **breakdown presenting the potential costs of rolling over the repayment of the principal beyond 2034?**
32. In light of the above, does the Commission consider the possibility that the **EUR 24 billion may prove to be an insufficient amount?** If such a situation arises, **from which source** does the Commission intend to provide the **missing financial resources?**
33. What mechanism will be used (to **replace the cascade mechanism using the EURI instrument**) in the event of increased NGEU repayment needs, to avoid negative impact on Heading 1, as currently occurs in the 2021–2027 MFF (impacting Sub-Heading 2b)?

Heading 2

Social Climate Fund

34. Will **SCF and the Innovation Fund** (both financed from ETS revenues) be **recorded** in the EU budget as **external assigned revenue**?
35. The Social Climate Fund was originally designed as a grant-based instrument. Could you clarify how it is intended to complement the existing grant-based architecture of the SCF?
36. We understand that if the entry into force of ETS 2 is delayed, the Union financial contribution referred to EUR 50 100 000 000 will be adjusted in line with Article 30d(4), fifth subparagraph, point (b) to (e) of Directive 2003/87/EC — increasing to EUR 50 600 000 000. Could you please confirm this interpretation?

European Competitiveness Fund

37. In the draft regulation, the EC uses **the term "added value."** However, it is **not defined**. Could the Commission precisely clarify what it understands by this term?
38. Could the Commission explain how exactly it **plans to harmonise the "crowding-in" of private capital** within the ECF?
39. How exactly will the ECF contribute **to reducing the innovation gap between regions**?
40. The draft regulation on the ECF indicates that it should be **coordinated with the NRPP**. This raises the question of the **demarcation line between projects** supported by the ECF and those supported at the national level under cohesion policy. Will the principles for providing support within the four areas mentioned in the draft regulation on the ECF be similar to those of the Horizon Europe program? Will the ECF support the most competitive international projects, and the remaining ones from the NRPP? Or will projects be financed by the ECF and simultaneously co-financed by the NRPP?
41. How does the draft regulation **address the principle of EU social, economic, and territorial cohesion**?
42. The new concept for implementing the funds after 2027 presented by the European Commission requires a thorough analysis of the proposed financing options, particularly considering that the **European Maritime, Fisheries and Aquaculture Fund** and previous fisheries programs were implemented under shared management. However, our initial observations regarding the EMFAF proposed by the EC indicate areas where fisheries-related issues could be addressed, particularly within its windows: 4 and 5. Do we understand correctly that the ECF **resources could be allocated to support, for example, decarbonization, digitalization, and improved safety of fishing vessels and port infrastructure**? Furthermore, the EMFAF will also support measures to promote the competitiveness, sustainability, and resilience of the fisheries, aquaculture, and coastal sectors, in order to strengthen long-term food security in the EU?

43. Regarding the format of **work programs**, will they be planned **multiannually or annually**?
44. Could the EC present **in details the structure and management of the Fund**? With so many program committees and various advisory bodies, it is difficult to imagine how the funds will be managed. What will be the role of the Member States and what will be the role of the EC, including how Member States will be involved in the decision-making and implementation processes?
45. Does the consolidation of 14 EU programs involve the establishment of a **single Contact Point at the national level for the Fund**?
46. How will the ECF be **coordinated with other EU funds**? How will the **synergies be ensured**? What measures will be taken to **avoid double funding** of the same projects?
47. Is it planned to **maintain the STEP initiative**, which focuses on three technological areas, with the prospect of adding a fourth area, defense? What will be the relationship between them? In particular, in the context of the STEP Seal and Competitiveness Seal, they are intended to indicate high-quality projects that fall within the STEP/ECF areas.
48. Will the **four policy windows** indicating technological areas constitute a **closed list, or is it planned to update or supplement** them? Does the EC assume no funding for other projects that do not thematically fit the areas indicated in the communication? Please indicate the support aimed at start-ups.
49. How should the definition of **'investment journey'** be understood? Will ECF include support for the implementation of clean technologies through the implementation of installation projects, e.g., photovoltaic farms, building heating and cooling systems, or the development of SAF infrastructure at airports?
50. How will be financing obtained from ECF treated in the light of **state aid rules**?
51. Will it be possible to **refinance investments started before the establishment of the Fund and still being implemented** at the time of its establishment?
52. How the Commission intends to address the **concerns of the MS related to geographical balance**? Does the Commission intends to introduce safeguards, guidelines or other mechanisms?

Policy Window 1 – Green Transition and Industrial Decarbonization

53. Window 1 has allocated over €26 billion to implement a number of thematic areas that are intended to contribute to the transformation and decarbonization of the European economy. How and according to what criteria will the budget be **distributed among the individual thematic areas covered by Window 1**, as specified in Article 33 of the draft regulation? These activities include, among others, support for projects involving

the development of innovative and decarbonized transport (including clean, multimodal, digital, and safe transport and mobility solutions, including modes of transport and infrastructure – charging infrastructure, ports or high-speed rail, systems and operations). How will **synergies with the CEF** be ensured?

Policy Window 3 - Health, Biotechnology, and Bioeconomy

54. The ECF has earmarked over €20 billion for one of its main objectives, covering a broad range of thematic areas, such as health, biotechnology, agriculture, and the bioeconomy. How will these funds be **distributed among the thematic areas**? What **criteria** will be used to set priorities? When will detailed information on this matter be made available?

Policy Window 4 - Resilience, Defense Industry, and Space

55. Section 2 establishes an EU **guarantee of €70 billion**, but does not specify how much of this amount will actually be allocated to defense industrial projects. Given that the Defense and Resilience Window represents €125 billion of the European Competitiveness Fund, what quantitative targets or earmarking mechanisms does the Commission intend to introduce to ensure a proportionate share of guarantees and safeguards for the development and readiness of the European defense industrial base?

56. Article 25 allows for the implementation of ECF financial instruments by private law entities of Member States. Given that the European Investment Bank (EIB) lending policy still excludes many lethal weapons, does the Commission **envisage establishing a fast-track accreditation process for national development banks**, such as Poland's BGK, or specialized capital funds in the defense sector, to enable defense industry to quickly access financing?

57. How will the Commission ensure that Poland's **capability priorities**—air and missile defense, unmanned systems, and mobility infrastructure on the eastern border—are **duly considered** in the award criteria and the composition of the evaluation committees?

58. The requirement for four or more countries in European Defense PCI favors the largest countries with strong industrial networks. How, then, does the Commission see **opportunities for smaller/less advanced Member States to achieve competitiveness in this area**? How will the Commission avoid the concentration of resources in the stronger EU economies?

Innovation Fund

59. **Which policy windows** will be eligible for financing from the Innovation Fund?

InvestEU

60. Do we understand correctly that InvestEU will be able to **finance activities in each window**?

EIBG

61. Why is there no **dedicated envelope for the European Investment Bank Group**? This can pose a serious problem for the Bank's participation in the instrument, particularly with regard to building a pipeline of projects, which requires long-term capital planning, as well as maintaining relationships with financial institutions and clients.

62. What **role** in general the Commission foresees **for the EIB** (questions concerns also other headings – such as Heading 3), given its new approach for **open architecture**. What was the **rationale**?

63. **Risk assessment** - so far under InvestEU, the EIB has played a key role in risk assessment and co-designing instruments with the Commission—based on its long-standing experience and risk management capacity in investment projects. It is unclear who will be responsible for risk assessment in the new system and on what basis—especially given the planned “open architecture” and thus the increased number of implementing partners. In light of the above, the issue of governance and the EIB’s role in managing the instrument is also important. The document vaguely refers to the roles of different partners but does not clearly define the EIB’s role in fund management, including participation in investment committees, consultations on investment guidelines, or monitoring activities. What is the role of the Commission in the new architecture, as compared to status quo.

64. There is also a lack of clear information on how funds from the four EIB policy windows are to support the guarantee component – both regarding the transfer mechanism and the decision-making calendar.

65. In this context, the issue of governance and the EIB's role in managing the instrument is also important. The document mentions the role of various partners in general, but does not clearly define the EIB's role in managing the fund, including participation in investment committees, consultations on investment guidelines, or monitoring.

66. Will the new instrument "honor" the pillar assessment that implementing partners (e.g., Polish BGK) underwent under the current InvestEU?

EU4Health

67. Please clarify whether the activities previously implemented under EU4Health will be **transferred to other programs**, such as the ECF or UCPM health program – please present **comparable table** for actions, risk of double funding and resources allocated as compared to current MFF.

Horizon Europe

68. Horizon Europe (HE) Regulation COM(2025) 543 is a provision on supporting public private partnerships (PPs) “increase **the potential of public-private partnerships** thanks to a simplified landscape”. How does the EC intend to support such initiatives? What conditions must PPs meet to receive support?
69. **Widening Participation and Spreading Excellence**: This component will support the development of research and innovation capacities in all regions of Europe. Widening countries” Bulgaria, Croatia, Czechia, Hungary, Latvia, Lithuania, Poland, Romania and Slovakia and „Transition countries” Cyprus, Estonia, Greece, Malta, Portugal and Slovenia. How will Widening funds be shared between the two categories of countries?
70. What is the assessment of the Commission of the **effects of the widening** and what is expected result of that instrument in the future MFF?

Connecting Europe Facility

71. According to **art.5 para 2 of CEF Regulation** : “Resources allocated to Member States under shared management may, at their request, be made available to the Programme. (...) Those resources shall be used for the benefit of the Member State concerned.”
Could the EC confirm that:
- the additional amount transferred to CEF **will be only for the benefit of the concerned Member States for the whole period** of the financial perspective and will not be used for the benefit of other MSs as it is the case of CEF 2021-2027?;
 - the additional amount transferred to CEF **will fall under the implementation rules of CEF**, however will **not be calculated to keep and prove the sectoral and geographical balance** in CEF Transport and Military Mobility allocation distribution, namely will be on top of 51 515 000 000 euro.
 - the transfer from shared management resources is **not a prerequisite to get a higher CEF co-financing rate up to 75%**?
72. How the EC is going to achieve a **geographical balance in the CEF Transport** distribution? What specific tools will be used to achieve that?
73. How the EC will be **verifying the criterium of per capita GNI** of less than 90 % of the Union GNI for the CEF co-financing rate of 75% of the total eligible cost (art. 10 para 6)? Will the **verification be done at the beginning** of the financial perspective or it will be an **ongoing verification** (at the stage of each call for proposals)?

74. What is meant by a **global project**? Could the EC define this term and support it will some **examples**? Do the possibilities of transferring funds between projects and expanding the scope of projects (without the need to submit an application for this scope in the call for proposals) specified in recital 22 and Article 10(4) of CEF Regulation apply only to projects implemented as part of a single global project/implemented by a single beneficiary? Could the EC explain the mechanism for transferring these funds and changing the scope of projects?
75. Transport investments are to be supported by various EU instruments, primarily by CEF, but also by NRPP (national parts of TEN-T network) as well as European Competitiveness Fund. How the EC is going to **monitor and guarantee the completion of core TEN-T network** by 2030? What coordination mechanisms will be in place?
76. Will it be **possible to increase the CEF Military Mobility budget by using the CEF Transport budget**? Will all the projects financed under **CEF Transport need to have military mobility component**? Will military mobility projects be **limited to cross-border and hotspots**? Are they need to be situated on the military and civilian corridors?
77. What is the **definition for a project of "cross-border dimension"** (Article 3(2) of CEF draft regulation). Will the approach be flexible or in line with the definition in the TEN-T Regulation?
78. In reference to: draft *Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509*
Article 22(2), paragraph (d), how Member States should ensure appropriate synergy?
Can you explain **demarcation between obligations of Commission and Member States in spite of e.g. avoiding double funding, or negative effects** of projects co-funded in same area from various mechanisms? Who will be responsible in case of projects with partners from third countries like Ukraine or Moldova, and also who will be responsible in case of PCI cross-border projects to ensure that such support does not cover the same cost?
79. In which financial instrument there will be a **budget line for extended core and comprehensive network and for green and digital transition of transport**?
80. Is there a plan to continue for e.g. **support for alternative fuels infrastructure**? If so, under what support instrument?

81. Could the Commission present the **proposed financing for the digital sector** (in comparison to the current MFF), given the abolition of the CEF-Digital, in particular digital connectivity.
82. What is the **division of roles and responsibilities** between the European Commission and the Member States under the Connecting Europe Facility 2028-2034?

Heading 3

Global Europe and Support for Ukraine

83. Where will the **funds for interest payments on loans to Ukraine** provided under Ukraine Facility be recorded (both in the 2021–2027 MFF and the 2028+ MFF), as well as funds for provisioning? What about the continued **interest payments under MFA+**, which until 2027 are covered by Member State budgets (approx. EUR 600 million annually, i.e., around EUR 4 billion over the MFF)? Will this amount **be included in the Ukraine Facility or in the EU budget** (Heading 3 – Global Europe)? Can the Commission confirm that **the total could reach around EUR 10 billion**?
84. **Where** will the **funds for interest payments** on loans granted to Ukraine from the **MFA** from 2022 (excluding the MFA ERA) be **located**? What about the MFA 2 from 2022? **Where** will the funds for interest payments on **loans to Ukraine after 2027** be located? What about **provisioning**?
85. Global Europe foresees **EUR 100 billion for Ukraine** (in current prices). In the draft regulation, the amount of EUR 100 billion refers to both grants (Ukraine Reserve) and loans (outside the budget). What is the Commission's **assumed ratio of grants to loans**? What will be the **mechanisms for managing and controlling the €100 billion loan pool for Ukraine** – will they be integrated into Global Europe or separate? Does the Commission plan to use some **mechanisms included in the Ukraine Facility Regulation**?
86. Support for Ukraine - why all support for Ukraine is to come from the MFF headroom (page 2 of the draft regulation on Global Europe). **Why can't Ukraine be covered by pre-accession assistance like any other candidate country**? We would like to ask whether at least part of the funds for recovery and macroeconomic assistance should not be financed from the general budget available under Global Europe, instead of from the reserve. By placing all funds for this purpose in reserve, are we not creating a situation in which the financing of one of the priority objectives of the Common Foreign and Security Policy, which is Ukraine, will be in question, while the financing of geographically distant and less priority directions will be much more certain?
87. In the context of the infrastructure corridors used to provide aid to Ukraine, **does derogation rule from fulfilling DNSH by military projects** (art. 5 COM (2025) 545

final) **may be applied** also to military mobility projects on TEN-T network, mutually chosen and agreed by member states and EC?

88. Will **aid to Ukraine be regulated in a separate legal act**, and if yes, then when is Commission planning to present its project?
89. Regarding Article 24(3): Support for Ukraine in the form of **budgetary guarantees** is set to reach up to EUR 48 billion. Provisioning has been planned at a minimum of 70%. What is the actual amount of **support the Commission can realistically mobilise**?
90. What is the estimated **total allocation for MFA**? Can the Commission provide estimates broken down geographically, in accordance with Article 6(1) of the draft regulation?
91. What is the **estimated total allocation for Humanitarian Aid**?
92. Is Global Europe intended to **support activities under other budget headings and programmes**? What portion of the EUR 200 billion budget in this heading has been planned to support programmes in other headings?
93. How does the Global Europe **address the changing geopolitical situation in Europe**, i.e. Russian aggression, hybrid threats from the East, illegal migration?
94. Does the Global Europe (Europe pillar) instrument provide for the possibility of financial **support for Belarusian democratic circles and Belarusian institutions**, organisations and enterprises operating in exile, **in the Member States**?
95. Does the Global Europe instrument provide for the possibility of **co-financing pro-democratic media coverage (TV/radio) addressed to the Eastern Partnership countries**?
96. What part of the funds planned in the Global Europe Instrument results from the continuation of the EU's activities to date, and what part results from the desire to fill the gap left by USAID? We ask the EC to present an analysis of the consequences of withdrawing or reducing the support provided so far by the United States on the functioning of projects in which the EU has been involved so far.
97. **Can funds under the Global Europe instrument be spent in Member States**? Point 57, p.12 says that, among others in the matter of migration, it is also necessary to focus on improving border management. Does it apply to **both sides of the external UE borders**?
98. How will **institutions and NGOs from the EU MS** be able to benefit from Global Europe funds to achieve **the instrument's objectives**, e.g. in relation to combating FIMI or promoting democracy and human rights?

99. How will specific EU **eastern neighbourhood policy instruments**, in particular the Eastern Partnership and Black Sea Strategy, be financed under Global Europe?
100. What will be the **mechanisms of MS supervision** over the spending of funds within Global Europe?
101. How will **MS be able to influence the change in priorities and geographical directions** of support within Global Europe? Will **regular review of the horizontal and geographical priorities** be conducted to ensure that the external actions corresponds well with dynamically changing geographical situation? What will be the role of the **Foreign Affairs Council** on transfers between and within the support geographical areas?
102. How will the **Council be involved in the programming and implementation** of the Facility? Is there any plan to ensure better coordination between the EC, EEAS and the Council (including with the geographical groups), as well as to improve the consultation process between the institutions and the Member States?
103. What exactly is the **Global Pillar** and what are the funds to be spent on?
104. Global Europe vs the EU's external economic policy - how does Global Europe **promote the EU's economic interests in the world**? Will Global Europe **support the international expansion of European companies**, and if so, how? Will they be able to receive direct support?
105. Will the beneficiary's receipt of **support depend on its commercial relations with the EU and cooperation in the area of migration**?
106. How will **access for EU economic operators to contract the purchase of services and goods** financed under Global Europe outside the EU be ensured? Will EU economic operators have privileged access to these contracts? How will the EC inform EU economic operators about business opportunities arising from the implementation of programmes financed under Global Europe? Is it **planned to build a uniform platform** of announcements about these contracts?
107. How will the **flexibility of the Facility**, including its ability to react rapidly, be ensured in the context of **cooperation with the private sector**?
108. **Cushion** – how will the flexibility tool for unforeseen and urgent needs work in response to emerging geopolitical challenges? Are there any **significant changes planned here compared to the cushion** included in the NDICI-GE instrument? What will be the **role of the Council** in managing the cushion? (the Council's role in determination of the directions of spending the cushion funds has been repeatedly postulated by the Member States)? Will the cushion set **thresholds for funding for**

geographical priorities or for the next few years (to prevent all funds from being spent too quickly)?

109. The draft regulation and its annexes contain proposals **for general and specific objectives** assigned to specific geographical areas. What will **determine the allocation** of funds to individual specific objectives as enlisted in ANNEX II to the Global Europe Regulation Proposal? Will the Commission propose to set at least a **minimum amount of resources for each objective, or will it be determined on the basis of dialogue with the beneficiary countries?**
110. In light of the two sources of financing foreseen for **Interreg** programmes along the EU's external borders, we would appreciate clarification as to whether, following the approach taken in the 2021–2027 programming period and previous ones, will there be any **dependencies or percentage thresholds regarding the level of co-financing from Global Europe funds**, which would be conditional upon the contribution made by a Member State from its Interreg allocation (under the NRP)?
111. Could the EC please explain the **lack of a dedicated envelope for the European Investment Bank**, similar to the current NDICI? In our opinion, the absence of such an envelope may negatively impact the Bank's ability to use this instrument, given that the risk of operations outside the EU is too high for the EIB without the EU budget guarantee.
112. In what way and to what extent will the Global Europe instrument **support the development of transport infrastructure projects connecting the EU with neighbouring countries?**

Heading 4

Administration

113. The 2028–2034 MFF proposal allocates €118 billion to administration, which is €35.5 billion more than in the 2021–2027 MFF. Please provide **details of this increase, including what proportion of the total amount would be allocated to the proposed new posts** and what proportion to other expenditure (e.g. buildings)?

Revenue side

Own Resources

114. Is the EC still working on any additional proposals, and could new sources of revenue for the EU budget be proposed at a later stage? Is it possible to come back to

the proposal based on a digital levy? Are crypto-assets and aviation taken into account as a possible own resource?

115. How does the EC plan to address the problem of regressivity in the proposed changes to the operation of the current OR system and the basket of new Own Resources (in accordance with the provisions of Protocol 28 TFEU)?
116. Is the EC working on a report on the operation of the Own Resources system that would justify the need for the proposed changes (as it has always been presented together with the proposals of the new Own Resources decision)?
117. Has the EC estimated the administrative costs and compliance costs of introducing the new own resources?

GNI – changes to ESA

118. Regarding rec. 19: *Rules should be provided to allow a smooth transition to the application of the revised ESA. To avoid retrospective changes in the applicable accounting system, the ESA 2010 should continue to apply for the determination of GNI of the Member States and for the own resources ceilings in respect of the years where the GNI has been established for the first time under ESA 2010.* How long transition period does the EC envisage for the use of ESA2010 data? For which years will national statistical offices be obliged to report data according to both methodological standards (ESA2010 and the updated ESA)?
119. According to current information, it is not yet known whether the updated ESA will be implemented in 2029 or 2030. It is also uncertain whether all countries will implement the new methodological standard in the same year. What impact does the timing of the updated ESA implementation has on ongoing work on proposals for own resources ?

TOR

120. Has the EC analysed and took into account actual administrative and technical costs borne by national EU customs authorities? Has the EC included cost arising from investing in customs infrastructure and digitalisation, as well as personnel costs connected with training, equipment and remunerations?
121. In light of the proposed reduction of the TOR collection costs from 25% to 10%, we ask for more detailed information on how, when, and to what extent the EC intends to support Member States “to better align the financial support for customs equipment, staff, digitalisation and information with the actual costs and needs” in order to compensate the proposed substantial cut in the retention rate. This is particularly important in countries like Poland, which play a key role on the EU's external border, ensuring its security.

E-waste

122. Could the EC present detailed assessment of the data quality, completeness and comparability of the statistical data, information of the actions undertaken and planned to ensure good quality, reliability and comparability of data.
123. What concrete lessons learnt the EC from the introduction of the plastic-based OR when proposing and submitting proposal based on e-waste?
124. According to Council conclusions , the EC was invited (in particular through Eurostat, where relevant) to: take into account the lessons learnt from the introduction of the plastic-based own resource when preparing and, where appropriate, submitting proposals for new own resources, in particular, relying on underlying data that is comparable, robust and available beforehand, and on the necessary implementing measures, as well as the relevant definitions, being in place in a timely and consistent manner.
125. In light of the argument of increasing circularity and recovery of raw materials how does the EC estimate the quantity and value of recoverable raw materials from the waste electrical and electronic equipment (WEEE)?
126. In accordance with Article 7 of Directive 2012/19/EU, two methods are permitted for calculating the collection rate for WEEE: The minimum collection rate to be achieved annually shall be 65 % of the average weight of EEE placed on the market in the three preceding years in the Member State concerned, or alternatively 85 % of WEEE generated on the territory of that Member State. However, the draft ORD is limited to only one method – based on the average weight of equipment placed on the market over the last three years: The weight of electrical and electronic equipment that is not collected in a Member State in a given year (N) shall be calculated as the annual average weight of electrical and electronic equipment placed on the market in the three preceding years (N-1, N-2, N-3) reduced by the weight of waste electrical and electronic equipment collected in year N. This method was introduced basing on an assumption, that mass of EEE placed on the market is roughly equal to WEEE generated annually. This assumption no longer reflects the true situation. In recent years, huge quantities of photovoltaic panels have been introduced in Poland (approx. 350,000 Mg in 2022). They did not replace any older equipment and they will become waste in c. 20 years. Therefore, there is simply not enough WEEE that could be collected that would be equal to 65% of the new EEE. The proposed solution is highly disadvantageous for Member States at a time of high demand (driven by EU policy) for green energy and heating technologies. We strongly advocate for allowing the alternative measure of 85% WEEE generated, or – if not possible – at least introducing an adjustment factor for PV panels. Furthermore, the chosen method is vulnerable to market fluctuations. A significant mass of WEEE is generated and collected when the used equipment is replaced by a new one. This has been observed during the COVID-19 pandemic. If there is a market boom in

year N-3, a lot of EEE will be placed on the market and a lot of WEEE will be generated and collected from the customers (high collection rates). When the market boom stops, in years, N-2, N-1 and N the market boom will increase the required collection rates but there will not be as much WEEE available anymore (lower collection rates). This is another reason for allowing the alternative measure of 85% WEEE generated, or – if not possible in principle – to allow for it under certain conditions, such as substantial variation of mass of EEE placed on the market y/y.

TEDOR

127. What is the rationale for 15% call rate and is it supported by any analysis or calculations?
128. What is the current tobacco excise duty rate in each Member State and how would it increase under the proposed changes to the Tobacco Directive?
129. Has the EC analysed and included in the own resource revenue estimates impact of increased rates (including those serving to balance national budgetary revenues) on the level of consumption and decrease in investment funds in tobacco industry?
130. In relation to the health policy and health threats what is the justification for choosing the tobacco as a base for the own resource?
131. We have doubts about how to understand the issue of the minimum rate of excise duty on manufactured tobacco (Tobacco Excise Duty Own Resource – TEDOR) in accordance with the draft ORD. “The minimum rate” specified in the method for calculation of the amount of own resources from TEDOR (15% for all Member States to amounts of manufactured tobacco and to amounts of tobacco related products released for consumption multiplied by the minimum rate applicable to each Member State in a calendar year):
- will be the same for each Member State i.e. at the level resulting from the Directive? or
 - should it be understood as the minimum excise rate specified by each Member State in its national legislation (this minimum rate must be equal to or greater than the EU minimum resulting from Directive)?

In the case of minimum rate of tobacco products specified in Articles 10 and 14 of the Tobacco Directive which minimum level will apply? Will it be 60% of the weighted average retail selling price of cigarettes released for consumption or EUR 90 per 1,000 cigarettes?

132. Have any solutions been considered to mitigate the planned financial burden on individual Member States, e.g. by differentiating the amount of contributions depending

on the economic situation of individual MSs, on the basis of the Harmonized Index of Consumer Prices (HICP)?

133. If in the new Tobacco Directive, under transitional provisions (special law provisions), different minimum rates for certain MSs for specific years were established (gradually reaching the final minimum rate specified in the new Tobacco Directive), would they have an impact on the amount of own resources from TEDOR transferred by the MSs? Or for the calculation of the amount of own resources from TEDOR will apply the final minimum rates specified in the general provision of the new Tobacco Directive? If the minimum rates applicable in individual MSs can be applied, then negotiating the transitional periods for minimum rates on manufactured tobacco and tobacco related products in the Tobacco Directive may become an important issue, as this will determine the amount of the own resources from TEDOR transferred to the EU budget in 2028-2034.

134. Considering the possible situation where the amendment of Tobacco Directive 2011/64/UE is not adopted by the Member States, will the own resources from TEDOR be based only on manufactured tobacco without tobacco related products? Will Member States that are currently levying excise duty on tobacco related products be obliged to take them into account when calculating the amount of own resources from TEDOR transferred to the EU budget. Tobacco related products are listed in article 3(1)(d) of the draft decision, so we would like to be sure what is the intention of this provision.

Perhaps for the sake of transparency of the draft of the Council decision, it would be worth to regulate separately the situation of adopting the recast of the Tobacco Directive 2011/64/UE and not adopting it?

Article 2(4) and (5)

135. Should not the Article 2(5) refer also to tobacco related products from the Council Directive [XXX] just as in the provision of the Article 2(4) which contains the definition of tobacco related products?

Article 3(1)(d)

136. The source of obtaining data for the purpose of determining the quantity of tobacco related products released for consumption in Member States should be considered and analysed. Whereas, in the case of cigarettes and smoking tobacco, such data are reported by operators for the purpose of determining the weighted average retail selling price of cigarettes and smoking tobacco, in the case of tobacco related products such an obligation would be an additional burden for manufacturers, importers, and intra-Community acquirers of these goods.

What would be the source of data on quantities of tobacco related products used for calculation of the own resources from TEDOR?

CORE

In the light of CJEU's jurisprudence (Case 90/79 Commission of the European Communities v French Republic, C-163/90 Legros and Others, C-72/03 Carbonati Apuani Srl) a charge that relates to a general system of internal dues and is not intended to finance direct consideration to payer is recognised as taxation. In light of the abovementioned rulings, could the CORE be recognised as a tax measure (irrespective to the form of determining its amount as a rate of income or a lump-sum)?

Considering the process of developing BEPS Pillar 2 (GloBE), the importance of turnover determination methodology cannot be overestimated, as it would differentiate the contribution. Having faced the complexity of the process in OECD, a similar complexity of the implementation process should be assumed in matters of definitions, data feeds, possible exemptions or safe harbours.

137. What would be the basis /source of data to determine the net turnover?
138. Has the EC considered differences between IAS and national accounting standards in this scope, and evaluated their implications to the complexity of implementation?

The turnover threshold of EUR 100 million has been set arbitrarily – it may favour certain sectors, such as high-margin industries, while discriminating against those characterized by high turnover and low profitability, such as retail trade. Also the constituent entities of multinational groups can be severely impacted if their functions, assets and risks determine low-margin business model (such as toll manufacturers, shared services centres). Moreover, companies operating just below the established limit may avoid taxation by fragmenting corporate structures or artificially lowering turnover, which leads to market distortions and inefficient allocation of resources.

Imposing CORE contributions to the businesses should be also seen as detrimental to the investment potential of certain MSs. As the contributions are to be turnover-dependant, their amount could not be decreased by expenses, such as investment costs.

Possible impact on investment potential can be particularly acute in countries like Poland, located near the EU border, where relocating the investments to avoid the contributions can be relatively simpler.

139. From which sectors do the companies in scope originate?
140. Has the EC considered contribution rate diversification due to industries or business model or the impact of uniform rate on possible industry discrimination?
141. What is a reason for proposing a lump sum contribution instead of uniform percentage rate applied to the net turnover?

142. Has the EC evaluated possible impact of market distortions due to the artificial fragmentation of corporate structure on MSs economies?

ETS and CBAM

143. In the EC's documents, the assumed EUA price (approx. €88 in 2025 constant prices) is significantly lower than the figures concerning the ETS1 presented in the Commission's official guidance [Recommended parameters for reporting on GHG projections in 2025 Update of June 2024 – Table 3 “Harmonised trajectory for the carbon price / value in sectors under ETS1 (EUR2023 / tCO₂)”]. In this document the carbon price already exceeds €99 in the year 2025 with an average price close to €113 (for period 2028-2034 at constant prices of 2025). Will the EC revise its CBAM and ETS1 revenue projections, which are needed to ensure the integrity of the EU's carbon pricing policies?

144. Has the Commission analysed the impact of diverting 30% of ETS1 revenues to the EU budget on existing climate instruments such as the Modernisation and Innovation Funds? How will the EC ensure that these new own resources do not undermine national sources of financing for the energy transition? Has the Commission conducted an impact analysis of the transfer of 30% of ETS revenues on MSs' ability to finance national support instruments for energy-intensive industries and climate funds, among other things?

145. How does the EC respond to the assertion that transferring 30% of ETS1 revenues to the EU budget does not create fresh money. It shifts existing revenues from MSs to the EU level, thereby potentially limiting MSs capacity to finance their own climate and energy goals? Has an impact assessment been carried out on the transfer of part of the ETS funds to national budgets? How does the Commission intend to address the specific situation of Member States with high emission levels and significant energy-intensive industries? Does allocating of 30% of ETS revenues not violate the principle of budgetary neutrality for MSs?

146. Could the EC provide a comparative analysis (benchmark) of the impact on national budgets of transferring 30% of ETS revenue, broken down by Member State and taking into account their respective GDP and emission levels.

147. Does the EC plan to establish stabilisation mechanisms to mitigate annual fluctuations in CBAM and ETS1 revenues, which may adversely impact on both the EU budget and MSs' financial forecasting?

148. Does the EC intend to implement any compensatory mechanisms for Member States that will lose a significant proportion of their ETS revenue?

149. Is the EC considering introducing an adjustment that takes into account Article 10(2)(b) of the ETS Directive? This article provides for the redistribution of funds in favour of the less wealthy Member States.
150. How will the 30% base exactly be calculated? Does it refer to gross auction revenues or net revenues, after deducting administrative and other costs?
151. The Commission presented an estimate that CBAM revenues will total EUR 1,4 billion. What parameters did the Commission use to calculate this figure? Was the adjustment for free allocation in the ETS taken into account? Does it reflect factors such as: carbon price to be paid in third countries, the extension of the CBAM scope, new de minimis rule? What was the carbon price and the CBAM benchmarks that were used to estimate revenue from the CBAM?
152. When does the Commission intend to share with Member States the results of its analysis on the extension of the CBAM? Will the analysis propose ways to increase the role of the CBAM as an own resource?

Plastic OR

153. Art. 3.1 point e) of the ORD proposal. Poland welcomes the transfer of the OR plastic calculation method (mandatory use of two methods/approaches and their balancing) from the implementing act to the legal act, as the calculation methodology has financial implications for Member States. However, in our opinion, this specific provision regarding mandatory methods and balancing should be transferred to the MAR. Is it possible to include provisions on methods of calculating the PPW generation in the MAR instead of the implementing decision? Eurostat is still working on the methodology and it cannot be frozen in the ORD. Any changes resulting from this work would be then difficult to incorporate them into the ORD.

Requests for fiches

1. A fiche with comparison of expenditure in current and future MFFs, including programmes and funds.
2. A fiche on flexibility - A comprehensive description of budget flexibility. Taking into account:
 - The four steps described on page 22 of COM 2025 570, broken down into:
 - i. Redeployments, reprogramming, reprioritizing – what will be the rules?
 - ii. Unprogrammed/unallocated funds and cushion, including: margins in headings 1-3, EU Facility Union actions (Agricultural Reserve, EUFS, HOME Thematic Facilities), cushion in headings 1 and 3.
 - iii. Flex
 - iv. Crisis mechanisms
3. A fiche on the new decommitment rule – rationale, impact.
4. A detailed fiche on rules of operation of the steering mechanism during the annual budgetary procedure, in particular what will be the role of the European Semester, the European Council Conclusions and the Competitiveness Compass in the process. Calendar of work in this process. What will be the role of the guidelines of the Council of the EU and the European Parliament for the draft EU budget and the spring budget trilogue.
5. A fiche on what mechanism will be used (instead of the cascade mechanism using the EURI Instrument) in the event of increased need for repayment costs of the NGEU, so that heading 1 is not affected (as is the case in the MFF 2021-2027 with heading 2b).
6. Transport investments across the EU budget 2028-2034, in particular which instruments will finance which parts of the TEN-T network to achieve the deadlines of 2030, 2040 and 2050.
7. Military mobility projects in Connecting Europe Facility, in particular definition (equal to dual-use?), priorities (indicative list of projects), beneficiaries, eligibility costs as well as specific requirements and exemptions in application procedure.
8. Financing projects from many different sources, in particular available options, coordination, tools to avoid overlaps.
9. Division of roles and responsibilities between the European Commission and the Member States in Connecting Europe Facility, in particular the role of the Member

States in the CEF Committee with regards to the project selection and the work programme elaboration and updating.

10. A fiche on technical assistance for Member States across the EU budget 2028-2034.
11. A fiche explaining the main determinants of the distribution of CAP funds among Member States, the distribution of funds for area payments, including the distribution of funds among Member States. Can the EC present an analysis on all elements impacting the level playing field between MS in the CAP, including changed rules on national co-financing?
12. A fiche explaining the principles for the EC's adoption of the NRP or its amendments, in the context of Articles 23 and 24 of the draft NRP Regulation.
13. A fiche explaining the implementation of Article 32 (Expenditure related to public intervention measures under the Unity Safety Net) of the NRP Regulation, providing examples (case studies) of the implementation of this provision.
14. A fiche on synergy between Horizon Europe and ECF versus cohesion policy, in particular in the area of R&D.
15. A fiche on relation of direction of support as indicated by 4 policy windows versus the Horizon Europe and STEP priorities. Details on the priorities.
16. A fiche on eligibility criteria in the ECF
17. A fiche on protection mechanisms of the Single Market embedded in the ECF against third countries.
18. Mechanisms for control and audit of ECF,
19. The EC proposes an increase of 2,500 full-time equivalents (FTEs) for all EU institutions during the first three years of the 2028–2034 MFF. Please provide detailed information of this increase, including:
 - What is the breakdown of the requested posts among the EU institutions?
 - In which areas will they provide reinforcement (e.g. AI, cybersecurity)?
 - Which of these posts result directly from adopted legislative proposals?
 - In the case of additional posts for the EC, please provide a detailed breakdown.
 - How would the proposed increase be spread over the first three years of the new period?
20. A fiche presenting geographical balance of employment in the institutions on every level (not limited to AD5-8).

21. Invest EU – Comparison of the current scope with the financing proposed for 2028-2024.
22. A fiche comparing the NRPP with the RRF – identifying improvements, differences, and added value; a fiche comparing the principles introduced in the new NRPP system with the CPR; a fiche on lessons learned from implementing the RRF;
23. A fiche on Articles 8 and 9 (rule of law) – how they work and what they refer to;
24. A fiche on the CAP allocation – how EUR 300 billion is distributed among Member States;
25. A fiche on the 14% for social earmarking – definition, what it covers, and how it is calculated;
26. A fiche on the distribution of funds for fisheries – methodology and allocations;
27. A fiche on minimum support for the CAP and fisheries;
28. A fiche on earmarking for the least developed countries – does it apply only to cohesion or also to the CAP;
29. A fiche on the Solidarity Fund – principles of operation in the new structure;
30. A fiche on the impact of the NRPP on cohesion policy – ringfencing, structure, flexibility, consequences of failure to adopt the plan on time for commitments and payments
31. A fiche on the macroeconomic data used by the EC

Own resources

Please revise and update the following fiches:

32. Fiche no. 12 (WK 9294/2023 INIT) Macroeconomic assumptions;
33. Fiche no. 13 (WK 9299/2023 INIT) Assumptions underlying the Commission's estimates for the own resources based on CBAM and ETS;
34. Fiche no. 14 (WK 9300/2023 INIT) Estimated projected revenues from the emissions trading own resources – with revised carbon price;
35. Fiche no. 16 (WK 9310/2023 INIT) Estimated projected revenues from the own resource based on CBAM – with revised carbon price and projections on different scenarios of the extension to the other sectors and to the other elements of the supply chain;

36. Fiche no. 53 containing estimates for all proposed and existing own resources per OR, per MS and per year (2028-2034) in current and 2025 prices;

New fiches:

37. Fiches concerning changes to the current OR system: VAT OR (elimination of capping of the VAT base), plastic OR (increase of the call rate, adjustment to the inflation, elimination of the annual lump sum reductions) and TOR (decrease of the collection costs from 25% to 10%) – showing the financial consequences of the proposed changes per MS and per year (2028-2034) in current and 2025 prices;

38. Fiche with estimated projected customs revenues from abolition of minimum customs value of 150 EUR threshold and revenues from the handling fee in e-commerce broken down per MS and year (2028-2034) in current and 2025 prices;

39. New fiches for: TEDOR, CORE, e-waste with estimated projected revenues in current and 2025 prices, broken down by MS and year (2028-2034).

In addition fiches should include:

- for TEDOR: estimated projected revenues from the own resources under the scope of the Council Directive 2011/64/EC as well as under possible scenarios of changes to the Directive, including the maximum scenario;
- for CORE: number of enterprises in the scope, broken down per MS and per year (2028-2034);
- for e-waste: estimated projected revenues under current provisions and possible scenarios under revised WEEE Directive (2012/19/UE); Projections based on the e-waste generation methodology.

PORTUGAL

General

1. Can you please specify if the amounts foreseen in the MFF 2028-2034 for investments in defence will count for the 5% NATO target for each country for defence expenditure? If yes, to what extent and how will it apply?
2. Please explain the rationale for including the Repayment of NGEU in heading 1 and how to guarantee that it will not represent an additional pressure on the other components of this heading, namely the NRPP?

MFF Regulation

3. We would like further clarifications on the Article 13 timeframe for submitting proposals for the post-2034 MFF: July 2033 seems too late.
4. On the UA Reserve: When and on what basis will the decision on the distribution between grants and loans take place?

IIA

5. Point 10 – Please explain the rationale for changing the margin for deviation from reference values from 15% to 20%, which will affect predictability.
6. Point 2 of the Annex – While the idea of a “political steering mechanism” looks appealing, the annual budget procedure will become much more complex, with greater unpredictability and potential for interinstitutional conflicts. We would like further details on the functioning/operationalisation of the mechanism.

Performance framework

7. The effort to simplify, streamline and harmonize policy monitoring and evaluation seems positive. However, we need to better understand the operationalisation of applying a single set of principles and rules across such a different range of instruments and areas, and the real added value in terms of simplification, burden reduction and transparency.
8. We need more detailed information on how the system will work in practice and ensure that the authorities responsible for the programs don't lose sight of mandatory rules and indicators that were previously included in each program's specific regulations - for example, climate targets.

National and Regional Partnership Plans

General

9. We would like to ask the Commission to provide the following detailed information:
- Member States allocations concerning the National and Regional Partnership Plans in 2025 prices;
 - In the MFF tables annexes to the Communication “A dynamic EU Budget for the priorities of the future – The Multiannual Financial Framework 2028-2034” (COM(2025) 570 final), please specify the amounts of the line “*Economic, territorial and social cohesion including fisheries and rural communities and tourism*” by areas (cohesion, fisheries, rural development, etc); which are the total amounts dedicated to fisheries and rural development in the NRPP and in which components are they included (please specify also the respective amounts);
 - In the same tables, the amount 865 076 million euros (current prices) and 711 317 million euros (2025 prices) refer to the NRPP, but according to the proposal for a regulation establishing the “European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security”, these amounts concern to the Fund. Please clarify and provide the several components referred to in article 10 of the regulation of the Fund also in 2025 prices;
 - Concerning the methodology foreseen in Annex I, please explain in detail the rationale behind the choice of these specific components. Why is there no element related to the Cohesion Fund having into account its explicit reference in the TFEU?
 - Concerning annex III of the proposal for the Fund, please detail the amounts for cross-border, transnational and outermost regions’ cooperation by Member State; please also depict the amount foreseen for interregional cooperation, in current and constant prices;
10. What is the rationale for the proposed N+1 rule for decommitments?
11. Which adjustments does the Commission envisage to the commitments and payment profiles to the NRPP, having into account the performance-based implementation model?
12. What role is reserved for Local and Regional Authorities in the definition and preparation of NRPPs? How will the Commission ensure compliance of the NRPPs with the principles of subsidiarity and multilevel governance?
13. Can you confirm that it is legally possible, under Article 51 of the Fund Regulation, for a single plan (national or regional) to have more than one managing authority, designated for distinct areas of intervention or specific territories?
14. How will the operational coordination between the Fund and the sectoral funds be ensured in order to guarantee programmatic coherence and avoid duplication?
15. What specific guidelines on eligibility are foreseen for sectoral funds?

[SOCIAL/ESF](#)

16. To what extent does the foreseen minimum allocation of 14% per Member State to social areas correspond programmatically and financially to the envelope currently allocated to the ESF in the ongoing MFF 2021-27?
17. What is the Commission's interpretation of the concept of "support for infrastructure" within the objectives aimed at social inclusion, considering subpoints iii) and iv) of point (c) of Article 3(1) of the Fund Regulation?
18. Is there any conditionality or budgetary limitation foreseen regarding the eligibility of social infrastructure?
19. Will the ESF Regulation maintain exclusively the shared management strand, or is the continuation of the direct management strand, currently ensured through the Employment and Social Innovation (EaSI) axis, foreseen?
20. In the event of integration, discontinuation, or reformulation of this strand, are any transitional measures or programmatic reconfigurations planned to preserve the capacity for intervention in the areas of employment and social innovation?

FISHERIES/MARITIME

21. How will the Fund support the implementation of the Common Fisheries Policy (CFP), Maritime Policy and Aquaculture and European Ocean Pact, considering the budget reduction as compared to the current European Maritime, Fisheries and Aquaculture Fund (EMFAF)?
22. Considering the very different Member States situations regarding fisheries and maritime space, which allocation criteria does the Commission intend to apply?
23. The minimum contributions stated under Article 20 are built under regional development objectives which seem unfit for the CFP, which has a broad national scope (and not regional in accordance with the level of development of each region). Should the minimum national contribution rate foreseen in Article 20 also be applied to measures under the CFP? (note: for compensations in outermost regions there is no national contribution under the current EMFAF).
24. What is the Commission intention regarding compensation measures for outermost regions, data collection and control or another component? Will they be, in the future, directly managed by the Commission using other resources?

Outermost regions

25. How will the Commission's proposals ensure adequate support for the Outermost Regions, considering their specific characteristics and constraints, as defined in Article 349 of the TFEU? How does the Commission intend to safeguard that its proposals do not represent a step backwards from the general model of support for the Outermost Regions, instead of a necessary and expected step forward, even more so in the foreseeable context of increased difficulties that these regions will face in the coming years?

26. The current specific additional allocations for the Outermost regions, both under the ERDF to offset the additional costs incurred and under the ESF+ to support the achievement of this fund's specific objectives, constitute indispensable allocations that will no longer be guaranteed as direct support from the EU. How does the Commission justify the absence of these allocations, given the persistence of the Outermost regions' structural constraints, as recognized by Article 349 of the TFEU, and the social needs of these regions?

27. Can the Commission explain how Title VI on the Outermost Regions is intended to comply with Article 349 of the Treaty, considering what is said in Article 21(2) of the NRPP regulation? How effective is Article 46, when paragraph 1 states that measures for the Outermost regions "may be implemented in a dedicated chapter" with no obligation on the concerned Member States to draw such chapter in their NRPPs?

28. The proposal for a regulation on the ERDF and the Cohesion Fund defines, in Article 4, specific support for disadvantaged areas, which includes the regions and areas enshrined in Article 174 of the TFEU, plus the just transition areas and regions bordering Russia, Belarus and Ukraine, which are not mentioned in Article 174. How does the Commission explain:

- the absence of the Outermost regions in Article 4, given that they are also disadvantaged regions, with a status recognized by Article 349 of the TFEU and constraints that are no less severe than those faced by the regions recognized by Article 174?
- the discrepancy between the measures proposed in Article 4 for the regions enshrined in Article 174, just transition areas and regions bordering Russia, Belarus and Ukraine on the one hand, and, on the other, the measures proposed for the Outermost regions in Article 6 of the same proposal?

29. Given that the European Competitiveness Fund (ECF) will be implemented through work programmes and calls for proposals, how does the Commission intend to ensure the participation of the Outermost Regions and their access to financing? Will specific calls be launched for the Outermost regions? Or will there be specific eligibility criteria for these regions in the scope of the calls?

30. Does the Commission intend to define envelopes outside the financial framework of the NRPPs for specific and direct support measures from the EU to the Outermost regions, namely POSEI and the Compensation for Additional Costs for Fishery and Aquaculture Products?

31. Given the vulnerability of the Outermost Regions to the impacts of climate change, how will the programmes for nature conservation be implemented, namely the Programme for the Environment and Climate Action (LIFE), and how will the Outermost Regions' specificities be taken into account under the European Green Deal support?

[European Competitiveness Fund \(ECF\)](#)

32. We would like further clarifications on the governance model and on the envisaged role for Member States authorities.

33. A Strategic Stakeholders Board is created with representatives from industry, academia, the financial sector, civil society, and public authorities, responsible for advising on the ECF's priorities and strategies. An Advisory Board on ECF InvestEU Instrument is also created, composed of a representative of a project implementation partner and a representative of the Member States. We consider that the functioning and coordination between the two needs clarification.

34. When investing in Project Advisory services and skills development support, it is important to ensure that these services are made available in a decentralized manner and are accessible to SMEs in the Member States. Can the Commission provide further insight into how the proposal addresses this issue?

35. The ECF highlights the priority given to SMEs but does not define specific measures to ensure their equitable access to financing in a highly competitive European context. We believe it is important to create dedicated mechanisms (e.g., calls reserved for SMEs, simplified instruments, vouchers). Can the Commission provide further elements on how the proposal tackles this issue?

Erasmus+

36. While we recognise that the proposed overall financial envelope –representing a 50% increase on the overall envelope for the current Erasmus+ programme – seems very positive, we note that it is presented in nominal terms, and we also note that the future programme will comprise new actions, including those resulting from the measures and initiatives announced in the context of the Union of Skills. As such, we are concerned that the increase in funding will in the end be very small. Please depict the amount foreseen for Erasmus+ in current and constant prices.

37. We would like further clarification regarding the following questions:

- The link between the future Erasmus+ and other funds and programmes under the MFF, including with regard to strengthening its international dimension and its articulation with the “Global Europe” instrument;
- (Consequently) the modalities for implementing, combining, accumulating and/or cross-financing;
- The fact that Member States may, if they so wish, transfer part of their management funds, which will be managed directly or indirectly by the Commission (‘even if it is for the benefit of the Member State’);
- The lack of any indication in the proposed regulation of the breakdown of the financial allocation by sector (education and training, youth, sport and volunteering/humanitarian aid) and activities funded;

- The lack of any mention in the draft regulation of funding for the operating costs of the National Agencies and for support for the new programme.

38. In addition, other issues on which we wish to receive further input from the Commission:

- The general structure of the Erasmus programme (there is no explicit reference to the sectors covered);
- Lack of clarity regarding comitology aspects related to the implementation of Erasmus (there is no explicit reference in the proposed regulation);
- Role of the Commission in the appointment and performance of the Director;
- Matters related to the “partial association” with third countries;
- The reduced visibility now given to the youth, sport and volunteering sectors compared to the education and training sector.

Own Resources (OR) Decision

39. More detailed information is needed on the impacts by Member State and OR category, in current and constant prices, as well as on the methodology and the main assumptions used in the calculations.

40. When does the Commission intend to present the proposals for the remaining regulations (IMSOR and MAR)?

41. CBAM:

- Can the Commission provide updated information on how the implementation of sectoral CBAM legislation is progressing in the Member States?
- Will the Commission still assess before the end of 2025 a possible extension of the mechanism’s scope to additional ETS sectors and make a first legislative proposal to include certain downstream products, starting with steel and aluminum intensive products as announced in the Steel and Metals Action Plan?

42. CORE:

- The CLS should give advice on whether the ORD constitutes a sufficient legal basis.
- Further clarification is needed on the scope of the CORE: to confirm the categories of EU companies excluded (Are all state-owned enterprises comprised?) and which third-country companies are included (Is it based on residence for tax purposes? What about double taxation?).
- Basing the new resource on turnover rather than profits reduces its fairness.
- How can it be ensured that this contribution is fairly coordinated with the tax burden already borne by companies?
- Does the Presidency intend to involve a tax working group and have tax experts to help clarify the concepts and application?

43. TEDOR: We have concerns about the potential deviation of revenue from national budgets. Please provide more details on the minimum rates considered for the calculations.

44. TOR:

- What are the prospects/timetable for establishing the “handling fee” (as part of the Customs reform)?
- It seems clear that this new TOR (“handling fee”) is meant to be covered by the expression "other duties established or to be established by the institutions of the Union in respect of trade with third countries" used in Article 3(1)(a) of the ORD proposal. We fear, however, that the “handling fee”, which implies the provision of a service, may not be considered a duty within the meaning of that provision.

45. The harmonization and reliability of basic statistics for "electronic waste" still have shortcomings, and the same applies to plastic waste, as the ECA pointed out in a Special Report. Is any progress expected in both cases?

46. We welcome the proposal for a new crisis mechanism; however, we would like to better understand the interconnections between the corresponding Articles 6, 7, and 8.

47. The procedure for activating the new crisis mechanism (adoption of a Council regulation) is provided for in Article 311, paragraph 4. For the EURI, it was Article 122. Is this meant to better involve the EP, or is there some other reason?

48. Is there any prospect of returning to a digital resource?

I. National and Regional Partnership Plan (NRPP)

General questions on the NRPP

- 1. Need further clarity on the added-value of a double layer decision process.** The Plan is proposed to be implemented in a hybrid mode: the RRF model in terms of milestones and targets, but in shared management. So far, the known models are: (i) the RRF model in direct management with Council decision; (ii) the Social Climate Fund with Commission decision in direct management, and now the Plan, under shared management, but with two decisions – both Council and Commission. How does the Commission consider that this approach will ensure flexibility and speed in the implementation?

We have serious concerns regarding the impact and real added-value of this new model on the proven flexibility of Cohesion Policy, on its adaptability and on the possibility to propose adjustment to the programmes in order to adapt them to the reality on the ground. Bringing all policies together and making the decision process more complex will definitely affect this flexibility and effectiveness.

- 2.** Regarding the revision of the plans, how often does the COM expect the plans to be revised during implementation, especially considering the experience from the current programmes under shared management?
- 3.** What is meant by intervention strategy? Is it similar to the intervention logic or theory of change—concepts that were specific to previous financial periods? The phrase should be defined in both the recital section and in Art. 4. [Reference: letter a, para. 1, Art. 22]
- 4.** Based on which instrument and assessment criteria will the Commission determine that a Member State’s NRPP contributes comprehensively and adequately to supporting the general and specific objectives and addresses most or all CSRs? [Reference: letters a and b, para. 1, Art. 22]
- 5.** Based on which criteria can the Commission request that a Member State include additional measures in the NRPP or amend the measures proposed by the Member State? What “dully justified” cases do the Commission envisage for this scenario? [References: para. 2, Art. 23 and para. 3, Art. 24]
- 6.** Can specific operations under the EU Facility be included in the NRPP from the programming phase, targeting specific third countries, especially for the elements under shared management under EU Facility? [Reference: Art. 31]

Definitions

- 7.** In order to ensure a common understanding of the terms used, it is necessary to standardize the definitions across all Regulations (there are some differences in definitions at the level of the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 ... {SWD(2025) 565 final} and those in the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure

tracking and performance framework and other horizontal rules for the Union programmes and activities {SWD(2025) 590-591 final

8. Harmonization of definitions in the CAP - Differences in terminology might occur between the definitions related to CAP introduced in the COM proposal or defined by the NRPP (article 4, alin. (22)) and the state aid regulations. These differences can lead to legal and operational misunderstandings during implementation of the CAP chapter. It is recommended to adopt unified and detailed definitions to comply with state aid compatibility requirements. Regarding state aid rules, it must be clarified which rules prevail in order to avoid discrepancies in the COM proposal. For example, the draft Regulation 565 final/16.07.2025 explicitly states the precedence of the Single Fund Regulation over other specific regulations of funds.
9. Clarification is also needed on the use of the concept data mining tools in the context of preventing irregularities, etc. – in Article 58, para 2, c), as well as of the concept related to non-compliance which is not uniformly addressed.
10. The Regulation explicitly excludes PPPs and single enterprises from the definition of beneficiaries for de minimis schemes, which could impact funding opportunities. The reasons for removing these elements from the definition must be analyzed and clarified.
11. Clarification of the limitation of the “public expenditure” concept (art. 4 point 24) to CAP, as well as of the link with the national cofinancing (art. 20).
12. Also, correlation between art. 20 point 4 referring to interventions falling under the scope of art. 35, g) and art. 35, 4) referring to the minimum national contribution is needed.
13. Please clarify the exclusion of the definition of the irregularity as a result of the action taken or failure to act by an economic operator. Is the new definition widening the concept and if yes, please provide an explanation in what way this concept is widen? Furthermore, clarification on the coherence with the other legislative proposals in the package, as well as in the Financial Regulation.
14. Clarification of the methodology based on the definition for “paid out value” and decommitment of funds - There are ambiguities regarding how reforms and targets are managed if funds are decommitted under the N+1 cross-plan rule without corresponding modifications to the approved plan. Also, how is applied the decommitting mechanism in relation with the pay-out value and how are the sums recalculated in the decommission phase when a reform is considered reversed or not fulfilled. A clear methodology and exemplified situation are necessary to prevent inconsistencies between plans and implementation and to be aware of the financial risks on the national budget.

Reforms

15. The NRPP will include reforms, investments and other interventions. Please explain what is envisaged by “other interventions”. Please clarify what are the differences between the approach to reforms in the plans compared to the approach to the reforms in the RRF? In addition, a definition for the concept of reform is needed for the purpose of the regulation. Based on which considerations will the Commission assess whether an administrative or economic process constitutes a reform?

Additionally, in the ad hoc presentation on the 25th of July, the Commission explained that, in the plans, “investments will not be conditioned by the implementation of reforms”.

Please indicate which are, if any, the (explicit) provisions in the proposal that underpin this statement.

16. In the same logic as above, what should be the linkage between reforms, investments, and interventions? Can the NRPP include reforms, without being accompanied by investments and interventions or vice versa? [References: para. 1, Art. 21.a, para. 1, Art. 22]
17. The COM presentation insists that the proposal will enable a more differentiated and qualitative approach to the delivery on EU priorities which will be tailored to each Member State's national and regional challenges. Please explain what are the concrete elements of difference and added value between the new approach and the CPR 2021 – 2027 approach in terms of the delivery on EU priorities? Also, in Article 10, para. 2, c) it is mentioned a Regulation on regional development and Interreg plan. It is not clear how this regulation would be linked with the NRPP and there is no proposal made public for this regulation.
18. The proposal states that the plans need to be “consistent with the national medium-term fiscal structural plans”. How does this consistency requirement correlate with the COM statement that “investments will not be conditioned by the implementation of reforms”?
19. Who is responsible for the assessment of the milestones and targets, compared to the RRF model?
20. What types of reforms are envisaged for addressing the cross-border, transnational, or multinational dimension? Who or what EU entity will be responsible for coordinating between Member States for this type of reform? [Reference: letter b, para. 2, Art. 22] Experience from the RRF shows that such reforms are prone to failure due to the lack of accountability from the Member States' side (see: ECA, Special Report 13/2025), as well as due to weak cooperation among Member States. Also, a clarification of the Interreg Plan status is need in relation with the inconsistencies within the regulation where Interreg is referred to as a chapter of the NRRP.

Conditionality

21. Based on which methodological tool should Member States assess the mechanisms for upholding the rights, freedoms, and principles set out in the Charter of Fundamental Rights? How this approach should be followed in the implementation phase of the NRPP? [Reference: para. 1, Art. 8]

Financial aspects

22. The presentation states that: “N+1 rule for decommitments (*will*) speed up implementation and provide more predictability on annual payments. Facilitated by the Plan's high pre-financing rate and new delivery model (interim milestones and targets allowing for faster payments).” Please explain, in concrete terms, which are the types of meaningful milestones and interim targets which will allow for faster payments, irrespective of the complexity and multi-annual timeline of many interventions? How will COM ensure that this rule will not discourage the programming of complex investment measures where only the public procurement phase for example typically needs more than two years?
23. The decommitment rule (n+ 10 months) needs better explanations under the new framework. We were not convinced by a simple reassurance that this will work. What are the reasons for choosing the date of the 31st of October for submitting the payments claims?

24. How will the n+10 months rule work, in practice, if a MS or a region decides to substantially revise its plan, including by eliminating a large number of reforms / investments or even entire chapters and by replacing them with other measures? Can the proposal as is, accommodate such a scenario which under the RRF model is quite common in some cases and was considered justified by the Commission for many NRPPs?
25. Will direct payments function like the rest of the Plan, based on reforms and investments, milestones and targets? There are two tables in the template for the NRPP in Annex V - point 5 – one contains the breakdown by measures and the other one refers to the group of farmers and agricultural actions. Both of them are needed in case of direct payments?
26. Can the Commission confirm that funds under Social Climate Fund are considered external assigned revenues in the context of MFF? If yes, are the provisions mentioned in art. 15(5) applying also to the Social Climate Fund?
27. Regarding co-financing, the presentation (slide 10) states that “compliance is assessed ex-ante at the level of each measure based on estimated costs”. Please clarify what is, concretely, the correlation between the estimated costs of a measure and the pay-out value of the milestones and targets associated with that measure.
28. How the pay-out value will be calculated and who decides on the pay-out value and when? In the RRF model, there is no pay-out value for a milestone or a target but there is a pay-out value determined ex ante for the entire instalment.

How do you calculate the “*amounts set aside for reforms*” (as indicated in the definition for the pay-out value (Art. 4(13)) and according to which methodology? And what the “amount for the Managing Authority” in the table with milestones and targets (point 5 in Annex V) means? We would like to understand precisely how the cost for reforms and investments will be established, especially for reforms.

A very detailed fiche on the methodology of the pay-out values is needed in order to be able to proceed with the assessment of the delivery mechanism proposed.

A more concrete definition is needed and fully transparent methodology should be provided in advance, within the regulation.
29. Are payments based on real costs an option under the EU Facility? Why is the real cost option possible under the Competitiveness Fund, while the national plans are exclusively objective – based? Please explain the rationale for maintaining this option in the Competitiveness Fund. Which are the interventions under the Competitiveness Fund for which the Commission intends to use real cost and why does the Commission think that real costs are the best option for the respective types of interventions?
30. The payment forecasts will include projections with regard to the pay-out values only since the model is not expenditure or payment based?
31. In the presentation (slide 17), Commission explains that it is guaranteed that MAs receive their Union contribution irrespective of the progress made on national reforms (Art. 50(1)g)). In our reading, this is not very clear in the indicated text. Kindly ask further clarification.
32. With regard to the Social Climate Fund, please clarify what is envisaged by the “possibility to programme all or part of available SCF resources to other measures contributing to the objectives laid down in Article 3, point (c)(vi) within the SCP chapter.”

33. Clarification regarding Art. 10 Budget - Considering the definition of the Fund (see art.1, para 1(a)) which includes the support from Social Climate Fund, it seems that the allocation provided at art 10 para (1) includes the amount dedicated to Social Climate Fund. Taking this into consideration, the reference to SCF should be included under para (2)a. If it is not the case, the allocation provided under para (1) should be modified by adding the SCF related allocation.

According to para (5), the calculation of the 14% takes into consideration the allocation provided in para 2 without CAP and SCF but, from the current formulation, the amount related to SCF is not within para (2), it is extra (according to para 2). Please clarify these aspects. Also, with reference with the same para (5), please provide further clarification on how the social objectives will be pursued through the technical assistance measures supporting the implementation of the plan, and explain the rationale for including these costs in the 14% calculation.

In order to be in line with the MFF headings and allocation, please correlate the financial allocation provided for CAP in art.10 para (2), (a)ii.

For the clarity of the article, the reference to technical assistance should be in a separate paragraph. The same recommendation applies to the reference related to the amount dedicated to Less developed region.

Expenditure tracking and performance framework

34. Please clarify what is the practical and operational correlation between the expenditure tracked under the performance regulation and the national plans which are not expenditure based. More generally, please explain the role of expenditure tracking in a system where payments are not based on expenditure?
35. While the terms “investment” and “reforms” are used to trigger payments based on predefined milestones and targets, Annex I of the Proposal lacks consistency in their use: the term reform appears in column Policy area (2), but term investment does not. We would like to highlight that if Annex I does not clearly include both terms, we will be unable to distinguish between them in any subsequent document (the plan, the report etc.).
36. Taking into account the indicators attached to reforms in Annex I of the Proposal (such as No of laws, No of policies, No of frameworks etc), we understand that the term “reform” refers to the preparation and adoption of reforms, rather than to their implementation – the latter involving higher investment costs. Please confirm.

Authorities and Management and Control System

37. Responsibilities of the Coordinating Authority stipulates that where there are multiple Managing Authorities, a Coordinating Authority must be designated with extended responsibilities regarding harmonization, monitoring, and reporting. However, it does not clearly specify the optimal institutional level for this authority. The use of the expression "relevant key requirements" in article 49(1) introduces a considerable degree of legal ambiguity in the interpretation and application of the provisions relating to the designation of the authorities involved in the implementation of the NRPP. Moreover, it should be analyzed if the responsibilities of this authority must be aligned with those of the Member States. Clarification of its position and duties is recommended to avoid internal conflicts of competence.

- 38.** Referring to article 49, para. (1), all authorities identified for the purposes of this Article shall have the possibility for exchanges with the Commission. The purpose of the text is unclear, since there will be a coordination structure at the level of each Member State, which will carry out the functions from article 50. Article 49(3) provides the possibility of designating several managing authorities, with the correlative obligation to establish a coordinating authority. Furthermore, a managing authority may be entrusted with carrying certain function of the coordinating authority. This coordinating authority is the structure ensuring the functions mentioned in article 50 at the level of each Member State, which is explicitly assigned the functions of supervision, reporting and harmonisation of the implementation of the Plan. Please further clarify on the scenario envisaged under article 49(3), whereby a managing authority is assigned certain functions of the coordinating authority, particularly in light of separate the establishing a coordinating authority at the national level and ensuring the principle of separation of functions.
- 39.** Referring to article 49, para. (3), where a Member State designates more than one managing authority, it is required to establish a coordinating authority. It is also provided that a managing authority may be entrusted with certain functions of the coordinating authority, based on written arrangements between the two entities. This ambiguity between the functions of the coordinating authority and a managing authority may affect both the national institutional architecture and the clear responsibility for coordination tasks, generating risks of duplication of functions, lack of accountability or inconsistency in reporting to the Commission. Furthermore, the principle of separation of functions referred to in para (6) must be respected, so that any delegation of functions of the coordinating authority to a managing authority must be eliminated. Also, considering the provisions of Reg. (EU) 1060/2021 and in order to ensure the continuity of the MCS, as well as the correlation with art. 50 the functions of the coordinating authority and art. 52 the functions of the paying agency, we propose to reformulate art. 49 para. (3) as follows:
- Where a Member State identifies more than one managing authority, it shall set up a coordinating authority. A managing authority and/or the national paying agency may be entrusted with carrying out certain functions of the coordinating authority. Arrangements between the coordinating authority and the managing authority/ national paying agency shall be recorded in writing.*
- 40.** Prevalence of the opinion of the monitoring committee responsible for the chapter instead of the coordination committee (Article 56, para 3) The Coordination Committee plays a strategic role in ensuring overall coherence and balance across priorities, including adherence to budgetary principles, global allocations, and program-level conditionalities. Granting priority to a sectoral committee’s opinion could lead to unbalanced, fragmented decisions, lacking an integrated vision of the program's overall objectives, potentially jeopardizing the achievement of the plan’s overarching goals in favor of sectoral interests. Also, the legal text from Article 56, para 3, specifies that the coordinating committee examines and approves the same elements applied to the monitoring committees. Please clarifies the roles of these committees.

Audit

- 41.** Audit and checks regarding the use of funds - The Regulation provides for audits focused on “use of funds in compliance with applicable law,” should be clarified in relation to the rules applicable to shared management. Also, it is not clear what elements should be

regulated at the national level in the context of shared management and implementation of the NRPP. The article 58 - *Responsibilities of MS* gives some details, but for example is not clear for the approach of the eligible costs (simplified cost options).

42. Please clarify whether a specific audit and control mechanism is envisaged for financial instruments under the Single Fund. The current document does not appear to provide for the adaptation of the audit framework applicable to financial instruments.

Other aspects

43. Under what conditions can technical assistance be activated at the initiative of the Member State for actions preceding the submission of the NRRP (such as ex-ante evaluations, strategic planning at national and regional levels, and programming of interventions), given that expenditures may be eligible starting from 1 January 2028, as stated in para. 3 of Art. 21? [Reference: para. 1, Art. 13]
44. Based on which concrete criteria can the Commission request that a Member State ensures a lower or higher minimum share of the plan's total allocation for climate and environmental objectives in the NRPP? [Reference: letter r, para. 2, Art. 22] The indication of Regulations (EU) 2018/842 and 2024/1991 is not sufficient. More clarity is needed on these aspects.

II. Common Agriculture Policy/ CAP – referring to both provisions in the Plan and in CAP Regulation

45. Why there is not an article dedicated to rural development in the CAP Regulation and only a general objective foreseen in the preamble (*“Enhancing working conditions and life in rural areas, by offering relief services and support for cooperation, business development, value added and projects allowing rural development.”*), as well as some specific measures in other articles that are part of the current EAFRD Regulation? How does the Commission foresee the implementation of the other special provisions on this Regulation since it is supposed that the new NRP Regulation is integrating the previous ones?
46. In article 15 of the CAP Regulation, an obligation is foreseen for the MS to include a strategy for generational renewal in the NRP Plan. Is this seen as a reform measure in the logic of the Plan and, if yes, is it conditional to the payment requests?
47. What is the connection between the current recommendations made by the Commission to MS concerning their National Strategic Plans on CAP and the steering process foreseen in Article 2? Is there any link between the possibility for the Commission to update the national recommendations and the NRPP update? Please clarify the implication of such update on the programming made by MS under the Plan.
48. What are the criteria considered for differentiating the eligible pay per hectare by groups of farmers or geographical areas?
49. Is our understanding right, that the EUR 100 000 maximum support threshold for area-based income does not include the coupled income support or other categories of support (e.g. articles 7, 11, 13 and 14 in CAP Regulation), thus being additional/ top-up to that?
50. We would welcome some clarification regarding the sectors eligible for coupled income support, including the correlation with the national schemes? For example, why are

vineyards not eligible because it seems that there is no longer a specific support scheme for vineyards?

51. What are the mechanisms for setting the milestones and targets associated with the CAP instruments? What would be the nature of them and how would be mitigated the risk of red tape and unnecessary administrative burden?
52. Is our understanding accurate that the Integrated Administration and Control System (IACS) would allow for advance payments? How would the new framework ensure adequate financial flows and how would the payment requests be managed?
53. We would welcome detailed individual fiches on CAP allocations by MS, including the data and the calculations, indicating the impact on external convergence and rural development.

III. European Competitiveness Fund/ ECF

54. What would be the role of the CONS in designing and operating the governance structure of the ECF, including in defining the rules on selection and competition, as well as in the selection process of the members of the ECF Strategic Stakeholders Board? How would the “geographical distribution” criteria be assessed?
55. What is the COM interpretation of “complementarity” between ECF and CEF, including regarding military mobility? We would welcome a few examples of what types of projects could be financed simultaneously through both instruments? How would the ECF interact with other sources of funding from NRP Plans, internal security funds and Global Europe?
56. What are the criteria considered by Commission in order to assess the duly justification of an accelerated intervention mechanism?
57. How would the strategic importance of the projects be assessed within the award process of the Resilience and Security, Defence Industry and Space window?
58. What would be the specific criteria and mechanisms employed for ensuring a geographically balanced coverage of the “EU for Business” Network?
59. Is there a minimum share associated with the requirement for dedicated SME Actions within each window (art. 29)?
60. Is our understanding accurate that nuclear energy is eligible for support under the Clean Transition and Industrial Decarbonisation window, taking into account the reference to technological neutral approach in recital 22 of the ECF Regulation?
61. What is the Commission perspective regarding the ECF and Innovation Fund complementarity? We would welcome a few examples of what types of projects could be financed through both instruments.
62. One of the lessons learned after evaluating the implementation of InvestEU relates to the entry cost of Implementing Partners (including the need to streamline the pillar assessment). What are the measures Commission intends to take in this regard?

IV. Defence

63. How will the next MFF ensure continuity of the current defence related programs (e.g. EDF, EDIP) to further develop the capabilities that are being built with the projects already agreed in the current MFF?
64. What is the envisaged mechanism that will allow MS to finance defence projects of common interest under the national and regional partnership plans?
65. What was the impact of the lessons learned from EDIRPA and ASAP taken into account when defining the defence industry needs under the next MFF?
66. How can the need for competitiveness be accommodated with the need for resilience and the priority given to address the challenges faced by the MS most exposed to military threats?
67. How will the spending under the ECF be accounted for in achieving the NATO spending targets?
68. What are the assumptions used to propose 130.7 bil. EUR for the Resilience and Security, Defence industry and Space window and what is the reasoning behind?
69. What are the assumptions used to propose 30.5 bil. EUR for the next European Peace Facility and what is the reasoning behind?

V. Horizon Europe

70. What are the mechanisms in place for ensuring an overall balanced distribution of projects and funds within the EU? What other additional mechanisms are envisaged in order to avoid and counter excessive concentration of project and funds in certain MS?
71. Regarding the widening component: Is there a distribution key? Is the award procedure competitive within the group of widening and transition countries?
72. What does the Commission envisage when referring to proportionate measures taken by Member States under the widening component? How this is correlated with the co-financing rules under the ECF?
73. What are the instruments and tools available for the Commission for ensuring valorization and dissemination? How would those instruments and tools be selected and enforced?

VI. Crisis response and Preparedness

74. We would welcome more clarity and details on the interaction and continuity between UCPM and UCPM+. What is the amount and how would be the funds allocated to UCPM+, considering the intersectoral character and the interconnectivity with other instruments?

VII. New own resources

75. We would welcome receiving a detailed individual fiche for each new own resource. Is there an indicative timeline when the Commission intends to propose the IMSOR and MAR regulations?
76. We would welcome more clarity regarding the Commission estimates for VAT and GNI own resources for the 2028-2034 period.

77. In respect to TEDOR, given that the MSs do not apply the same minimum excise duty for tobacco products, we would like the COM to clarify how the principle of equity is respected.
78. How would the inflation rate be applied in respect to the own resource based on non-recycled plastic packaging waste and electrical and electronic waste? Is there a country specific rate or an average applied to all MS?

VIII. Other issues

79. What is the assessment of the Commission regarding the implications of the next MFF on the administrative side? If there is an internal Commission document that analyzed this impact, we would appreciate the circulation of it?
80. We would welcome more detailed information regarding the macroeconomic assumptions that the COM used when defining the proposals.
81. How would the EU Facility and Catalyst Europe function in practice? We would welcome more clarity and a detailed individual fiche on each instrument.
82. What are the practical ways of implementing the lifelong learning component within Erasmus+? How would the country specific characteristics of labour markets be reflected, so that we have tailored support for MS?

SLOVENIA

REQUESTS FOR FICHES

1. NRPP Allocation Formula Inputs and Statistical Datasets:

We request that the Commission provide the following information to ensure full transparency and verifiability of the calculations underpinning Member State allocations under the National and Regional Partnership Plans (NRPPs):

1. NRPP envelope sub-amounts and earmarks (annual breakdowns):
 - a. Provide the sub-amounts applied to each allocation key A(i), B(i), C(i) as annual breakdowns for 2028–2034 in both current and constant (2025) prices.
 - b. Provide a clear indication of the overall NRPP envelope breakdown into allocated vs. non- allocated parts (i.e. parts allocated under keys A(i), B(i), C(i), Interreg, and non- allocated).
 - c. Provide earmarked amounts (e.g., for less developed regions, CAP, migration/border/security thematic allocations) as annual breakdowns for 2028–2034 in both current and constant (2025) prices.
2. Input data for the B(i) allocation key:
 - a. Provide geolocational data used in the calculation of B(i) in numeric table format: i.e. lengths of sea borders and external land borders by Member State; lengths of sea and external land borders specifically with Russia and Belarus by Member State; surface area values by Member State.
 - b. Provide data or point to publicly available dataset for total uniform visa applications for short stays used in the calculation of B(i).

2. Macroeconomic Assumptions and GNI/GDP Projections:

We request that the Commission provide:

1. Underlying macroeconomic assumptions and datasets:
 - a. Present annual GNI and GDP forecasts by Member State and for the EU- 27 aggregate used in preparing the MFF 2028–2034 proposal, to allow conversion of budgetary amounts into shares of GNI and verification of ceiling calculations.
 - b. Include annual projections of nominal and real GDP growth rates and price deflators.

3. Comparative Tables of Aggregate EU-27 Financial Frameworks:

To facilitate comparison between the current (2021-2027) and proposed (2028-2034) multiannual financial frameworks, we request that the Commission provide:

1. Comparative overview of the current (2021–2027) and proposed (2028–2034) Multiannual Financial Framework commitment appropriations:
 - a. Present data by MFF heading and programme and year, using the 2028–2034 nomenclature for headings, to enable direct comparison of envelopes.
 - b. Provide figures under a. in both current prices and constant prices (with a fixed 2% deflator), showing changes relative to (a) the total 2021–2027 envelope and (b) the 2027 annual level multiplied by seven.
2. Traditional policy aggregates:
 - a. Include subtotals for Cohesion Policy and the Common Agricultural Policy by year in comparative overview to facilitate continuity analysis across MFF periods.
3. Programme structure correspondence:
 - a. Provide a table mapping programme structures from the current MFF to the proposed MFF, highlighting in particular any programme mergers, discontinuities or restructurings.
4. Special instruments and new elements:
 - a. Identify expenditure related to new instruments.

4. Payment Profiles and Reste- à- Liquider (RAL):

While the Commission has published a long-term forecast of inflows and outflows for 2026–2034, this forecast provides only high- level annual aggregates. It does not include the level of methodological detail available in dedicated payment profiles and is therefore insufficient for Member States to replicate and verify payment needs. We request that the Commission provide:

1. Methodology for payment profiles:
 - a. Clarify the methodology and assumptions used to project annual payment appropriations for 2028–2034 (i.e. payment profiles), including:
 - i. Distinction between payments on outstanding commitments from the 2021–2027 framework (RAL) and payments on new commitments of the 2028–2034 framework.
 - ii. Treatment of NextGenerationEU payments.
 - iii. Programme- specific payment patterns based on the 2028–2034 heading and programme nomenclature.
 - iv. Other measures affecting cash flow (e.g., pre- financing, n+1/n+2/n+3 rules, accelerated implementation).
 - b. Provide tables showing annual payment appropriations (2028–2034) split into:
 - i. Payments for outstanding commitments from 2021–2027 (RAL), by heading and programme.
 - ii. Payments for NextGenerationEU.
 - iii. Payments for new commitments under the 2028–2034 framework, by heading and programme (using the 2028–2034 nomenclature).
 - iv. Provide all amounts in current prices and constant (2025) prices.

- c. RAL projections:
 - i. Provide the estimated level of RAL at the start of 2028, its annual reduction path, and the expected RAL at the end of 2034, broken down by heading and main instrument.
- d. Special instruments outside the MFF ceilings:
 - i. provide indicative payment profiles for these instruments for the period 2028–2034.

5. Own Resources – Data and Contribution Estimates:

We request that the Commission provide:

1. Data sources for new own resources:
 - a. Clarify which statistical and administrative datasets are envisaged to be used for calculating Member State shares in each of the proposed new own resources, including:
 - i. EU Emissions Trading System (ETS).
 - ii. Carbon Border Adjustment Mechanism (CBAM).
 - iii. E- waste levy.
 - iv. Tobacco Excise Duty (TEDOR).
 - v. Corporate Resource for Europe (CORE).
2. Estimated contributions by Member State:
 - a. Provide indicative estimates of contributions by own resource type and by Member State in total for each year 2028–2034, including the impact of new resources on reducing GNI- based contributions.

NRPs – GENERAL

1. Member State Contributions:

Could the Commission clarify how much Member States will be required to contribute to the EU budget for the years 2028–2030, taking into account the application of the **n+3 rule** for the 2021–2027 programming period and the proposed **n+1 rule** for the 2028–2034 period?

2. Assessment of national and regional partnership plans (NRPPs):

Who within the Commission will be responsible for assessing the NRPPs? Will Member States have a **single point of contact** for the coordination and submission of the entire NRPP, or will there be **multiple entry points** corresponding to specific chapters or components?

3. Criteria for Assessment and Predictability:

Will the Commission provide a **list of clear assessment criteria** for NRPPs sufficiently in advance, in order to ensure clarity, predictability, and legal certainty, thereby supporting accelerated and coherent programming?

4. Valuation of Reforms and Milestones for Payments:

How will the **value of reforms** be determined as part of the milestone achievements that trigger payments during the implementation phase? Clear guidance on this point would be **essential to ensure consistency and fairness across Member States**.

5. Reporting:

Will the Commission provide a **uniform information system for all Member States** for reporting and interim payments, or will Member States be expected to establish a new system that aggregates data from various already established and well-functioning systems used for funds under shared management, including Interreg programmes?

COHESION POLICY

1. Alignment with TFEU Objectives and Cohesion Policy Goals:

How does the proposal for the NRP Regulation ensure alignment with the objectives set out in **Articles 174–178 of the Treaty on the Functioning of the European Union (TFEU)**, particularly with regard to reducing economic, social, and territorial disparities?

In particular, how does the Commission intend to reconcile these objectives with the ring-fencing of funds and the 25% threshold for unallocated resources, which may limit the flexibility needed for long-term investments, especially in less developed regions where infrastructure gaps persist and place-based challenges remain significant?

2. Delegated Acts and Guidelines:

Which delegated acts and guidelines does the Commission plan to prepare in cooperation with Member States? In order to ensure **legal certainty** and predictability, such acts and guidelines should be prepared swiftly and incorporated into the Regulation itself, either as **Articles** or **Annexes**, as is the case in the current Common Provisions Regulation (CPR).

COMMON AGRICULTURAL AND FISHERIES POLICIES

1. Budget:

- Are specific envelopes for MS foreseen for sectoral interventions (wine and beekeeping)?
- A minimum ceiling for CAP interventions in Article 35(1) is foreseen for the measures under points (a) to (k) and (r) and paragraphs 10 and 11.

Other interventions under Article 35, which will have to be provided by the Member States in the national plan, will have to be provided from the common fund. Is it envisaged to set a minimum allocation for the implementation of these interventions, as it is foreseen for the implementation of LEADER (5%)?

Article 14(2) 2 paragraph states that the funds allocated for interventions referred to in Article 35(1), points a to h, j, k and r, will not count towards the amount for flexibility. Do we

understand correctly that this will also apply to measures for which funds are not earmarked within the minimum CAP spending?

2. System of control for "farm stewardship":

- A clarification is requested for Art. 7(3), specifically the sentence "*Payments subject to the farm stewardship requirements referred to in Annex I, parts A and C, to Regulation (EU) 202X/XXXX [CAP Regulation] shall be deemed to comply with the principle of "do no significant harm" as set out in Article 33(2), point (d), of Regulation (EU, Euratom) 2024/2509.*"

- Has the approach from current social conditionality become applicable also for SMRs under 'farm stewardship' not covering workers' rights, meaning that non-compliances, found by inspectorates that are responsible for respective directives or regulations, are taken into account and consequently there are no more separate controls done by paying agencies and hence mandatory % for control samples will not be stipulated in EU regulation?

- Please explain how to implement the part in bold below of the text in 4th subparagraph of Art. 62(5):

*For the calculation of those penalties, account shall be taken of the severity, extent, permanence or reoccurrence and intentionality of the non-compliance determined, in line with the assessment referred to in paragraph 3. **A penalty imposed pursuant to the national legislation implementing the legal acts listed in Annex I, parts A and B, to Regulation XX [CAP] for the same act or omission of a farmer or other beneficiary shall be taken into account in the calculation of penalties referred to in the first subparagraph.***

3. Governance:

- One of the key requirements for the Member States management, control and audit systems is appropriate separation of functions and functional independence between authorities. Functions of coordinating authority, managing authority and paying agency are unclear, and there is even overlap or transition of tasks between plan authorities (especially in CAP): Which tasks are performed by each authority? Who performs the tasks of the coordinating authority if the Member State does not have one?

How the separation of functions is ensured if certain tasks of managing authority shall be performed by paying agency?

Which authority prepares and submits the annual report?

- Can you confirm that the level of details in the plan will be the same for both cohesion policy and CAP?

- What precisely is meant by the provision that bodies that existed in the period 2021-2027 and have not lost so-called accreditations (managing authorities and paying agencies) can be kept?

- Legal proposal allows more than one paying agency in a MS. Is this meant only for regional paying agencies or on the contrary it allows, instead of regional paying agencies, also »sectoral , i.e. per specific policy« paying agencies, meaning that for payments of the CAP interventions during 2028-2034 a MS is allowed to keep current paying agency.

4. Earmarking of funds for climate-environmental goals under CAP post-2027:

Currently, under the period 2023-2027 CAP funds had to be earmarked (to a certain extent) for climate-environmental aspects. Will this mechanism be in place for the future CAP since we see no provision on that? Article 22 of the new horizontal regulation stipulates under point r) that MS need to ensure that the NRP Plan contributes to the Union's climate and environmental objectives. A minimum percentage of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in Annex III of Regulation (EU) .../... [Performance Regulation]. How will this minimum percentage be defined? We noticed that the specific percentage shall be established by the Commission in the context of the approval of the NRP Plan. **But there are no clear criteria. How will they be defined?**

5. State aid:

Art.85(6): Is the derogation from applying the state aids rules for local agricultural production and special supply arrangements under Art. 85(6) applicable only for such support on Aegean islands and outermost regions or for all MS? If is meant for all MS:

- Which conditions and criteria have to be fulfilled for being considered local agricultural products and special supply arrangements?
- Is such support limited, e.g. by thresholds for notifying support, upper limit for amounts of aid or aid intensity?

6. Common fisheries policy:

- Art. 35(11): Under financing of common agricultural policy, it would be reasonable to add if it covers also financing controls of fishery and data collection for supporting CFP (as currently being financed also now)?
- Art. 52 (2) stipulates that that each MS limits the number of paying agencies to one paying agency, while according to Art. 49(1) MS can have more than 1 paying agency.
- Art. 64(5): exemption from publication if a beneficiary receives less than 2.500 EUR should be broader (as to cover also fishermen or aquaculture producer or in general beneficiaries or natural persons).- Art. 78(1): Is the use of simplified costs mandatory for operations of up to 400.000EUR? (for fisheries/aquaculture, it is not possible always to calculate /take into account simplified costs) perhaps it would be »may« instead of »shall«?

EUROPEAN COMPETITIVENESS FUND AND HORIZON EUROPE

- Why is only an advisory comitology procedure suggested for adoption of the Work Programmes and not examination procedure? Horizon Europe work programmes have always been adopted in examination procedure, so this should remain the case at least for the part of the work programme determining the collaborative research activities.

- Horizon Europe's main objective is to deliver R&I-based results that can be deployed in the industry and society, while ECF's objective is to facilitate this deployment. Research projects usually take from 1 to 3 years to deliver results, meaning sequential support (after 1-3 years) will be necessary in any case, so programming both R&I and deployment activities at the same time cannot happen. How is the intertwining of Horizon Europe and ECF through the same Work programme justified?

- Why can't the same programming and adoption approach be applied for the "competitiveness" part of Horizon Europe Pillar II as for the "society" part?

- We acknowledge the focus of both Horizon Europe and ECF on valorisation of R&I results at the EU level, but miss a strategy and concrete implementation tools for joint EU+MS valorisation and for joint investments. Which HE and ECF tools are most relevant for this purpose?

- How would the Competitiveness collaboration tool work and its pilot work in practice?

ERASMUS+

1. Unified Programme Structure:

The proposal is merging the three main areas of the programme - education, youth, and sport - under a single framework based on two pillars. There are concerns regarding the preservation of a distinct identity and priorities of each the sectors within this integrated and simplified structure. In addition, youth and sport seem only as additions to the programme and not any more with their own chapters and actions.

How will the Commission ensure that all three areas remain distinct with their own instruments and actions? Also, what will be the role of youth and sport in the programme concerning their specific position and role in the programme?

2. National Agencies:

Another important consideration relates to the number of national agencies. The current programme allows Member States to establish more than one national agency. However, the new proposal appears to encourage the rationalisation of national agencies, which could lead to a reduced number of them. In Slovenia, we have two agencies, one responsible for education and sport, and the other for youth. It is a structure we want to maintain.

What is the Commission's exact approach on this issue, and will Member States continue to have a prerogative on the structure of National agencies for the implementation of the new programme?

3. Governance – Comitology:

The current proposal mentions work programmes as part of the implementation of the programme, but with much less details on the distribution of the budget between Member States and third countries and also according to the actions of the programme. In addition, there is no reference to the examination procedure which is essential for Member States to have a formal role in the adoption of yearly Work Programmes.

What is the rationale for this change?

4. Budget:

There is no specific distribution/delimitation of budget lines (with amounts/percentages) in any of the sectors of the programme.

Why is this the case? What is the Commission's preliminary assessment of the distribution according to the areas of the programme?

5. Third countries:

Who will determine the full or partial accession of third countries to the Programme?

GLOBAL EUROPE

- How does the Commission intend to ensure that the political priority of enlargement is sufficiently reflected in both the structure and implementation of the Global Europe instrument, given that candidate and potential candidate countries are grouped with non-candidate countries under the same pillar?

- How does the Commission intend to ensure that the specific and complex needs of the enlargement process are not diluted within this broad structure?

- What concrete safeguards are foreseen to ensure that enlargement remains a distinct political and budgetary priority within the proposed "Europe" pillar, which also includes countries without candidate or potential candidate status?

- Given the diverse levels of preparedness and political commitment among enlargement countries, how will the Global Europe instrument allow for differentiated support — both in scope and conditionality — while still maintaining a fair and credible accession path?

- How will the Global Europe instrument avoid a one-size-fits-all approach in programming assistance and ensure that the unique political, economic and social circumstances of each partner country are taken into account, while at the same time ensuring flexibility and adaptability in assistance planning and delivery?

SLOVAKIA

I. Request for fiches

- 1) Fiche on **comparison between MFFs 2021-2027 and 2028-2034** per program and year in current and 2025 prices.
- 2) Fiche providing **counterfactual data on MFF 2021-2027 if the dynamic deflator as proposed by the European Commission in art. 4 of the MFF 2028-2034 regulation was applied** already in the MFF 2021- 2027 for 1) MFF in total and per heading, 2) contributions of MS to the EU budget and national 3) allocations of Member States within Cohesion Policy and CAP.
- 3) Fiche on **estimated revenues from all own resources incl. proposed NOR**, per year and per Member State in current and 2025 prices, including the underlying assumptions.
- 4) Fiche on **updated GNI growth prediction** (both real and nominal) for years 2028-2034?
- 5) Fiche on a **detailed split of national envelopes for Cohesion policy and the CAP, as parts of NRPPs with a comparison between MFF 28-34 and MFF 21-27** in the following structure:
 - 1/ Cohesion policy per program (ERDF, ESF, Cohesion Fund, JTF, Interreg)
 - 2/ CAP (pillar I, direct payments incl. convergence of direct payments; pillar II, Rural development).
- 6) Fiche on **NRPP governance** structure providing a comparison of the main differences of the NRPP proposed governance structure with the current one applied for Cohesion policy funds, CAP funds, Home funds and RRF.
- 7) Fiche on **decommitment rule within NRPP** comparing the proposed approach with the existing one in Cohesion policy, EAFRD (II pillar of the CAP 2021-2027), Home funds and Recovery and Resilience Plan.
- 8) Fiche on **external convergence of direct payments** as proposed by the Commission for the MFF 28-34 expressed as a percentage of the EU-27 average (two columns: 2027 percentage of the EU-27 average of direct payments and MFF 2028-2034 percentage of the EU-27 average)?
- 9) Fiche providing an overview of **allocations in all programs of the MFF 2028-234** ringfenced for investments in the regions at the Eastern border of the EU (NRPP, CEF, ERASMUS+ etc.).
- 10) Fiche providing more details on **Global Europe** as it comes to governance, call for proposals, state aid rules application.

II. Horizontal questions

11) Performance framework

- How are the **reform and investment milestones going to be monitored**? Is the Commission developing a central information system or is this going to be delegated to individual MS?
- Can you issue **DNSH** and all horizontal conditions as an annex to NRPP regulation, i.e. well ahead of the adoption of the NRPP?
- What happens if the activity would be eligible under sector-specific rules, but there are

no appropriate intervention field/output/result indicators associated with that activity in the annex of the performance regulation (COM(2025) 545)?

III. Revenue side of the MFF 2028-2034

12) Revenue side in general

- Could the Commission confirm that the Interreg allocation 10,3 bn. EUR is not included in the general allocations of Member States in the National and Regional Partnership plans?
- Could the Commission explain in more detail how indexation via variable deflator will function in practice? Will the Commission have the ability to intervene in the event of excessive year-on-year fluctuations for individual Member States? How will a year-on-year change in the deflator be implemented for preallocated envelopes?

13) GNI:

- Could the Commission provide us with updated GNI growth prediction (both real and nominal) for years 2028- 2034?

14) VAT

- What WAR will be used for the calculation of VAT OR? Annual or frozen WAR?

15) Customs duties

- What assumptions did the Commission use when predicting the level of customs duties, especially regarding the volume of trade with 3rd countries (its relation to GDP growth) and average tariff rate?
- Does the forecasted average tariff rate take into account the effect of ongoing trade tensions and / or EU aim to conclude multiple free trade zones with 3rd countries?
- Does the forecasted level of collected customs duties take into account possible increase in customs duties after removing the €150 import VAT and customs consignment threshold?

16) ETS1

- What assumptions did the Commission use regarding the revenue from ETS 1 after 2030 when it comes to the total level of allowances (per MS), price for 1 allowance, Market Stability Reserve and other key aspects of ETS?

17) E-waste

- What assumptions (proxy variables) did the Commission use regarding the volume of: 1) electronic equipment placed on the market and 2) electrical and electronic equipment collected by MS after 2022 (final year for which statistics is available)?

18) CORE

- Could the Commission provide us with the detailed breakdown on the number of various types of companies per bracket subject to this OR by MS?
- What assumptions did the Commission use for future development on this statistic?
- How will it be ensured that the CORE contribution does not distort economic competition between Member States? Its design will affect a country's attractiveness to large firms, their profitability and location decisions— and consequently tax revenues, employment and GDP growth in each Member State—so it is not without impact.

19) TEDOR

- Could the Commission provide us with the statistics on the volume of amounts of manufactured tobacco and tobacco related products released for consumption? What assumptions did the Commission use for years 2025- 2034 (last data available for 2024)?
- Is the estimate of TEDOR collected in 2028-34 based on the provisions of new tobacco taxation directive (COM(2025) 580 final) or the one in place (2011/64/EU)?
- What approach does the Commission plan to use to account for differences in tobacco excise duty rates across Member States? Will a correction mechanism be applied to avoid placing an excessive burden on countries with higher tax rates?
- It is not clear why a New Own Resource is being introduced solely based on excise duties from tobacco and related products. It would be appropriate to explain the determination of the minimum tax rate to be used for re- calculating the quantity of products.
- How was the TEDOR rate (15%) determined?
- How has the Commission addressed the cumulative overlap between traditional and new own resources (specifically VAT and TEDOR), given that the traditional own resource based on VAT already includes excise duties on tobacco and related products, and at the same time, the proposed new TTD Directive does not change the taxation structure of cigarettes, where one component of the tax rate already includes VAT applied to the retail packages of cigarettes?
- We consider it appropriate to clarify the mechanism and methodology for calculating the quantity of tobacco and related products intended for consumption.

IV. Heading 1 (NRPP)

20) Questions on governance

- Why does the Commission propose for all MS **mandatory to switch exclusively to the model**? What is the rationale behind the preference of a recently introduced model within the RRF instead of a model stabilized over decades within the Cohesion Policy and CAP?
- Would the proposed model based on milestones and targets not **jeopardize predictability and stability of public finance** due to less predictability of the NRRP implementation over time?
- A clarification would be needed why the **Council has the competence to adopt decisions** on the approval as well as amendments of the NRPP, given that shared management is based on a relationship between the Member State and the Commission under Regulation (EU, Euratom) 2024/2509. The involvement of the Council prolongs the process, does not simplify it and creates the space for politization.
- Considering that the payments will be triggered by achieving targets and milestones after fulfilling determined output indicators, **what is the role of result indicators** and what

are the change vis a vis the current system of Cohesion policy, CAP and Recovery and Resilience Plan.

- What aspects of this process does the Commission consider as **simplification** compared to current system of all policies merged into the NRPP?
- Does the Commission consider the system triggering payments based on output indicators and not on invoices as a result-based system?
- How will the **MS do the costing of milestones and targets, especially by reforms**? The MS does not need to provide invoices by triggering payment, is it right? What will the MS provide for control and audit?
- How to deal with the **outcomes which are beyond the control of the responsible beneficiary**. Is the Commission considering the introduction of several layers of interlinked indicators (outcome, output, process, input)?

21) Coordination authority

- The MS can continue with established governance structures. However, the proposal introduces a new **coordination authority**. Can you please specify, which are the main adjustments/changes, which should be undertaken by the national and regional level?
- Can you provide us with a **list of simplification measures** which are incorporated into the new governance proposal?

22) Requirements for the NRP Plan (art. 22)

- Can you provide us with a full and comprehensive **list of requirements**, which should be fulfilled as a precondition for adoption of the NRPP? What are the relevant documents and strategies referred to in art. 22? What kind of checklist will be used by the EC to assure equal treatment of the MS?

23) Reforms and investments

- Who will determine the level of ambition of the country specific NRPP and assure **equal treatment among MS**? Who will be responsible for identification of the reforms and investments, the MS, regions or the EC?
- Should the MS elaborate a standalone **chapter on reforms** within the NRPP? Can you list all documents, which should be considered when outlining the measures? The measures will be developed based on which CSR?

24) Thematic concentration

- Can investments/reforms in NRPP contribute at the same time to climate, environmental and biodiversity targets (43 %) as well as social targets (14 %)? If the 43% environmental target is not applied **proportionally to all 27 MS** who will then decide which MS may apply for a lower contribution to this target?
- What criteria were used to exclude some investments from contributing to green or social objectives even though they might have contributed (defence, CAP, fisheries)?
- Can the Commission explain in more detail how will be contribution to green and social objectives calculated for the amount of flexibility within the NRPP?

25) Charter and RoL assessment

- **What criteria will the MS use for self-assessment** of principles of RoL and Charter of Fundamental Rights?
- What will be the checklist that EC utilizes when evaluating the fulfilment by which the EC can conclude that the Charter or rule of law horizontal condition are or are not being fulfilled?
- How will this mechanism be applied **proportionally**?

26) Use of decommitted funds

- **Who and based on what criteria** will decide how the decommitted funds will be due to breach of RoL/Charter used and if it will be used within flexibility/Facility or in direct managed programs?

27) Decommitments (art. 15)

- Why has the Commission proposed to **significantly shorten the n+3 rule** applied in the Cohesion Policy 2021- 2027 and the **n+2 rule** in the Rural Development 2021-2027? How does the Commission envisage the implementation of, for example, infrastructure projects within such a short timeframe in practice? The draft regulation implies that the n+10 months rule gives the Member State only 1 year and 10 months, not a full 2 years, which, given the newly set system, represents a burden and a significant shift from previous programming periods, especially considering the commitment profile under Article 14 and the overlap with the 2021–2027 programming period.
- What will be the **effect on the payments** if the NRPP is not approved by July 2028 and **effect on the decommitments** if the Plan is not approved by the End of 2028?

28) Eligibility rules

- Since the article of exclusion of eligibility is not included into the ERDF/CF regulation, does it mean that the MS can finance any type of investments/reforms based on its own specific needs?

29) Territorial contribution

- Do we understand correctly that the territorial impact assessment requested in Cohesion Policy 2021-2027 is not necessary any more within the NRPP?

30) Role of the regions

- Can you describe the **role of the regions in the NRPP** design, implementation, monitoring and evaluation? Does it mean that the regions might negotiate regional chapters? What is the role of coordination authority in this regard?

31) Finances for categories of regions (art. 10)

- What are the possibilities **for transfers between funds and categories of regions** within the NRPP? Such transfers are not provided for in the regulation.

- Since the Cohesion policy is open for all categories of regions (less developed, transition and more developed regions) **who and how will determine the share of the TR and MDR on the MS national envelopes** considering there are no ringfenced financial envelopes any longer for TR and MDR?

32) National contributions (co-financing)

- Does the NRPP regulation stipulate any compulsory share of the Member State's state budget co-financing within the national contribution? Can the MS take a loan for national contributions (from Catalyst Europe)?

33) Process of approval of NRPP

- Who will be the **leader within the European Commission services** whom the MS should consult the NRPP with? The timeline for approval of the NRPP is challenging and there is a clear need for launching early informal consultations with the EC prior official submission of NRPP.

34) Flexibility amount

- Can you explain the activation of flexibility amount prior the MTR for emergency situations and shift in priorities?

35) Common Agricultural Policy (CAP) and Common Fisheries Policy (CFP)

- Concerning the **capping of direct payments** (Art. 6 of the proposed regulation) does the Commission propose to maintain the current conditions established within CAP 2023-2027? In other words, will it apply only to the Basic Income Support for Sustainability (BISS) and Member States may subtract from the amount of BISS per beneficiary all labour-related costs?
- Why has **CFP become part of the chapter on CAP** and what is the purpose of merging these two policies?
- Will the CAP 2028-234 ensure the continuity of financing of **multiannual commitments** stemming from the CAP 2021-2027 Strategic Plans?
- Does the Commission plan to **harmonize requirements** for new IACS features or will the current design remain?

36) Unity Safety Net

- Can you explain how will the Unity Safety Net work in practice to stabilize agricultural markets in case of market disturbances?
- Why did the Commission proposed to double the amount of the reserve having in mind that within MFF 2021- 2027 the use of the agricultural reserve is very low?
- The new legislative proposals do not address what will happen with the **unspent funds** of this new reserve, which is to be specifically intended for farmers. Will the unspent funds stay within the CAP?
- What will happen to the unused **agricultural reserve of the MFF 21-27**? How will the unspent funds be used?

37) EU Facility

- Can you explain how will the EU Facility work in practice? **Who and based on what procedure will decide** on which measures it will be used and how it will be activated in emergency situations? What is the total allocation of EU Facility and allocation per MS?

38) Interreg

- What is the division of labor between the NRPP and the Interreg Plan, especially if the NRPP is expected to include cross-border and multi-country projects?
- Why is interregional cooperation excluded from the Interreg allocation?
- Will the Interreg Plan also cover multi-country dimension?

39) Cash flow management and other elements

Article 34 and Article 4(20)

What is the reason for the lack of linkage between Article 34 and the definition of a “crisis” as set out in Article 4(20)? Do we understand correctly that Article 34 should be coherent with the definition of “crisis” in Article 4(20), so that financing under Article 34 can also cover other crisis situations, not only natural disasters?

Article 4(13)

Do we understand correctly that in Article 4(13) of the CPR, the definition of “pay-out value” takes into account only the amounts allocated to reforms, despite the fact that the term “measure” in Article 4(10) refers to a reform, investment, or other intervention at national or sub-national level? Is the definition in paragraph 13 complete in light of paragraph 10?

Article 4(35)

Could you provide a distinction between types of irregularities in relation to the definition of “irregularity” in the regulation, which states: “irregularity means any breach of applicable law”? What exactly is meant by “effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget”? Does it only mean an irregularity that has a direct impact on the fulfilment of milestones, targets or outputs?

Article 13(4) a Article 50 g)

Why do Articles 13 and 50 require proportional disbursement of funds received from the European Commission to the individual chapters/managing authorities? Is the Member State eligible to determine how financial transfers are managed within the national system and when EU funds are integrated into the individual chapters/managing authorities?

Article 14(1)

We consider the descending profile of commitments to be a departure from previous programming periods, where commitments were distributed in an ascending manner. What is the rationale behind this approach? It creates pressure on the Member State to absorb funds in the early years, while the previous programming period is still being implemented.

Art. 17 (1)

Do we understand correctly that pre-financing for the year 2028 is available for the Member State concerned only in case its NRPP was approved and the Council decision adopted by 31 July 2028?

Article 21(3)

What action or moment constitutes the start of implementation of a measure under Article 21(3)? For example, can public procurement be carried out in 2027, with the grant agreement signed after 1 January 2028? Or can expenditure be incurred before 1 January 2028?

Article 22(2)(l)

Why is the Member State required to pay funds to the beneficiary even when a financial correction caused by the beneficiary has been applied? If the beneficiary is responsible for the correction, the Member State will obviously apply the correction on to the beneficiary and request settlement and/or discontinue funding.

Article 34(7)

What does “cleared on a yearly basis” mean? Does it imply that the additional pre-financing must be cleared within 12 months?

Articles 49 and 58 and Article 10 ERDF/CF Regulation

Is it up to the Member State to decide whether to retain or merge current authorities? If it is the case, this is probably not sufficiently reflected in the draft regulation, particularly regarding the functions of the coordinating authority under Article 50.

Does it mean that the coordinating authority may delegate the functions under Article 50(c) to (g) of the NRPP regulation to another body, not necessarily the managing authority?

Does the Article 10 of the ERDF/CF Regulation enable the managing authority to delegate these functions to another body.

Article 58

If a Member State detects an irregularity, what financial procedure should follow? The regulation does not clarify how the Member State should settle detected irregularities with the Commission. In Annex XI (Template for the payment application) and the assurance package, we do not see a space for correcting irregularities. Should we understand that this will be a separate financial flow?

What procedure should be followed if the Member State detects a conflict of interest, corruption, fraud, or double financing, as highlighted in Article 59(1)(c)(iii) and Annex IV (Key Requirement 2)?

What procedure should be followed for other breaches, such as violations of public procurement rules, state aid, or other applicable law/irregularities?

Will the Commission issue or update a Decision on the application of financial corrections for breaches of public procurement rules?

Do we understand correctly that some measures will need to be settled at national level, while others will affect financial relations with the Commission?

According to Article 58, the Member State is obliged to take appropriate measures to prevent, detect, and correct irregularities, including fraud, corruption, and conflicts of interest, and to apply remedial actions in cases of non-compliance with applicable law. This obligation also stems from key requirements under points 2 and 3 of Annex

IV. However, under Article 51(1)(b), the managing authority is not expected to verify the related costs of operations. At the same time, the managing authority is required, under Annex XII (Template for the management declaration), to declare that the submitted transactions are legal, regular, and in compliance with the applicable rules. The regulation does not clarify how the managing authority is to ensure the effective implementation of adequate and effective measures against fraud and corruption, and measures for the prevention, detection, and correction of irregularities, including conflicts of interest and double financing, as well as risk assessment and compliance with applicable law, including Union rules on public procurement and State aid, without verifying the related costs of operations.

Article 58(2)(i)

Is the Member State required to archive all necessary documentation for 10 years from the date of the final payment by the Commission for the measure? For projects implemented at the beginning of the programming period, this would mean a very long retention period (e.g. 17 years), resulting in disproportionately high archiving costs for beneficiaries and national authorities. In the 2021–2027 programming period, it was established that all documents related to an operation supported by the Funds must be retained at an appropriate level for 5 years from 31 December of the year in which the managing authority made the final payment to the beneficiary. Therefore, the proposed retention period is considered unreasonably long. Moreover, under Article 60(5), the Commission may carry out audits up to 3 years after the final payment, which further questions the need for such an extended retention period, especially since most measures are likely to be completed towards the end of the period.

Articles 58(3) and 59(1)(a)

We note an inconsistency between Article 58(3), which states that the progress report should cover the entire calendar year, and Article 59(1)(a), which links the report to payment applications submitted by 31 October. This may lead to discrepancies between the factual information reported to the Commission after the submission of payment applications and the financial data included in those applications. Is our understanding of this inconsistency correct?

Article 59

How should a Member State deal with ongoing assessments of legality and regularity at the time of submission of the assurance package? Is this covered by a possible reservation in the Management declaration?

Article 63(c)(iii)

The requirement to provide information on all contracts with contractors suggests an obligation to record data for all contractor contracts, not only those related to NRRP operations. Probably clarification of the text would be needed in the same way as in point (d)(ii) regarding subcontractors.

Article 65(4)

What is the rationale behind shortening the deadline for submitting payment applications to 31 October? Does this mean that payment applications cannot be submitted in November and December? If so, this could negatively affect the Member State's liquidity. We also request clarification and definition of the term "financial year," as it deviates from the accounting year used in the 2021–2027 programming period.

Article 68(2)

The text refers to "extrapolated" financial corrections, but Annex XIV does not contain any information on such corrections. Could you clarify whether this is a typo? If extrapolated financial corrections are to be applied, will the procedure be further detailed?

Article 68(4)

Given that the accounting year is being abolished, we propose replacing "final accounting year" in Article 68(4) with "final assurance package." Is this interpretation correct? We request clarification of the difference between paragraphs 1 and 4 of Article 68, as they appear to be duplicative.

Article 69

Why is a five-year durability period being introduced for the achievement of a milestone/target rather than for a specific operation? In practice, this could result in situations where one project is completed in 2029 and another in 2035, extending the durability period for the first project to 11 years.

40) Audit and control

- Could the Commission explain how audit authorities should proceed if the public support provided by a Member State to a beneficiary takes a **form other than financing not linked to costs or unit costs, lump sums, or flat-rate amounts**. In that case, how is the audit authority to ensure verification of the legality and regularity of the relevant transactions and compliance with applicable law, and thus the effective and timely protection of the Union's financial interests, in the context of Article 53(4) of the draft Regulation, which states "*The audit authority is not expected to verify the underlying costs of the operations for the purpose of its audit work.*"?
- Does Article 53(4) of the draft Regulation **also apply to "real costs,"** or only to simplified cost options or financing that is not linked to costs?
- It is not clear whether the audit of milestones and targets is solely focused on **verifying that the milestone and target declared in the payment claim have been met** in accordance with the verification mechanism, and whether system audits also test the functionality of the management and control systems, including verification that compliance with applicable rules (including public procurement and state aid) is ensured. Or is it expected that applicable rules will be verified within the audit of milestones and targets, and what procedure does the Commission envisage for verifying compliance with those rules?
- **If both audits (system audit and audit of milestones and targets) are expected,** then Articles 53(1) and 53(3) of the draft Regulation appear to be in conflict. Article 53(1)

provides: *“The audit authority shall be responsible for carrying out audits on the fulfilment of milestones and targets, and system audits in order to provide assurance to the Commission regarding the effective functioning of the management and control systems, including whether the management and control systems ensure the legality and regularity of the underlying transactions and the effective and timely protection of the financial interests of the Union. The audits shall provide assurance on the effective use of funds in compliance with the applicable law.”*

Whereas Article 53(3) states:

“The audit authority shall prepare an audit strategy based on a risk assessment, taking into account the management and control system description provided for as required in Article 22(2), point (m), covering system audits, and audits regarding the milestones and targets, and the effective use of funds in compliance with applicable law.”

- It is not entirely clear from the draft Regulation **when and in what manner the Commission expects audit authorities to verify applicable law** – in the context of system audits or in the context of audits of milestones and targets?
- **Is it necessary to verify all milestones and targets included in the payment claims** submitted to the Commission, or is it permissible to take a sample of the milestones and targets declared in the payment claims for the relevant period?
- The audit authority is expected to verify compliance with applicable rules, but the draft Regulation does not clarify **what sample size the Commission expects the audit authority to use for this verification**, nor whether the Commission expects compliance with applicable rules to be checked as part of management and control system testing in the framework of system audits?
- **Should the term “financial year” be understood as the period from 1 January to 31 December?** When can a Member State submit the “first” payment claim for the financial year? Since payment claims must be submitted by 31 October and, under Article 59(3), the assurance package is to be submitted by 15 February of year n+1 for the previous “financial year”. It is unclear what period this “budgetary year” refers to.
- **How does the Commission expect the managing authority to approach verifying itself**, given that under the management declaration the managing authority must assess that the funds have been properly used in accordance with applicable law, but at the same time Article 51(1)(b) of the draft Regulation states that the managing authority is not expected to verify the relevant costs of operations for the purposes of preparing the management statement? Does this expectation—that the managing authority will not verify the relevant costs of operations—apply only to simplified cost options and financing not linked to costs?
- **The new configuration of financial flows creates insufficient time to prepare the assurance package**, which must be submitted by 15 February of the following year under Financial Regulation (EU) 2024/2509. This time pressure arises because the final payment claim is to be submitted to the Commission, in accordance with the template in Annex XI, by 31 October of the relevant year. Given the need to allow audit authorities enough time to conduct audits and issue an audit opinion in line with

the requirements of the draft Regulations, these deadlines should be adjusted so that the audit authority and other national bodies have adequate time to fulfil their obligations under the draft Regulation related to preparing the assurance package.

V. How should the separation of functions between the bodies designated for the NRRP—and within those bodies—be understood? Should it mean separating the functions of approval, control, payment and accounting, or separating approval, control and payment, or some other alternative? We propose that the Commission clearly define the institution of function separation to ensure an unambiguous understanding of this principle and its correct application in practice.

VI. Heading 2

41) European Competitiveness Fund

- Could you clarify how the **14 programmes from the previous MFF 2021–2027 have been combined into each of the new policy sub-headings** (Clean Transition and Industrial Decarbonisation; Resilience and Security, Defence Industry and Space; Digital Leadership; Health, Biotech, Agriculture and Bioeconomy)? E.g. which programs from the MFF 21-27 make up the new sub-heading Clean Transition and Industrial Decarbonisation.

VII. Heading 3 (Global Europe)

42) Ukraine

- Could the Commission confirm that **100 bn. EUR from Ukraine reserve** would be used solely for non-repayable support and budgetary guarantees (apart from possible future loans for Ukraine covered by headroom).
- Please clarify all available funding modalities for UA under the MFF 2028–2034, including the use of the UA Reserve (grants, loans backed by headroom, budgetary guarantees), the integration of UA related support within Global Europe programmes (e.g. Erasmus+), as well as the potential role of instruments such as INSC- D or nuclear instrument.
- **How will the Commission adjust the mix of grants and loans to UA** based on the evolution of Ukraine’s public debt and external financing (IMF/WB scenarios, contributions from third countries)?

43) Global Gateway

- What reporting principles will be applied to the **Global Gateway projects/flagships** covered by the new Instrument?

FINLAND

1) General questions & requests for information:

- We would like to have a chart that indicates clearly the changes in the funding at the programme level (2025 prices & current prices) between the current framework and the proposed framework (in excel format).
- Could the Commission provide further information on the proposed overall level of the framework?
- Is the proposed dynamic deflator used in the technical adjustment based solely on the Commission's inflation forecast? Is there a mechanism to adjust or correct the forecast if it proves inaccurate? Was backward-looking inflation correction considered instead of forecasting?

2) On the proposed loan instrument:

- How does the Crisis Mechanism comply with the requirement of clear definition when the ORD does not contain a maximum amount in euros? Instead, there is only a % definition.
- What are the criteria for an extraordinary crisis? What could be the rules for the implementation of such mechanism? In the proposed Council Decision on the system of own resources it is just stated that its implementation will follow the rules set in the most relevant programme or instrument.

3) Special Instruments:

- Regarding the fines and other penalties which would be channeled into the Flexibility instrument: does this mean that all fines and penalties would go into the Flex instrument, and no longer as other revenue into the EU budget? If that is the case, could you then give an estimation of the annual amount approximately?
- Regarding the decommitments of appropriations, they are being proposed to be channeled into the Flex instrument – an estimation of annual amounts would be useful for this as well.
- Amendments to the Financial Regulation art.63 – reference made e.g., under the MFF Communication (page 22) – does the Commission have a timeline in mind when such an amendment would be made?

4) Performance Framework & Conditionalities:

- Could the Commission elaborate on the relationship of the regulation on the Performance framework and horizontal requirements to the NRPP-regulation and Competitiveness Fund?
 - How, in practice, does the performance regulation guide the selection of targets and milestones in the NRPs or guide the functioning of the Competitiveness Fund?
- How would the Commission ensure an adequate level of funding to support the green transition, considering that only a part of the ETS would be directed to support the actions?

5) NRPP

- Could the commission provide a more detailed chart of the allocations by Member States under the different policy areas – agriculture, cohesion, home affairs?
- The loan element under the NRPP:
 - The regulation does not have a clear reference to the basis on which the Member States could take on the loan to finance their plans?
 - Why isn't there a reference to the MFF Regulation in the loan provisions of the NRPP regulation? (Such a reference exists e.g., in the SAFE instrument: "... Instrument will take the form of a lending scheme of up to EUR 150 billion underpinned by a guarantee from the under Article 2(3) of the MFF Regulation)." Could the Commission elaborate on this?
 - How would the maximum 150 bn euro of loans be implemented, and what would be used as a guarantee for the loan?
 - Will the loan support part form a part of Member States' plans, and they need to update their plans when applying for the loan support? When a Member State submits its request for the loan support, what is the decision-making procedure? Will the decision be made only by the Commission, or will this require also council implementing decision if the plan is updated?
- How will the investments and reforms be selected and how would you ensure a high level of ambition and consistency of the investments and reforms in the NRPs as well as equal treatment between Member States NRPs?
- How would the country-specific recommendations and the NRPP be linked, and would there be an impact on the payments paid by the Commission to the Member States?
- What are the procedures and rules if Member States want to benefit from the EU Facility? Who decides on the eligibility? Will the funds from the Facility form a part of

Member States' plans and they need to update their plans? If not, what will guide implementation and use of the funds and how will the implementation be monitored?

- Could the Commission provide details on the Eastern Border financing, in particular what elements does it consist of and how it is designed to function?
- How are the Northern Sparsely Populated Areas (NSPAs) taken into account in the MFF proposal, considering that they are left out in the ERDF Article 4 reference to TFEU Article 174?
- How is it possible for the Member states to acknowledge specific constitutional arrangements regarding autonomous areas within a country when drafting the Plan? Would it be possible to draft two or more Plans, if required in certain circumstances, for example one for mainland Finland and one for the autonomous region of Åland Islands?
- NRP Article 22 (2): Could Commission please explain in detail the earmarking logic for climate and environmental objectives for each Member State? Do we understand correctly that the Commission would have the discretion to set any minimum-% it sees fit with no minimum threshold?
- NRP Article 30: Do we understand correctly that Member States have no say in the annual work plans which direct the strategic use of EU facility funding? Could the Commission give an estimate on the expected share of Union funding which is to be allocated to non-EU States and entities in direct or indirect management as part of the EU Facility (other than the funding referred to in Article 26 (11) in relation to HOME funds which is clearly linked to common EU priorities)?
- NRP Regulation, Annex I: On the allocation methodology for NRP/cap and safety net to apply for the general allocation key A: Which documents setting out the allocation for 2021-2027 are used for Cohesion and CAP?
- Annex I states: The α_i of all Member States is proportionally adjusted to ensure that the sum of all α_i equals 100%. Are all Member States' shares proportionally adjusted to reach sum of 100% (in effect increasing some Member States' share above the 105% capping) or only those Member States, whose share does not exceed 105%. I.e., can the final share after the adjustment back to 100% of a Member State be above 105% (or below 80%) of 2021-2027 allocations?
- In what order have the safety net and capping been applied?
- For JTF and EAFRD, should both the amounts from MFF and NGEU be included or only MFF? Has the NGEU allocation for ReactEU been included?

- Do the ERDF amounts for 2021-2027 include ETC (Interreg)?
- Social Funding: There is a requirement of "at least 14% of National and Regional Partnership Plans will be dedicated to social expenditure." Why has the Commission chosen this exact percentage and what would be included in the scope of the social expenditure?
- What kind of funding would be allocated to the closer cooperation between the land and sea areas to improve the wellbeing and security of these areas?

6) Security and Defense

- Security and defense related aspects are covered under different headings of the MFF Proposal. Could the Commission provide a single table detailing all the security and defense relevant funding in the proposal?
- How is the EU external border to Russia addressed in the proposal and from a defense perspective? Could you explain the rationale behind the proposed actions and the analysis behind them (land, sea, air surveillance, military mobility and counter mobility, regional vitality, or other considerations)? What would be the estimated impact for the Eastern border in the MFF proposal?
- The EDF programme has been very useful. Would there be a similar programme in the proposed MFF that would have similar elements to EDF (participation in the defense industry development, market access)
- How has the Commission taken into account in its proposal the access to European defense industry supply chains for SMEs and start-ups?

7) Questions related to Competitiveness

- Could the Commission explain the relationship between the Competitiveness Fund and Horizon Europe, in particular in relation to Pillar II and its Single Rulebook? How would they be connected to each other?
- What is the role of the Competitiveness Coordination Tool in the implementation of the Competitiveness Fund and the Horizon Europe?
- We see value in a more streamlined fund. Could the Commission further elaborate the governance of the ECF and more specifically where the prioritization across different goals is done, goal by goal? Regarding the governance of the programme, how will

Member States' role in shaping the content of the work programmes be ensured (especially in areas that have been previously governed through smaller programmes)?

- Why are also domestic transmission and distribution grids included in the proposed ECF? Could the Commission elaborate on this?
- How would the funding for the Innovation Fund be organized? Would the funding continue to come from outside the framework (from ETS?)
- InvestEU: The Communication (chart) refers to “a minimum amount ECF InvestEU Instrument” that is allocated from the Competitiveness Fund to InvestEU. Could the Commission give further details on what does this minimum amount mean and from where the allocation would be taken? Would there be a maximum amount? Would the InvestEU component function in the same way as the current one, where there is a common provisional rate?
- One of the challenges of European investments in digital has been their smaller scaling and impact compared to American tech investments. The new MFF proposal champions objective-based funding. How is life-cycle sustainable investment in digital economy promoted?
- Is there historical data on how much private investment the EU digital/tech investments have leveraged? Are there measurable objectives for how much private investment the new MFF digital/tech investments should leverage?
- What role is envisaged for the Export credit agencies in the implementation of respective programmes/budget lines?
- UCPM+: Health sector is included as part of the regulation (Title III). What is the relationship between health crisis preparedness and other parts of the UCPM/regulation?
- How do you foresee the health sector expertise, and the necessary capacities and resources ensured as part of UCPM coordination?
- Regarding RescEU capacities, we would like to better understand the maintenance and financing of existing capacities in the future.
- Erasmus+: The proposal does not appear to contain a provision for the Programme Committee, a key tool in the monitoring of implementation. Can the Commission confirm that this is a general approach to be proposed for the upcoming framework, and

if so, could the commission explain how are the Member States' opportunities to influence secured in this scenario?

- Erasmus+ & UK: The 2028-2034 Erasmus+ -proposal indicates that 3rd countries could join the programme fully or partially. What would this mean for the UK participation?

8) Questions on Global Europe

- Could the Commission provide more information on the calculations, priority settings and future operational environment analyses that have been used for the proposal under Global Europe pillars? What are the differences in analyses in comparison to the current framework?
- European Peace Facility (outside the MFF): how does the Commission envisage the allocation of funds within the EPF? How does the Commission plan to facilitate the way forward in ensuring a timely EPF implementation?

9) Questions on Administration

- Could the Commission explain the reasoning for the increase in administration costs? Does the draft contain establishment plans for new positions? If so, how many and how are they proposed to be distributed among the institutions?
- How much would the admin expenditures be outside the new Heading 4 (please include growth figures also in percentages)?

10) Own resources

- What will the Commission propose for the WAR in VAT OR calculations? There is a need to update the current 2016 WAR and there is also a need for member states to have the option to update the WAR whenever there are significant changes in the VAT system that affect the WAR, for example VAT rate changes.
- How large would the administrative costs and overall burden be for member states and the commission for all the new own resources?
- Would the plastic and e-waste inflation correction be based on forecasted inflation or realized inflation?

We reserve the right to come back with further written questions and comments.

SWEDEN

SE eagerly awaits answers to the following questions from the Commission:

Overarching questions on the MFF

Could the Commission explain how the EU-27 Gross National Income for 2028-2034 has been calculated? Using the AMECO Gross National Income forecast for 2026, published in the Spring 2025 economic forecast and T+10 projections, does not give the same GNI projections.

Can the Commission specify the distribution of Ukraine grants and loans in the proposal? What is the difference between loans using the budget guarantee (via the Global Europe Instrument) and loans guaranteed through headroom? When the COM suggests a maximum ceiling for loans of 100 bn euro, does it include both loans through the budget guarantee financed with the Ukraine reserve and loans guaranteed through headroom?

Can the Commission specify how the policy loans to third countries in pillar 3 are proposed to be guaranteed (headroom, or other)?

Can the Commission provide data used for calculating NRPP distributions?

Can the Commission provide a forecast of RAL per year after 2027?

Can the Commission provide specifications and revenue forecasts for the flexibility instrument?

What are the sub-headings and sub-ceilings for the proposed MFF?

Questions related to own resources and other revenues

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On the own resource based on non-recycled plastic, can the commission explain the practical implications of article 3.1(e) stating member states should use both calculation methods? Can the commission give specify how this is suggested to be implemented and regulated (e.g. what flexibility does member states have in weighting the two methods)? Can the commission explain the choice to regulate this in the ORD, and not in the Commission Implementing Regulation (EU) 2023/595?

Can the commission explain the changes in the ETS proposal, compared to the previous one, under article 3.1(g)?

Regarding article 4.4, what are the effects and implications of GNI calculations following revisions in ESA, and why it is now proposed to allow for upward adjustments to the ceilings in EUR?

Can the commission specify in the ORD what are the total liabilities for the EU, as the share of EU total GNI, for the relevant period. Can the commission confirm that the proposal is 1,75 % payment ceilings + 0,25 % for the Crisis Mechanism + 0,6 % for NGEU = 2,60 %? *It is important with full transparency, especially when it comes to financial liabilities which will be ratified in member states' parliaments. The reference in article 13 to NGEU liabilities is not sufficient. It should be clearly stated along with the other numerical ceilings in article 4.*

Can the Commission provide more information on the legal base to include handling fees for e-commerce in the traditional own resources. The commission had earlier said these were “other revenues”. These are fees separate from the customs duties. Can the commission explain why these are not defined as a new own resource? *Important with full transparency in the bases for own resources.*

Additional questions and requests related to own resources

Can the Commission specify the proposed headroom and its components (UA, NGEU, etc)?

What is the projected carbon prices used by the commission to calculate the ETS NOR and CBAM NOR?

Revenues from fines are proposed to finance the flexibility instrument. Does this proposal include all revenues from fines entering as other revenues in the current system?

The commission has also said that CORE can be implemented without sectorial legislation. Could the commission elaborate on how and why there is no need for a separate legal base?

Has the Commission carried out an impact analysis on the European economy for CORE?

Can the commission provide impact analyses for the new proposed new own resources CORE, TEDOR and e-waste, as well as other additional other revenues of interest?

For each own resource (current and new), please provide data on the projections per year and member state 2028-2034. Please also provide data on other revenues, broken down per source of revenue, for each year. Also, please provide the assumptions and background data for which these calculations are based on. All in Excel.

Can the Commission provide assumptions and calculations on the increased revenue inflows coming from changes in existing own resources, broken down per revenue source?

In addition, we would also like to have long-term forecasts and risk analysis on headroom and background on how the commission reached the proposed own resources ceiling.

Does the Commission have any figures for the expected development of the proposed new own resources in an economic downturn? Would a drop in these require higher Gross National Income contributions?

Can the Commission provide details on how it will ensure data quality, comparability and reliability regarding the amount of non-recycled e-waste?

Is it proposed that the Innovation fund and Social Climate Fund will be financed with ETS revenues? Please provide specifications and revenue inflows for instruments and programmes financed by ETS (i.e. Innovation Fund, Modernisation Fund and Social Climate Fund). Can the Commission confirm that instruments under the ceilings cannot be financed through ETS if it is not a NOR? SCF is now below the MFF ceilings. How can it be financed with ETS2 revenues, if it is not a NOR?

Pillar 1

- Regarding performance-based budgeting, how will the actual reimbursement model to beneficiaries be designed to ensure that the reimbursement from the COM to the Member State is the same as to the beneficiary. For example, which actor should bear the financial risk if an intervention is granted funding but then does not achieve all the results according to predefined indicators, as a result of changes in the geopolitical developments or new needs?
- Why does COM propose that the financing of the plans should be supplemented with loans? (Art. 10(4), (18) and (19))?
- Developing the plan with its performance-based framework (milestones, goals and reforms) will be a very extensive work that requires a new way of working in MS with extensive need for anchoring (there are also requirements for anchoring, partnership). How does COM view the possibility that MS will be able to complete this work in sufficient time in a qualitative way so that the plan actually leads to desirable changes in regions and MS?
- The COM should explain the different elements of the proposed EU Facility and how it relates to the regulatory framework and the amounts allocated for this programming

period. And what is the relationship with other "crisis instruments"/margins in other parts of MFF?

- The COM proposes (Article 14(2)) a flexibility amount of 25% of the national envelope, with shares of it to be used in different ways. It would be good if the COM could explain how they decided that proposal and how it relates to the proposed EU facility?
- Articles 8 and 9 on the Charter of Rights and respect for the rule of law propose that account be taken of how deficiencies in these respects may affect the financial interests of the Union, paragraph 4. (a) in both Articles. Can COM explain how it will work/ what it will mean?
- The Commission has published a fact sheet showing the allocation of funds under the NRP to each Member State. The methodology and criteria taken into account in the allocation model are mentioned in Annexes I-III (COM(2025) 565 final). Will there be a more detailed explanatory fiche published on the calculation methods? Calculation principles and the distribution of the earmarked CAP funds between MS should also be requested.

Conditionality and Rule of law

- Are the aspects referred to in article 9.4 (a) and (b) to be understood as cumulative? More specifically, should the existence of some element of risk for the sound financial management/economic interests of the Union always be a factor in determining the non-fulfilment of the Charter/Rule of Law horizontal conditions?
- Could the Commission further elaborate on how you see that point (a) in article 9.4 should be assessed, regarding the level of potential impact on the management of the budget/financial interests?
- Outside the scope of the NRP-regulation, the general conditionality regulation would be the sole instrument dealing with RoL related issues. That means more than half of all funding would not be covered by any "ex ante" mechanism. It would be interesting to have the Commission's comments on that, given the strong message of Rule of Law being a must for EU-funds.
- Can "measures" or "milestones" in a NRP Plan refer to the Rule of Law or the Charter?
-

- Are the “supporting measures” according to article 24(8) and 24(9) limited to the same Member State, i.e. the MS that does not fulfil the Rule of Law horizontal condition, or can the funds be reallocated to the benefit of other MS?

PUBLIC

FICHES CATALOGUE MFF 2028-2034 PROPOSAL, SUBMITTED BY AT, BE, DE, FI, FR, IE, NL, SE

General

- 1) Estimates for the annual growth-rate of GNI and GDP for the years 2025-2034 per Member State and per year and for the EU27 in total.
- 2) Estimates of GNI and GDP in absolute terms per year and MS for the years 2025-2034 per Member State and for the EU27 in total.
- 3) Estimates for actual inflation of GNI/GDP for the years 2025-2034 per Member State and for the EU27 in total.
- 4) Estimates for the annual growth-rate of TOR- and VAT-own resources for the years 2025-2034 per Member State and for the EU27 in total.
- 5) Assumptions regarding the level of other revenue (fines, surplus, interest on late payments, etc.) 2025-2034.
- 6) A detailed breakdown of the current MFF per programme in constant 2025- and current prices (incl. Art. 5 top-ups).
- 7) Comparative table between the 2021-2027 (incl. NGEU) and the 2028-2034 MFF.
- 8) Table of correspondence between the current and the new Multiannual Financial Framework structure. Changes to the underlying structure as well as a conversion table (current MFF/new MFF).
- 9) Overview of proposed cuts/redeployments and mergers from current MFF to (proposed) next MFF.
- 10) Flexibility in the 2028-2034 Multiannual Financial Framework: Flexibility within and between programmes and in programme implementation.
- 11) Overview of special instruments (incl. specifying the forecasted revenue to be included in the flexibility instrument).
- 12) Estimates of decommitments for the current MFF and previous MFF, per heading and programme. Estimates of decommitments for the next MFF.
- 13) More detailed explanation of the Ukraine Reserve (needs of Ukraine, reasoning behind total amount of 88.9 bn EUR (2025 prices) for the Reserve). Interaction with Art. 6 in the Global Europe Regulation, detailing maximum amounts in grants and loans.
- 14) Overview of the proposed total support from the Union to Ukraine for the next MFF compared to current MFF (including EPF).
- 15) Flexibility instrument: budgetary impact in 2021-2027 if the mechanism as proposed in the MFF proposal 2028-2034 would have been applicable.
- 16) SMI: impact in 2021-2027 MFF if the mechanism as proposed in the MFF proposal 2028-2034 would have been applicable.
- 17) Forecast of application of the new dynamic deflator in the MFF 2028-2034
- 18) Counterfactual analysis of applying the proposed dynamic deflator to the current MFF (2021-2027) and impact on national contributions per year.
- 19) Methodology for estimating payment appropriations.
- 20) Detailed payment-profiles for every program of the current and new MFF and for the entire implementation period of each program, i.e. for 2021-2027/2028-2034 and beyond.
- 21) Detailed payment-profiles for items outside the MFF ceilings.

- 22) Information on the room for borrowing and lending under the own-resources ceiling (headroom) and detailed methodology of calculation. Forecast to 2050 based on current borrowing.
- 23) Detailed updated forecasts of the total expected RAL per Member State, per heading and per program as of December 31, 2027 and as end of each year from 2028 to 2034.
- 24) Depiction of the different actors, timeline and steps in the proposed steering mechanism to set the priorities of the annual budget procedure (step-by-step description).
- 25) More detailed explanation for the loan instruments (Catalyst Europe, the crisis mechanism, loan instruments within Global Europe).
- 26) Outline of the steps for the mobilization of the new crisis mechanism.
- 27) Detailed explanation of the synergies between the different pillars.
- 28) Expectations of ODA share of EU budget, inside and outside MFF, per year in current period and next period.
- 29) Comparison table of IIA with changes of current and newly proposed version with explanations for each change.
- 30) Application guidelines of 20 % flexibility of point 10 IIA, incl. instances where going beyond would be justified (“unless duly justified new circumstances arise, including in relation to the Union’s policy priorities”).
- 31) Overview of gender equality in the Multiannual Financial Framework.

Own resources

- 32) Method of establishing the newly increased OR ceiling. Figures/breakdown on the proposed need for the increase of the headroom. (if not already provided under 22)
- 33) Assumptions regarding the current and proposed new own resources and their projected revenue (incl. expected potential share per Member State).
- 34) Methodology and data (with links to the actual datasets when possible) used to estimate each new own resource.
- 35) Estimates of ETS-revenues generated by allowances to be auctioned and the market value for 2028-2034 and most current revenues by Member State as available. (if not already provided under 34)
- 36) Overview of data sources used for TEDOR, e-waste and CORE. (if not already provided under 34)
- 37) Data on non-collected e-waste by Member State. (if not already provided under 34)
- 38) Number of companies per MS with their annual net turnover in the following categories: from EUR 100 000 000,01 to EUR 249 999 999,99, from EUR 250 000 000 to EUR 499 999 999,99, from EUR 500 000 000 to EUR 749 999 999,99 and EUR 750 000 000 or more), current data. (if not already provided under 34)
- 39) TEDOR: overview of the estimated number of tobacco products per MS until 2034. (if not already provided under 34)
- 40) CBAM: Number of issuances of CBAM allowances until 2034 and share per member state. (if not already provided under 34)
- 41) Estimate of expected fees for ETIAS after adjustment of fees for 2028-2034.
- 42) ETS: Transfers to the SCF until 2034.
- 43) Estimates for the annual growth-rate of the plastic own resource for the years 2025-2034 per Member State and for the EU27 in total. (if not already provided under 34)

- 44) What are the assumptions regarding the level of extra-EU imports and the average tariff rate from 2028-2034. (if not already provided under 34)

NRPPs

- 45) Statistical data used for calculating NRPP allocations (including the general key and the home affairs key).
- 46) Statistical data used for calculating the minimum amount that Member States shall allocate to their less developed regions within NRPP.
- 47) Statistical data used for calculating the financial contribution for each Member State under the Interreg Plan.
- 48) Estimates for the annual growth rate of GNI and GDP in terms of PPS for the years 2025-2028 per Member State and regions at NUTS3-level. (if not already provided under 45)
- 49) Comparison of methodology for cohesion/CAP allocation key and new general key under NRPs.
- 50) Overview of hectares declared as eligible for support under the (“potential eligible area”; claim year 2022) per MS. (if not already provided under 45)
- 51) Overview of current share in the number of total uniform visas applied for short stays (DG HOME) per MS and forecast. (if not already provided under 45)
- 52) Detailed methodology regarding the calculation of direct payments/minimum ringfenced amount for CAP – direct income support per MS.
- 53) Comparison of co-financing of CAP/cohesion in the current MFF (2021-2027) and under the NRPPs in the future MFF proposal (2028-2034). Detailed description of the requirements on member states for co-financing under the NRPPs.
- 54) Complementarities between the Asylum and Migration Fund, the Integrated Border Management Fund, the Internal Security Fund and other EU Funds in the 2028-2034 MFF.
- 55) Explanation of scope (limitation of extra safeguards to NRPP) and functioning (application of the RoL and Charter on Fundamental Rights procedures in the NRPP, including (super)milestones and reallocation resources) of additional RoL framework.

EU Competitiveness Fund

- 56) Descriptive outline of link between HorizonEU and the competitiveness fund.
- 57) InvestEU Programme - comparison of allocations in MFF proposal 2028-2034 to the 2021-2027 corresponding elements.
- 58) Explanation of the synergies in the governance of ECF and Horizon and CEF.

Global Europe

- 59) Comparison of the amounts proposed for the Global Europe instrument 2028-2034 compared to programmes in the current MFF.

Administration

- 60) Detailed estimates of administrative expenditure under Heading 4 for the period 2028-2034, and a comparison to the current MFF (incl. an update with DB2026 (not only in terms of salary increases but also actual number of FTE)). This should also indicate the administrative expenditure changes presented in the Legislative Financial Statements in a compiled form.
- 61) Information about the proposed increase by 2.500 FTE (which DGs, tasks and paygrades). We would expect this to include an overview of needs of the institutions.
- 62) Detailed administrative expenditure outside heading 7/4 (by dissociating administrative expenditure and staff expenditure) for the current and next MFF, per heading and programme; detailed methodology to estimate the need for the next MFF 2028-2034. This fiche should aim to provide the information on individual agencies and other bodies of the Union as well.
- 63) Estimates of the support granted by the EU to and, assigned revenue received by, each Agency for the current and previous MFF, and detailed methodology to calculate this dotation.
- 64) Update of Commission's overview of the active population of the “Pension Scheme of Officials and Other Servants of the European Union” (PSEO) as in WK 17080 2022, with the most recent data. In this context, the Commission is requested to provide the figures of all staff eligible for retirement during the period 2028-2024 specified on an annual basis.
- 65) Overview of major building and renovation projects for the MFF period 2028-2034, detailing their estimated costs.
- 66) To GCS specifically: Forecast of needs of the General Secretariat of the Council for the period 2028-2034 including the full costs of the JL renovation project and any policy staff needs.
- 67) European Schools Expenditure for the Period 2028 – 2034.

Remark: We would kindly ask that all the fiches containing datasets are provided also in an Excel format.