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CONTRIBUTION

From:	General Secretariat of the Council
To:	Ad Hoc Working Party on the Connecting Europe Facility (AHWP CEF)
N° prev. doc.:	ST 12888/25
N° Cion doc.:	ST 11711/25 + ADD 1
Subject:	Proposal for a Regulation of the European Parliament and of the Council establishing the Connecting Europe Facility for the period 2028-2034, amending Regulation (EU) 2024/1679 and repealing Regulation (EU) 2021/1153 - Comments from Poland

Delegates will find attached comments from **Poland** on the subject above.

PL initial comments (general scrutiny reservation)

to the Presidency compromise text of 17th Sept. 2025

= ST 12888/25

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Article 2 – Definitions

- PL proposes the following wording of a 'global project' definition:

'global project' means a ~~large scale cross border~~ project that is broken down into several actions and that benefits from several grant agreements ***within one or various EU programmes.***

Justification:
- 'large scale' is not defined and will cause ambiguity and misinterpretation;
- 'cross-border' narrows down too much;
- by adding 'within one or various EU programmes' becomes clear that different grant agreements may come both from different EU programmes or just one programme (e.g. CEF).

- In line with the proposal to add a new para 3 [Article 3(3)], PL proposes the following definition of a 'geographical balance':

'geographical balance' means the equitable distribution of financial support across the Union, ensuring that projects are not concentrated in a limited number of Member States or regions but contribute to cohesion and accessibility throughout the EU. In particular, it reflects the need to adequately address investment gaps in regions that are less integrated into the trans-European networks, including Member States located on the Union's Eastern flank, which, in the current geopolitical context, play a critical role in strengthening security, resilience and connectivity both within the EU and with its neighbouring countries.

Article 3 - Programme objectives

PL proposes the following amendments to article 3:

- to add a new point (4) to Article 3(2) point (a)(i) as follows [Article 3(2) point (a)(i)(4)]:

(4) missing links on TEN-T network

Justification:

Without explicit indication to the missing links on the TEN-T network, the provisions of Art. 3(2) point (a)(i) leave too much room for interpretation and may mislead both the Member

States and potential beneficiaries. Some may assume that missing links are eligible, others that only cross-border projects are eligible.

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- to add adjective '*interoperable*' to Article 3(2) point (a)(i) as follows:

*actions relating to the projects of common interest with Union dimension relating to the completion of **an interoperable,** smart, resilient, decarbonised and sustainable trans-European transport network;*

Justification:

Interoperability is essential for the efficient functioning of the TEN-T network.

- to add a new para 3 [Article 3(3)] as follows:

3. The Commission and the delegated entity shall ensure an appropriate geographical balance in the allocation of funds under this Programme. The Commission shall also take into account the prevailing geopolitical situation, including the critical importance of strengthening dual-use infrastructure along the eastern external border of the Union.

Justification:

Although the issue of geographical balance has not yet been addressed in the CEF Regulation, we propose regulating it to ensure transparency of the processes, which is also important from the perspective of potential beneficiaries. We also propose emphasizing the importance of strengthening dual-use infrastructure on the EU's eastern border.

Article 9 – Eligibility

PL opts to regulate the issue of expenditure eligibility at the level of CEF3 Regulation. However, if the Member State's role remains unchanged (examination procedure), PL may agree to shift this issue to the work programme level.

PL supports PRES DK proposal to delete para 7 in Article 9.

Article 10 – Complementary rules of grants

PL supports PRES DK amendments.

Article 12 – Work programme

PL strongly supports PRES DK amendments and asks to maintain them in the subsequent compromise versions.

Article 15 – Committee procedure

PL strongly supports PRES DK amendments and asks to maintain them in the subsequent compromise versions.

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