



Council of the European Union  
General Secretariat

**Brussels, 13 October 2025**

**WK 13398/2025 INIT**

**LIMITE**

**EDUC  
JEUN  
SPORT  
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**COMPET  
DIGIT  
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CODEC**

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## **WORKING DOCUMENT**

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<b>From:</b>	General Secretariat of the Council
<b>To:</b>	Education Committee
<b>Subject:</b>	Proposal for a Regulation of the European Parliament and of the Council establishing the Erasmus+ programme for the period 2028-2034, and repealing Regulations (EU) 2021/817 and (EU) 2021/888 (doc. 11748/25) - MS comments

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Following the request for comments on the above proposal set out in WK 12684/2025 INIT, delegations will find attached contributions received from: HR, DE, BE, SK, ES, EE, PL, CY, SE, SI, LT, LU, FI, HU, AT, NL, FR, IT, LV, IE

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

**Guidelines to be followed**

Please kindly provide your contributions in the table below.

**Drafting suggestions:** you may use 'track changes'\* or formatting (for example bold-underline for additions and ~~strike through~~ for deletions, where necessary, in a different colour). \*Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

**Name of document:** please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on ... .docx**

Thank you for your cooperation!

Commission proposal	Drafting suggestions and Comments
ANNEX	EE (Comments): Estonia maintains a scrutiny reservation on the entire document FR (Comments): The French delegation indicates that, due to the short notice to analyse the articles added to the agenda, it has a scrutiny reservation regarding recitals.
Proposal for a	IT (Comments): <b>COMMENTS OF THE ITALIAN DELEGATION</b>

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Commission proposal	Drafting suggestions and Comments
<b>REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL</b>	
<b>establishing the Erasmus+ programme for the period 2028-2034, and repealing Regulations (EU) 2021/817 and (EU) 2021/888</b>	
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	
Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 165(4), 166(4) and 214(5) thereof,	
Having regard to the proposal from the European Commission,	
After transmission of the draft legislative act to the national parliaments,	
Having regard to the opinion of the European Economic and Social Committee <sup>1</sup> ,	
Having regard to the opinion of the Committee of the Regions <sup>2</sup> ,	

<sup>1</sup> OJ C , , p. .

<sup>2</sup> OJ C , , p. .

Commission proposal	Drafting suggestions and Comments
Acting in accordance with the ordinary legislative procedure,	
	<p>HU (Comments):</p> <p>In general, we would like to highlight that mobility is first mentioned in Recital 4. As we have stressed before, the primary objective of the Programme is mobility in our opinion. Therefore we would like to include a paragraph about learning mobility among the first recitals.</p>
Whereas:	
<p>(1) The Union needs to support and prepare its people, starting from an early age, with the knowledge, skills and competences needed for success in learning, work, and life. To enable this, the Union needs performing, agile, innovative and inclusive education and training systems, able to nurture, attract and retain talent, to keep up with the pace and scope of the ongoing societal, digital, environmental and economic transformations, respond to the demographic challenges and the society's and economy's skills needs, bridge skills gaps and satisfy industry needs in critical sectors.</p>	<p>LV (Drafting suggestions):</p> <p>(1) The Union needs to support and prepare its people, starting from an early age, with the knowledge, skills and competences needed for success in learning, work, and life. To enable this, the Union needs performing, agile, innovative and inclusive education and training systems, able to nurture, attract and retain talent, to keep up with the pace and scope of the ongoing societal, digital, environmental and economic transformations, respond to the demographic challenges and the society's and economy's skills needs, <b>and</b> bridge skills gaps <del>and satisfy industry needs in critical sectors.</del></p> <p>LV (Comments):</p> <p>Whis should refer to areas which this programme can influence directly.</p> <p>DE (Drafting suggestions):</p> <p>( DE</p>

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	<p>(Comments):</p> <p>.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>The Union needs to support and prepare its people, starting from an early age, with the knowledge, skills and competences needed for success in learning, work, and life. To enable this, the Union needs high-quality performing, agile, innovative and inclusive education and training systems, able to nurture, attract and retain talent, to keep up with the pace and scope of the ongoing societal, digital, environmental and economic transformations, respond to the demographic challenges and the society's and economy's skills needs, bridge skills gaps and satisfy industry needs in critical sectors</p> <p>EE</p> <p>(Comments):</p> <p>Estonia would like to highlight that education and training systems should be of high quality, as this is essential for ensuring their effectiveness and long-term impact</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>(1) The Union needs to support and prepare its people, starting from an early age, with the knowledge, skills and competences needed for success in learning, work, and life <u>covering health literacy.</u></p> <p>IT</p> <p>(Comments):</p> <p>We propose to highlight from the beginning an indirect reference to physical well-being as an outcome enabled by health literacy, a competence</p>

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	<p>developed through Erasmus+ activities in the sport field. Using this term aligns with the Union’s approach to (HEPA) health-enhancing physical activity and sport, and with the EU Work Plan for Sport 2024–2027, which calls for coordinated action between education, youth and sport.”</p>
<p>(2) The Union is a community of values rooted in Europe's history and identity and anchored in the Treaty on the EU. Understanding those values, including fundamental rights and democracy, is an essential life skill and key to participation in the political debate and decision making. Education and training, youth and sport activities help equip citizens with the skills and competences to thrive, actively and meaningfully participate in democratic life and in the society overall, and help people connect around and defend shared values.</p>	<p>AT  <b>(Drafting suggestions):</b>                      “(...) in the fields of education and training, <u>volunteering</u>, youth and sport”</p> <p>AT  <b>(Comments):</b>                      Add “volunteering”</p> <p>CY  <b>(Drafting suggestions):</b>                      Education and training, youth and sport activities help equip citizens with the skills and competences to <del>thrive</del>, actively and meaningfully participate in democratic life and in the society overall, and help people connect around and defend shared values.</p> <p>CY  <b>(Comments):</b>                      The term ‘thrive’ may be too strong in this context, as it suggests a guaranteed outcome. We would recommend considering a softer alternative, since while the programme can motivate and inform young people about the importance of democratic participation, it cannot, on its own, ensure such an outcome. The activities (e.g., in education, training, youth, and sport) can certainly help equip citizens with valuable skills and competences to actively and meaningfully participate in democratic life and in society overall, and to connect around and defend shared values.</p> <p>FR</p>

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	<p><b>(Drafting suggestions):</b></p> <p>The Union is a community of values rooted in Europe's history and identity and anchored in the Treaty on the EU. Understanding those values, including fundamental rights and democracy, is an essential life skill and key to participation in the political debate and decision making. Education and training, youth and sport activities help equip citizens with the skills and competences to thrive, actively and meaningfully participate in democratic life and in the society overall, <b>enhance healthy lifestyle</b> and help people connect around and defend shared values.</p> <p>FR</p> <p><b>(Comments):</b></p> <p>FR delegation would like to include this part in order to emphasize that sport also serves as a vector for promoting a healthy lifestyle, which is one of the EU's objectives in the field of sport. The notion of "healthy lifestyle" addresses several interconnected issues (health, environment, social activities, etc.) and shows that citizens' flourishing relies not only on the development of skills and competences, but also on broader dimensions of well-being</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>Understanding those values, including fundamental rights and democracy, is <del>an</del> essential <b>for the development of</b> life skills and <b>is</b> key to participation in the political debate and decision making.</p> <p>IT</p> <p><b>(Comments):</b></p> <p>We revised the wording to clarify that "understanding those values" is a prerequisite rather than a life skill. It underpins the development of EU key competences, that ensure participation in the political debate etc. This also</p>

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	<p>improves coherence with the following sentence, which explains how these competences are developed via education, youth and sport activities.</p> <p>SK  <b>(Drafting suggestions):</b>                      2. The Union is a community of values rooted in Europe's history and identity and anchored in the Treaty on the EU. Understanding those values, including fundamental rights and democracy, is <del>an essential life skill and</del> key to participation in the political debate <del>and decision making</del>. Education and training, youth and sport activities help equip citizens with the skills and competences to thrive, actively and meaningfully participate in democratic life and in the society overall, and help people connect around and defend shared values</p>
<p>(3) The Union is built on solidarity, both among its citizens and among the Member States. That universal value guides the actions of the Union and provides the unity necessary to cope with societal challenges, which individuals are willing to help address in practice, notably through volunteering.</p>	<p>HU  <b>(Drafting suggestions):</b>                      The Union is built on solidarity, both among its citizens and among the Member States. That universal value guides the actions of the Union and provides the unity necessary to cope with societal challenges, which individuals are willing to help address in practice, notably through volunteering <b>and solidarity action</b>.</p> <p>HU  <b>(Comments):</b>                      In Recital 3, 7, 11, 20, and 33 we would like to add solidarity action as well to the wording after volunteering.</p> <p>NL  <b>(Drafting suggestions):</b>                      The Union is built on solidarity, both among its citizens and among the Member States. That universal value guides the actions of the Union and</p>

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	<p>provides the unity necessary to cope with societal challenges, which individuals are willing to help address in practice, notably through volunteering and solidarity activities.</p> <p>SK (Drafting suggestions):</p> <p>3. The Union is built on solidarity, <del>both among its citizens and among the Member States</del>. That universal value guides the actions of the Union and provides the unity necessary to cope with societal challenges, which individuals are willing to help address in practice, notably through volunteering.</p> <p>SK (Comments):</p> <p>Not relevant in context of volunteering.</p>
<p>(4) It is essential that all people, irrespective of their personal, social, economic or cultural background, have the opportunity to participate in a mobility experience abroad from an early age, when values and attitudes are formed and when individuals are most receptive to new experiences and influences. Early exposure to different environments, cultures, languages and ways of life can help to break down stereotypes, promote intercultural understanding, and instil values of respect, tolerance and solidarity, thereby contributing to a more united and harmonious Europe.</p>	<p>LV (Drafting suggestions):</p> <p>(4) It is essential that all people, irrespective of their personal, social, economic or cultural background, have the opportunity to participate in a mobility experience abroad.</p> <p>LV (Comments):</p> <p>Split recital as first part should refer and be relevant to anyone. Second recital can focus on benefits from early mobility experiences.</p> <p>ES (Comments):</p> <p>This is the first recital where mobility is mentioned. We believe that mobility is at the heart of the Erasmus+ programme and is not only its most emblematic action but also one of its main objectives: to facilitate exchange,</p>

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	<p>knowledge and understanding between people from different cultures and countries through mobility experiences.</p> <p>IT (Drafting suggestions):</p> <p>It is essential that all people, irrespective of their personal, social, economic or cultural background, have the opportunity to participate in a mobility experience abroad from an early age, when values and attitudes are formed and when individuals are most receptive to new experiences and influences. Early exposure to different environments, cultures, languages and ways of life can help to break down stereotypes, promote intercultural understanding, and instil values of respect, tolerance and solidarity, thereby contributing to a more united and harmonious Europe.</p> <p><b>To this end, equitable and inclusive access to learning mobility should be promoted by removing economic, social, physical and cultural barriers and by providing appropriate financial, linguistic, psychological and logistical support. Such experiences should also contribute to fostering European citizenship, intercultural dialogue, environmental sustainability and the promotion of the Union’s common values. The skills and knowledge acquired through these experiences should be recognised and validated through European instruments. Promoting virtual and blended mobility can further broaden participation, reduce inequalities and ensure equal opportunities for transnational learning for all.</b></p> <p>IT (Comments):</p> <p>We suggest including: <b>To this end, equitable and inclusive access to learning mobility should be promoted by removing economic, social, physical and cultural barriers and by providing appropriate financial, linguistic, psychological and logistical support. Such experiences should also contribute to fostering European citizenship, intercultural dialogue, environmental</b></p>

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	sustainability and the promotion of the Union's common values. The skills and knowledge acquired through these experiences should be recognised and validated through European instruments. Promoting virtual and blended mobility can further broaden participation, reduce inequalities and ensure equal opportunities for transnational learning for all.
	<p>LV (Drafting suggestions):</p> <p>(4) Mobility experience abroad from an early age, when values and attitudes are formed and when individuals are most receptive to new experiences and influences, <b>can be particularly influential</b>. Early exposure to different environments, cultures, languages and ways of life can help to break down stereotypes, promote intercultural understanding, and instil values of respect, tolerance and solidarity, thereby contributing to a more united and harmonious Europe.</p>
<p>(5) Building inclusive, cohesive and resilient societies, and sustaining the competitiveness of the Union requires investing in learning opportunities for all, regardless of background and means, in cooperation between Member States and organisations active in the field, and in innovative policy development in the fields of education and training, youth and sport. Such an investment also contributes to strengthening European identity, fundamental rights and values and a more democratic Union.</p>	<p>AT (Drafting suggestions):</p> <p>“(…) in the fields of education and training, <b>volunteering</b>, youth and sport”</p> <p>AT (Comments):</p> <p>Add “volunteering”</p> <p>ES (Drafting suggestions):</p> <p>5. Building inclusive, cohesive and resilient societies, and sustaining the competitiveness of the Union requires investing in learning opportunities for all, regardless of background and means, in cross-border cooperation between Member States and organisations active in the field, and in</p>

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	<p>innovative policy development in the fields of education and training, youth and sport. Such an investment contributes significantly to strengthening European identity, fundamental rights and values and a more democratic Union.</p> <p>ES (Comments):</p> <p>It should be made clear that Erasmus+ fosters cross-border mobility actions and cooperation. It does not fund national actions or reforms.</p> <p>Besides, we propose placing greater emphasis on the fact that strengthening European identity and democratic values is one of the programme's main priorities and one of its most notable achievements, as demonstrated by successive evaluations. Few European programmes have as much EU added value. We should not be afraid to highlight this.</p> <p>FR (Drafting suggestions):</p> <p>Building inclusive, cohesive and resilient societies, and sustaining the competitiveness of the Union requires investing in learning opportunities for all, regardless of background and means, in cooperation between Member States and organisations active in the field, and in innovative policy development in the fields of education and training, youth and sport. Such an investment also contributes to strengthening European identity, <u>citizens' well-being</u>, fundamental rights and values and a more democratic Union.</p> <p>SK (Drafting suggestions):</p> <p>5. Building inclusive, cohesive and resilient societies, and sustaining the competitiveness of the Union requires investing in learning opportunities for all, <u>regardless of background and means</u>, in cooperation between Member States and organisations active in the field, and in innovative policy</p>

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	<p>development in the fields of education and training, youth and sport. Such an investment also contributes to strengthening European identity, fundamental rights and values and a more democratic Union.</p> <p>SK (Comments): Background and means of investment are always taken into account.</p>
<p>(6) In line with the EU Preparedness Union Strategy<sup>3</sup>, preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions to play a key role in fostering digital and media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU must engage actively to prevent crises and to be sufficiently prepared to respond to them.</p>	<p>IE (Drafting suggestions): LAST SENTENCE: People, <b>civil society organisations</b>, and communities across the EU must engage actively to prevent crises and to be sufficiently prepared to respond to them.</p> <p>IE (Comments): IE would welcome the inclusion of ‘civil society organisations here so they are key actors in delivering on the EU Preparedness Union Strategy</p> <p>HU (Drafting suggestions): In line with the EU Preparedness Union Strategy , preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions to play a key role in fostering digital and media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU <b>should</b> <del>must</del> engage actively to prevent crises and to be sufficiently prepared to respond to them.</p>

3 Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Preparedness Union Strategy (Join/2025/130 final)).

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	<p>HU (Comments):</p> <p>In the last sentence of Recital 6, we feel that the term “must” is a bit strong as it does not appear at all in the current Regulation. Therefore we suggest a softer wording, for example “should”. Furthermore this sentence is addressed for people and communities, which of course have a crucial role, but in our view it is rather authorities and governments that have the proper tools to prevent crisis, not them.</p> <p>IT (Drafting suggestions):</p> <p>In line with the EU Preparedness Union Strategy<sup>4</sup>, preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions <b>at all levels and across all programme sectors</b> to play a key role in fostering digital and media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU must engage actively to prevent crises and to be <del>sufficiently</del> <b>adequately</b> prepared to respond to them.</p> <p>IT (Comments):</p> <p>We suggest to add a sentence. By stating “at all levels and across all programme sectors”, the text expressly covers actors at national, regional and local level across education and training, youth and sport, therefore broadening the bottom-up scope and implicitly including grassroots organisations which are central to this approach in the Sport sector.</p>

<sup>4</sup> Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Preparedness Union Strategy (Join/2025/130 final).

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	<p>Moreover, we propose to adjust wording for clarity using “adequately prepared”, instead of sufficiently prepared.</p> <p>SK (Drafting suggestions):</p> <p>6. In line with the EU Preparedness Union Strategy<sup>3</sup>, preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions to play a key role in fostering digital and media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU must engage actively to prevent crises and to be sufficiently prepared to respond to crises.</p> <p>SK (Comments):</p> <p>Not relevant in the sentence.</p>
<p>(7) Common areas of action and objectives between the 2021-2027 European Solidarity Corps and Erasmus+ programmes highlight the potential for enhanced synergy and regulatory coherence. Bringing all learning mobility, volunteering, cooperation and active citizenship opportunities together provides a single-entry point to all opportunities offered by the Union for young people and organisations active in the field of youth, allowing for a more coordinated and effective approach, and easier access for potential participants and beneficiaries.</p>	<p>IE (Comments):</p> <p>IE welcomes the proposed simplification of the EU youth programmes and particularly the motivation to reduce the administrative burden. This has been something highlighted by one of our national agencies and national evaluation reports as being a barrier to participation in the programmes. However, IE is still concerned about the lack of a dedicated chapter focusing on youth or a ringfenced fund for youth in the proposal. This may lead to a situation where there is competition between youth initiatives and other initiatives.</p> <p>IE also regrets the removal of the three familiar key actions from the last programme. Each Key Action previously responded to distinct needs in the</p>

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	<p>youth field. Removing the Key Actions risks undermining the interconnected system that they create, and by extension those in the youth sector that count on it.</p> <p>BE <b>(Drafting suggestions):</b> FIC &amp; GsC Youth: Common <b>and complementary</b> areas of action and objectives between the 2021-2027 European Solidarity Corps and Erasmus+ programmes highlight the potential for enhanced synergy and regulatory coherence. Bringing all learning mobility, volunteering, cooperation and active citizenship opportunities together provides a single-entry point to all opportunities offered by the Union for young people and organisations active in the field of youth, allowing for a more coordinated and effective approach, and easier access for potential participants and beneficiaries</p> <p>BE <b>(Comments):</b> Add complementary</p> <p>DE <b>(Drafting suggestions):</b> Common areas of action and objectives between the 2021-2027 European Solidarity Corps and Erasmus+ programmes <b>but also with the “Aim, Learn, Master, Achieve” (ALMA) initiative</b>, highlight the potential for enhanced synergy and regulatory coherence. Bringing all learning <b>and social inclusion</b> mobility, volunteering, cooperation and active citizenship opportunities together provides a single-entry point to all opportunities offered by the Union for young people and organisations active in the field of youth, allowing for a more coordinated and effective approach, and easier access for potential participants and beneficiaries.</p>

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	<p>DE <b>(Comments):</b></p> <p>We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve” (ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management. ALMA would highly contribute to the specific objectives of Erasmus+, especially N°1: <i>“support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</i></p> <p>HU <b>(Drafting suggestions):</b></p> <p>Common areas of action and objectives between the 2021-2027 European Solidarity Corps and Erasmus+ programmes highlight the potential for enhanced synergy and regulatory coherence. Bringing all learning mobility, volunteering, <b>solidarity action</b>, cooperation and active citizenship opportunities together provides a single-entry point to all opportunities offered by the Union for young people and organisations active in the field of youth, allowing for a more coordinated and effective approach, and easier access for potential participants and beneficiaries.</p> <p>HU <b>(Comments):</b></p> <p>See above in Recital 3.</p>

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	<p>SI (Comments): Regarding the single-entry point we share the concern that this approach could potentially introduce additional technical challenges.</p>
<p>(8) In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training and also in the fields of youth and sport (the ‘Programme’), as the successor to the 2021-2027 Erasmus+<sup>5</sup> and European Solidarity Corps<sup>6</sup> Programmes, which encompasses actions in the field of education and training, youth and sport and sets up the European Voluntary Humanitarian Aid Corps.</p>	<p>IE (Drafting suggestions): Education, training, youth and sport (the ‘Programme’)</p> <p>IE (Comments): IE would like to see the removal of ‘<i>and also in the field of</i>’ to ensure equity across all sectors.</p> <p>AT (Drafting suggestions): In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training, <del>and also in the fields of</del> youth and sport (the ‘Programme’), as the successor to the 2021-2027 Erasmus+<sup>7</sup> and European Solidarity Corps<sup>8</sup> Programmes, which encompasses actions in the field of education and training, <b>volunteering</b>, youth and sport and sets up <b>the</b></p>

5 Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport (OJ L 189, 28.5.2021).

6 Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme (OJ L 202, 8.6.2021).

7 Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport (OJ L 189, 28.5.2021).

8 Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme (OJ L 202, 8.6.2021).

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	<p><b>European Solidarity Corps and</b> the European Voluntary Humanitarian Aid Corps.</p> <p><b><u>The integration of the European Solidarity Corps into the Programme shall preserve the principles of solidarity, volunteering and civic engagement that characterise it, and ensure continuity, accessibility and quality, in particular for young people with fewer opportunities and for grassroots organisations implementing volunteering and solidarity activities.</u></b></p> <p>CY <b>(Drafting suggestions):</b></p> <p>In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training <del>and also in the fields</del> of youth and sport (the ‘Programme’), as the successor to the 2021-2027 Erasmus+<sup>9</sup> and European Solidarity Corps<sup>10</sup> Programmes, which encompasses actions in the field of education and training, youth and sport and sets up the European Voluntary Humanitarian Aid Corps.</p> <p>CY <b>(Comments):</b></p> <p>As proposed in the articles</p> <p>DE <b>(Comments):</b></p> <p>We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve”</p>

<sup>9</sup> Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport (OJ L 189, 28.5.2021).

<sup>10</sup> Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme (OJ L 202, 8.6.2021).

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>(ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management.</p> <p>ES <b>(Drafting suggestions):</b></p> <p>8. In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training, youth and sport (the ‘Programme’), as the successor to the 2021-2027 Erasmus+ and European Solidarity Corps Programmes, which encompasses actions in the field of education and training, youth and sport and sets up the European Voluntary Humanitarian Aid Corps.</p> <p>ES <b>(Comments):</b></p> <p>We suggest removing “and also in the fields of”, in accordance with what we proposed for art. 1.</p> <p>HU <b>(Drafting suggestions):</b></p> <p>In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training, <del>and also in the fields of</del> youth and sport (the ‘Programme’), as the successor to the 2021-2027 Erasmus+ and European Solidarity Corps Programmes, which encompasses actions in the field of education and training, youth and sport and sets up the European Voluntary Humanitarian Aid Corps.</p> <p>HU <b>(Comments):</b></p> <p>Like in the case of Article 1, in Recital 8, we believe that the youth and sport sectors are just as integral parts of the Programme as education and training are, so we would like to request the following wording instead.</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>IT <b>(Drafting suggestions):</b></p> <p>In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training <del>and also in the fields of youth and sport (the 'Programme')</del>, as the successor to the 2021-2027 Erasmus+<sup>11</sup> and European Solidarity Corps<sup>12</sup> Programmes, which encompasses actions in the field of education and training, youth and sport and sets up the European Voluntary Humanitarian Aid Corps.</p> <p>IT <b>(Comments):</b></p> <p>In line with our comments on Article 1, we suggest making a related change in this 'Whereas' clause as well, to ensure that the draft Regulation reflects a balanced consideration of all Erasmus+ sectors (Education and Training, Youth, Sport).</p> <p>Furthermore, <b>Italy does not support the proposed integration of the European Solidarity Corps into Erasmus+</b>, considering very important to preserve the distinct identities, objectives, and visibility of the two programmes.</p> <p>SK <b>(Drafting suggestions):</b></p> <p>8. In this context, it is necessary to establish Erasmus+ 2028-2034, the Union Programme for education and training and also in the fields of youth and</p>

<sup>11</sup> Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport (OJ L 189, 28.5.2021).

<sup>12</sup> Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme (OJ L 202, 8.6.2021).

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>sport (the 'Programme'), as the successor to the 2021-2027 Erasmus+<sup>4</sup> and European Solidarity Corps<sup>5</sup> Programmes, which encompasses actions in the field of education and training, youth and sport and <del>sets up</del> <b>incorporates</b> the European Voluntary Humanitarian Aid Corps.</p> <p>SK  <b>(Comments):</b>                      EVHAC are not set up in next programme period by this regulation proposal.</p>
	<p>LV  <b>(Drafting suggestions):</b>  <b>(8)<sup>1</sup> The programme should support the educational, personal and professional development through lifelong learning, while promoting well-being, inclusion, active participation in society, thereby contributing to competitiveness, social cohesion and the labour market.</b></p> <p>LV  <b>(Comments):</b>                      We propose to include a clearly stated goal of the programme we are flexible about wording.</p>
<p>(9) In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a more flexible multiannual financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.</p>	<p>IE  <b>(Drafting suggestions):</b>                      In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a <del>more</del> flexible multiannual financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.</p>

Commission proposal	Drafting suggestions and Comments
	<p>IE (Comments): Removal of ‘more’</p> <p>LV (Drafting suggestions): (9) In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a more flexible multiannual financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, <b>adopted by the Council conclusions</b> and <b>the European Parliament resolutions</b>, while ensuring sufficient predictability for the budget implementation.</p> <p>LV (Comments): The scope of the work of Council that have to be taken into account should not be limited only to Conclusions.</p> <p>AT (Drafting suggestions): financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, <b>adopted by the # Council conclusions</b> and <b>European Parliament resolutions</b>, while ensuring sufficient predictability for the budget implementation. financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, in Council conclusions and</p>

Commission proposal	Drafting suggestions and Comments
	<p>European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.</p> <p>AT (Comments):</p> <p>Recital should underline the crucial role of the Council when it comes to education policies as it is a national competence.</p> <p>CY (Comments):</p> <p>The term ‘sufficient predictability’ is too vague and should be clarified. It would be more appropriate to define specific limits or parameters, for example by specifying a maximum percentage by which allocations may change, in order to ensure greater certainty and transparency in budget implementation.</p> <p>DE (Drafting suggestions):</p> <p>(9)</p> <p>ES (Drafting suggestions):</p> <p>9. In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a more flexible multiannual financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient transparency and predictability for the budget implementation, with the participation of the Member States in deciding how the budget is allocated.</p> <p>ES</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>We believe it should be made clear that flexibility cannot lead to less transparency or less involvement of Member States in decision-making regarding the implementation of the Programme and the budget allocations (comitology).</p> <p>HU</p> <p><b>(Comments):</b></p> <p>We believe that we also have Council resolutions, decisions, recommendations etc., so we propose a more general wording to the documents adopted by the Council.</p> <p>NL</p> <p><b>(Drafting suggestions):</b></p> <p>In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a flexible multiannual financial framework and Union spending programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.</p> <p>NL</p> <p><b>(Comments):</b></p> <p>Although flexibility is important, a certain degree of predictability is also important in order to be able to implement various components of E+ effectively. Moreover, the sector is highly diverse. It takes time and effort on the part of the NA to set out a specific course of action. A compromise would therefore be to delete the word “more.”</p> <p>SI</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>We believe that a flexible multiannual financial framework should balance visibility with adequate room for planning.</p> <p>SK</p> <p><b>(Drafting suggestions):</b></p> <p>9. In a rapidly changing economic, social and geopolitical environment, experience has shown the need for a more flexible multiannual financial framework and Union-spending <b>implementation</b> programmes. To that effect, and in line with the objectives of the Erasmus+ programme, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.</p> <p>SK</p> <p><b>(Comments):</b></p> <p>The goal is not to spend the budget, it's just a means.</p>
	<p>IE</p> <p><b>(Comments):</b></p> <p>IE believes that a recital on the European Education Area should proceed recital 10.</p>
<p>(10) The Programme should support the implementation of the Union of Skills<sup>13</sup> and the overall strategic frameworks for Union policy cooperation in the fields of education and training, including the policy agendas for school education, higher education, vocational education and training and adult</p>	<p>IE</p> <p><b>(Comments):</b></p>

13 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

Commission proposal	Drafting suggestions and Comments
<p>learning, including up-skilling and re-skilling, to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p>	<p>HEA- We support the further reinforcement of basic skills and STEM competencies, in line with the Union of Skills initiative, as an important step in strengthening employability, innovation and competitiveness</p> <p>LV (Drafting suggestions):</p> <p>(10) The Programme should support <del>the implementation of the Union of Skills<sup>14</sup> and the overall</del> strategic frameworks for Union <del>policy</del> cooperation in the fields of education and training, <del>including as well as</del> the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling and <b>the implementation of the Union of Skills<sup>15</sup></b>, to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>LV (Comments):</p> <p>There is only one Strategic Framework for cooperation in education and training, which should be clearly used as the primary reference (even if the current one is at the moment confirmed only until 2030). Other documents can be referred to as political agendas or otherwise. European Education Area can be mentioned here.</p> <p>AT (Drafting suggestions):</p> <p>The Programme should support the implementation of the <b>European Education Area</b> and the overall strategic frameworks for Union policy cooperation in the fields of education and training, including the policy</p>

14 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

15 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, to allow citizens to develop competences and skills at all stages of their life to thrive in society, <b>and the Union of Skills</b><sup>16</sup>.</p> <p>AT (Comments):</p> <p>Erasmus+ ist an educational programme and is the basis for the European Education Area and ET 2030. Therefore, those two need to be mentioned before the Union of Skills.</p> <p>BE (Drafting suggestions):</p> <p>(10) The Programme should support the implementation of the <b>European Education Area</b>, of the Union of Skills</p> <p>BE (Comments):</p> <p>In this paragraph, we want to make a reference to the European Education Area as it is in line with agreed upon Council policy. We want to remind everyone that the Union of Skills is only a communication from the Commission, and has not been formally endorsed by the Council.</p> <p>CY (Drafting suggestions):</p> <p>..The Programme should support the implementation of the Union of Skills<sup>17</sup> and the overall strategic frameworks for Union policy cooperation in the fields of education and training, including the policy agendas for school</p>

<sup>16</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

<sup>17</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, <del>to allow citizens to develop competences and skills at all stages of their life to thrive in society.</del> <b><u>to enable citizens to develop the competences and skills needed at all stages of life to actively participate and contribute to society.</u></b></p> <p>CY (Comments): We propose an alternative to the deleted sentence, replacing 'thrive' with a more precise formulation, as 'thrive' implies a guaranteed outcome. The revised wording emphasizes enabling citizens to develop the skills and competences necessary to actively participate in and contribute to society, which more accurately reflects the programme's role.</p> <p>DE (Drafting suggestions): (10)</p> <p>EE (Drafting suggestions): The Programme should support the implementation of the European Education area and Union of Skills<sup>18</sup> the overall, including the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>EE (Comments):</p>

<sup>18</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

Commission proposal	Drafting suggestions and Comments
	<p>First and foremost, we would like to emphasise that the programme should support progress towards the European Education Area.</p> <p>ES (Drafting suggestions):</p> <p>10. The Programme should support the implementation of the Union of Skills and the strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030)<sup>19</sup> and its successor after 2030, as well as the overall strategic agendas for Union policy cooperation in the fields of education and training, including the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>ES (Comments):</p> <p>Is necessary to expressly mention the strategic framework for European cooperation in education and training (and the legal reference in a footnote). An inter-sectoral initiative such as the Union of Skills is very valuable, but we do not consider it appropriate to limit educational priorities solely to those proposed in the Commission's Communication when we have a strategic framework agreed between Member States (with exclusive competences on education and training).</p> <p>HU (Comments):</p>

<sup>19</sup> Council Resolution on a strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030) 2021/C 66/01 (OJ C 66, 26.2.2021, pp. 1–21).

Commission proposal	Drafting suggestions and Comments
	<p>In Recital 10 the Union of Skills is mention while the EEA is first mentioned in Recital 24. In general we would like to have a referelce to the EEA first, before the UoS.</p> <p>IT  <b>(Drafting suggestions):</b></p> <p>(10) The Programme should support the implementation of the <b>European Education Area and the Union of Skills</b><sup>20</sup> and the overall strategic frameworks for Union policy cooperation in the fields of education and training [REDACTED], including the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, <b>and in the sport field</b> to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>IT  <b>(Comments):</b></p> <p>We suggest to add “and sport” and “and in the sport field” to ensure balance among.</p> <p>We suggest first highlighting the program's role in developing the European Education Area, and subsequently its contribution to the implementation of the Union of Skills.</p> <p>LT  <b>(Drafting suggestions):</b></p> <p>The Programme should support the implementation of <del>the Union of Skills</del><sup>21</sup> <del>and</del> the overall strategic frameworks for Union policy cooperation in the</p>

<sup>20</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

<sup>21</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

Commission proposal	Drafting suggestions and Comments
	<p>fields of education and training, including the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>LT (Comments): We support those MS which prioritise the EU strategic framework/EEA.</p> <p>NL (Drafting suggestions): The Programme should support the implementation of the European Education Area, Union of Skills<sup>22</sup> and the overall strategic frameworks for Union policy cooperation in the fields of education and training, youth and sports including the policy agendas for school education, higher education, vocational education and training and adult learning, including up-skilling and re-skilling, youth and sports and the recognition of the role of non-formal and informal learning to allow citizens to develop competences and skills at all stages of their life to thrive in society.</p> <p>NL (Comments): We are missing references to the European Education Area. Furthermore, the youth and sports sector are missing in this paragraph.]</p> <p>SI (Comments): We would like to add the reference on the EEA and relevant balance between both initiatives.</p>

<sup>22</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions the Union of Skills (COM/2025/90 final).

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>(11) In line with the EU Youth Strategy<sup>23</sup>, the European Youth Work Agenda<sup>24</sup> and the 2024 Communication on the legacy of the European Year of Youth 2022<sup>25</sup>, the Programme should support meaningful participation of young people and youth organisations in decision and policy making, youth mainstreaming across policy fields, the validation of non-formal and informal learning, high-quality youth work and competence development of youth workers. The programme will continue to support all young people to participate in learning mobility and non-formal learning mobility, including youth exchanges and youth participation activities, with the objective to engage and empower young people to acquire and develop competences for life and their professional future, to become active citizens and participate in economic, social, cultural, democratic and political life, and to connect them to the European project and contribute to building an inclusive, competitive and resilient Union.</p>	<p>IE (Drafting suggestions): In line with the EU Youth Strategy <b>The Programme should support the implementation of the EU Youth Strategy</b>, the European Youth Work Agenda and the 2024 Communication on the legacy of the European Year of Youth 2022 , the Programme should support meaningful participation of young people and youth organisations in decision and policy making, youth mainstreaming across policy fields, the validation of non-formal and informal learning, high-quality youth work and competence development of youth workers. The programme will continue to support all young people to participate in learning mobility and non-formal learning mobility, including youth exchanges, <del>and</del> youth participation <b>and solidarity</b> activities, with the objective to engage and empower young people to acquire and develop competences for life and their professional future, to become active citizens and participate in economic, social, cultural, democratic and political life, and to connect them to the European project and contribute to building an inclusive, competitive and resilient Union.</p> <p>IE</p>

- 23 Resolution of the Council of the European Union and the Representatives of the Governments of the Member States meeting within the Council on a framework for European cooperation in the youth field: The European Union Youth Strategy 2019-2027 (OJ C 456, ST/14944/2018/INIT, 18.12.2018).
- 24 Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the Framework for establishing a European Youth Work Agenda 2020/C 415/01 (OJ C 415, 1.12.2020).
- 25 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Year of Youth 2022 (COM/2024/1 final, <https://eur-lex.europa.eu/legal-content/en/txt/?uri=celex:52024dc0001>)

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>IE would like to see a clear reference to EU Youth Strategy would like to see the inclusion of solidarity activities.</p> <p>Is it possible to reference strategies that will succeed this one?</p> <p>LV</p> <p><b>(Comments):</b></p> <p>What are the options to refer to successors of European Youth Strategy and EU Work Plan for Sport in the footnotes 9 and 12? If MFF negotiations go smoothly, the final version of the programme may be adopted before work on next strategic documents for youth and sport are finalized.</p> <p>BE</p> <p><b>(Drafting suggestions):</b></p> <p>FIC &amp; GsC Youth: In line with the EU Youth Strategy , the European Youth Work Agenda and the 2024 Communication on the legacy of the European Year of Youth 2022 , the Programme should support meaningful participation of young people and youth organisations in decision and policy making, youth mainstreaming across policy fields, the validation of non-formal and informal learning, high-quality youth work and competence development of youth workers. The programme will continue to support all young people to participate in learning mobility and non-formal learning mobility, including youth exchanges, <b>volunteering, solidarity actions</b>, and youth participation activities, with the objective to engage and empower young people to acquire and develop competences for life and their professional future, to become active citizens and participate in economic, social, cultural, democratic and political life, <del>and to</del> <b>as this</b> connect them to the European project and contribute to building an inclusive, competitive and resilient Union.</p> <p>BE</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>FIC &amp; GsC Youth: for the youth sector, recital 11 is definitely one of the most important ones, as it refers to our specific policy documents, strategies and agendas. Recital 11 should therefore also be a strong argument and statement for the causes of the youth sector. → in line with previous intraBE position re. the importance of links between the programme and policies.</p> <p>DE</p> <p><b>(Drafting suggestions):</b></p> <p>(11) In line with the EU Youth Strategy, the European Youth Work Agenda and the 2024 Communication on the legacy of the European Year of Youth 2022, the Programme should support meaningful participation of young people and youth organisations in decision and policy making <b>including the EU Youth dialogue</b>, youth mainstreaming across policy fields, (...)</p> <p>DE</p> <p><b>(Comments):</b></p> <p>We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and of the the “Aim, Learn, Master, Achieve” (ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management.</p> <p>EE</p> <p><b>(Drafting suggestions):</b></p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>In line with the EU Youth Strategy<sup>26</sup>, the European Youth Work Agenda<sup>27</sup> and the 2024 Communication on the legacy of the European Year of Youth 2022<sup>28</sup>, the Programme should support meaningful participation of young people and youth organisations in decision and policy making, youth mainstreaming across policy fields, the validation of non-formal and informal learning, high-quality youth work and competence development of youth workers. The programme will continue to support all young people to participate in learning mobility and non-formal learning activities, including youth exchanges and youth participation activities, youth volunteering and solidarity activities with the objective to engage and empower young people to acquire and develop competences for life and their professional future, to become active citizens and participate in economic, social, cultural, democratic and political life, and to connect them to the European project and contribute to building an inclusive, competitive and resilient Union.</p> <p>HU (Drafting suggestions):</p>

<sup>26</sup> Resolution of the Council of the European Union and the Representatives of the Governments of the Member States meeting within the Council on a framework for European cooperation in the youth field: The European Union Youth Strategy 2019-2027 (OJ C 456, ST/14944/2018/INIT, 18.12.2018).

<sup>27</sup> Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the Framework for establishing a European Youth Work Agenda 2020/C 415/01 (OJ C 415, 1.12.2020).

<sup>28</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Year of Youth 2022 (COM/2024/1 final, <https://eur-lex.europa.eu/legal-content/en/txt/?uri=celex:52024dc0001>)

Commission proposal	Drafting suggestions and Comments
	<p>In line with the EU Youth Strategy<sup>29</sup>, the European Youth Work Agenda<sup>30</sup>, <b>the EU Youth Dialogue</b> and the 2024 Communication on the legacy of the European Year of Youth 2022<sup>31</sup>, the Programme should support meaningful participation of young people and youth organisations in decision and policy making, youth mainstreaming across policy fields, the validation of non-formal and informal learning, high-quality youth work and competence development of youth workers. The programme will continue to support all young people to participate in learning mobility and non-formal learning mobility, including youth exchanges and youth participation activities, <b>and volunteering and solidarity action</b>, with the objective to engage and empower young people to acquire and develop competences for life and their professional future, to become active citizens and participate in economic, social, cultural, democratic and political life, and to connect them to the European project and contribute to building an inclusive, competitive and resilient Union.</p> <p>HU (Comments):</p> <p>We propose to add the EU Youth Diaogue, volunteering and solidarity action to the text here.</p> <p>LT (Comments):</p>

<sup>29</sup> Resolution of the Council of the European Union and the Representatives of the Governments of the Member States meeting within the Council on a framework for European cooperation in the youth field: The European Union Youth Strategy 2019-2027 (OJ C 456, ST/14944/2018/INIT, 18.12.2018).

<sup>30</sup> Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the Framework for establishing a European Youth Work Agenda 2020/C 415/01 (OJ C 415, 1.12.2020).

<sup>31</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Year of Youth 2022 (COM/2024/1 final, <https://eur-lex.europa.eu/legal-content/en/txt/?uri=celex:52024dc0001>)

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>We support the DE and other MS proposal which would like to include EU Youth Dialogue.</p> <p>SI <b>(Drafting suggestions):</b> <u>...participate in learning mobility and non-formal learning activities, including youth exchanges, youth participation activities, youth volunteering and solidarity activities...</u></p> <p>SI <b>(Comments):</b> <u>learning mobility and non-formal learning mobility</u>: we propose new wording, as all of these activities fall under KA1 and are directly linked to the Youth policy and the objectives of the EU Youth Strategy.</p>
	<p>NL <b>(Drafting suggestions):</b> <b>Further the programme will strengthen the capacities of organisations active in the areas of youth work and youth participation, including the competence development of youth workers and support policy development.</b></p> <p>NL <b>(Comments):</b> Please include a reference to capacity building for organizations and youth workers in an additional paragraph. The original text only refers to young people.]</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>(12) The Programme should support participation in sport and physical activity for all, in line with the EU Work Plan for Sport 2024-2027<sup>32</sup>. Therefore, there is a need to focus, in particular, on grassroots sport, taking into account the important role that sport plays in promoting healthy lifestyles, interpersonal relations, social inclusion and equality as well as building cohesive communities.</p>	<p>BE (Drafting suggestions): The Programme should support participation in sport and physical activity for all, in line with the <b>current and next EU Work Plan for Sport, and the future strategic vision for sport in Europe.</b></p> <p>BE (Comments): Therefore, there is a need to focus, in particular, on grassroots sport, taking into account the important role that sport plays in promoting healthy lifestyles, interpersonal relations, social inclusion and equality as well as building cohesive communities.</p> <p>DE (Drafting suggestions): (12) .</p> <p>DE (Comments): .</p> <p>EE (Drafting suggestions):</p>

<sup>32</sup> Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the European Union Work Plan for Sport (1 July 2024 — 31 December 2027), (OJ C, C/2024/3527, 3.6.2024).

Commission proposal	Drafting suggestions and Comments
	<p>The Programme should support participation in sport and physical activity for all, in line with the current EU Work Plan for Sport 2024-2027<sup>33</sup> and next EU Work Plan for Sport. Therefore, there is a need to focus, in particular, on grassroots sport, taking into account the important role that sport plays in promoting healthy lifestyles, interpersonal relations, social inclusion and equality as well as building cohesive communities.</p> <p>ES (Drafting suggestions):</p> <p>12. The Programme should support participation in sport and physical activity for all, in line with the EU Work Plan for Sport 2024-2027 and successive Plans. Therefore, there is a need to focus, in particular, on grassroots sport, taking into account the important role that sport plays in promoting healthy lifestyles, interpersonal relations, social inclusion and equality as well as building participatory and cohesive communities</p> <p>ES (Comments):</p> <p>We think it is appropriate to mention that there will be successive work plans for Sport after 2027. We also believe that sport can contribute to civic participation and engagement in society.</p>
<p>(13) Digital transformation has changed society and the economy with an ever-deepening impact on everyday life and demonstrated the need for higher levels of digital readiness and capacity of education and training as well as the pressing need for digital skills development for all across the Union.</p>	<p>EE (Drafting suggestions):</p> <p>Digital and AI transformation has changed society and the economy with an ever-deepening impact on everyday life and demonstrated the need for higher levels of digital readiness and capacity of education and training as well as</p>

<sup>33</sup> Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the European Union Work Plan for Sport (1 July 2024 — 31 December 2027), (OJ C, C/2024/3527, 3.6.2024).

Commission proposal	Drafting suggestions and Comments
	<p>the pressing need for the Programme to support digital skills development for all across the Union.</p> <p>EE (Comments): By the time the Programme is adopted, it is highly likely that a reference can be made to the fact that AI has transformed society.</p> <p>The paragraph should include a reference to the role the programme plays in the digital and AI transformation.</p> <p>SK (Drafting suggestions): 13. Digital transformation has changed society and the economy with an ever-deepening impact on everyday life and demonstrated the need for higher levels of digital readiness and capacity of education and training as well as the pressing need for digital skills development for all across the Union.</p> <p>SK (Comments): What is digital capacity of education?</p>
<p>(14) Formal, informal and non-formal learning play an essential role in addressing climate change, raising awareness and instilling the skills and key competences needed for changing personal behaviours. The Programme will help empowering people to act in their respective communities and build up the needed skills for a successful clean transition, in line with the Clean Industrial Deal.</p>	<p>IE (Drafting suggestions): Formal, informal and non-formal learning play an essential role in addressing <b>priorities, including</b> climate change, raising awareness and instilling the skills and key competences needed for changing personal behaviours. The Programme will help empowering people to act in their respective communities and build up the needed skills for a successful clean transition, in line with the Clean Industrial Deal.</p>

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	<p>IE (Comments): Informal and non-formal learning play a key role in all aspects of learning development particularly in the youth and civil society organisations, not only in addressing climate change. Perhaps this could be broadened. Solidarity activities are key to allowing young people address local issues however it is not visible here.</p> <p>ES (Drafting suggestions): 14. Climate change is already impacting our lives. Formal, informal and non-formal learning play an essential role in addressing climate change, raising awareness and instilling the skills and key competences needed for changing personal behaviours, preparing and adapting. The Programme will help empowering people to act in their respective communities and build up the needed skills for a successful green transition, also in line with the Clean Industrial Deal.</p> <p>ES (Comments): Like digital transformation, climate change is already affecting us, and the future that awaits us seems increasingly complicated. It is important to highlight this issue, as it will be necessary to prepare and adapt.  We suggest referring to “green transition” instead of “clean transition” and not limiting everything to the Clean Industrial Industrial Deal. We consider it broader and more adapted to the fields of education and training, youth and sport.</p> <p>SK (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>14. Formal, informal and non-formal learning play an essential role in <del>addressing</del> <b>shaping attitudes towards</b> climate change, raising awareness and instilling the skills and key competences needed for changing personal behaviours. The Programme will help empowering people to act in their respective communities and build up the needed skills for a successful clean transition, in line with the Clean Industrial Deal.</p>
<p>(15) The international dimension of the Programme should aim to offer opportunities for learning mobility, cooperation and policy dialogue with third countries not associated to the Programme, building on the experience of predecessor programmes, including to contribute to competitiveness of the Union, while ensuring protection of the Union's economic security interests. To increase the impact of those activities, it is important to enhance synergies between the Programme and Global Europe, taking into account the enlargement of the Union, the Global Gateway Strategy and the education and training, youth and sport policy frameworks.</p>	<p>IE (Drafting suggestions): The international dimension of the Programme should aim to offer opportunities for learning mobility, cooperation and policy dialogue with third countries <b>with similar values</b> not associated to the Programme, building on the experience of predecessor programmes, including to contribute to competitiveness of the Union, while ensuring protection of the Union's economic security interests. To increase the impact of those activities, it is important to enhance synergies between the Programme and Global Europe, taking into account the enlargement of the Union, the Global Gateway Strategy and the education and training, youth and sport policy frameworks.</p> <p>AT (Drafting suggestions): “(…) and the education and training, <b>volunteering</b>, youth and sport policy frameworks.</p> <p>ES (Drafting suggestions): 15. The international dimension of the Programme should aim to offer opportunities for learning mobility, cooperation and policy dialogue with third countries not associated to the Programme, building on the experience of predecessor programmes, including to contribute to fundamental human</p>

Commission proposal	Drafting suggestions and Comments
	<p>rights and EU values, as well as to competitiveness of the Union, while ensuring protection of the Union's economic security interests. To increase the impact of those activities, it is important to enhance synergies between the Programme and Global Europe, taking into account the enlargement of the Union, the Global Gateway Strategy and the education and training, youth and sport policy frameworks.</p> <p>ES (Comments): We suggest adding that cooperation with third countries cannot be carried out without respect for human rights and EU values. Recital 17 only refers to this issues as regards the implementation of the Programme.</p>
<p>(16) The Programme should bring candidate countries and potential candidates closer to their goal of acceding to the Union. The Programme should promote stability, partnerships and skills development, with countries in the wider neighbourhood including by enhancing ties with the Mediterranean region. Through cooperation with other countries across the globe, the Programme should as well attract talents worldwide, and shape partnerships notably to promote competitiveness of the Union. The Programme should support countries in modernising their institutions and organisations and, more generally, enhancing the quality and inclusiveness of education, training, youth and sport through international partnerships.</p>	<p>AT (Drafting suggestions): The Programme should promote stability, partnerships, <b>participation in democratic life and civic engagement</b>, and skills development, with countries in the wider neighbourhood, including by enhancing ties with the Mediterranean region.</p> <p>CY (Drafting suggestions): The Programme should <b>contribute to</b> bring candidate countries and potential</p> <p>CY (Comments): A suggestion for an addition to be more precise</p> <p>DE (Comments): .</p>

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	<p>."</p> <p>ES (Drafting suggestions):</p> <p>16. The Programme should bring candidate countries and potential candidates closer to their goal of acceding to the Union. The Programme should promote stability, partnerships and skills development, with countries in the wider neighbourhood including by enhancing ties with the Mediterranean region. Through cooperation with other countries across the globe, the Programme should as well attract talents worldwide, and shape partnerships notably to promote competitiveness of the Union. The Programme should support countries in modernising their institutions and organisations and, more generally, enhancing the quality and inclusiveness of education and training, youth and sport through international partnerships, while fostering contacts between people and promoting EU values and identity among participants in Europe and beyond..</p> <p>ES (Comments):</p> <p>We should also acknowledge that Erasmus+ serves as a key pillar of the European Union's public diplomacy and soft power in the fields of education and training, youth and sport.</p>
<p>(17) The implementation of the Programme should be guided by the principles and values of respect for human dignity, freedom, democracy, equality and the rule of law, and solidarity, as respectively enshrined in Article 2 of the Treaty of the European Union and referred to in the preamble of the Charter of Fundamental Rights of the European Union. It is thus essential that all parties involved in the Programme respect those principles and values. The Programme should as well respect the principles set out in the 2017 EU Guidelines for the Promotion and Protection of the Rights of the Child and in</p>	<p>HU (Drafting suggestions):</p> <p>The implementation of the Programme should be guided by the principles and values of respect for human dignity, freedom, democracy, equality and the rule of law, and solidarity, as respectively enshrined in Article 2 of the Treaty of the European Union and referred to in the preamble of the Charter of Fundamental Rights of the European Union. It is thus essential that all parties involved in the Programme respect those principles and values. The</p>

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<p>Article 9 of the UN Convention on the Rights of Persons with Disabilities as well as the Union of Equality strategies.</p>	<p>Programme should as well respect the principles set out in the 2017 EU Guidelines for the Promotion and Protection of the Rights of the Child and in Article 9 of the UN Convention on the Rights of Persons with Disabilities, <del>as well as</del> <b>and take into account</b> the Union of Equality strategies <b>adopted by the European Commission.</b></p> <p>HU (Comments):</p> <p>It should be pointed out that none of the Commission’s documents referred to have been adopted by the Council, therefore we propose an addition here.</p>
<p>(18) The Programme should encourage participation, in particular of young people, in Europe’s democratic life, including by supporting activities that contribute to citizenship education, nurture skills needed for civic engagement and enable to engage and learn to participate in civic society, thereby raising awareness of European common values, including fundamental rights, facilitating interaction with decision-makers at local, national and European levels and contributing to the process of European integration. The Programme should also support the creation of opportunities and mechanisms for meaningful youth participation.</p>	<p>IE (Comments):</p> <p>This is a key objective it could be linked to the EU Youth Strategy</p> <p>AT (Drafting suggestions):</p> <p>“and mechanisms for meaningful youth participation <b>in all sectors</b>”</p> <p>SI (Comments):</p> <p>We would like to include reference to the “all sectors”.</p>
<p>(19) The Programme should offer accessible, inclusive and safe opportunities for young people and organisations to show solidarity, helping them support communities and address societal challenges, while gaining valuable experience and skills for their personal growth and employability.</p>	<p>AT (Drafting suggestions):</p> <p>“</p> <p>AT (Comments):</p> <p>This is a well-formulated recital. However, the articles section of the programme proposal does not contain any description of what these</p>

Commission proposal	Drafting suggestions and Comments
	<p>“opportunities” should look like in concrete terms. It is therefore impossible to say which article would implement this recital.</p> <p>EE  <b>(Drafting suggestions):</b>                      The Programme should offer accessible, inclusive and safe opportunities for young people and organisations to show solidarity, helping them support communities and address societal challenges, while gaining valuable experience and skills for their personal growth , social participation, employability, active citizenship and lifelong learning.</p> <p>EE  <b>(Comments):</b>                      We believe that, in addition to personal growth and employability, experience and skills are also necessary for active citizenship and lifelong learning</p> <p>ES  <b>(Drafting suggestions):</b>                      19. The Programme should offer accessible, inclusive and safe opportunities for young people and organisations to show solidarity and engagement, helping them support more inclusive and cohesive communities and address societal challenges, while gaining valuable experience and skills for their personal growth and employability.</p> <p>ES  <b>(Comments):</b>                      We suggest adding that volunteering and solidarity should contribute to supporting communities in becoming more inclusive and cohesive.</p>

Commission proposal	Drafting suggestions and Comments
<p>(20) Volunteering, both within and beyond the Union, constitutes a rich experience in a non-formal and informal learning context, enabling young people to show solidarity and engage in activities contributing to address societal and humanitarian challenges while enhancing their personal, socio-educational and professional development, active citizenship, civic participation and employability. The Programme should thus also support “European Solidarity Corps” volunteering actions, including the European Voluntary Humanitarian Aid Corps. Those actions were covered under the European Solidarity Corps programme in the 2021-2027 programming period.</p>	<p>AT (Drafting suggestions): The Programme should thus <b>build upon and enhance</b> “European Solidarity Corps” volunteering actions (....)”</p> <p>HU (Drafting suggestions): Volunteering, both within and beyond the Union, constitutes a rich experience in a non-formal and informal learning context, enabling young people to show solidarity and engage in activities contributing to address societal and humanitarian challenges while enhancing their personal, socio-educational and professional development, active citizenship, civic participation and employability. The Programme should thus also support “European Solidarity Corps” volunteering <b>and solidarity</b> actions, including the European Voluntary Humanitarian Aid Corps. Those actions were covered under the European Solidarity Corps programme in the 2021-2027 programming period.</p> <p>HU (Comments): See above in Recital 3.</p>
<p>(21) With a view to enhancing the promotion of solidarity and the visibility of humanitarian aid and development cooperation among European citizens, there is a need to develop solidarity of Member States and third countries associated to the programme with third countries not associated affected by disasters from natural hazards and human-induced risks. The European Voluntary Humanitarian Aid Corps should contribute to a coordinated Union needs-based response and will be implemented in accordance with the rules and procedures laid down in this Regulation.</p>	<p>AT (Comments): Please specify in articles as well.</p>

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<p>(22) Young people, in particular those with fewer opportunities, should continue to be given the chance to have a first time, experience travelling throughout Europe as part of an informal and non-formal educational activity that aims to foster their sense of belonging to the Union and to enable them to discover its cultural and linguistic diversity.</p>	<p>IE <b>(Drafting suggestions):</b> Young people, in particular those with fewer opportunities, should continue to be given the chance to have a first time, experience travelling throughout Europe as part of an informal and non-formal <del>educational</del> <b>learning</b> activity that aims to foster their sense of belonging to the Union and to enable them to discover its cultural and linguistic diversity.</p> <p>IE <b>(Comments):</b> Using ‘learning’ rather than educational, in line with current language of the programme</p> <p>BE <b>(Drafting suggestions):</b> FIC &amp; GsC Youth: Young people, in particular those with fewer opportunities, should continue to be given the chance to have a first time, experience travelling throughout Europe as part of an informal and non-formal <del>educational</del> <b>learning</b> activity that aims to foster their sense of belonging to the Union and to enable them to discover its cultural and linguistic diversity.</p> <p>BE <b>(Comments):</b> Text proposal in line with agreed language</p> <p>DE <b>(Comments):</b> We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve” (ALMA) initiative, in order to integrate her with their specific characteristics</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management.</p> <p>ALMA would highly contribute to the specific objectives of Erasmus+, especially N°1: <i>“support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</i> “</p> <p>NL <b>(Drafting suggestions):</b></p> <p>Young people, in particular those with fewer opportunities, should continue to be given the chance to have a first time, experience travelling throughout Europe as part of an informal and non-formal learning activity that aims to foster their sense of belonging to the Union and to enable them to discover its cultural and linguistic diversity.</p>
<p>(23) In the field of sport, through mobility opportunities and capacity building, including cooperation, the Programme should foster common European values, volunteering as well as innovation and skills development in and through sport. The Programme should also promote good governance, safety and integrity in sport, sport diplomacy, support grassroots sports organisations, as well as offer young people across Europe the opportunity to participate in cross-border sports initiatives, fostering personal growth, cultural exchange, solidarity and community engagement.</p>	<p>BE <b>(Comments):</b></p> <p>From the sports sector, we would be delighted if the colleagues could also ask the Commission their idea behind the introduction of “young people”, we would love to hear from their side.</p> <p>FR <b>(Drafting suggestions):</b></p> <p>In the field of sport, through mobility opportunities and capacity building, including cooperation, the Programme should foster common European</p>

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	<p>values, volunteering as well as innovation and skills development in and through sport. The Programme should also promote good governance, safety and integrity in sport, sport diplomacy, <u>healthy lifestyle</u>, support grassroots sports organisations, as well as offer young people across Europe the opportunity to participate in cross-border sports initiatives, fostering personal growth, cultural exchange, solidarity and community engagement.</p>
<p>(24) The Programme brings a key contribution to the Union of Skills and the European Education Area, laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders. The Union of skills aims to step up the efforts to achieve high quality education, training, and lifelong learning through delivering basic and advanced skills, providing opportunities for people to update regularly and acquire new and future-oriented skills, facilitating skills circulation and recruitment by businesses across the EU, and attracting, developing and retaining top talent in Europe. In line with the Union of Skills, the Programme should also reflect the importance of entrepreneurship education and financial literacy.</p>	<p>IE (Drafting suggestions): The Programme brings a key contribution to the Union of Skills, the European Education Area, and the EU Youth Strategy laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders. The Union of skills aims to step up the efforts to achieve high quality education, training, <b>non formal, informal</b> and lifelong learning through delivering basic and advanced skills, providing opportunities for people to update regularly and acquire new and future-oriented skills, facilitating skills circulation and recruitment by businesses across the EU, and attracting, developing and retaining top talent in Europe. In line with the Union of Skills, the Programme should also reflect the importance of entrepreneurship education and financial literacy.</p> <p>LV (Drafting suggestions): (24) The Programme brings a key contribution to the European Education Area and the Union of Skills, laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders.</p> <p>LV (Comments):</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>Why is <i>importance of entrepreneurship education and financial literacy</i> highlighted specifically? What specific actions/calls will address these areas?</p> <p>AT <b>(Drafting suggestions):</b></p> <p>The Programme brings a key contribution to the the <b><u>European Education Area, Education and Training 2030 and the Union of Skills</u></b>, laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders</p> <p>In line with the <b><u>European Education Area, Education and Training 2030 and the Union of Skills</u></b>, the Programme should also reflect the importance of entrepreneurship education, <b><u>innovation</u></b> and financial literacy.</p> <p>AT <b>(Comments):</b></p> <p>Erasmus+ ist an educational programme and is the basis for the European Education Area and ET 2030. Therefore, those two need to be mentioned before the Union of Skills.</p> <p>BE <b>(Drafting suggestions):</b></p> <p>The Programme brings a key contribution to <del>the Union of Skills and the</del> European Education Area and the Union of Skills,</p>

ERASMUS +

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>facilitating skills circulation and recruitment by businesses <u>or organisations</u> across the EU</p> <p>BE <b>(Comments):</b> MFWB: A intervertir pour respecter ce qui est prioritaire pour le Conseil EJCS (filière EDUC), à savoir l'EEA</p> <p>MFWB: la question se pose si la mention de “businesses” ne devrait pas être élargie. Alternativement on pourrait juste faire mention de “recruitment across the EU”. WAL : faciliter le recrutement par des organismes (notion plus large) ou des entreprises</p> <p>EE <b>(Drafting suggestions):</b> The Programme brings a key contribution to the European Education Area and the Union of Skills , laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders. The Union of skills aims to step up the efforts to achieve high quality education, training, and lifelong learning through delivering basic and advanced skills, providing opportunities for people to update regularly and acquire new and future-oriented skills, facilitating skills circulation and recruitment by businesses</p>

ERASMUS +

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>across the EU, and attracting, developing and retaining top talent in Europe. In line with the Union of Skills, the Programme should also reflect the importance of entrepreneurship education and financial literacy.</p> <p>EE <b>(Comments):</b></p> <p>First and foremost, we would like to emphasise that the programme should support progress towards the European Education Area.</p> <p>ES <b>(Drafting suggestions):</b></p> <p>24. The Programme brings a key contribution to the Union of Skills and the European Education Area, laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders. The European Education Area fosters collaboration among EU with the aim to build more resilient and inclusive national education and training systems to enable all EU citizens to receive the best education and training opportunities. The Union of skills also aims to step up the efforts to achieve high quality education, training, and lifelong learning through delivering basic and advanced skills, providing opportunities for people to update regularly and acquire new and future-oriented skills, facilitating skills circulation and recruitment by businesses across the EU, and attracting, developing and retaining top talent in Europe. In line with the Union of Skills, the Programme should also reflect the importance of entrepreneurship education and financial literacy.</p> <p>ES <b>(Comments):</b></p> <p>We do not consider it either correct or fair to assume only the priorities of the Union of Skills, as if the European Education Area was simply integrated</p>

Commission proposal	Drafting suggestions and Comments
	<p>into this Commission’s initiative. A broader mention to the European Education Area is also needed. Therefore we propose explicitly referring to the purpose of the European Education Area as well, or rewriting the section to mention the common objectives of the Union of Skills and the EEA.</p> <p>HU (Comments): We would like to have the EEA first before the UoS here as well. This paragraph is about mainly the UoS, so we would like to have a dedicated paragraph first to the EEA, which can be complemented by a recital about the UoS.</p> <p>IT (Comments): We consider it important to highlight first the program's role in building the European Education Area, and secondly its role in the Union of Skills.</p> <p>LT (Drafting suggestions): The Programme brings a key contribution to the <del>Union of Skills</del> and the European Education Area, laying the foundation to skills and competences formation throughout life and providing a genuine common space for quality education and lifelong learning across borders.</p> <p>LT (Comments): We support those MS, which prioritise EEA as the umbrella strategy for education and training. We would like to emphasise that the Programme should focus on the long term strategic priorities.</p> <p>SI (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	We would like to have more emphasis on the EEA and and relevant balance between both initiatives.
<p>(25) It is important to stimulate and widen access to learning, teaching and research on EU, values and citizenship. Fostering a European sense of belonging and commitment is particularly important given the challenges faced today by the Union. The Programme should continue to contribute to learning on European integration matters, including the Union’s future challenges and opportunities, to promote debate on those matters and the development of excellence in European integration studies.</p>	<p>ES (Drafting suggestions):</p> <p>25. It is important to stimulate and widen access to learning, teaching and research on the EU, values and citizenship. Fostering a European sense of belonging and democratic commitment is particularly important given the challenges faced today by the Union. The Programme should continue to contribute to learning on European integration matters, including the Union’s future challenges and opportunities, to promote debate on those matters and the development of excellence in European integration studies.</p> <p>ES (Comments):</p> <p>We believe it is necessary to emphasise that we must also commit to the EU in democratic terms.</p> <p>IT (Drafting suggestions):</p> <p>It is important to stimulate and widen access to learning, teaching and research on EU, values and citizenship. Fostering a European sense of belonging and commitment is particularly important given the challenges faced today by the Union. The Programme should continue to contribute to learning on European integration matters, including the Union’s future challenges and opportunities, to promote debate on those matters and the development of excellence in European integration studies, <b>encouraging inclusive and interdisciplinary approaches, the use of innovative and digital tools, and the participation of a wider audience, particularly young people, in order to strengthen active citizenship and awareness of common European values</b></p>

Commission proposal	Drafting suggestions and Comments
	<p>IT (Comments):</p> <p>We suggest adding: “encouraging inclusive and interdisciplinary approaches, the use of innovative and digital tools, and the participation of a wider audience, particularly young people, in order to strengthen active citizenship and awareness of common European values.”</p>
<p>(26) The learning of languages contributes to mutual understanding between people and cultures, and fosters mobility within and outside the Union, as language competences are essential life and job skills. Therefore, the Programme should enhance the learning of languages, including, where relevant, national sign languages. To ensure broad and inclusive access to the Programme, it is important that multilingualism be a key principle in the implementation of the Programme.</p>	<p>IE (Drafting suggestions):</p> <p>The learning of languages contributes to mutual understanding between people and cultures, and fosters mobility within and outside the Union, as language competences are essential life and job skills. Therefore, the Programme should enhance the learning of languages, including, where relevant, national sign languages <b>and supporting the preservation of minority languages</b>. To ensure broad and inclusive access to the Programme, it is important that multilingualism be a key principle in the implementation of the Programme.</p> <p>IE (Comments):</p> <p>IE would like to see the inclusion of minority languages here to show recognition and support for these languages.</p> <p>DE (Drafting suggestions):</p> <p>(</p> <p>ES</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <p>26. The learning of languages raises awareness of Europe's rich cultural diversity. It contributes to mutual understanding between people and cultures, and fosters mobility within and outside the Union, as language competences are essential life and job skills. Therefore, the Programme should enhance the learning of languages, including, where relevant, national sign languages. To ensure broad and inclusive access to the Programme, it is important that multilingualism be a key principle in the implementation of the Programme.</p> <p>ES <b>(Comments):</b> We suggest emphasising the importance of languages in order to raise awareness of European cultural diversity and not only in terms of a life and professional competence.</p> <p>SK <b>(Comments):</b> The requirement that multilingualism is a key principle of the implementation of the programme is strong. Does this mean that the programme will be implemented in all official EU languages or something more, such as the right to support the language of participants from third countries (outside the Union)?</p>
<p>(27) Europe faces a growing challenge in meeting the demand for skilled talent in strategic and evolving sectors like clean and circular technologies, transport, energy, water resilience, healthcare, digital technologies, aerospace and defence. To address this key need, it is essential to develop, attract and retain talented individuals in these fields. In line with the Union of skills, the Programme should among other support EU students to pursue studies in such critical sectors and attract as well top talent to Europe by enhancing the</p>	<p>IE <b>(Comments):</b> Ireland needs significantly more information about these scholarship programmes.</p> <p>Will there be an inclusion dimension to these scholarships ?</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>attractiveness of education and training and offering scholarships to students, including through Erasmus Mundus scholarships. This would contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.</p>	<p>AT (Comments): Could the Commission provide us with detailed information on the scholarships? According to information provided in the EC webinar on “Scholarships in strategic educational fields”, the pilot action, which is scheduled to start in the 2026 AWP, is only intended for bachelor's students. However, the European added value for this group in particular is viewed critically in comparison to the high costs. Since the measure in the new programme generation is intended to target the most talented students, the question of the target group arises; again bachelor's or master's students? Is it planned to include VET? We also request a more precise definition of the target group: international students who are already studying in Europe or all students who have already begun studying in the aforementioned subject areas? Or is this measure intended to attract students in the first place? What quality criteria can then be used for BA students upon admission? Why is the list of strategic fields conclusive?</p> <p>DE (Drafting suggestions): (</p> <p>EE (Comments): Does the Union need skilled individuals or skilled talents, or do we consider all workers in strategic sectors as talents? In general, discussions have referred to a shortage of skills in strategic areas and separately efforts to attract talents.</p> <p>ES (Drafting suggestions):</p>

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	<p>27. Europe faces a growing challenge in meeting the demand for skilled talent in strategic and evolving sectors like, for example, clean and circular technologies, transport, energy, water resilience, healthcare, digital technologies, aerospace and defence. To address this key need, it is essential to develop, attract and retain talented individuals in these current and future strategic fields. In line with the Union of skills, the Programme should among other support EU students to pursue studies in critical sectors and attract as well top talent to Europe by enhancing the attractiveness of education and training and offering scholarships to students, including through Erasmus Mundus scholarships. This would contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.</p> <p>ES (Comments):</p> <p>We believe that we should not be categorical about the sectors that we currently consider to be the most strategic or those with the greatest shortages. In the future, other sectors may become critical. We suggest using a less definitive wording.</p> <p>IT (Drafting suggestions):</p> <p>27) Europe faces a growing challenge in meeting the demand for skilled talent in strategic and evolving sectors like clean and circular technologies, transport, energy, water resilience, healthcare, digital technologies, aerospace and defence. To address this key need, it is essential to develop, attract and retain talented individuals in these fields. In line with the Union of skills, the Programme should among other support EU students to pursue studies in such critical sectors and attract as well top talent to Europe by enhancing the attractiveness of education and training <b>and sport, also</b> offering scholarships to students, including through Erasmus Mundus scholarships. This would</p>

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	<p>contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.</p> <p>IT (Comments): We suggest to add “and sport” to ensure balance among each sector.</p> <p>NL (Drafting suggestions): Europe faces a growing challenge in meeting the demand for skilled talent in strategic and evolving sectors like clean and circular technologies, transport, energy, water resilience, healthcare, digital technologies, aerospace and defence. To address this key need, it is essential to develop, attract and retain talented individuals in these fields. In line with the Union of skills, the Programme should among other with due respect for institutes autonomy where applicable, support EU students to pursue studies in such critical sectors and attract as well top talent to Europe by enhancing the attractiveness of education and training and offering scholarships to students, including through Erasmus Mundus scholarships. This would contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.</p> <p>NL (Comments): As mentioned before, we have some remaining questions regarding the scholarships for strategic educational fields. We want to avoid Erasmus+ becoming too much of a political program. In the Commission’s presentation on the pilot for these scholarships it seemed like much of the decision on what these scholarships will focus on is up too the HE consortia, which we can support. Through this addition we want to make sure that the flexibility for HE-institutes to utilize the scholarships to their liking remains.</p> <p>SI</p>

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	<p><b>(Comments):</b></p> <p>We seek clarification on the difference between Erasmus+ and Erasmus Mundus scholarships</p> <p>SK</p> <p><b>(Drafting suggestions):</b></p> <p>27. Europe faces a growing challenge in meeting the demand for <del>skilled talent</del> <b>qualified professionals</b> in strategic and evolving sectors like clean and circular technologies, transport, energy, water resilience, healthcare, digital technologies, aerospace and defence. To address this key need, it is essential to develop, attract and retain talented individuals in these fields. <b>In line with the Union of skills, the Programme should among other support EU students to pursue studies in such critical sectors and attract as well top talent to Europe by enhancing the attractiveness of education and training and offering scholarships to students, including through Erasmus Mundus scholarships.</b></p> <p>This would contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.</p> <p>SK</p> <p><b>(Comments):</b></p> <p>Proposed wording better reflect the context “This would contribute to address the skills needs for the labour market, including for sectors suffering severe staff shortages.”</p>
<p>(28) Cooperation enables exchange of practices and capacity building and thereby leads to better outcomes and performance as well as efficiency gains by pooling resources and knowledge. The Programme should therefore support capacity building measures that enhance cooperation at different levels between institutions and organisations that are active in the fields of education and training, youth and sport. This recognises the fundamental role of institutions and organisations in equipping individuals with the knowledge,</p>	<p>IE</p> <p><b>(Drafting suggestions):</b></p> <p>Cooperation enables exchange of practices and capacity building and thereby leads to better outcomes and performance as well as efficiency gains by pooling resources and knowledge. The Programme should therefore support capacity building measures that enhance cooperation at different levels between institutions and organisations, <b>including civil society organisations</b></p>

Commission proposal	Drafting suggestions and Comments
<p>skills and competences needed in a changing world and helping institutions and organisations active in the field to adequately fulfil their potential for innovation, creativity and entrepreneurship, in particular within the digital economy.</p>	<p>that are active in the fields of education and training, youth and sport. This recognises the fundamental role of institutions and organisations in equipping individuals with the knowledge, skills and competences needed in a changing world and helping institutions and organisations active in the field to adequately fulfil their potential for innovation, creativity and entrepreneurship, in particular within the digital economy.</p> <p>IE (Comments): The civil society and NGO sector may not always fit into this sectors can they still engage with the programmes? Consider text</p> <p>AT (Drafting suggestions): “education and training, <u>volunteering</u>, youth and sport”</p> <p>SK (Drafting suggestions): 28. Cooperation enables exchange of practices and capacity building and thereby leads to better outcomes and performance <del>as well as efficiency gains</del> by pooling resources and knowledge. The Programme should therefore support capacity building measures that enhance cooperation at different levels between institutions and organisations that are active in the fields of education and training, youth and sport. This recognises the fundamental role of institutions and organisations in equipping individuals with the knowledge, skills and competences needed in a changing world and helping institutions and organisations active in the field to adequately fulfil their potential for innovation, creativity and entrepreneurship, in particular within the digital economy.</p> <p>SK (Comments): Cooperatin, pooling resources and knowledge has no effect on efficiency.</p>

Commission proposal	Drafting suggestions and Comments
<p>(29) The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU's priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards a joint European Degree<sup>34</sup>.</p>	<p>IE (Comments): This recital seems to be solely about higher education institutions. However this is not clear. Should this recital be broadened to include all times of intutions, including sports and youth insitutions?</p> <p>LV (Comments): Regarding European degree, the language has to be aligned with what has been adopted until now by the Council. Wording changes require further relevant decisions on Council level.</p> <p>AT (Drafting suggestions): The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, <b>volunteering and</b> youth and sport organisations and institutions, in line with the EU's priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards a <b>possible</b> joint European Degree</p>

<sup>34</sup> Council Resolution on a joint European degree label and the next steps towards a possible joint European degree: boosting Europe's competitiveness and the attractiveness of European higher education. (J C, C/2025/2939, 22.5.2025).

Commission proposal	Drafting suggestions and Comments
	<p>AT (Comments): The addition of the term ‘possible’ is necessary because the Council has not yet decided on a ‘joint European Degree,’ and the regulation should not prejudge the Council’s decision.</p> <p>Include “volunteering”</p> <p>DE (Drafting suggestions): (.</p> <p>EE (Drafting suggestions): The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU’s priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes,</p> <p>EE (Comments): The decision to implement the European Degree has not yet been adopted, and once adopted, it should not take extra years to move towards it. A reference to transnational joint study programmes should be sufficient, as the possible European Degree is part of it. No other specific initiative is mentioned in this</p>

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	<p>Article either, therefore it would not be appropriate to make an exception for one.</p> <p>ES (Drafting suggestions):</p> <p>29. The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU’s priorities, with flagship and forward-looking initiatives across all sectors and levels. This includes acting as testbeds for innovative education, training and skills development instruments, and supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards a joint European Degree in the field of higher education or similar initiatives at other levels and types of education and training.</p> <p>ES (Comments):</p> <p>We propose stating that all sectors need flagship cooperation initiatives for the future (besides European Universities Alliances in recital 30). Given that the paragraph is for all sectors and levels, we also propose clarifying that the joint European degree initiative concerns higher education and that there can be other similar initiatives in other fields of education and training.</p> <p>HU (Drafting suggestions):</p>

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	<p>The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU’s priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards a joint European Degree <b>label</b></p> <p>HU (Comments):</p> <p>In Recital 29, we would like to point out that no decision has been made by the Council on the long term introduction of the joint European Degree. The text should better reflect the Council Resolution adopted this May. We would prefer a reference to the joint European degree label here.</p> <p>IT (Drafting suggestions):</p> <p>29) The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU’s priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training, <b>youth and sport</b> institutions and Member States towards removing remaining barriers to transnational cooperation and</p>

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	<p data-bbox="949 352 1727 408">multiplying the offer of transnational joint study programmes, contributing towards a joint European Degree<sup>35</sup>.</p> <p data-bbox="949 424 976 448">IT</p> <p data-bbox="949 453 1088 480"><b>(Comments):</b></p> <p data-bbox="949 496 1715 523">We suggest to add “youth and sport” to ensure balance among each sector</p> <p data-bbox="949 568 976 592">NL</p> <p data-bbox="949 596 1189 624"><b>(Drafting suggestions):</b></p> <p data-bbox="949 639 1742 1058">The Programme should support long-term strategic cooperation at institutional level to build excellence, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU’s priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards the implementation of a joint European Degree (label) and paving the way for a possible joint European degree together with the Policy Lab of the Working Group on Higher Education of the European Education Area strategic framework, while considering possible alternative approaches.</p> <p data-bbox="949 1074 976 1098">NL</p> <p data-bbox="949 1102 1088 1129"><b>(Comments):</b></p> <p data-bbox="949 1145 1704 1201">We suggest adjusting this passage in line with the resolution. At the very least <i>(label)</i> must be introduces.</p>

<sup>35</sup> Council Resolution on a joint European degree label and the next steps towards a possible joint European degree: boosting Europe’s competitiveness and the attractiveness of European higher education. (J C, C/2025/2939, 22.5.2025).

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	<p>SI (Drafting suggestions): The Programme should continue to support the work of education and training and Youth.</p> <p>SI (Comments): To add reference to Youth.</p> <p>SK (Drafting suggestions): 29. The Programme should support long-term strategic cooperation at institutional level to build excellence, efficiency, competitiveness and attractiveness and generate sustainable and systemic transformation of education and training, youth and sport organisations and institutions, in line with the EU's priorities, including by acting as testbeds for innovative education, training and skills development instruments, supporting cooperation with business and industry. The Programme should continue to support the work of education and training institutions and Member States towards removing remaining barriers to transnational cooperation and multiplying the offer of transnational joint study programmes, contributing towards a joint European Degree<sup>11</sup>.</p> <p>SK (Comments): To stress the need of efficiency in European education area.</p>
(30) The Programme should support the core education mission of the European Universities Alliances to enable systemic impact achieved more efficiently through long-term Union level action, notably to reinforce excellence, reduce fragmentation and increase the attractiveness and	<p>IE (Comments): IE strongly supports the establishment of a clear and sustainable long term investment pathway for European University alliances ensuring their</p>

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<p>inclusiveness of EU higher education systems, develop innovative instruments to increase quality of learning and teaching, develop future oriented skills and competences (such as AI, cybersecurity, sustainability, STEM), including the sectors already identified in the Union of Skills, through relevant and future-proof curricula, pedagogical innovation, joint degrees, lifelong learning, micro-credentials, to nurture and attract talent and facilitate transnational cooperation in education, including with business and industry.</p>	<p>continued capacity to drive excellence, innovation and cooperation across the EHEA. In supporting their alliances, closer links are required between education and research to minimise complexity of multiple funding sources.</p> <p>AT (Comments): Please include “<b>research dimension</b>” in Recital 30. The core missions of the European Universities Alliances are education and research, and synergies between these fields are essential to achieve long-term systemic impact.</p> <p>DE (Drafting suggestions): .</p> <p>DE (Comments): .</p> <p>ES (Drafting suggestions): 30. The Programme should support the core education mission of the European Universities Alliances to enable systemic impact achieved more efficiently through long-term Union level action, notably to reinforce excellence, reduce fragmentation and increase the attractiveness and inclusiveness of EU higher education systems, develop innovative instruments to increase quality of learning and teaching, develop future oriented skills and competences (such as AI, cybersecurity, sustainability, STEM), including the sectors already identified in the Union of Skills, through relevant and future-proof curricula, pedagogical innovation, joint degrees, lifelong learning, micro-credentials, to nurture and attract talent and facilitate transnational cooperation in education, including with business and</p>

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	<p>industry, as well as in research, seeking synergies with the European Research Area (ERA).</p> <p>ES (Comments):</p> <p>We suggest adding at the end of the recital: a reference to transnational cooperation in research and the synergies with the European Research Area.</p> <p>HU (Drafting suggestions):</p> <p>The Programme should support the core education mission of the European Universities Alliances to enable systemic impact achieved more efficiently through long-term Union level action, notably to reinforce excellence, reduce fragmentation and increase the attractiveness and inclusiveness of EU higher education systems, develop innovative instruments to increase quality of learning and teaching, develop future oriented skills and competences (such as AI, cybersecurity, sustainability, STEM), including the sectors already identified in the Union of Skills, through relevant and future-proof <del>curricula</del>, pedagogical innovation, joint degrees, lifelong learning, micro-credentials, to nurture and attract talent and facilitate transnational cooperation in education, including with business and industry.</p> <p>HU (Comments):</p> <p>In Recital 30, mentioning curricula is a red line for us. The current Regulation does not have a reference to them either.</p> <p>IT (Drafting suggestions):</p> <p>The Programme should support the core education mission of the European Universities Alliances <b>and the Centres of Vocational Excellence</b> to enable systemic impact achieved more efficiently through long-term Union level action, notably to reinforce excellence, reduce fragmentation and increase the</p>

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	<p>attractiveness and inclusiveness of EU higher education systems, develop innovative instruments to increase quality of learning and teaching, develop future oriented skills and competences (such as AI, cybersecurity, sustainability, STEM), including the sectors already identified in the Union of Skills, through relevant and future-proof curricula, pedagogical innovation, joint degrees, lifelong learning, micro-credentials, to nurture and attract talent and facilitate transnational cooperation in education, including with business and industry.</p> <p>IT (Comments):</p> <p>As with the European Universities Alliances, we consider it necessary to include in the recitals a reference to the strategic importance and added value offered by the Centres of Vocational Excellence (CoVEs).</p>
<p>(31) In line with relevant Union frameworks and tools, the Programme should contribute to the development and circulation of skills, including by setting up a basic skills support scheme and fostering quality assurance, transparency, the recognition of skills, competences and qualifications, their digitalisation, and the validation of non-formal and informal learning, skills management and guidance. In that regard, the Programme should also provide support to contact points and networks at national, and European level that facilitate cross-European exchanges and beyond, and the development of flexible learning pathways between different fields of education and training and youth and across formal and non-formal settings, including through the support of micro-credentials' eco-systems.</p>	<p>AT (Drafting suggestions):</p> <p>“education and training, <u>volunteering</u>, youth and sport”</p> <p>IT (Drafting suggestions):</p> <p>(31) In line with relevant Union frameworks and tools, the Programme should contribute to the development and circulation of skills, including by setting up a basic skills support scheme and fostering quality assurance, transparency, the recognition of skills, competences and qualifications, their digitalisation, and the validation of non-formal and informal learning, skills management and guidance. In that regard, the Programme should also provide support to contact points and networks at national, and European level that facilitate cross-European exchanges and beyond, and the development of flexible learning pathways between different fields of</p>

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	<p>education and training and youth and <b>sport</b> across formal and non-formal settings, including through the support of micro-credentials' eco-systems.</p> <p>IT (Comments): We suggest to add "sport" to ensure balance among each sector</p> <p>SI (Comments): In line with relevant Union frameworks and tools the proposal should preserve and enhance the role of the Youthpass.</p>
<p>(32) User-friendly online platforms and tools for virtual cooperation can play an important role in supporting the delivery of education and training and youth policy in Europe and beyond. To increase the use of virtual cooperation activities, the Programme should support more systematic and coherent use of online platforms. It should as well facilitate and support mobility processes through digitalisation.</p>	<p>LV (Drafting suggestions): (32) User-friendly online platforms and tools for virtual cooperation can play an important role in supporting the delivery of education and training and youth policy in Europe and beyond. To increase the use of virtual cooperation activities, the Programme should support more systematic and coherent use of online platforms <b>such as eTwinning, the European School Education Platform, the Electronic Platform for Adult Learning in Europe, the European Youth Portal.</b></p> <p>LV (Comments): We wish to see specific examples of online platforms mentioned here.</p> <p>AT (Comments): Where can we find the concrete reference in the Articles?</p> <p>DE</p>

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	<p><b>(Drafting suggestions):</b></p> <p>(32) .</p> <p>ES</p> <p><b>(Drafting suggestions):</b></p> <p>32. User-friendly, efficient and stable online platforms and tools for virtual cooperation play an important role in supporting the delivery of education and training, youth and sport policy in Europe and beyond. To increase the use of virtual cooperation activities, the Programme should support more systematic and coherent use of online platforms. It should as well facilitate and support mobility processes through digitalisation.</p> <p>ES</p> <p><b>(Comments):</b></p> <p>We suggest adding that stable and efficient online IT tools are also very much needed. Introducing successive changes that have not been tested or do not always work correctly can discourage and hinder participation. We also wonder why the field of sport is excluded from this recital now there will be more learning mobility opportunities and cooperation between organisations.</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>(32) User-friendly online platforms and tools for virtual cooperation can play an important role in supporting the delivery of education and training and youth <b>and sport</b> policy in Europe and beyond. To increase the use of virtual cooperation activities, the Programme should support more systematic and coherent use of online platforms. It should as well facilitate and support mobility processes through digitalisation.</p> <p>IT</p> <p><b>(Comments):</b></p>

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	We suggest to add “and sport” to ensure balance among each sector
<p>(33) The Programme should be designed to promote inclusion, diversity and equal opportunities by widening access to mobility, volunteering and learning across the Union and beyond, thereby enabling all people to fully benefit from a transformative experience.</p>	<p>DE (Comments): We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve” (ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management.</p> <p>ES (Drafting suggestions): The Programme should be designed to promote inclusion, diversity and equal opportunities by widening access to mobility, volunteering and learning across the Union and beyond, thereby enabling all people to fully benefit from a transformative experience abroad.</p> <p>ES (Comments): We suggest precisng that the transformative experience takes place abroad, at European or international level (meaning transnational level).</p> <p>HU (Drafting suggestions): The Programme should be designed to promote inclusion, diversity and equal opportunities by widening access to mobility, volunteering, <b>solidarity action</b> and learning across the Union and beyond, thereby enabling all people to fully benefit from a transformative experience.</p>

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	<p>HU (Comments): See above in Recital 3.</p> <p>SK (Drafting suggestions): 33. The Programme should be designed to promote inclusion, diversity and equal opportunities by widening access to mobility, volunteering and learning across the Union and beyond, thereby enabling all people to fully benefit from a <del>transformative</del> <b>transnational</b> experience.</p>
<p>(34) The Programme should provide for a set of measures to facilitate and increase the access for people with fewer opportunities, to remove the obstacles that may prevent such access, including financial ones, and to serve as a basis for further implementation guidance. Those measures include, among other, targeted financial support, accessible learning formats, housing support, preparatory activities and support for participants with fewer opportunities before, during and after their participation within the Programme, user-friendly and accessible documents available in different languages, support activities for staff dealing specifically with inclusion and diversity in organisations and raising awareness activities among potential participants with fewer opportunities, including in rural and remote areas. In addition, the Programme should allow to give priority in the grant awarding process to quality projects that actively address the inclusion and involvement of participants with fewer opportunities.</p>	<p>IE (Comments): IE is supportive of measures to increase accessibility for those with fewer opportunities, especially financial supports, all of which would be highly beneficial in enabling students to access and fully benefit from Erasmus+ opportunities. However ‘housing support’ while the intention is welcome, it may be difficult to impliment in many MS in the context of the housing crisis. IE would also like to see the grant allocation process take into account participation rates by underrepresented groups so that high-participation countries are not penalised with reduced mobility numbers simply because they serve more students with fewer opportunities</p> <p>DE (Comments): We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve”</p>

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	<p>(ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management.</p>
<p>(35) In order to make the Programme more accessible for newcomer organisations and for organisations with smaller administrative capacity and to make the Programme more manageable for beneficiaries, the Programme should reinforce the measures to simplify procedures at all stages.</p>	<p>IE (Comments): IE would like clarification on what is understood as a ‘newcomer organisation.’</p> <p>LV (Drafting suggestions): (35) In order to make the Programme more accessible for newcomer organisations and for organisations with smaller administrative capacity and to make the Programme more manageable for beneficiaries, <b>national authorities and national agencies</b>, the Programme should reinforce the measures to simplify procedures at all stages.</p> <p>DE (Drafting suggestions): (35) .</p> <p>DE (Comments): .</p>

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<p>(36) [This Regulation lays down an indicative financial envelope for the Programme. For the purpose of this Regulation, current prices are calculated by applying a fixed 2% deflator.]</p>	<p>AT (Comments): The budget is stated in “current prices for 2025,” but the “fixed deflator” mentioned here contradicts this budget logic.</p> <p>IT (Comments): Clarifications are requested regarding the term ‘indicative’ associated with the financial envelope</p>
<p>(37) In view of the diversity of the fields covered by the Programme, the ambition for youth and sport to contribute meaningfully to the Programme’s objectives and to reach its target groups, should be maintained.</p>	<p>LV (Drafting suggestions): (37) In view of the diversity of the fields covered by the Programme, the ambition for youth and sport to contribute meaningfully to the Programme’s objectives and to reach its target groups, should be maintained, <b>strengthened and further developed.</b></p> <p>AT (Drafting suggestions): (...) the ambition <b>of all sectors</b> to contribute meaningfully (...)</p> <p>EE (Drafting suggestions): In view of the diversity of the fields covered by the Programme, the ambition for youth and sport sectors to contribute meaningfully to the Programme’s objectives and to reach their target groups, should be maintained, strengthened and further developed.</p> <p>NL (Drafting suggestions):</p>

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	<p>In view of the diversity of the fields covered by the Programme, the ambition for youth and sport to contribute meaningfully to the Programme's objectives and to reach its target groups, should be further strengthened.]</p> <p>NL (Comments): We think this could be framed more positively.]</p> <p>SK (Drafting suggestions): 37. In view of the diversity of the fields covered by the Programme, the ambition for youth and sport to contribute <del>meaningfully</del> <b>appropriately</b> to the Programme's objectives and to reach its target groups, should be maintained.</p>
<p>(38) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council<sup>36</sup> applies to this Programme. It lays down the rules on the establishment and the implementation of the general budget of the Union, including the rules on grants, prizes, non-financial donations, procurement, indirect management, financial assistance, financial instruments, budgetary guarantees and protection of the financial interests of the Union.</p>	
<p>(39) In accordance with Regulation (EU, Euratom) 2024/2509, Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council<sup>37</sup>, Council Regulation (EC, Euratom) No 2988/95<sup>38</sup>, Council Regulation</p>	

<sup>36</sup> Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union. (OJ L, 2024/2509, 26.9.2024).

<sup>37</sup> Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L 248, 18.9.2013, p. 1, ).

<sup>38</sup> Council Regulation (EC, Euratom) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests (OJ L 312, 23/12/1995, p. 1).

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>(Euratom, EC) No 2185/96<sup>39</sup> and Council Regulation (EU) 2017/1939<sup>40</sup>, the financial interests of the Union are to be protected through proportionate measures, including the prevention, detection, correction and investigation of irregularities and fraud, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, the imposition of administrative sanctions. In particular, in accordance with Regulation (EU, Euratom) No 883/2013 and (EC, Euratom) No 2185/96 the European Anti-Fraud Office (OLAF) may carry out investigations, including on-the-spot checks and inspections, with a view to establishing whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union. In accordance with Regulation (EU) 2017/1939, the European Public Prosecutor's Office (EPPO) may investigate and prosecute fraud and other illegal activities affecting the financial interests of the Union as provided for in Directive (EU) 2017/1371 of the European Parliament and of the Council<sup>41</sup>. In accordance with Regulation (EU, Euratom) 2024/2509, any person or entity receiving Union funds is to fully cooperate in the protection of the Union's financial interests, to grant the necessary rights and access to the Commission, OLAF, EPPO and the European Court of Auditors and to ensure that any third parties involved in the implementation of Union funds grant equivalent rights.</p>	
<p>(40) In order to simplify requirements for beneficiaries, simplified cost options in the form of lump sums, unit costs and flat rates should be used to the maximum possible extent. Simplified cost options to support learning</p>	<p>DE (Comments):</p>

<sup>39</sup> Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities (OJ L 292, 15.11.1996, p. 2).

<sup>40</sup> Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO') (OJ L 283, 31.10.2017, p. 1).

<sup>41</sup> Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (OJ L 198, 28.7.2017, p. 29).

ERASMUS +

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<p>mobility under the Programme should take into account the living and subsistence costs in the host country. In accordance with national law, Member States should be encouraged to exempt those grants from any taxes and social levies; grants awarded to individuals by public or private legal entities should be treated in the same manner.</p>	<p>We are currently examining the appropriate inclusion of the target group of NEETs (Not in Employment, Education or in Training) in the Erasmus+ regulation proposal, and possibly of the the “Aim, Learn, Master, Achieve” (ALMA) initiative, in order to integrate her with their specific characteristics and target groups under one youth, learning mobility umbrella, and would therefore welcome an expansion of the Erasmus+ scope to NEETs and ALMA currently running under ESF+ shared and indirect management - with the extended use of SCOs, including mobility lump sums based on Leonardo/Erasmus+ unit costs, and FNLC schemes like the ALMA Delegated Act.</p> <p>EE (Drafting suggestions):</p> <p>In order to simplify requirements for beneficiaries, simplified cost options in the form of lump sums, unit costs and flat rates should be used to the maximum possible extent. Simplified cost options to support learning mobility under the Programme should take into account the living and subsistence costs in the host country. In accordance with national law, Member States should be encouraged to exempt those grants from any taxes and social levies; grants awarded to individuals by public or private legal entities should be treated in the same manner. The Commission should develop a methodological approach for calculating simplified cost options, review them every two years in transparent consultation with Member States, and, where necessary, adopt decisions to revise them. The outcomes of the review should be transparently communicated on the Commission’s website.</p> <p>EE (Comments):</p> <p>To ensure the relevance, fairness and transparency of simplified cost options, it is essential that the Commission establishes a clear methodology, engages Member States in regular consultations, and updates the cost options when</p>

Commission proposal	Drafting suggestions and Comments
	<p>needed. Public communication of the results enhances trust and accountability.</p> <p>HU (Drafting suggestions):</p> <p>In order to simplify requirements for beneficiaries, simplified cost options in the form of lump sums, unit costs and flat rates should be used to the maximum possible extent. Simplified cost options to support learning mobility, <b>volunteering and solidarity action</b> under the Programme should take into account the living and subsistence costs in the host country. In accordance with national law, Member States should be encouraged to exempt those grants from any taxes and social levies; grants awarded to individuals by public or private legal entities should be treated in the same manner.</p>
<p>(41) It is appropriate to ensure that the 2021-2027 Programmes are closed correctly, in particular as regards the continuation of multiannual arrangements for their management, such as the financing of technical and administrative assistance. As from 1 January 2028, the technical and administrative assistance should ensure, where necessary, the management of actions that have not been finalised under the 2021-2027 Programmes by 31 December 2027.</p>	
<p>(42) In line with Article 349 of the Treaty on the Functioning of the European Union (TFEU), the Programme should take into account the specific situation of the outermost regions referred to in that Article, including measures to facilitate their participation to the Programme.</p>	

ERASMUS +

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>(43) Pursuant to Article 85 (1) of Council Decision (EU) 2021/1764<sup>42</sup>, persons and entities established in overseas countries and territories are eligible for funding under the Programme subject to the rules and objectives and to any specific arrangement applicable to the Member State to which the relevant overseas country or territory is linked.</p>	
<p>(44) [The Programme is to be implemented in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], which establishes the rules for the expenditure tracking and the performance framework for the budget, including rules for ensuring a uniform application of the principles of ‘do no significant harm’ and gender equality referred to in Article 33(2), points (d), and (f), of Regulation (EU, Euratom) 2024/2509 respectively, rules for monitoring and reporting on the performance of Union programmes and activities, rules for establishing a Union funding portal, rules for the evaluation of the programmes, as well as other horizontal provisions applicable to all Union programmes such as those on information, communication and visibility.]</p>	
<p>(45) In view to optimise the added value, increase scale and impact of investments, synergies should be sought in particular between the Programme and other Union funding instruments, including through enabling mechanisms. The Programme should seek as well synergies that strengthen collaboration between education and the private sector.</p>	<p>AT  <b>(Drafting suggestions):</b>            (...) strengthen collaboration between education, <b>training and volunteering</b> and the private sector”.</p> <p>HU  <b>(Drafting suggestions):</b></p>

<sup>42</sup> Council Decision (EU) 2021/1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the European Union including relations between the European Union on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland) (OJ L 355, 7.10.2021, p. 6–134).

Commission proposal	Drafting suggestions and Comments
	<p>In view to optimise the added value, increase scale and impact of investments, synergies should be sought in particular between the Programme and other Union funding instruments, including through enabling mechanisms. The Programme should seek as well synergies that strengthen collaboration between education <b>and training</b> and the private sector.</p> <p>HU (Comments):</p> <p>In Recital 45, we propose to insert “training” next to education in the last sentence.</p> <p>IT (Comments):</p> <p>To support synergies, we consider necessary not only to define enabling mechanisms but also to simplify procedures that make achieving synergies cumbersome and sometimes impossible</p>
<p>(46) The Programme should allow for full and partial association of third countries. The Programme should also support the participation of third countries that are not associated to the Programme where those countries are identified in the work programme, their participation contributes to achieve the objectives of the programme and is essential for the implementation of the action.</p>	<p>IE (Comments):</p> <p>IE welcomes the increased opportunities for mobility experiences and cooperation with industrialised third countries and those with emerging economies as a means to address skills shortages and enhance EU competitiveness. However, it is important that these opportunities do not come at the expense of existing mobility levels. Support of industrialised countries in European University alliances should be encouraged</p> <p>ES (Comments):</p> <p>Spain has a scrutiny reservation on partial association to the Programme.</p>

Commission proposal	Drafting suggestions and Comments
	<p>We are concerned that the management of the programme will become more complicated if too many models of partial associations are allowed and that third countries will be able to negotiate their financial contribution too freely and engage in excessive cherry picking by choosing the actions and/or sectors in which they want to cooperate or not.</p> <p>HU (Comments):</p> <p>We are concerned that the Commission's proposals do not provide adequate guarantees that the Council will be meaningfully involved in determining the scope and content of partial or full association agreements, particularly in the case of third countries where the COM would negotiate with the third countries concerned on the basis of the standard authorization used in FP9 (accessing countries, candidate countries and potential candidates, and European Neighborhood Policy countries). In our view, this is an issue related to both governance and interinstitutional balance.</p> <p>As the problem arises in the case of 10 funds/programmes, we believe that the issue should be addressed by the horizontal ad hoc working group. The Council's role in establishing partial or full association agreements could be strengthened either horizontally, by including the same text in all funds, or by addressing this issue in the interinstitutional agreement on the new MFF.</p> <p>IT (Comments):</p> <p>We request clarifications regarding the term 'partial' concerning the participation of third countries</p> <p>SI (Comments):</p> <p>Not in favor of the partial association of their countries. Clarification would be welcome on whether countries will have the possibility to be fully or partially associated, whether such status could evolve over time, what types</p>

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>of participation are linked to each status, and how the management of these different statuses will be ensured</p> <p>SK (Comments):</p> <p>What is the rationale of the partial association of third countries? Will there be any mechanism through which Member States will express their opinion to such participation? (same comment as to Art. 13(1).</p>
<p>(47) Appropriate and inclusive outreach, publicity of the opportunities supported by the Programme should be ensured at local, national and Union level and should take into account the main target groups of the Programme and, where relevant, a wide variety of other target groups. Furthermore, the Commission and the implementing bodies should facilitate the sharing of good practices and project results and gather feedback on the Programme.</p>	
<p>(48) The Programme should mobilise the potential of former participants in the Erasmus+ Programme and support related activities by encouraging them to promote the Programme.</p>	<p>IE (Comments):</p> <p>IE is supportive of encouraging past participants in the promotion of the programme. Our national evaluation report showed most young people found out about the programme from peers through word of mouth.</p> <p>AT (Drafting suggestions):</p> <p>(..) former participants in the Erasmus+ Programme <b><u>and the European Solidarity Corps Programme (...)</u></b>”</p>

Commission proposal	Drafting suggestions and Comments
<p>(49) Measures should be taken to streamline the management of the Programme and achieve economies of scale including by limiting and reducing the number of national agencies.</p>	<p>IE (Comments): This is a matter for National Authorities.</p> <p>AT (Drafting suggestions): Measures should be taken to streamline the management of the Programme and achieve economies of scale including by limiting and reducing the number of national agencies. <b><u>Such measures shall not undermine the accessibility, outreach or operational capacity of national agencies, nor the support provided at any level to organisations and beneficiaries (including grassroots and self-organised groups).</u></b></p> <p>ES (Drafting suggestions): 49. Measures should be taken to streamline the management of the Programme and achieve economies of scale including by adjusting the number of national agencies, where appropriate and taking into account national circumstances.</p> <p>ES (Comments): It should be made clear that Member States are free to decide whether they want and need to have more than one national agency. If the Commission pretends to limit the number of agencies in certain cases, like new third countries associated to the Programme, then it should be made clear.</p> <p>IT (Drafting suggestions): (49) Measures should be taken to streamline the management of the Programme and achieve economies of scale. <b><u>including by limiting and reducing the number of national agencies.</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p>IT  <b>(Comments):</b>  <b>Italy would not agree on cutting the number of national agencies.</b></p> <p>The wording here seems to envisage a potential reshaping of the Programme’s governance, suggesting a rationalisation of national agencies, possibly through a decrease in their overall number.</p> <p>Following the clarification provided by the Commission during a previous EDUC meeting, we believe that the mechanisms enabling such rationalisation should be explained more clearly, as well as how it would be reconciled with the access of new countries to the Programme and with the implementation of actions under indirect management, ensuring operational continuity, Programme’s effectiveness, and a correct EU funds management.</p> <p>SI  <b>(Drafting suggestions):</b>  <u>To delete: including by limiting and reducing the number of national agencies</u></p> <p>SI  <b>(Comments):</b>          Not in favor of the reducing NA</p> <p>SK  <b>(Drafting suggestions):</b>          49. Measures should be taken to streamline the management of the Programme and achieve economies of scale <del>including by limiting and reducing the number of national agencies.</del></p>

ERASMUS +

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	SK (Comments): The calculation of the programme management contribution does not include the number of national agencies as a parameter. Therefore, the number of agencies in the country does not affect the management costs. The costs of IT tools, the inefficient implementation of multiple rounds within a call, or excessive regulation of decentralized management have a significant impact on management efficiency.  RED LINE
(50) Regulations (EU) 2021/817 <sup>43</sup> and (EU) 2021/888 <sup>44</sup> should be repealed with effect from 1 January 2028.	
(51) In order to ensure continuity in providing support in the relevant policy area and to allow implementation to start from the beginning of the 2028-2034 MFF, this Regulation should enter into force on and apply from 1 January 2028.	
HAVE ADOPTED THIS REGULATION:	

<sup>43</sup> Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013 (OJ L 189, 28.5.2021, p. 1).

<sup>44</sup> Regulation (EU) 2021/888 of the European Parliament and of the Council of 20 May 2021 establishing the European Solidarity Corps Programme and repealing Regulations (EU) 2018/1475 and (EU) No 375/2014 (OJ L 202, 8.6.2021, p. 32).

ERASMUS +

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CHAPTER I	<p>IE (Comments): IE has already submitted observations on articles 1 to 14 in the first round. We are not submitting comments in this round on those articles.</p>
GENERAL PROVISIONS	
<i>Article 1</i>	
<i>Subject matter</i>	
<p>This Regulation establishes Erasmus+, the Union programme for action in the fields of education and training and also in the fields of youth and sport (the ‘Programme’) and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding. This Regulation also sets up the European Voluntary Humanitarian Aid Corps.</p>	<p>AT (Drafting suggestions): This Regulation <b>includes the European Solidarity Corps and</b> the European Voluntary Humanitarian Aid Corps.</p> <p>BE (Comments): .</p> <p>CY (Drafting suggestions): This Regulation establishes Erasmus+, the Union programme for action in the fields of education, and training, and also in the fields of youth and sport (the ‘Programme’).</p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>It sets out the Programme's</u></b> and lays down the objectives, of the Programme, its budget, <del>for the period 2028-2034</del>, the forms of Union funding and the rules for providing such funding.</p> <p>This <del>The</del> Regulation also <b><u>establishes</u></b> <del>sets up</del> the European Voluntary Humanitarian Aid Corps <b><u>and defines the framework for its operation.</u></b></p> <p>CY  <b>(Comments):</b>                      The proposed changes improve clarity, simplify the structure, and ensure consistent punctuation and wording while keeping all key content from the original Commission text.</p> <p>FI  <b>(Drafting suggestions):</b>                      This Regulation establishes Erasmus+, the Union programme for action in the fields of education and training, youth, including European Voluntary Humanitarian Aid Corps, and sport (the 'Programme') and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding. This.</p> <p>FI  <b>(Comments):</b>                      Suggested wording could indicate that Humanitarian Aid Corps is separate from the rest of the 'Programme'. A link should be made more visible.</p> <p>FR  <b>(Drafting suggestions):</b></p>

Commission proposal	Drafting suggestions and Comments
	<p>This Regulation establishes Erasmus+, the Union programme for action in the fields of education and training, <del>and also in the fields of</del> youth and sport (the ‘Programme’) and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding.</p> <p>This Regulation also sets up <b>the European Solidarity Corps</b> and the European Voluntary Humanitarian Aid Corps.</p> <p>FR  <b>(Comments):</b></p> <p>The FR delegation suggests rewording to put all areas of action within the program on the same level.</p> <p>The FR delegation also proposes adding a reference to the the European Solidarity Corps to highlight this initiative which would be integrated into the future Erasmus+ program in the same way as is already done for Humanitarian Volunteering</p> <p>IT  <b>(Drafting suggestions):</b></p> <p>This Regulation establishes Erasmus+, the Union programme for action in the fields of education and training <del>and also in the fields of</del> youth and sport (the ‘Programme’) and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding. This Regulation also sets up the European Voluntary Humanitarian Aid Corps.</p> <p>IT  <b>(Comments):</b></p> <p>Article 1 of the draft Regulation does not seem to consider all Erasmus+ sectors at the same level.</p>

ERASMUS +

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	<p>We therefore propose an amendment that restores equal standing among all sectors of the Programme.</p> <p>NL <b>(Drafting suggestions):</b></p> <p>This Regulation establishes Erasmus+, the Union programme for action in the fields of education and training and youth and sport (the ‘Programme’) and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding. This Regulation also sets up the European Voluntary Humanitarian Aid Corps.</p> <p>NL <b>(Comments):</b></p> <p>We suggest deleting “also in the fiels of”to treat the two components equally.</p>

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 2</i></p>	<p>FR (Comments): The position of the added definitions will be determined together.</p> <p>NL (Comments): The Netherlands missed references to virtual modes of exchange in this article and throughout the proposal. International and intercultural skills can be acquired in more ways than only physical mobility, for example blended mobility, virtual exchange and internationalisation at home. In the Council Recommendation of ‘Europe on the move’, virtual and blended learning are also included. The Dutch national evaluation of Erasmus+ also concludes that virtual mobility and BIPs have proven to facilitate opportunities for inclusion target groups and need dedicated financing, as costs associated with organising digital programmes and virtual mobility are not adequately covered by the current programme. Mobility should be seen as a means, not an end goal in itself. For the Netherlands, it is therefore important that virtual mobility remains part of Erasmus+.</p>

<i>Definitions</i>	<p>ES (Comments):</p> <p>Many definitions are the same as those in the current regulations or are very similar, but several have been removed. We believe it could be useful to recover and update some of them, <b>for example the ones from the ESC programme.</b></p> <p>FI (Comments):</p> <ul style="list-style-type: none"> <li>- Some definitions missing from this list:</li> <li>- EU Youth Dialogue, national authority/agency, partnership, legal entity, newcomer organisation).</li> <li>- virtual mobility</li> <li>- newcomer institution</li> </ul> <p>In order to ensure equal implementation and avoid confusion, the basic concepts should be defined in the regulation.</p> <p>IT (Drafting suggestions):</p> <p><b><u>‘Sport Collaborative Alliance’ means a structured, transnational partnership in the field of sport that brings together organisations from different countries and sectors to deliver cooperation actions supporting integrity and good governance, health-enhancing physical activity and inclusion, and skills development and innovation in sport, including inbound and outbound learning mobility implemented with formally recognised host organisations acting as project partners.</u></b></p> <p>IT (Comments):</p> <p>We propose adding the definitions of National Authority and National Agency.</p>
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Commission proposal	Drafting suggestions and Comments
	<p>Moreover, we suggest to add a new definition of Sport Collaborative Alliances and you can find here our proposal: <i>‘Sport Collaborative Alliance’ means a structured, transnational partnership in the field of sport that brings together organisations from different countries and sectors to deliver cooperation actions supporting integrity and good governance, health-enhancing physical activity and inclusion, and skills development and innovation in sport, including inbound and outbound learning mobility implemented with formally recognised host organisations acting as project partners.</i></p>
<p>For the purposes of this Regulation, the following definitions apply:</p>	<p>CY (Drafting suggestions):</p> <p><b><u>‘sport staff’ means a person involved in the instruction, training and management of a sports team or individual sports people, either on a paid basis or on a voluntary basis;</u></b></p> <p><b><u>‘newcomer organisation’ means an organisation or institution that has not previously received support in a given type of action supported by the Programme or by the 2021-2027 Programme either as a coordinator or as a partner.</u></b></p> <p>CY (Comments):</p> <p>It is proposed to add the definitions of the two terms, which appear in various parts of the regulations, to ensure a common understanding.</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>‘partnership’ means an agreement between a group of institutions or organisations to carry out joint activities and projects;</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments):</p> <p>The FR delegation requests adding a definition of the term “partnership,” which is mentioned numerous times in the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>
<p>(1) ‘adult learner’ means a person who has left or finished initial education and training and engages in formal, non-formal or informal learning, including NEET;</p>	<p>CY (Drafting suggestions):</p> <p>‘adult learner’ means a person who has left or finished initial education and training and engages in formal, non-formal or informal learning, <del>including NEET;</del></p> <p>CY (Comments):</p> <p>The definition, as currently written with regard to the NEET category, does not make sense. We recommend deleting this reference.</p> <p>DE (Drafting suggestions):</p> <p>(1) <del>‘adult learner’ means a person who has left or finished initial education and training and engages in formal, non-formal or informal learning, including NEET;</del> <b>‘adult education’ means any form of non-vocational education for adults after initial education, whether of a formal, non-formal or informal nature;</b></p> <p>DE (Comments):</p> <p>We request the (re)introduction of an appropriate definition of adult education. The previous clarification in the definition of "adult learner" and "adult learning" to "non-vocational" has currently been dropped. This results in an overlap with the definition of "vocational education and training learner", which refers to "initial and continuous" VET. According to the</p>

Commission proposal	Drafting suggestions and Comments
	<p>amended definition, the major areas of continuing vocational education and training and retraining fall under both vocational education and training and adult education. This would create new ambiguities in the allocation of educational institutions to the sectors of the programme and could lead to even less funding being available for general non-vocational adult education.</p> <p>ES (Comments):</p> <p>The definition does not really describe the types of adult learners. It could be understood to mean any adult in any type of education and training, including VET or HE students.</p> <p><b>Moreover, the inclusion of NEET in the definition is new. Although the Commission did not explain this to us in our Education Committee, it seems that it is considering financing or supplementing the financing of other initiatives such as ALMA (at least that is what it has been said in groups such as the SQWP). Is this true? What would this mean for the Erasmus+ programme? We believe we must be cautious. Erasmus+ cannot serve issues that are fundamentally employment-related, even if the target group is young people.</b></p> <p>FR (Comments):</p> <p>New definition, not included in the Regulation 2021-2027.</p> <p>IT (Drafting suggestions):</p> <p>(1) ‘adult learner’ means a person who has left or finished initial education and training and engages formal, non-formal or informal learning, including NEET, <b><u>employed and looking for job</u></b>;</p> <p>IT</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>We propose to better clarify the definition of adult learner because in the VET context, the individuals to whom the programme is addressed (for example with mobility) include those who have activated upskilling and reskilling paths and in any case enrolled in skills enhancement paths even if they are already employed or looking for job.</p>
	<p>FR</p> <p><b>(Drafting suggestions):</b></p> <p><b><u>‘international’ relates to any action involving at least one third country not associated to the Programme;</u></b></p> <p>FR</p> <p><b>(Comments):</b></p> <p>The FR delegation suggests to define term “international,” which is mentioned in the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>
<p>(2) ‘adult learning’ means any form of formal, non-formal or informal learning for adults, encompassing opportunities for skills development, upskilling and reskilling for competitiveness, enhancing social cohesion and supporting active participation in society;</p>	<p>DE</p> <p><b>(Drafting suggestions):</b></p> <p><del>(2) ‘adult learning’ means any form of formal, non formal or informal learning for adults, encompassing opportunities for skills development, upskilling and reskilling for competitiveness, enhancing social cohesion and supporting active participation in society;</del></p> <p>DE</p> <p><b>(Comments):</b></p> <p>See comment above.</p> <p>FI</p> <p><b>(Comments):</b></p>

Commission proposal	Drafting suggestions and Comments
	<p>This definition is wider than the current wording where vocational learning was excluded. Why was this change made and is there a risk adult learning is now overlapping with VET and higher education? Why is reskilling and upskilling only limited to competitiveness?</p> <p>IT (Drafting suggestions):</p> <p>(2) ‘adult learning’ means any form of formal, non-formal or informal learning for adults, encompassing opportunities for skills development, upskilling and reskilling for competitiveness <b>and employability</b>, enhancing social cohesion and supporting active participation in society;</p> <p>IT (Comments):</p> <p>In line with what is suggested in point (1), we suggest including a reference to the purpose regarding the employability of adults.</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>‘national authority’ means one or more authorities in charge, at national level, of monitoring and supervising the management of the Programme in a Member State or in a third country associated to the Programme;</u></b></p> <p>FR (Comments):</p> <p>The FR delegation suggests to define “national authority,” which is mentioned in the content of the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>
<p>(3) ‘grassroots sport’ means physical leisure activities practiced regularly at non-professional level by people of all ages for health, educational or social purposes;</p>	

Commission proposal	Drafting suggestions and Comments
	<p>FR (Drafting suggestions): <b><u>‘national agency’ means one or more bodies in charge of managing the implementation of the Programme at national level in a Member State or in a third country associated to the Programme;</u></b></p> <p>FR (Comments): The FR delegation suggests to define “national agency,” which is mentioned in the draft regulation but is absent from the definitions, even though it is included in the current regulation. Furthermore, reintroducing this definition unchanged has the advantage of highlighting the possibility of having more than one national agency within the same country (and therefore also several national authorities).</p>
<p>(4) ‘higher education institution’ means an institution which, in accordance with regional, national, or international law or practice, offers quality assured degrees or other recognised tertiary level qualifications, regardless of what such an establishment is called, or a comparable institution at tertiary level which is considered by the national/regional authorities or the European Commission as eligible to participate in the Programme in the respective territories;</p>	<p>AT (Drafting suggestions): <b>‘higher education institution’ means an institution which, in accordance with regional, national, or international law or practice, offers quality assured recognised degrees or other recognised tertiary level qualifications, regardless of what such an establishment is called, or a comparable institution at tertiary level which is considered by the national/regional authorities or the European Commission as eligible to participate in the Programme in the respective territories;</b></p> <p>AT (Comments): The definition of what constitutes a higher education institution is subject to national legislation. Therefore, the definition of “higher education institution” as set out in Art. 2 (19) of the current Erasmus+ Regulation should be maintained.</p>

Commission proposal	Drafting suggestions and Comments
	<p>CY  <b>(Drafting suggestions):</b>                      or a comparable institution at tertiary level which is considered by the national/regional authorities or the European Commission as eligible to participate in the Programme in the respective territories;</p> <p>CY  <b>(Comments):</b>                      It is suggested to remove the reference, as it allows for an overly broad interpretation regarding the types of organisations eligible to participate.</p> <p>DE  <b>(Drafting suggestions):</b>                      (4) ‘higher education institution’ means an institution which, in accordance with regional, national, or international law or practice, offers quality assured degrees or other recognised tertiary level qualifications, regardless of what such an establishment is called, or a comparable institution at tertiary level which is considered by the national/regional authorities or the European Commission as eligible to participate in the Programme in the respective territories;</p> <p>DE  <b>(Comments):</b>                      Only the member states responsible for higher education institutions should define what constitutes a higher education institution, not the Commission. The Commission is not listed in the current regulation. Therefore, it should not appear in the new regulation, either.</p> <p>FI</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <p>Also offers quality assured degrees or other recognised tertiary level qualifications, <b>that are legally a part of a national higher education system</b></p> <p>FI</p> <p><b>(Comments):</b></p> <p>How / in which structure Commission would consider? "...or a comparable institution at tertiary level which is considered by the national/regional authorities or the European Commission</p> <p>We understand COM is willing to open legislation to new opportunities, but legal text needs to be clear.</p> <p>FR</p> <p><b>(Drafting suggestions):</b></p> <p>higher education institution' means an institution which, in accordance with regional, national, or international law or practice, offers quality assured degrees or other recognised tertiary level qualifications, regardless of what such an establishment is called, or a comparable institution at tertiary level which is considered by the national/regional authorities <del>or the European Commission</del> as eligible to participate in the Programme in the respective territories;</p> <p>FR</p> <p><b>(Comments):</b></p> <p>What is the added value of the new definition of 'higher education institution' (which differs from that in the current regulation), mentioning the European Commission as the body responsible for recognising HEIs and guaranteeing the quality of the qualifications awarded? To avoid legal risks</p>

Commission proposal	Drafting suggestions and Comments
	<p>associated with a lack of competence in this area, the French delegation requests that the European Commission be removed from the list of authorities competent for the recognition of higher education institutions.</p> <p>NL (Drafting suggestions):</p> <p>. ‘higher education institution’ means an institution which, in accordance with regional, national, or international law or practice, offers quality assured degrees or other recognised tertiary level qualifications, regardless of what such an establishment is called, or a comparable institution at tertiary level which is considered by the national/regional authorities as eligible to participate in the Programme in the respective territories;</p> <p>NL (Comments):</p> <p>Could the Commission provide us with an example of an institution at tertiary level that is considered by the Commission to be eligible to participate in the Programme, while not by a national or regional authority? The “or” in the definition suggests that one could be considered eligible by the Commission to participate, while not by a national/regional authority. Unless we receive clarity, we suggest deleting.</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>‘virtual cooperation’ means any form of cooperation using information and communication technology tools to facilitate and support any relevant Programme actions:</u></b></p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	‘Virtual cooperation’ is mentioned in the content of the draft regulation but is absent from the definitions, even though it is included in the current regulation. It should be added.
(5) ‘higher education student’ means a person enrolled at a higher education institution, including at short-cycle, bachelor’s, master’s or doctoral level or equivalent or a person who recently completed a degree from such an institution;	<p>AT (Drafting suggestions):</p> <p>‘higher education student’ means a person enrolled at a higher education institution, including at short-cycle, bachelor’s, master’s or doctoral level or equivalent or a person who recently <b>completed a degree graduated</b> from such an institution;</p> <p>AT (Comments):</p> <p>The definition should be maintained as set out in Art. 2 (8) of the current Erasmus+ Regulation.</p> <p>FI (Comments):</p> <p>recently= two years or smth else?</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>‘transnational’ relates to any action involving at least two countries which are either Member States or third countries associated to the Programme.</u></b></p> <p>FR (Comments):</p> <p>The FR delegation suggests the adding of the definition of ‘transnational’, which is mentioned in the content of the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>(6) 'European Voluntary Humanitarian Aid Corps' refers to volunteering activities that support post-crisis long-term humanitarian aid and development cooperation operations in third countries not associated to the Programme, that are intended to provide needs-based assistance aimed at preventing and alleviating human suffering, and maintaining durable human dignity in the face of crises, and that include actions that aim to reinforce disaster preparedness and disaster risk reduction, link relief, rehabilitation and development and contribute towards strengthening the resilience and capacity of vulnerable or disaster-affected communities to cope with and recover from crises;</p>	<p>FI (Comments): Humanitarian Aid Corps receives a lot of visibility compared to the Solidarity Corps. Should also the latter be defined either in the definitions or in the articles?</p>
	<p>FR (Drafting suggestions): <b><u>'legal entity' means a natural person or a legal person created and recognised as such under national law, Union law or international law which has legal personality and which may, acting in its own name, exercise rights and be subject to obligations, or an entity which does not have legal personality as referred to in point (c) of Article 197(2) of the Financial Regulation;</u></b></p> <p>FR (Comments): 'Legal entity' is mentioned in the content of the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>
<p>(7) 'informal learning' means learning resulting from daily activities and experiences which is not organised or structured in terms of objectives, time or learning support; it may be unintentional from the learner's perspective;</p>	<p>FR (Comments): Identical to Regulation 2021-2027.</p>
	<p>FR (Drafting suggestions): <b><u>'EU Youth Dialogue' means the dialogue between young people and youth organisations and policy and decision-makers, as well as experts,</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p><u>researchers and other civil society actors, as appropriate; it serves as a forum for continuous joint reflection and consultation on the priorities of, and all fields of relevance to, young people;</u></p> <p><u>‘youth participation activity’ means an activity outside formal education and training carried out by informal groups of young people or youth organisations, and characterised by a non-formal or informal learning approach;</u></p> <p><u>European Solidarity Corps’ means the Union initiative providing young people with opportunities to participate in solidarity, volunteering and community engagement activities, both in the Union and beyond, that address societal, environmental or humanitarian challenges. Such activities shall be non-profit, voluntary, include a strong learning and civic dimension, and contribute to strengthening solidarity, social cohesion and European values.</u></p> <p><u>‘newcomer organisation’ means an organisation or institution that has not previously received support in a given type of action supported by the Programme or by the 2021-2027 Programme either as a coordinator or as a partner.</u></p> <p>FR  <b>(Comments):</b>                      Identical to Regulation 2021-2027 (Art 23).                      Identical to Regulation 2021-2027 (Art 21).                      The FR delegation will support AT for including a definition of ESC</p>

Commission proposal	Drafting suggestions and Comments
	<p>“Newcomer organisation” is mentioned in the content of the draft regulation but is absent from the definitions, even though it is included in the current regulation.</p>
<p>(8) ‘joint study programme’ means a programme coordinated and offered jointly by different higher education institutions from two or more countries and leading to the award of a joint degree;</p>	<p>DE (Comments): Only for joint degrees? In Erasmus Mundus, “joint study programs” have so far also included multiple degree certificates.</p> <p>FI (Drafting suggestions): ‘joint study programme’ means a programme coordinated and offered jointly by different higher education institutions from two or more countries and leading to the award of a joint degree;</p> <p>FI (Comments): FI suggest to add VET, joint study programmes are also part of Cove, there is also the VET Label project, therefore it is relevant to add VET</p> <p>FR (Drafting suggestions): ‘joint study programme’ means <b>an integrated curriculum</b> programme coordinated and offered jointly by different higher education institutions from <b>the European Higher Education Area (EHEA) countries, included under the Erasmus Mundus action and leading to double/multiple degrees or</b> two or more countries and leading to the award of a joint degree;</p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	For the sake of clarity, a clear definition of joint degree is necessary. It is also important to stress that these joint programmes could be also implemented under the Erasmus Mundus actions.
	FR (Drafting suggestions): <b><u>'joint degree' : a single document awarded by higher education institutions offering the joint programme and nationally acknowledged as the recognised award of the joint programme.</u></b>
<p>(9) 'lifelong learning' means learning in all its forms, whether formal, non-formal or informal, taking place at all stages in life and resulting in an improvement or update in knowledge, skills, competences and attitudes, including through micro credentials or participation in society from a personal, civic, cultural, social or employment-related perspective, such as the provision of counselling and guidance services; it includes early childhood education and care, general education, vocational education and training, higher education, adult learning, youth work and other learning settings outside formal education and training and it typically promotes cross-sectoral cooperation and flexible learning pathways;</p>	<p>FI (Drafting suggestions):</p> <p>(9) 'lifelong learning' means learning in all its forms, whether formal, non-formal or informal, taking place at all stages in life and resulting in an improvement or update in knowledge, skills, competences and attitudes, including through micro credentials or participation in society from a personal, civic, cultural, social or employment-related perspective, such as the provision of counselling and guidance services; it includes early childhood education and care, general education, vocational education and training, higher education, adult learning, youth work and other learning settings outside formal education and training <b>including through micro credentials</b> ; and it typically promotes cross-sectoral cooperation and flexible learning pathways; <b>The provision of counselling and guidance services promotes lifelong learning.</b></p> <p>FI (Comments):</p> <p>Including through... could preferably be removed to the end, as well as such as the provision...</p>

Commission proposal	Drafting suggestions and Comments
	<p>If the sentence on counselling and guidance is not removed to the end, FI suggest to delet ‘such as’</p> <p>FI suggest to delete “and it typically promotes cross-sectoral cooperation and flexible learning pathways “ it is an irrelevant precision.</p> <p>FR (Comments): Identical to Regulation 2021-2027.</p> <p>IT (Drafting suggestions): (9) ‘lifelong learning’ means learning in all its forms, whether formal, non-formal or informal, taking place at all stages in life and resulting in an improvement or update in knowledge, skills, competences and attitudes, including through micro credentials or participation in society from a personal, civic, cultural, social or employment-related perspective, such as the provision of counselling and guidance services; it includes early childhood education and care, general education, vocational education and training, <b>including continuing vocational education</b>, higher education, adult learning, youth work <b>and sport</b> and other learning settings outside formal education and training and it typically promotes cross-sectoral cooperation and flexible learning pathways;</p> <p>IT (Comments): We suggest to add “<b>including continuing vocational education</b>” and “<b>and sport</b>” to ensure balance among each sector and to clarify that VET does not exclusively concern initial training but also ongoing training, which should be distinguished from the more general adult education.</p>

Commission proposal	Drafting suggestions and Comments
<p>(10) ‘learning mobility’ means moving physically to a country other than the country of residence, in order to undertake study, training, teaching, or non-formal or informal learning;</p>	<p>FR (Drafting suggestions): ‘learning mobility’ means moving physically to a country other than the country of residence, in order to undertake study, training, teaching, or non-formal or informal learning; <b><u>if necessary, these mobility programmes may also take place in a hybrid format</u></b></p> <p>FR (Comments): Reaffirmation that learning mobility is above all physical mobility. But the programme may also support other kind of mobility actions taken place in a hybrid format.</p>
<p>(11) ‘non-formal learning’ means learning which takes place outside formal education and training through planned activities in terms of learning objectives and learning time and where some form of learning support is present;</p>	
<p>(12) ‘people with fewer opportunities’ means people who, for economic, social, cultural, geographical or health reasons or due to their migrant background, or for reasons such as disability or educational difficulties or for any other reason, including a reason that could constitute discrimination under Article 21 of the Charter of Fundamental Rights of the European Union, face obstacles that prevent them from having effective access to opportunities under the Programme;</p>	<p>AT (Drafting suggestions): ‘people with fewer opportunities’ means people who <b><u>face structural or situational barriers that prevent them from having effective access to opportunities under the Programme. Such barriers include low income or poverty, rural or remote residence, migrant or refugee background, disability, long-term health issues, homelessness or precarious housing, educational disadvantage, gender unemployment, ethnic or racial discrimination, or other grounds that could constitute discrimination under Article 21 of the Charter of Fundamental Rights of the European Union.</u></b></p>

Commission proposal	Drafting suggestions and Comments
	FR <b>(Comments):</b> Identical to Regulation 2021-2027.
(13) ‘school pupil’ means a person enrolled in a learning capacity at an institution providing general education at any level from early childhood education and care to upper secondary education or a person schooled outside an institutional setting considered by the competent authorities as eligible to participate in the Programme as a school pupil in their respective territories;	FR <b>(Comments):</b> Identical to Regulation 2021-2027.
(14) ‘staff’ means a person who, on either a professional or a voluntary basis, is involved in education, training or non-formal and informal learning at all levels, including sport; it includes academic staff, teachers, trainers, school leaders, youth workers, sport staff, early childhood education and care staff, non-educational staff and other practitioners involved on a regular basis in promoting learning;	FI <b>(Drafting suggestions):</b> ‘staff’ means a person who, on either a professional or a voluntary basis, is involved in education, training or non-formal and informal learning at all levels, including sport; it includes academic staff, teachers, trainers, <b>guidance and career counsellors</b> school leaders, youth workers, sport staff, early childhood education and care staff, non-educational staff and other practitioners involved on a regular basis in promoting learning;  FI <b>(Comments):</b> FI suggest to add <b>guidance and career counsellors</b> . Guidance and counselling are mentioned in (9) and thus it is important to mention the counsellors here. Including informal learning in the definition is important for sport but does it open up the definition too much regarding other fields? What does it mean in practice if mobility under article 4 is also extended to informal learning?  FR

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <p>‘staff’ means a person who, on either a professional or a voluntary basis, is involved in education, training or non-formal and informal learning at all levels, <b>as well as in related inspection activities</b>, including sport; it includes academic staff, teachers, trainers, school leaders, youth workers, sport staff, early childhood education and care staff, non-educational staff and other practitioners involved on a regular basis in promoting learning;</p> <p>FR</p> <p><b>(Comments):</b></p> <p>Inspection is already included in the current regulation but it might be appropriate to make this more explicit.</p> <p>Identical to Regulation 2021-2027.</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>(14) ‘staff’ means a person who, on either a professional or a voluntary basis, is involved in education, training or non-formal and informal learning at all levels, including sport; it includes academic staff, teachers, trainers, <b>in-company tutors</b>, school leaders, youth workers, sport staff, early childhood education and care staff, non-educational staff and other practitioners involved on a regular basis in promoting learning;</p> <p>IT</p> <p><b>(Comments):</b></p> <p>We suggest including in the definition of staff also “<b>in-company tutors</b>” who has a strategic role in vocational education and training programme, particularly in the programme implemented with the dual model.</p>
(15) ‘third country’ means a country that is not an EU Member State;	

Commission proposal	Drafting suggestions and Comments
<p>(16) ‘vocational education and training learner’ means a person enrolled in an initial or continuous vocational education and training programme at any level from secondary to post-secondary level or a person who has recently graduated or obtained a qualification from such a programme;</p>	<p>FI (Drafting suggestions): vocational education and training learner’ means a person enrolled in an initial or continuous vocational education and training programme at any level from secondary to post-secondary level <del>or a person who has recently graduated or obtained a qualification from such a programme;</del></p> <p>FI (Comments): FI suggests to delete <del>or a person who has recently graduated or obtained a qualification from such a programme;</del> someone recently graduated no more a learner.</p> <p>FR (Comments): Identical to Regulation 2021-2027.</p> <p>IT (Drafting suggestions): (16) ‘vocational education and training learner’ means a person enrolled in an initial or continuous vocational education and training programme at any level from secondary to post-secondary level or a person who has recently graduated or obtained a qualification from such a programme <b><u>or a person employed or seeking first employment who is participating in a upskilling or reskilling programme;</u></b></p> <p>IT (Comments): We suggest introducing a specific reference also to working adults or young adults seeking their first job included in upskilling or reskilling programme</p>

Commission proposal	Drafting suggestions and Comments
<p>(17) ‘volunteering’ means an unpaid activity that addresses societal or humanitarian challenges and has a strong learning component;</p>	<p>CY (Drafting suggestions): <b><u>‘volunteer’ is a person who undertakes an unpaid activity for the common good or societal/humanitarian purpose, on a voluntary basis, which includes a strong learning and training component.</u></b></p> <p>CY (Comments): “It is recommended to include the definition of ‘volunteer’ prior to the definition of ‘volunteering’, following the structure used for previous entries, e.g., (1) ‘adult learner’, (2) ‘adult learning’.”</p> <p>DE (Drafting suggestions): (17) <b><u>‘European volunteering service’ activities</u></b> <del>‘volunteering’</del> means an <b><u>long-term or short term</u></b> unpaid <b><u>individual or group</u></b> activity that addresses societal or humanitarian challenges and has a strong learning component; <b><u>these activities include a learning and training component, shall not be a substitute for traineeships or jobs, are not be equated with employment; and shall be based on a written volunteering agreement;</u></b></p> <p>DE (Comments): → Re-wording of this definition refers to DE proposal on art. 4.2</p>
<p>(18) ‘young people’ in the field of youth means individuals aged between 13 and 30;</p>	
<p>(19) ‘youth worker’ means a person who, on either a professional or a voluntary basis, is involved in non-formal learning and supports young people</p>	

Commission proposal	Drafting suggestions and Comments
<p>in their personal socio-educational and professional development and the development of their competences; it includes persons who plan, steer, coordinate and implement activities in the field of youth.</p>	
	<p>AT  <b>(Drafting suggestions):</b>  <u>'European Solidarity Corps' means the Union initiative providing young people with opportunities to participate in solidarity, volunteering and community engagement activities, both in the Union and beyond, that address societal, environmental or humanitarian challenges. Such activities shall be non-profit, voluntary, include a strong learning and civic dimension, and contribute to strengthening solidarity, social cohesion and European values.</u>   <u>'youth organisation' means a non-profit organisation, network, association, collective or self-organised group (whether legally constituted or not) whose primary purpose is to work with, for or on behalf of young people, promoting youth participation, non-formal learning, volunteering or youth work. Youth organisations include youth-led, democratically elected and membership-based entities at local, national and European level.</u>   <u>"EU Youth Dialogue" is a participatory mechanism for young people in the European Union and, where appropriate, other European countries. It serves as a forum for continuous joint reflection, direct dialogue, and consultations on the priorities, implementation and follow-up of cooperation at EU level in the field of youth between young people and their representative organisations, policymakers as well as researchers. The EUYD makes possible a continuous partnership in the governance of these processes at local, regional, national and European level</u></p>

Commission proposal	Drafting suggestions and Comments
	<p>DE (Drafting suggestions):</p> <p><u>(20) ‘youth initiatives’ means an activity outside formal education and training carried out by informal groups of young people or youth organisations, and characterised by a non-formal or informal learning approach or an unpaid solidarity activity that takes place for a period of up to 12 months and that is carried out by groups of at least five participants with a view to addressing key challenges within their communities while presenting a clear European added value;</u></p> <p><u>(21) ‘EU Youth Dialogue’ means the dialogue between young people and youth organisations and policy and decision-makers, as well as experts, researchers and other civil society actors, as appropriate; it serves as a forum for continuous joint reflection and consultation on the priorities of, and all fields of relevance to, young people;</u></p> <p><u>(22) “virtual” and “blended” mobility ...</u></p> <p>DE (Comments):</p> <p>We kindly request the addition of a definition for the area of "youth participation / youth dialogue".</p> <p>The definition for the new term “youth initiatives” includes both youth participation projects (currently in E+) and solidarity projects (ESC).</p> <p>→ New definitions refer to DE proposal for re-structuring art. 4.2</p> <p>We kindly ask for addition of a definition of virtual and blended mobility.</p> <p>FR</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <p>(20) <u>'athlete'</u></p> <p><b>(21) European Universities Alliances: <u>consisting in sustainable bottom-up networks of Higher Education that are geographically and socially inclusive and work seamlessly across the EU which will enable students to obtain a degree by combining studies in several EU countries and contribute to the international competitiveness of European higher education systems.</u></b></p> <p><b>(22) <u>'virtual cooperation' means any form of cooperation using information and communication technology tools to facilitate and support any relevant Programme actions;</u></b></p> <p><b>(23) <u>'transnational' relates to any action involving at least two countries which are either Member States or third countries associated to the Programme;</u></b></p> <p><b>(24) <u>'legal entity' means a natural person or a legal person created and recognised as such under national law, Union law or international law which has legal personality and which may, acting in its own name, exercise rights and be subject to obligations, or an entity which does not have legal personality as referred to in point (c) of Article 197(2) of the Financial Regulation;</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>(25) ‘microcredential’ means the record of the learning outcomes that a learner has acquired following a small volume of learning. These learning outcomes will have been assessed against transparent and clearly defined criteria. Learning experiences leading to micro-credentials are designed to provide the learner with specific knowledge, skills and competences that respond to societal, personal, cultural or labour market needs. Micro-credentials are owned by the learner, can be shared and are portable. They may be stand-alone or combined into larger credentials. They are underpinned by quality assurance following agreed standards in the relevant sector or area of activity.</u></b></p> <p>FR  <b>(Comments):</b></p> <p>FR delegation would suggest a definition of ‘athlete’ to be added, since it is not the same meaning everywhere. It would also contributes to better define the scope of the new mobility opportunities for athletes</p> <p>FR: Council definition</p> <p>2021-2027 Regulation</p>



Commission proposal	Drafting suggestions and Comments
<p><i>Programme objectives</i></p>	<p>DE (Comments): We would welcome a reduction of the diversity/number of objectives. This would possibly also reduce the bureaucracy involved in implementing the programme (leaner applications and proof of target achievement)?</p> <p>IT (Comments): We consider the proposed Regulation to be rather general in comparison with the previous ones, as it does not clearly define the objectives and key actions envisaged for each sector (Education and Training, Youth and Sport), and disproportionately emphasises competitiveness and skills</p>
<p>1. The general objective of the Programme is to contribute to a resilient, competitive, and cohesive Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, while fostering Union values, democratic and societal participation, solidarity, social inclusion and equal opportunities, in the EU and beyond. The Programme shall be a key instrument for building the Union of Skills, developing the European Education Area and supporting the implementation of European strategic cooperation in the fields of education and training, including its underlying sectoral agendas.</p>	<p>IE (Drafting suggestions): ” DE (Drafting suggestions): 1. The general objective of the Programme is to contribute to a resilient, competitive, and cohesive Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, while fostering Union values, democratic and societal participation, solidarity, social inclusion and equal opportunities, in the EU and beyond. The Programme shall be a key instrument for building <del>the a</del> Union of Skills, developing the European Education Area and supporting the implementation of European strategic cooperation in the fields of education and training <b>and the EU Youth Strategy [2028 - xxx]</b>, including its underlying sectoral agendas.</p> <p>DE</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>We request the inclusion of the implementation of the EU Youth Strategy as a single objective. In square brackets where applicable, as the EU-JS from 2028 onwards will not be negotiated until 2027.</p> <p>FI</p> <p><b>(Drafting suggestions):</b></p> <p>The general objective of the Programme is to contribute to a resilient, competitive, and cohesive Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, while fostering Union values, democratic and societal participation, solidarity, social inclusion and equal opportunities, in the EU and beyond. <b>The Programme shall be a key instrument for developing the European Education Area and building the Union of Skills</b>, and supporting the implementation of European strategic cooperation in the fields of education and training, including its underlying sectoral agendas.</p> <p>FI</p> <p><b>(Comments):</b></p> <p>First EEA, then UoS</p> <p>FR</p> <p><b>(Drafting suggestions):</b></p> <p>The general objective of the Programme is to contribute to a <b>cohesive</b>, resilient, competitive <del>and, sovereign and cohesive</del> Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, while fostering Union values, <b>green and digital transitions</b>, democratic and societal participation, solidarity, social inclusion, <b>healthy lifestyles</b> and equal opportunities, in the EU and beyond. The Programme shall be a key instrument <del>for building the Union of Skills, developing the</del></p>

Commission proposal	Drafting suggestions and Comments
	<p>European Education Area and supporting the implementation of European strategic cooperation in the fields of education and training, including its underlying sectoral agendas <b><u>for developing the European Education Area and supporting the implementation of European strategic cooperation in the fields of education and training, including its underlying sectoral agendas, and building the Union of Skills. The Programme shall also be a key instrument for advancing youth policy cooperation under the European Union Youth Strategy, the European Youth dialogue, and the European Youth Work Agenda.</u></b></p> <p>FR (Comments):</p> <p>France supports the renewal of the four cross-cutting priorities of the current program. Inclusion/diversity and citizenship/EU priorities values are here clearly highlighted, while the digital and green transitions are much less so. Climate/biodiversity and DNSH/ do no significant harm are yet cross-cutting priorities for the next MFF (alongside social inclusion and gender equality). Sovereignty is a major EU objective, to which the programme contributes. The Erasmus+ program must be perceived as the most suitable instrument for strengthening the European Education Area in line with the Union of skills (and not the other way around). The Union of skills is essential, but should not be the only strategy put at the heart of the rationale behind the E+ programme.</p> <p>The FR delegation suggests adding a sentence highlighting the contribution of the future program to European youth policies.</p> <p>IT (Drafting suggestions):</p> <p>1. The general objective of the Programme is to contribute to a resilient, competitive, and cohesive Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, while</p>

Commission proposal	Drafting suggestions and Comments
	<p>fostering Union values, democratic and societal participation, solidarity, social inclusion and equal opportunities, in the EU and beyond. The Programme shall be a key instrument for building the Union of Skills, developing the European Education Area, <del>and</del> supporting the implementation of European strategic cooperation in the fields of education and training, <b>youth and sport</b>, including its underlying sectoral agendas, <b><u>and advancing youth policy cooperation under the European Union Youth Strategy and the European Youth Work Agenda.</u></b></p> <p>IT  <b>(Comments):</b></p> <p>To avoid a paradigm change that would subordinate sport to overarching priorities, we propose to reiterate the triadic formula of the Programme's sectors: education and training, youth and sport.</p> <p>Reference should be made also to the European Youth Strategy and the European Youth Work Agenda</p> <p>NL  <b>(Drafting suggestions):</b></p> <p>The general objective of the Programme is to support, through lifelong learning, the educational, professional and personal development of people in the fields of education and training, youth and sport, thereby contributing to a resilient, competitive, and cohesive Europe by promoting high quality lifelong learning, enhancing skills and competences for life and for jobs for all, and fostering Union values, democratic and societal participation, solidarity, social inclusion and equal opportunities, in the EU and beyond. The Programme shall be a key instrument for developing the European Education Area building the Union of Skills, , supporting the implementation of European strategic cooperation in the fields of education and training, including its underlying sectoral agendas, increasing competencies through informal and non-formal learning, supporting the role of youth work,</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>promoting active citizenship, strengthening democratic participation, social inclusion, and cohesion and developing soft skills and competencies among young people to enable their personal and professional development.</p> <p>NL (Comments):</p> <p>Our proposal puts the various objectives on an equal footing.</p> <p>Furthermore we are missing references to the youth and sports component of the programme in the general objective. We understand the proposed track might be too much, but at least some reference should be made.</p> <p>The NL misses reference to educational, professional and personal development as the main objective of Erasmus+. We agree with emphasizing the relevance of the programme for the competitiveness of the EU, but believe that the broader relevance of education and training for personal development should not be lost.</p>
<p>The Programme will advance youth policy cooperation and further develop the European dimension in sport. The objective is to foster a more inclusive, united, and robust Europe by empowering young people, strengthening community ties, and promoting solidarity through meaningful engagement and cooperation. Sport plays a vital role as a driver for social inclusion, health, education, and community development. By investing in youth, volunteering, and sport, the Programme aims to build stronger, more connected societies, encourage civic and democratic engagement, and contribute to social cohesion at all levels.</p>	<p>AT (Drafting suggestions):</p> <p>The Programme will advance youth policy cooperation <b>by strengthening the EU Youth Strategy and the European Youth Work Agenda</b>, and further develop the European dimension in sport. The objective is to foster a more inclusive, united, and robust Europe by empowering young people, strengthening community ties, and promoting <b>active citizenship and</b> solidarity through meaningful engagement and cooperation. Sport plays a vital role as a driver for social inclusion, health, education, and community development (...)"</p> <p>CY</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <p>Sport plays a vital role as a driver for social inclusion, health, education, and community development.</p> <p>CY</p> <p><b>(Comments):</b></p> <p>Currently, disproportionate emphasis is placed on sport, despite its relatively limited budget. Greater focus could instead be directed towards fostering cooperation and collaboration among different types of organisations across the EU, with the aim of supporting innovation, internationalisation, and related priorities.</p> <p>FI</p> <p><b>(Comments):</b></p> <p>language in the proposed objectives is partly ambiguous, as legal text hard to interpret.</p> <p>NL</p> <p><b>(Drafting suggestions):</b></p> <p>The Programme will advance youth policy cooperation and further develop the European dimension in sport. The objective is to foster a more inclusive, united, and robust Europe by empowering young people, strengthening community ties, and promoting solidarity through meaningful engagement and cooperation. Sport plays a vital role as a driver for social inclusion, health, education, and community development. By investing in youth, volunteering, and sport, the Programme aims to build stronger, more connected societies, encourage civic and democratic engagement, contribute to social cohesion at all levels, increasing competencies through informal and non-formal learning, support the role of youth work, promote active citizenship, strengthen democratic participation, social inclusion, and cohesion and develop soft skills and competencies among young people to enable their personal and professional development.</p>

Commission proposal	Drafting suggestions and Comments
	<p>NL (Comments): We are missing some important components of the youth and sports section.</p>
<p>2. The Programme has the following specific objectives:</p>	<p>FI (Drafting suggestions): Addition before a) on mobility that should remain the key objective of the Programme:  (-a) to promote the learning mobility, including non-formal and informal learning mobility, of individuals and groups, and cooperation, quality, inclusion and equity, excellence, creativity and innovation at the level of organisations and policies in the field of education and training, youth and sport;</p> <p>FI (Comments): Also important: Mobility inside flagship actions (EUI, COVE:s, Teacher Academics - pilars hand in hand). Also not to forget Europe on the Move.</p> <p>FR (Comments): We propose changing the order of the specific objectives to better reflect the priorities of the programme as follows: 1= b, 2= c, 3= e, which are more general, then 4= a; 5=d; 6= f; 7=g.</p>

Commission proposal	Drafting suggestions and Comments
<p>(a) support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</p>	<p>DE (Drafting suggestions): <del>(a) support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</del> <u>foster a sense of European identity and active citizenship, enhance solidarity and active participation in society and democracy, inducing a positive societal impact, greater resilience and better preparedness to anticipate, prevent and respond to risks of different nature, promote mutual understanding about the education systems in Europe;</u></p> <p>DE (Comments): This should actually come first, as letter a, since the EU is first and foremost a Union of shared values.</p> <p>FI (Drafting suggestions): support the improvement of education, <b>quality of education</b>, skills and competences as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society; with particular regard <b>to their relevance for the labour market</b></p> <p>FI (Comments): labour market to the end</p> <p>FR (Drafting suggestions):</p>

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	<p>support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a <del>cohesive society</del>, competitive <del>and</del>, sustainable <del>society and cohesive society</del>;</p> <p>FR (Comments):</p> <p>We also suggest to replace the word “cohesive society” before “sustainable and competitive”. We do believe that The Erasmus+ programme also meets the objectives of EU cohesion policies, which are primarily intended as an investment policy to finance projects that are in line with the priorities defined by all Member States in terms of training, competitiveness, innovation, digital technology, inclusion, health, etc.</p> <p>IT (Drafting suggestions):</p> <p>(a) support the improvement of education <b>and training</b>, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</p> <p>IT (Comments):</p> <p>It is suggested to also include the reference to training in coherence with the rest of the text of the regulation</p> <p>NL (Drafting suggestions):</p> <p>support the improvement of education, skills and competences with particular regard to their relevance for the professional development and personal</p>

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>growth of the individual as well as to the labour market and to their contribution to a competitive, sustainable and cohesive society;</p> <p>NL (Comments):</p> <p>The Netherlands considers the relationship between education and personal development to be more important than its relevance to the labor market. To this end, we propose reversing the order of these two points in the paragraph.</p>
<p>(b) foster a sense of European identity and active citizenship, enhance solidarity and active participation in society and democracy, inducing a positive societal impact, greater resilience and better preparedness to anticipate, prevent and respond to risks of different nature;</p>	<p>DE (Drafting suggestions):</p> <p><del>(b) foster a sense of European identity and active citizenship, enhance solidarity and active participation in society and democracy, inducing a positive societal impact, greater resilience and better preparedness to anticipate, prevent and respond to risks of different nature;</del> <b><u>support the improvement of education, skills and competences with particular regard to their relevance for the labour market as well as to the professional development and personal growth of the individual and to their contribution to a competitive, sustainable and cohesive society;</u></b></p>
<p>(c) foster quality, inclusion, equity, sustainability, creativity, innovation, excellence and cross-border collaboration, strengthening Europe's attractiveness and competitiveness globally, across all fields of education and training, youth and sport;</p>	<p>IT (Drafting suggestions):</p> <p>foster quality, inclusion, equity, sustainability, <b><u>health and well-being,</u></b> creativity, innovation, excellence and cross-border collaboration, strengthening Europe's attractiveness and competitiveness globally, across all fields of education and training, youth and sport;</p> <p>IT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We suggest to include ‘<b>health and well-being</b>’ among the objectives of the Programme, in line with the priorities and objectives of the current Erasmus+ Programme, as well as with other relevant European initiatives and priorities. This would contribute to further enhancing the effectiveness, inclusiveness, and quality of education, training, youth, and sport activities promoted by the EU.</p>
<p>(d) engage and empower young people to acquire and develop professional and personal competences, to participate actively in society and democracy and connect them to the European project;</p>	<p>AT (Drafting suggestions):</p> <p>d) engage and empower young people to acquire and develop professional and personal competences <b>through formal, non-formal and informal learning</b>, to participate actively in society and democracy and connect them to the European project, <b>while facilitating and supporting the implementation of the EU Youth Strategy, the European Youth Work Agenda and other EU initiatives in the field of youth</b></p> <p>CY (Comments):</p> <p>It should be placed after point (e) and before point (f) for the sake of better coherence, so that issues concerning young people are clearly presented consecutively.</p> <p>DE (Drafting suggestions):</p> <p>(d) engage and empower young people to acquire and develop professional and personal competences, <b>to develop cross-border friendships</b>, to participate actively in society and democracy and connect them to the European project;</p> <p>FI (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>European project – definition?</p> <p>IT  <b>(Drafting suggestions):</b></p> <p>(d) engage and empower young people to acquire and develop professional and personal competences, to participate actively in society and democracy and connect them to the European project, <b><u>also through non-formal and informal learning mobility</u></b>;</p> <p>IT  <b>(Comments):</b></p> <p>We suggest adding “<b>also through non-formal and informal learning mobility</b>” to recall another important objective of the current Programme typical of the Youth sector, which is not included in the Proposal</p>
<p>(e) support policy development, including for circulation of skills, accelerating reforms and modernisation at systems' level, across all fields of education and training, youth and sport, ensuring that they are more effective, resilient and inclusive;</p>	<p>FI  <b>(Comments):</b></p> <p>Circulation of skills not a clear concept.</p>
	<p>FR  <b>(Drafting suggestions):</b></p> <p><b><u>(f) Prepare young people to gain the skills needed to face digital and green transitions.</u></b></p> <p>FR  <b>(Comments):</b></p> <p>There is a need in the list of specific objectives for a paragraph dedicated to green and digital transitions</p>

Commission proposal	Drafting suggestions and Comments
<p>(f) provide young people with easily accessible opportunities for engagement in solidarity and humanitarian activities that induce positive societal changes in the Union and beyond (the latter through setting up the European Voluntary Humanitarian Aid Corps), while improving and properly validating their competences, as well as facilitating their continuous engagement as active citizens;</p>	<p>AT (Drafting suggestions): provide young people with easily accessible opportunities for engagement in <b>volunteering</b>, solidarity and humanitarian activities that induce positive societal changes in the Union and beyond (<del>the latter through setting up the European Voluntary Humanitarian Aid Corps</del>), while improving and properly validating their competences, as well as facilitating their continuous engagement as active citizens</p> <p>FR (Drafting suggestions): Provide young people with easily accessible opportunities for <b>volunteering</b> and engagement in solidarity and humanitarian activities that induce positive societal changes in the Union (<b>through the European Solidarity Corps</b>) and beyond (the latter through setting up the European Voluntary Humanitarian Aid Corps), while improving and properly validating their competences, <b>including their soft skills</b>, as well as facilitating their continuous engagement as active citizens”</p> <p>FR (Comments): FR delegation would like to see more reference to volunteering, the European Solidarity Corps, and soft skills, thus these new following additions.</p>
<p>(g) promote the European Sport Model by investing in grassroots sport, especially voluntary activities, ensuring accessibility, promoting participation, protecting integrity, supporting good governance, and reinforcing sport’s social, educational, and community role, through actions that focus on building a fair, inclusive, and sustainable sport system across Europe.</p>	<p>FI (Drafting suggestions): promote <del>the European Sport Model</del> <b>sport and physical activity</b> by investing in grassroots sport, especially...</p> <p>FI (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>There is no one agreed sport model in Europe.</p> <p>FR (Drafting suggestions):</p> <p>Promote the European Sport Model by investing in grassroots sport, especially voluntary activities, ensuring accessibility, promoting participation, protecting integrity, supporting good governance, and reinforcing sport’s social, educational, <b>well-being</b> and community role, through actions that focus on building a fair, inclusive, and sustainable sport system across Europe.</p> <p>FR (Comments):</p> <p>France supports the explicit reference to the European Sport Model among the specific objectives of the program since Erasmus + support the development of grassroot sport and volunteering in sport, which are at the core of the European Sport Model</p> <p>FR delegation requests that this sport-related objective be considered as a key priority of the programme and be placed among the first ones</p> <p>IT (Drafting suggestions):</p> <p>promote the European Sport Model by investing in grassroots sport, especially voluntary activities, ensuring accessibility, <del>promoting</del> <b>encouraging</b> participation, <del>protecting</del> <b>promoting</b> integrity, supporting good governance, and reinforcing sport’s social, educational, and community role, through actions that focus on building a fair, inclusive, and sustainable sport system across Europe.</p> <p>IT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	We believe that Erasmus+ does not “protect integrity” in a regulatory sense; rather, it contributes to it indirectly through cooperation, mobility, and the exchange of good practices. Accordingly, we consider it most appropriate to reintroduce the verb “ <b>promoting</b> ” in relation to <i>integrity</i> , as in the previous Programme. To avoid repetition, we suggest replacing “ <i>promoting participation</i> ” with “ <i>encouraging participation</i> .”
3. The Programme objectives shall be pursued through the following pillars, which mainly have either a transnational or an international character:	
(a) Learning opportunities for all;	DE (Drafting suggestions): (a) Learning <b>mobility and learning</b> opportunities for all; DE (Comments): Mobility is a central element of Erasmus+. In our view, this must be expressed more clearly (eventually by means of a budget quota) and by emphasising it in the text.
(b) Capacity building support.	
	DE (Drafting suggestions): <b><u>4. European added value</u></b> <b><u>1.The Programme shall support only those actions and activities which present a potential European added value and which contribute to the achievement of the Programme objectives laid down in Article 3.</u></b>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>2. The European added value of the actions and activities of the Programme shall be ensured, for example, through their:</u></b></p> <p><b><u>(a) transnational character, particularly with regard to learning mobility and cooperation aimed at achieving a sustainable systemic impact;</u></b></p> <p><b><u>(b) complementarity and synergies with other programmes and policies at national, Union and international level;</u></b></p> <p><b><u>(c) contribution to the effective use of Union transparency and recognition tools.</u></b></p> <p>FR (Drafting suggestions):</p> <p><b><u>4. European added value</u></b></p> <p><b><u>1. The Programme shall support only those actions and activities which present a potential European added value and which contribute to the achievement of the Programme objectives laid down in this article.</u></b></p> <p><b><u>2. The European added value of the actions and activities of the Programme shall be ensured, for example, through their:</u></b></p> <p><b><u>(a) transnational character, particularly with regard to learning mobility and cooperation aimed at achieving a sustainable systemic impact;</u></b></p> <p><b><u>(b) complementarity and synergies with other programmes and policies at national, Union and international level;</u></b></p> <p><b><u>(c) contribution to the effective use of Union transparency and recognition tools.</u></b></p> <p><b><u>5. The actions supported under the Programme are set out in Chapter II. The description of those actions is set out in Annex I. The Commission is empowered to adopt delegated acts in accordance with article 23 [new] to amend that Annex by adding to the description of the actions, where necessary, in order to adapt to developments in the relevant fields</u></b></p>

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments):</p> <p>The reference to the programme's "European added value" (Article 4 of the current regulation) should be reintroduced. The evaluation of the 2014-2020 and 2021-2027 programmes has shown their capacity to deliver significant European added value by playing a key role in the fields of education and training, as well as youth and sport</p> <p>In line with the reintroduction of Annex I and of a new Article 23 on the 'exercise of the delegation' (adoption of delegated acts), the delegation requests the addition of a new paragraph 4 to relate with the description of the actions of the Programme.</p>
CHAPTER II	
SCOPE OF INTERVENTION	
SECTION 1	
LEARNING OPPORTUNITIES FOR ALL	<p>LV (Comments):</p> <p> </p>

Commission proposal	Drafting suggestions and Comments
<i>Article 4</i>	
<i>Learning mobility and volunteering opportunities</i>	<p>NL (Drafting suggestions): <i>Learning mobility, activities supporting active citizenship and volunteering opportunities</i></p> <p>NL (Comments): Activities for youth participation and solidarity projects are not always necessarily mobility projects. Therefore, we suggest mentioning these matters separately in the preamble.</p>
1. In the field of education and training, the Programme shall support:	<p>FR (Drafting suggestions): in the field of <u>school</u> education and training, <u>higher education, vocational education and training, and adult education</u>, the Programme shall support:</p> <p>FR (Comments): For the sake of clarity, the FR delegation will propose mentioning the various sectors financed by the program.</p>
(a) Learning mobility of higher education students and staff;	<p>FR (Drafting suggestions): Learning mobility of higher education students? <u>including doctoral students</u>, and staff;</p>

Commission proposal	Drafting suggestions and Comments
	FR <b>(Comments):</b> The FR delegation will suggest learning mobility for doctoral students. NL <b>(Drafting suggestions):</b> (a) Learning mobility of vocational education and training learners and staff; NL <b>(Comments):</b> The Netherlands suggests considering swapping points a and b. We consider point b to be a more significant part of the possible additions to learning mobility, meaning it would be better placed at the top.
(b) Learning mobility of vocational education and training learners and staff;	NL <b>(Drafting suggestions):</b> (b) Learning mobility of higher education students and staff;
(c) Learning mobility of school pupils and staff, including staff in early childhood education and care;	
(d) Learning mobility of adult learners and staff in adult learning.	
2. In the field of youth, the Programme shall support:	DE <b>(Comments):</b> We would like to divide the youth area into three parts.

ERASMUS +

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Commission proposal	Drafting suggestions and Comments
	The background to this is that the area of youth participation should have its own visibility.
<p>(a) Learning mobility of young people, including DiscoverEU, activities supporting youth participation and learning mobility of youth workers;</p>	<p>DE (Drafting suggestions):</p> <p>(a) Learning mobility of young people, including DiscoverEU, activities supporting youth participation and learning mobility of youth workers;</p> <p>FI (Comments):</p> <p>Does <i>activities supporting youth participation</i> include previous Youth Participation projects (KA154) and Solidarity Projects? Should be mentioned clearly</p> <p>NL (Drafting suggestions):</p> <p>Learning mobility of young people, including youth exchanges, activities supporting youth participation and learning mobility of youth workers, active citizenship and DiscoverEU Inclusion</p> <p>NL (Comments):</p> <p>Activities to promote active citizenship and strengthen youth exchange are missing here. According to the NL DiscoverEU can be moved further back in the text.</p>
<p>(b) 'European Solidarity Corps' volunteering, including the European Voluntary Humanitarian Aid Corps.</p>	<p>DE (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>(b) <del>‘European Solidarity Corps’ volunteering, including the European Voluntary Humanitarian Aid Corps.</del>  <u><b>Youth initiatives including activities supporting youth participation and the EU youth dialogue;</b></u></p> <p>DE  <b>(Comments):</b>                      We propose a new (old) term for the area of youth participation: youth initiatives - this should include both the youth participation projects from E+ and the solidarity projects from the ESC; both lines of action directly address young people</p> <p>FI  <b>(Comments):</b>                      Also Solidarity Projects should be included, clear definition what European Solidarity Corps include</p> <p>FR  <b>(Drafting suggestions):</b></p> <p>(b) <del>‘European Solidarity Corps’ volunteering, including the European Voluntary Humanitarian Aid Corps.</del></p> <p>FR  <b>(Comments):</b>                      The FR delegation will ask to delete this point and replace it with the addition of an article 4 bis detailing more the European Solidarity Corps which secures more its specificity compared to the other components of Erasmus.</p> <p>IT  <b>(Comments):</b></p>

Commission proposal	Drafting suggestions and Comments
	Italy considers it essential to preserve the distinction between Erasmus+ and the European Solidarity Corps (ESC), maintaining ESC as a separate Programme
	<p>DE (Drafting suggestions): <b>(c) 'European voluntary Service' activities</b></p> <p>DE (Comments):</p> <p>The volunteering area should be changed to the former term European Voluntary Service, which is easily accessible to young people. This would then include</p> <ul style="list-style-type: none"> <li>- short and long-term individual voluntary services (2-12 months)</li> <li>- and short-term formats in groups (volunteer teams)</li> </ul> <p>We would have the solidarity projects from the ESC under b; the Humanitarian Aid Corps under 4.</p> <p>This would mean that the ESC would be consequently dissolved in terms of content in the new programme but the different youth actions would be kept under 4.2b and 4.2c.</p>
3. In the field of sport, the Programme shall support learning mobility of athletes and people active in grassroots sport and learning mobility of sport staff.	<p>AT (Drafting suggestions):</p> <p>In the field of sport, the Programme shall support learning mobility of <del>athletes and</del> people active in grassroots sport and learning mobility of sport staff</p> <p>AT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The proposed inclusion of athletes in sports mobility is viewed critically. It is questionable to what extent opening up the programme to athletes aligns with its educational character and is compatible with the fundamental concept of learning mobility. The main objective remains the promotion of grassroots sport.</p> <p>DE (Comments):</p> <p>We are critical of the expansion of the target group to include ‘athletes and people active in grassroots sport’ and would be grateful if the Commission could explain the reasoning behind this proposal. In our view, the deliberate limitation in the 2021 regulation to ‘sport staff’ made sense because the mobility measures and the insights gained from them (also) benefit the sending institutions (e.g. associations and federations).</p> <p>FI (Drafting suggestions):</p> <p>In the field of sport, the Programme shall support learning mobility [...] of sport staff.</p> <p>FI (Comments):</p> <p>On sports, Finland is not in favor of widening the scope of the beneficiaries [to athletes] due to limited funding.</p> <p>FR (Drafting suggestions):</p> <p>In the field of sport, the Programme shall support learning mobility of <del>athletes and people</del>, <b>including athletes under specific conditions</b>, active in grassroots sport and learning mobility of sport staff</p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>France believes that there could be an interest to broaden the scope of mobility to athletes, but only under specific conditions. Those conditions should be specified. We should be careful not to open the possibility to cover athletes' travels for sport competitions, as it must be learning mobilities. Furthermore, extending mobility opportunities to young athletes should not be at the expense of opportunities that may exist for young people in other parts of the programme.</p> <p>IT (Drafting suggestions):</p> <p>In the field of sport, the Programme shall support <b><u>inbound and outbound</u></b> learning mobility of athletes and people active in grassroots sport and learning mobility of sport staff.</p> <p>IT (Comments):</p> <p>This wording clarifies that both inbound and outbound learning mobility in sport are important, without expanding the scope beyond the existing categories (athletes/grassroots participants and sport staff). It is a purely clarificatory edit. For inbound mobility, the reference is to activities implemented with formally recognised host organisations (beneficiaries or affiliated partners) acting as project partners under the Programme. Operational activities can be addressed in the annual work programmes.</p>
	<p>DE (Drafting suggestions):</p> <p><b><u>4. the European Voluntary Humanitarian Aid Corps</u></b></p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The Humanitarian Aid Corps is not a youth activity; although it is currently regulated in the ESC Regulation, it is also regulated there as a separate line. We should do the same here.</p> <p>Arguments in favour:</p> <ul style="list-style-type: none"> <li>- In Art. 2 Para. 18, young people are defined as 13-30. However, the Aid Corps has 18-35. The upper age limit in particular was a huge point of discussion in the 2020 trialogue with the EP. 35 was a tough compromise. EP and also some MS wanted more or even age-open.</li> <li>- The Aid Corps is managed purely centrally. There are no points of contact with NA Youth.</li> <li>- The target group has nothing to do with the target groups of the youth sector. It is a completely separate area.</li> </ul>
<p>4. Learning mobility under this Article may be accompanied by:</p>	<p>DE (Drafting suggestions):</p> <p>4. <del>5.</del> Learning mobility under this Article may be accompanied by:</p> <p>NL (Drafting suggestions):</p> <p>4. Learning mobility under this Article will be accompanied by:</p> <p>NL (Comments):</p> <p>The current wording is non-mandatory, while training and support are important parts of the programme.</p>
<p>(a) support to teaching and learning about the EU, including European integration, values and citizenship;</p>	<p>FR (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>support to teaching and learning about the EU, including European integration, values and citizenship <b>and the Jean Monnet actions in the fields of school education and VET.</b></p> <p>FR (Comments): Location to be confirmed, but it would be curious to mention Jean Monnet actions in the field of higher education (Article 5) and not in the fields of school education and VET.</p> <p>IT (Comments): We suggest to make clear that this is the Article of reference for the <b>Jean Monnet actions for schools.</b></p>
(b) measures such as language support, preparatory visits, training and virtual cooperation.	<p>DE (Drafting suggestions): (b) measures such as language support, preparatory visits, training and virtual cooperation <b>and virtual learning.</b></p> <p>DE (Comments): Virtual learning mobility should be explicitly mentioned, in line with the current regulation (Article 5).</p>
	<p>FR (Drafting suggestions): <b>Article 4 bis, Volunteering The volunteering activities of the European solidarity corps set up the following two strands of actions:</b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>(a) the ‘participation of young people in solidarity activities’ strand; and</u></b></p> <p><b><u>(b) the ‘participation of young people in humanitarian aid related solidarity activities’ strand (the ‘European Voluntary Humanitarian Aid Corps’).</u></b></p> <p><b><u>In both cases, volunteering shall:</u></b></p> <p><b><u>(a) include a learning and training component;</u></b></p> <p><b><u>(b) not be a substitute for traineeships or jobs;</u></b></p> <p><b><u>(c) not be equated with employment; and</u></b></p> <p><b><u>(d) be based on a written volunteering agreement that shall set out the rights and obligations of the parties to that agreement, the duration and location of deployment and a description of the tasks involved.</u></b></p> <p><b><u>The participant shall register in the European Solidarity Corps Portal and be at least 18 years of age and not older than 30 years of age at the moment of starting volunteering.</u></b></p> <p><b><u>The actions of the European Solidarity Corps shall also be consistent with, and complementary to, the relevant national-level policies, programmes and instruments in the participating countries. To that end, the Commission, national authorities and national agencies shall exchange information on existing national schemes and priorities related to solidarity and youth, on the one hand, and actions under the European Solidarity Corps on the other hand, with a view to build on relevant good practices and achieve efficiency and effectiveness.</u></b></p> <p>FR</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>This article clarifies the specificity of the European Solidarity Corps compared to the rest of the Erasmus program, building on key elements of the current ESC program.</p>
<i>Article 5</i>	
<i>Talent and excellence development opportunities</i>	<p>DE</p> <p><b>(Comments):</b></p> <p>What is meant by this with regard to VET and adult education?</p>
In the field of education and training, the Programme shall support:	
<p>(a) Erasmus+ scholarships in strategic educational fields, including in joint study programmes;</p>	<p>DE</p> <p><b>(Comments):</b></p> <p>We kindly ask for clarification of what is meant by “strategic fields” and the extent to which the scholarships are planned. How do they differ from decentral scholarships? What are the financial considerations? How does this relate to the general approach of enabling E+ mobility for as many young Europeans as possible?</p> <p>FI</p> <p><b>(Comments):</b></p> <p>Definition; who is the one choosing strategic educational fields, are they gonna be permanent for the programme period? Any scholarships for other fields?</p> <p>FR</p> <p><b>(Drafting suggestions):</b></p>

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>(a) Erasmus+ scholarships in strategic educational fields or <b><u>complementary disciplines required to tackle complex challenges</u></b>, including in joint study programmes; <b><u>such as the Erasmus Mundus joint programmes</u></b>;</p> <p>FR (Comments):</p> <p>France is satisfied with the inclusion of various measures to promote the attractiveness of higher education sector. However, it may point out that, when allocating Erasmus+ grants to sectors considered strategic, the new programme must nevertheless avoid creating silos: how, for example, can the challenges of European digital sovereignty or ecological transition be addressed without taking into account economic issues and the contributions of the social sciences and humanities?</p> <p>FR also wonders about the final beneficiaries of this action (European students or rather International students. In this case, what is the difference compared to the full scholarships offered by Erasmus Mundus to best-ranked students worldwide?</p> <p>IT (Drafting suggestions):</p> <p>(a) Erasmus+ scholarships in strategic educational <b><u>and training</u></b> fields, including in joint study programmes;</p>
(b) Erasmus Mundus scholarships;	<p>FR (Drafting suggestions):</p> <p>(b) Erasmus Mundus scholarships <b><u>and the institutional costs of the Erasmus Mundus programmes; and grant support to implement them, including support for international mobility actions allowing to attract</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>talented students, doctoral students, researchers, and teachers from both Europe and worldwide;</u></b></p> <p>FR (Comments):</p> <p>With regard to Erasmus Mundus actions, it is important that, in addition to grants designed to attract international talent, the new programme also takes into account the institutional costs of Erasmus Mundus programmes. FR also wonders about the final beneficiaries of this action. This point needs to be clarified. On the other hand, we consider that the issue of attracting talented students in Europe and worldwide has not been sufficiently tackled in the EC proposal</p> <p>NL (Drafting suggestions):</p> <p>“Erasmus Mundus Joint Master’s degrees”</p> <p>NL (Comments):</p> <p>“Erasmus mundus scholarships”, instead of “Erasmus Mundus Joint Master’s degrees”. Does the Commission envision a change compared to the current Programme, if so, in what way? If not, we propose maintaining the current phrasing.</p>
(c) Jean Monnet actions in the field of higher education;	<p>DE (Comments):</p> <p>Will these continue to exist outside HE? Or should this be included in Pillar 1, article 4.4.(a)? We welcome the basic idea of decentralising this and request further information on how this is to be implemented.</p>

Commission proposal	Drafting suggestions and Comments
<p>(d) Support to the following Jean Monnet institutions pursuing an aim of European interest: the European University Institute, Florence, including its School of Transnational Governance; the College of Europe (Bruges, including its subsidiary in Tirana, and Natolin campuses); the European Institute of Public Administration, Maastricht; the Academy of European Law, Trier; the European Agency for Special Needs and Inclusive Education, Odense; and the International Centre for European Training, Nice.</p>	<p>FR  <b>(Drafting suggestions):</b>  <u><b>Based on their EU evidence-based societal impact, outputs and results,</b></u> support to the following Jean Monnet institutions pursuing an aim of European interest: the European University Institute, Florence, including its School of Transnational Governance; the College of Europe (Bruges, including its subsidiary in Tirana, and Natolin campuses); the European Institute of Public Administration, Maastricht; the Academy of European Law, Trier; the European Agency for Special Needs and Inclusive Education, Odense; and the International Centre for European Training, Nice.</p> <p>FR  <b>(Comments):</b>                      For France, it is important that these institutions continue to demonstrate their added value at European level, as well as their contribution to European public policy, not to mention the dissemination of the results of their actions to Member States.</p>
	<p>DE  <b>(Comments):</b>  <u>Virtual mobility:</u> The current regulation also enables “accompanying virtual learning”. We ask for clarification as to whether this option should also be available in the future? Blended Intensive Programmes (BIP) in particular have proven their worth and should be continued.</p>
<p>SECTION 2</p>	

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><b>CAPACITY BUILDING SUPPORT</b></p>	<p>IT (Comments):</p> <p>The activities under the second pillar, Capacity Building Support – divided into Cooperation among organisations and institutions (Art. 6) and Support to policy development (Art. 7) – are described as common to all three sectors (education and training, youth, and sport) and therefore appear somewhat general, without detailed provisions for each individual sector. There is no reference to the European Youth Strategy or to the main strategies connected to the youth sector. Moreover, the EU Youth Dialogue is mentioned only within the limits of the National Working Groups, while SALTO Resource Centres, the EU-CoE Youth Partnership, the European Youth Work Convention are not even cited, despite being the foundations for achieving the specific objectives of European cooperation in the field of Youth.</p> <p>On the contrary, in the current Regulation (EU) 2021/817 the key actions for education and training, youth, and sport are presented in different articles, with specific references to other initiatives and instruments, such as the Youth Wiki and Eurodesk networks and the EU Youth Dialogue (Art. 11).</p> <p>It might be useful <b>to provide further clarification in order to avoid possible issues that could arise in case of any reconsideration of national governance.</b></p>
<i>Article 6</i>	

Commission proposal	Drafting suggestions and Comments
<i>Cooperation among organisations and institutions</i>	FR (Comments): As in the article 4 on learning mobility, there should be sectorial under paragraphs. There is indeed a need to specify the objectives and scope of partnerships for cooperation and partnerships for excellence and innovation by sectors.
	FR (Drafting suggestions): <b><u>The programme shall cover and support a wide range of projects and activities that have a significant European added value in the sectors of education, training, volunteering, youth and sport for the period of 2028-2034 following the policy objectives set in Art. 3 of this Regulation.</u></b>  <b><u>The European Commission, with the support of the Member States and third countries associated to the programme, shall ensure that the right to information on the programme activities, its implementation and final beneficiaries' smooth participation are fully respected.</u></b>
The Programme shall support:	FR (Drafting suggestions):  The programme shall finance the strategic actions listed below, <b><u>across the following pillars and programme sectors:</u></b>
(a) Partnerships for cooperation, including small-scale partnerships to foster wider and more inclusive access to the Programme;	CY (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments
	<p>Partnerships for cooperation, including small-scale partnerships <b><u>with emphasis to newcomer organisations</u></b> to foster wider and more inclusive access to the Programme;</p> <p>CY (Comments):</p> <p>The explicit reference to “<i>with emphasis to newcomer organisations</i>” is important to ensure that small-scale partnerships are clearly positioned as a tool to facilitate access to Key Action 2. KA2 actions are highly competitive, and without a dedicated entry point, newcomer organisations risk being systematically excluded, with benefits concentrated among more experienced actors.</p> <p>By highlighting newcomer organisations, the text makes clear that the Programme aims to balance competitiveness with inclusiveness, offering a structured pathway for less experienced entities to participate, gain expertise, and progressively scale up their involvement. This strengthens diversity, innovation, and fairness in Programme implementation.</p> <p>DE (Comments):</p> <p>What is meant by this? The proposed removal of the wording "and exchange of practice" must not lead to the further development and exchange of innovative practices no longer being promoted. Regarding decentral partnerships for cooperation it is important to us that sufficient budget is made available to support a critical mass of projects and that the maximum size of the projects allows impetus to be given to the decentralised further development of the European Education Area.</p> <p>FR (Drafting suggestions):</p>

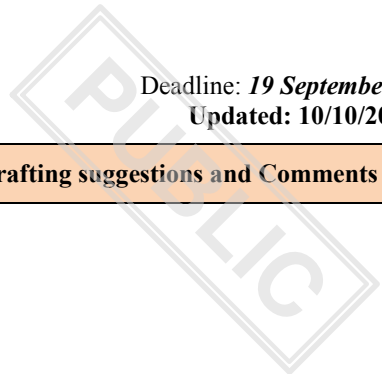
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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>Partnerships for cooperation <b>in the field of education, training, volunteering, youth and sport</b>, including small-scale partnerships to foster wider and more inclusive access to the Programme;</p> <p>FR <b>(Comments):</b></p> <p>It is important to clearly specify the areas of cooperation in order to ensure that each sector can benefit from them. In the field of sport specifically, there is a need to specify the scope and objectives of the Sport collaborative alliances as it a new brand action.</p> <p>NL <b>(Drafting suggestions):</b></p> <p>Partnerships for cooperation, innovation and exchange of practices, including small-scale partnerships to foster wider and more inclusive access to the Programme;</p> <p>NL <b>(Comments):</b></p> <p>We suggest a more comprehensive definition of E+ partnerships.</p>
<p>(b) Partnerships for excellence and innovation, building on the European Universities Alliances, Centres of Vocational Excellence, European Teacher Academies, European School Alliances, Joint study programmes, European Youth Together and Sport Collaborative Alliances.</p>	<p>AT <b>(Comments):</b></p> <p>We very much appreciate the introduction of the <b>European partnerships for school development</b>. We believe that such partnership projects can significantly enhance the systemic impact of Erasmus+ in the sector of school education.</p> <p>FI <b>(Comments):</b></p> <p>It is difficult to accept these in regulation, when there is no definitions existing yet.</p>



Commission proposal	Drafting suggestions and Comments
	<p>FR  <b>(Drafting suggestions):</b>  <b>Partnerships for excellence and innovation, <del>building on</del> in particular the European Universities Alliances, Centres of Vocational Excellence, European Teacher Academies, European School Alliances, Joint study programmes, European Youth Together and Sport Collaborative Alliances. The programme shall also cover the institutionnal grant support associated to the implementation of these partnerships for excellence</b></p> <p>FR  <b>(Comments):</b>                      In order to reinforce the cooperation between HEIs and fully support the partnerships for excellence in the HE sector, the new programme should also take into account the institutional costs associated to the implementation of those partnerships for excellence.</p> <p>IT  <b>(Comments):</b>                      We have suggested a definition of sport collaborative alliances in Art. 2</p> <p>NL  <b>(Comments):</b>                      We suggest adding a description of European School Alliances and Sport Collaborative Alliances to the text. This is not explained anywhere else at present.</p>

Commission proposal	Drafting suggestions and Comments
	<p>FR                      (Drafting suggestions):</p> <p><b>Article 6 Bis:</b>  <u>The Programme shall support the setting-up of partnerships for excellence and innovation, in particular in the Higher education sector:</u>  <u>-European Universities Alliances ; as they are a flagship initiative aiming at accelerating the construction of the European Union through higher education, research, and innovation, the Program must finance the development of existing European university alliances through a long term funding that goes beyond the project logic. Alliances must be funded on the basis of a clear roadmap for the future that shows their commitment to fulfil common goals such as : life long learning education; scientific and technological research, dissemination and promotion of research results for the benefit of society; social advancement, and professional integration; dissemination of humanistic culture; participation in the construction of the European Higher Education and Research Area; international cooperation ; European degrees ; incoming and outgoing mobility. The European universities alliances they shall also be supported through complementary funding from appropriate European Union programmes to reinforce their research and innovation activities ; -- Joint study programmes, including the Erasmus Mundus actions.</u></p>
<p>Article 7</p>	

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<i>Support to policy development</i>	DE (Comments): Does the new programme intend to promote outstanding evaluated projects in order to increase the dissemination of results and impact? If so, how?
The Programme shall support:	
(a) Experimentation, preparation and implementation of the Union's policy agendas and tools covering skills, education and training, youth and sport <sup>45</sup> ;	CY (Comments): EPALE and eTwinning are key platforms supporting adult education and school-level cooperation accordingly within the Erasmus+ framework. Their inclusion in reference 22 is essential to ensure completeness, accurately reflecting the full range of Programme tools and networks available to stakeholders.  DE (Drafting suggestions):

<sup>45</sup> In particular: the European Qualifications Framework (EQF); the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET); the European Quality Assurance Register for Higher Education (EQAR); the ENIC (European Network of Information Centres in the European Region) and NARIC (National Academic Recognition Information Centres in the European Union) Networks, the Euroguidance network, the common framework and tools for the provision of better services for skills and qualifications (Europass), the Eurydice Network, National Coordinators for Adult Learning, the Central and National Support Services for online platforms, the European Higher Education Area (EHEA) and the National Reference Points on graduate tracking, Youth wiki network, the Eurodesk network, the European Youth Forum, Youthpass, the National Working Groups implementing the EU Youth Dialogue and the National Coordinating Bodies implementing the European Week of Sport at national level.

Commission proposal	Drafting suggestions and Comments
	<p>(a) Experimentation, preparation and implementation of the Union’s policy agendas and tools covering skills, education and training, youth and sport<sup>46</sup> <b>with regards to Member States’ competencies;</b></p> <p>Footnote: <b>SALTO, TCA, TEC, EuroPeers</b></p> <p>DE <b>(Comments):</b></p> <p>What legal force does the footnote have? We assume that all the organisations/networks mentioned in the footnote will (continue to) be supported in the future. The following are missing from the list in the footnote: SALTO, TCA, TEC, EuroPeers (They could also be mentioned under Art. 4)</p> <p>FI <b>(Drafting suggestions):</b></p> <p>Experimentation, preparation and implementation of the Union’s policy agendas and tools covering education and training, youth and sport and <b>skills</b></p> <p>FR <b>(Drafting suggestions):</b></p>

<sup>46</sup> In particular: the European Qualifications Framework (EQF); the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET); the European Quality Assurance Register for Higher Education (EQAR); the ENIC (European Network of Information Centres in the European Region) and NARIC (National Academic Recognition Information Centres in the European Union) Networks, the Euroguidance network, the common framework and tools for the provision of better services for skills and qualifications (Europass), the Eurydice Network, National Coordinators for Adult Learning, the Central and National Support Services for online platforms, the European Higher Education Area (EHEA) and the National Reference Points on graduate tracking, Youth wiki network, the Eurodesk network, the European Youth Forum, Youthpass, the National Working Groups implementing the EU Youth Dialogue and the National Coordinating Bodies implementing the European Week of Sport at national level.

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Commission proposal	Drafting suggestions and Comments
	<p>Experimentation, preparation and implementation of the Union's policy agendas, <b>cooperation framework</b>, and tools covering skills, <b>in the field of</b> education and training, <b>volunteering</b>, youth and sport ;</p> <p><u>Proposal of annex :</u></p> <p>To support policy development, the program shall support the European Qualifications Framework (EQF); the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET); <b>the European Youth Work Convention</b> ; the European Quality Assurance Register for Higher Education (EQAR); <b>SALTO Resource Centres</b>, the ENIC (European Network of Information Centres in the European Region) and NARIC (National Academic Recognition Information Centres in the European Union) Networks, the Euroguidance network, the common framework and tools for the provision of better services for skills and qualifications (Europass), the Eurydice Network, National Coordinators for Adult Learning, the Central and National Support Services for online platforms, the European Higher Education Area (EHEA) and the National Reference Points on graduate tracking, Youth wiki network, the <b>EuroPeers network</b>, the Eurodesk network, the European Youth Forum, Youthpass, the National Working Groups implementing the EU Youth Dialogue ; <b>Training and Cooperation Activities (TCAs); Networking Activities (NET); the EU-CoE partnership</b> ; and the National Coordinating Bodies implementing the European Week of Sport at national level.</p> <p>FR <b>(Comments):</b></p> <p>The current Regulation Article 7 mentions the Bologna Process in the body of the regulation. However, the EHEA is cited in the footnote, which it not considered sufficient.</p> <p>The word skills should be removed to remain in the list of program sectors and volunteering should be added.</p>

Commission proposal	Drafting suggestions and Comments
	<p>Furthermore, for greater readability, it is proposed to transform the footnote into an annex listing what can be financed by Erasmus within the framework of this article and to add to this annex the frameworks of cooperation in what can be supported, such as for example the European Youth Work Convention. This should be part of a broader annex mentioning like the current annex 1, the other actions funded by Erasmus.</p> <p>NL (Comments):</p> <p>We suggest expanding footnote 22 which is references in 7a to include: EU Youth Dialogue and SALTO Resource Centres as instruments. We are also missing a reference to the link between youth policy and youth work.</p>
<p>(b) Programme implementation including synergies with, and support to other Union policies and programmes, online platforms, tools for virtual cooperation and tools to facilitate learning mobility;</p>	<p>FR (Drafting suggestions):</p> <p>b) Programme implementation including synergies with, and support to other Union policies and programmes, online platforms <b>such as eTwinning/ESEP</b>, tools for virtual cooperation and tools to facilitate learning mobility <b>and volunteering</b>;</p> <p>FR (Comments):</p> <p>As in the current regulation, the eTwinning action, given its central role in virtual exchanges between teachers and pupils, should be mentioned. The delegation is open to any suggestion. <b>The addition of volunteering in this article results from the creation of an article dedicated to volunteering as such.</b></p>
<p>(c) Dissemination and communication.</p>	<p>CY (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>Dissemination and <del>communication</del> <b><u>awareness-raising activities about European policy outcomes and priorities and about the Programme.</u></b></p> <p>CY (Comments):</p> <p>The replacement of “<i>Dissemination and communication</i>” with “<i>Dissemination and awareness-raising activities about European policy outcomes and priorities and about the Programme</i>” makes the objective clearer and more impactful.</p> <p>The term “<i>communication</i>” is too broad and vague, while the proposed wording specifies both the content (EU policy outcomes, priorities, and the Programme) and the purpose (awareness-raising). This ensures that dissemination activities not only share information but also foster understanding, visibility, and engagement, thereby strengthening the Programme’s contribution to policy development.</p>
<b>CHAPTER III</b>	
<b>INCLUSION AND DIVERSITY</b>	

Commission proposal	Drafting suggestions and Comments
<i>Article 8</i>	
<b><i>Support measures for inclusion and diversity</i></b>	NL <b>(Comments):</b> The Netherlands welcomes the focus on inclusion within the program. At the same time, the current proposal no longer contains any explicit references to the green transition, even though the national interim evaluations show that the existing horizontal priorities have worked well. We therefore consider it desirable to include the horizontal priority of sustainability and green transition in the proposal.
1. When implementing this Regulation, the Commission, Member States and third countries associated to the Programme shall ensure an inclusive approach across all activities.	
2. The Commission, Member States and third countries associated to the Programme shall take effective measures to promote inclusion, diversity and fairness, solidarity, and equal opportunities, in particular to ensure participation of people with fewer opportunities in the Programme.	
3. The Commission shall support access to the Programme from an early age and independent of socio-economic background. To achieve that, it shall ensure the provision of measures to facilitate the participation of people with fewer opportunities, including financial support mechanisms, where relevant.	CY <b>(Drafting suggestions):</b> The Commission shall support access to the Programme from an early age and independent of socio-economic background. To achieve that, it shall ensure the provision of measures to facilitate the participation of people with

Commission proposal	Drafting suggestions and Comments
	<p>fewer opportunities, including financial support mechanisms, <b><u>such as pre-financing</u></b>, where relevant.</p> <p>CY (Comments):</p> <p>The proposed inclusion of the example “<i>such as pre-financing</i>” is important in order to make the provision more concrete and operational. While the general reference to “financial support mechanisms” is valuable, it remains abstract and could lead to varying interpretations in practice. By explicitly mentioning <i>pre-financing</i>, the text highlights a practical tool that can significantly facilitate access for participants with fewer opportunities.</p> <p>Pre-financing can help overcome one of the main barriers faced by individuals from disadvantaged socio-economic backgrounds: the inability to cover upfront costs before receiving reimbursement. By securing initial financial support, beneficiaries are not excluded due to cash-flow constraints and can participate on equal terms with others.</p> <p>Therefore, this addition enhances legal clarity, ensures better alignment with the objective of inclusiveness, and strengthens the Programme’s capacity to reach those who need support the most.</p> <p>FI (Comments):</p> <p>early age – definition?</p> <p>COM or member state funding?</p> <p>FR (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The Commission shall support access to the Programme from an early age and independent of socio-economic background. To achieve that, it shall ensure the provision of measures to facilitate the participation of people with fewer opportunities, including financial support mechanisms <b>and pre-financing</b>, where relevant</p> <p>FR (Comments): It is worth emphasizing the importance of pre-financing to facilitate participation of people with fewer opportunities</p> <p>NL (Comments): What is covered by inclusion measures: are these mainly inclusion top-ups or also other, additional or new measures? The Netherlands would like to see a clarification of the possibilities included in this article.</p>
<p>4. The Commission may adjust or may authorise the national agencies referred to in Article 19 to adjust, on the basis of objective criteria, the financial support mechanisms to improve access to people with fewer opportunities.</p>	<p>FI (Comments): The updating of national plans might not be the role of the national agency. It is important that the workload of the national agency does not increase. The national plans are at the responsibility of the member states.</p> <p>Which framework?</p> <p>FR (Drafting suggestions): The Commission <del>may shall</del>-adjust or, <b>where necessary</b>, authorise the national agencies referred to in Article 19 to adjust, on the basis of objective</p>

Commission proposal	Drafting suggestions and Comments
	<p>criteria, the financial support mechanisms to improve access to people with fewer opportunities.</p> <p>FR (Comments):</p> <p>FR delgation will propose the deletion of may and the inclusion of shall, as was the case in the previous regulation, to make the financial support mechanisms more binding.</p>
<p>5. The costs of measures to facilitate or support the participation of people with fewer opportunities shall not justify the rejection of an application under the Programme.</p>	<p>DE (Comments):</p> <p>We would ask you to consider whether this area of regulation should not be better regulated by subordinate legislation. Generally, funding is not unlimited and may in certain cases lead to surprising results.</p>
<p>6. The national agencies referred to in Article 19 shall develop or update where relevant, national inclusion and diversity action plans, based on the framework, and with particular attention to the specific challenges to access the programme within the national contexts. The national inclusion and diversity plans shall form an integral part of the national agencies' planning documents as referred to in Article 19(2).</p>	<p>DE (Comments):</p> <p>It should be clarified that the action plans relate only to the programme (implementation).</p>
<p>7. The Commission shall monitor on a regular basis the implementation of the inclusion and diversity measures, including the national inclusion and diversity plans.</p>	

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
CHAPTER IV	
<p style="text-align: center;"><b>FINANCIAL PROVISIONS</b></p>	<p>IT <b>(Comments):</b> It might be useful to provide references to the allocation criteria between the funding lines for Education and Training, Youth/ESC, and Sport, as well as to the percentage distribution of resources assigned to each of the three sectors.</p>
<p style="text-align: center;">[Article 9</p>	
<p style="text-align: center;"><b>Budget</b></p>	<p>FI <b>(Comments):</b> Discussion about Budget allocation needed really soon</p> <p>NL <b>(Comments):</b> The current proposal does not include any distribution of resources per sector. We fully support the Commission's aim to make the MFF and E+ more flexible, but are wondering how the Commission plans on ensuring a fair distribution of the total budget between the sectors.</p>
<p>1. The indicative financial envelope for the implementation of the Programme for the period 2028-2034 is set at EUR 40 827 000 000 in current prices.</p>	

Commission proposal	Drafting suggestions and Comments
	<p>AT</p> <p><b>(Drafting suggestions):</b></p> <p><b><u>The indicative distribution of the amount set out in paragraph 1 shall be:</u></b></p> <p><b><u>(a) EUR ..., representing xx of the amount set out in paragraph 1 of this Article, to actions in the field of education and training, allocated as follows:</u></b></p> <p><b><u>(i) at least ..., representing xx % of the total amount set out in point (a) of this paragraph, higher education;</u></b></p> <p><b><u>(ii) at least EUR..., representing xx % of the total amount set out in point (a) of this paragraph, in the field of vocational education and training;</u></b></p> <p><b><u>(iii) at least EUR ..., representing xx % of the total amount set out in point a) of this paragraph, in the field of school education</u></b></p> <p><b><u>(iv) at least EUR ..., representing xx % of the total amount set out in point (a) of this paragraph, in the field of adult education;</u></b></p> <p><b><u>(v) at least EUR..., representing xx % of the total amount set out in point (a) of this paragraph, to Jean Monnet actions</u></b></p> <p><b><u>(vi) at least EUR ..., representing xx % of the total amount set out in point (a) of this paragraph, to actions that are primarily directly managed and to horizontal activities</u></b></p> <p><b><u>(vii) EUR ..., representing xx % of the total amount set out in point (a) of this paragraph, for a margin of flexibility that can be used to support any of the actions referred to in Chapter II;</u></b></p> <p><b><u>(b) EUR ....., representing xx of the amount set out in paragraph 1 of this Article, to actions in the field of youth and volunteering</u></b></p> <p><b><u>(c) EUR ... representing xx % of the amount set out in paragraph 1 of this Article, to actions in the field of sport</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>(d) at least EUR ..., representing xx % of the amount set out in paragraph 1 of this Article, as a contribution to the operational costs of the national agencies; and</u></b></p> <p>AT (Comments):</p> <p>The establishment of minimum percentages per sector in Art. 9 analogous to Art. 17 of the current programme is indispensable. Clear financial guidelines are necessary to ensure reliability in programme implementation and to keep ongoing administrative costs within Member States to a minimum. It is essential that minimum percentages per sector are specified in the text of the Regulation. <b>A legal text with significant budgetary implications should provide sufficient clarity for programme implementation.</b></p>
<p>2. In addition to the amounts set out in paragraph 1 of this Article, and in order to promote the international dimension of the Programme, an additional financial contribution shall be made available from Regulation (EU) [XXX]* of the European Parliament and of the Council [Global Europe]to support actions implemented and managed in accordance with this Regulation. Such contribution shall be in line with a single programming document drawn up under Regulation (EU) XXX[Global Europe].</p>	
	<p>BE (Comments):</p> <p>.</p>

Commission proposal	Drafting suggestions and Comments
<p>3. Appropriations may be entered in the Union budget beyond 2034 to cover the expenses necessary and to enable the management of actions not completed by the end of the Programme.</p>	
<p>4. The financial envelope referred to in paragraph 1 and 2 of this Article and the amounts of additional resources referred to in Article 10 may also be used for technical and administrative assistance for the implementation of the Programme, such as preparatory, monitoring, control, audit and evaluation activities, specific and corporate information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Programme.]</p>	<p>IT (Comments): Please clarify what “corporate information” and “corporate communication” mean as these concepts have been introduced ex novo.  Please clarify what “and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Programme” means as this concept has been introduced ex novo (respect the current Regulation in art. 17 paragraph 7) and what should be the impact.</p>
	<p>FR (Drafting suggestions): <b>5. or new article 10) : The indicative distribution of the amount set out in paragraph 1 shall be, with mentions of margins of flexibility:</b>  - in the field of education and training : higher, education, VET, school education, adult education, accompanying measures, - in the field of youth and volunteering... - in the field of sport... - contribution to the operational costs of the national agencies - Programme support...  <b>(6. or part of new article 10) : At least 75% of the Programme budget should be managed indirectly by national agencies.</b>  FR</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>Proposition of a new paragraph or a new article 10 to indicate a sectoral allocation of funds.</p> <p>The absence of an indicative sectoral allocation of available financial resources creates a considerable risk for predictability and equity within the framework of the European Education Area. The French delegation requires the Commission to propose an allocation that takes into account the new architecture (Chapter II, Sections 1 and 2), if necessary by introducing greater margins of flexibility than in the current regulation, in order to allow greater flexibility and adaptability.</p> <p>Given the indirect management of mobility and cooperation partnerships, it is essential to specify the proportion of the programme budget that should be managed indirectly by national agencies, as in the current regulation (recital 24).</p>
<i>Article 10</i>	
<i>Additional resources</i>	
<p>1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.</p>	

Commission proposal	Drafting suggestions and Comments
<p>2. Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 9(1). Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p>	<p>DE (Drafting suggestions): Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 9(1). Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes <del>or their successors.</del></p> <p>DE (Comments): No pre-empting of the MFF from 2035</p>
<i>Article 11</i>	
<i>Alternative, combined and cumulative funding</i>	<p>DE (Comments): Cross-financing, i.e. the transfer of ESF funds without national co-financing, for example, must continue to be possible.</p>
<p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under the Programme. The rules</p>	<p>FR (Drafting suggestions):</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>of the relevant Union programme shall apply to the corresponding contribution, or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p>	<p>The Programme shall be implemented in synergy with other Union programmes <b>such as FP10, Global Europe, FSE+, AgoraEU...</b></p> <p>FR <b>(Comments):</b></p> <p>The EU programmes with which budgetary synergies are possible should be clearly identified, in particular the next Framework Programme for Research and Innovation (FP10), Global Europe, <b>AgoraEU</b> and the successor to ESF+.</p> <p>IT <b>(Drafting suggestions):</b></p> <p>The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under the Programme. The rules of the relevant Union programme shall apply to the corresponding contribution. <b>Different programme rules may not be applied to a single contribution, except where</b> <del>or</del> a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>IT <b>(Comments):</b></p> <p>Given the importance that has been, and is increasingly being, attached to the role of the synergy between funds, and also according to the lessons learned during the current programming period, it is essential to strengthen, <b>in Article 11 and Article 18</b>, both the joint effort of the Member States and the Commission to remove legal and administrative obstacles to the promotion of complementarity between funds, and a clearer indication to avoid cases of duplication or overlapping of rule systems concerning a funding source</p>

Commission proposal	Drafting suggestions and Comments
	<p>where this contributes to the implementation of Erasmus+ Programme interventions. It is therefore proposed to insert the highlighted text into the body of the Article.</p> <p>In this regard we propose a new recital after Article 11.1, “to ensure effective complementarity and cumulative funding, the Commission should provide guidance, including model clauses and standard templates, and ensure appropriate coordination with other Union programmes to prevent duplication of controls and reporting.</p>
<p>2. Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties (‘partners to the joint award procedure’), provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 10, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, EURATOM) 2024/2509.</p>	<p>DE (Comments): Could you please provide further information on “joint award procedure” and “contribution under one set of rules”?</p>
<p><i>Article 12</i></p>	

Commission proposal	Drafting suggestions and Comments
<i>Implementation and forms of Union funding</i>	
<p>1. The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.</p>	<p>AT (Drafting suggestions): The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation. <b><u>At least 80% of the Programme budget shall be implemented under indirect management by national agencies.</u></b></p> <p>AT (Comments): A clear focus on decentralised actions, which have proven successful, should be included in the text of the Regulation in order to provide clarity and stability.</p>
<p>2. The funds implemented under indirect management in a Member State shall be allocated on the basis of:</p>	
(a) the population of and cost of living in the Member State concerned;	
(b) the distance between capitals of Member States;	<p>FR (Drafting suggestions): the distance between capitals of Member States, <b><u>for Member states with outermost regions and overseas territories, this should be taken into account in addition to the distance between the capitals.</u></b></p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments): The funds implemented must also take into account the remoteness of the overseas territories, the costs of which, particularly mobility costs, are significant.</p>
(c) performance, calculated based on the most recent data available.	<p>DE (Comments): How are the national budgets calculated? What are the performance criteria?</p>
3. The Commission shall further specify those criteria and their underlying formulae in the work programmes referred to in Article 15.	
4. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, and non-financial donations.	<p>DE (Drafting suggestions): 4. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, <b><u>incl. micro-grants</u></b>, prizes, procurement, and non-financial donations.</p> <p>DE (Comments): Is there any reference to micro-funds in the regulation? If not, DE suggests to add the reference here. The taks to explore the feasibility for micro-grants in the new programme was given by the COM herself.</p> <p>Micro-Grants are even for other parts of the programme beyond youth an interesting instrument.</p>

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From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>In the communication from the COM on the European Year of Youth it was said (p. 8):  <i>To maintain and build on the Year’s momentum for dialogue and mainstreaming, the Commission will:                      explore the feasibility of providing micro-grants in the future Erasmus+ programme. These low-threshold and low-value grants were successfully tested by some national coordinators during the Year. They provide easy access to funding for young people to work on common projects, develop their skills, capacity for action and their confidence, to make a positive difference in their communities. Moreover, micro-grants are an efficient mechanism for raising young people’s awareness of and interest in EU opportunities for young people.</i></p>
<p>5. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to costs or, where necessary, simplified cost options, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise.</p>	
<p>6. For the purpose of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may be composed partially or fully of independent external experts.</p>	
<p>7. Public legal entities, and institutions and organisations in the fields of education and training, youth and sport that have received over 50 % of their annual revenue from public sources over the last two years, shall be considered as having the necessary financial and operational capacity to carry out</p>	<p>DE  <b>(Comments):</b>                      Why is this topic dealt with at the level of the regulation? What is meant by “public funding”? Why is also the “operational capacity” included?</p>

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From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
activities under the Programme. They shall not be required to present further documentation to demonstrate that capacity.	
<b>CHAPTER V</b>	
<b>PARTICIPATION IN THE PROGRAMME</b>	
<i>Article 13</i>	

Commission proposal	Drafting suggestions and Comments
<p><i>Third countries associated to the Programme</i></p>	<p>CY (Drafting suggestions):</p> <p><b><u>Third countries not associated to the programme</u></b></p> <p><b><u>In duly justified cases in the Union's interest, the Programme actions referred to in Articles 4, Article 5 points (a) (b) (c), Article 6 and Article 7 may also be open to the participation of legal entities from third countries not associated to the Programme.</u></b></p> <p>CY (Comments):</p> <p>It would be important to introduce an additional article that clearly defines the participation of third countries that are not associated with the Programme. Such a provision would ensure full clarity regarding the specific actions in which these countries may be involved.</p>
<p>1. The Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3, and with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p>	<p>DE (Comments):</p> <p>What is the background to the distinction between full and partial association?</p> <p>The opportunity given to countries who are currently fully associated with the programme to downgrade to a partial association could lead in some part of programme to a loss of cooperation compared to the current status.</p> <p>FR (Drafting suggestions):</p> <p>The Programme may be opened to the participation of the following third countries <del>through full or partial association</del>, in accordance with the objectives</p>

Commission proposal	Drafting suggestions and Comments
	<p>laid down in Article 3, and with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>FR (Comments):</p> <p>France is not in favour of any forms of partial association with the programme, which is largely incompatible with its spirit. Such “à la carte participation” would jeopardise its internal coherence, its integrative force and its objectives, and would damage its image.</p> <p>HU (Comments):</p> <p>We are concerned that the Commission's proposals do not provide adequate guarantees that the Council will be meaningfully involved in determining the scope and content of partial or full association agreements, particularly in the case of third countries where the COM would negotiate with the third countries concerned on the basis of the standard authorization used in FP9 (accessing countries, candidate countries and potential candidates, and European Neighborhood Policy countries). In our view, this is an issue related to both governance and interinstitutional balance.</p> <p>As the problem arises in the case of 10 funds/programmes, we believe that the issue should be addressed by the horizontal ad hoc working group. The Council's role in establishing partial or full association agreements could be strengthened either horizontally, by including the same text in all funds, or by addressing this issue in the interinstitutional agreement on the new MFF.</p>
(a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states;	

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From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
(b) acceding countries, candidate countries and potential candidates;	
(c) European Neighbourhood Policy countries;	
(d) other third countries.	
2. The association agreements for participation in the Programme shall:	<p>ES  <b>(Comments):</b>                      We would suggest including a clause here to ensure that participation in the Programme is only possible if international law, fundamental rights and EU values are respected.</p>
(a) ensure a fair balance as regards the contributions and benefits of the third country participating in the Programme;	<p>FI  <b>(Comments):</b></p> <ul style="list-style-type: none"> <li>The text do not sufficiently describe the participation of third countries. It is not appropriate for countries outside the programme to be able to choose initiatives involving participants. If a country outside the programme wishes to participate in the programme, the terms, payments and limitations should apply to all pillars and parts of the programme.</li> </ul>
(b) lay down the conditions of participation in the programmes, including the calculation of financial contributions, consisting of an operational	

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From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
contribution and a participation fee, to a programme and its general administrative costs;	
(c) not confer on the third country any decision-making power in the Programme;	
(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests;	
(e) where relevant, ensure the protection of security and public order interests of the Union.	
For the purposes of point (d) , the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgements and orders of the Court of Justice of the European Union, are enforceable.	
	DE (Comments): Request for an opening clause to temporarily adapt changes to the above regulations under special geopolitical circumstances such as a reference to the Temporary Protection Directive (Council Directive 2001/55/EC).
<i>Article 14</i>	

Commission proposal	Drafting suggestions and Comments
<i>Eligibility</i>	<p>IT (Comments):</p> <p>We note that only in this article on eligibility there is a reference to non-associated third countries, as also introduced in points (6), (15), (21) and (46) of the recitals of the proposed Regulation. In particular, it would seem appropriate to transfer the content of point (46) into a specific article of the Regulation, as is already the case in Article 20 of the current Regulation, and to simplify the wording of Article 14, paragraph (d).</p>
<p>1. Eligibility criteria shall be set to support achievement of the objectives laid down in Article 3, in accordance with Regulation (EU, Euratom) 2024/2509.</p>	
<p>2. In award procedures under direct and indirect management one or more of the following legal entities may be eligible to receive Union funding:</p>	
<p>(a) entities established in a Member State;</p>	
<p>(b) entities established in an associated third country;</p>	
<p>(c) international organisations;</p>	
<p>(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives laid down in Article 3.</p>	

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
<p>3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 13(1) may, where relevant, participate in and benefit from any procurement mechanisms set in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States shall be applied, <i>mutatis mutandis</i>, to participating associated third countries.</p>	
<p>4. 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.</p>	
<p>5. The work programme referred to in Article 110 of Regulation (EU, Euratom) 2024/2509 or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions.</p>	
<p>CHAPTER VI</p>	<p>BE (Comments): See Belgian proposal on comitology and governance here below.</p>
<p>PROGRAMMING</p>	

*Article 15*

BE

(Drafting suggestions):

**New article X – Annual Work Programmes**

1. The Programme shall be implemented by means of an annual work programme adopted by the Commission in the form of implementing acts, in accordance with the examination procedure referred to in Article 5 of Regulation (EU) No 182/2011.
2. The annual work programme shall constitute a single coherent framework, covering all components of the programme. It shall be adopted through two separate implementing acts, both in accordance with the examination procedure referred to in Article 5 of Regulation (EU) No 182/2011:
  - (a) Part A, covering the section on Learning Opportunities for All;
  - (b) Part B, covering the section on Capacity Building and Support.
3. The annual work programme shall set out the priorities, expected results and the indicative allocation of funds for the relevant components and sectors of the programme.

**[Article X(2a) – Transfer of appropriations between parts of the workprogramme**

1. Within the limits of the annual budget, and without prejudice to the Financial Regulation, the Commission may transfer up to X% of the appropriations initially allocated to either Part A or Part B of the

Commission proposal	Drafting suggestions and Comments
	<p>annual work programme to the other Part, where such a transfer is necessary to ensure the effective implementation of the Programme.</p> <p>2. Transfers exceeding X% shall be adopted by means of an amending implementing act in accordance with the examination procedure referred to in Article 5 of Regulation (EU) No 182/2011. The Commission shall inform the committee referred to in Article Y of all transfers made under this paragraph.]</p> <p><b>New article Y – Programme Committee and Sectoral Formations</b></p> <ol style="list-style-type: none"> <li>1. The Commission shall be assisted by a committee within the meaning of Regulation (EU) No 182/2011.</li> <li>2. The Commission shall ensure that the committee meets in sectoral formations covering education and training, youth (including the European Solidarity Corps) , sport and, for the purpose of examining draft work programmes related to their respective sectoral areas.</li> <li>3. The sectoral formations shall meet in advance of the plenary meeting. The outcome of their discussions shall be presented to the committee.</li> </ol> <p><b>Associated new Recitals</b></p> <p>Recital X</p> <ul style="list-style-type: none"> <li>• In order to enhance transparency and the involvement of the Member States in the implementation of the Programme, and to facilitate focused deliberations on the two main strands of the Programme — Learning Opportunities for All and Capacity Building and Support — and its sectors, the annual work programme, as a single coherent</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<p>framework, should be adopted through separate implementing acts reflecting these components</p> <p>Recital Y</p> <ul style="list-style-type: none"> <li>In order to take due account of the specific characteristics and policy needs of the different fields covered by the Programme, the committee assisting the Commission in accordance with Regulation (EU) No 182/2011 should meet in sectoral formations. These formations should cover education and training, youth, sport and the European Solidarity Corps and should contribute to the preparation of the committee’s deliberations on the draft work programmes.</li> </ul> <p>BE (Comments):</p> <p><u>Context key issues</u></p> <ul style="list-style-type: none"> <li>The Commission proposal of 16 July 2025 foresees no explicit implementing framework. An indirect reference is made to the annual work programme in article 15. However this creates only an indirect link to implementation measures, through references to the Financial Regulation, raising concerns about transparency and Member State oversight.</li> <li>This reduces Member States’ effective control over budgetary priorities. In the past, on multiple occasions, the Erasmus+ annual</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<p>work programme has been used to advance new policy proposals without adequate discussion and oversight by the Member States.</p> <ul style="list-style-type: none"> <li>• To safeguard political ownership and transparency, targeted amendments to the Basic Regulation are necessary.</li> </ul> <p><u>Proposed solutions</u></p> <p><b>1. Split annual work programme (new Article X)</b></p> <ul style="list-style-type: none"> <li>• <i>Proposal:</i> The annual work programme, recognizing it is one framework, should consist of two separate implementing acts, corresponding to the two proposed sections: Learning Opportunities for All and Capacity Building and Support.</li> <li>• <i>Rationale:</i> This approach gives Member States two distinct decision points and prevents ‘take-it-or-leave-it’ situations. For example, ongoing discussions on new policy initiatives by the commission within the capacity-building support strand would not block the timely adoption of measures on student mobility, thereby safeguarding the annual mobility cycle.</li> <li>• <i>Effect:</i> Greater control without paralysing the entire programme if concerns are strand-specific or relate to new policy initiatives. This proposal does not imply that Member States would block initiatives as such. Both the Member States and the Commission share the</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<p>responsibility to make the programme function in the best possible way.</p> <p><b>2. Sectoral subcommittees (new Article Y)</b></p> <ul style="list-style-type: none"> <li>• <i>Proposal:</i> Require the Commission to ensure the committee meets in sectoral formations covering Education and Training, Youth, Sport, and the European Solidarity Corps.</li> <li>• <i>Rationale:</i> Facilitates focused and expert deliberations tailored to each sector, improves the quality and efficiency of discussions, and prevents overload in plenary meetings.</li> <li>• <i>Effect:</i> Strengthens Member States’ and sectors meaningful involvement in the programme’s implementation while fully respecting the Comitology framework under Regulation (EU) No 182/2011.</li> </ul> <p><b>Overall reasoning behind the proposal</b></p> <ul style="list-style-type: none"> <li>• The Commission’s proposal is streamlined to maximise flexibility. The Basic Act provides limited detail, leaving key decisions to be taken through the annual work programme. As the sole implementing measure, the work programme’s design is therefore pivotal.</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<ul style="list-style-type: none"> <li>• The proposal reinforces Member State ownership, respecting the principle of subsidiarity and enhancing democratic legitimacy by giving national experts greater influence over annual priorities.</li> <li>• It is legally sound and fully compliant with the Interinstitutional Agreement on Comitology and Regulation (EU) No 182/2011.</li> </ul> <p><b>Compatibility with Regulation 182/2011</b></p> <ul style="list-style-type: none"> <li>• No parallel structures: The amendment does not create separate “subcommittees” with decision-making power. There remains one committee within the meaning of Regulation 182/2011.</li> <li>• Preparatory role only: The sectoral formations prepare discussions but do not deliver a binding opinion. The committee itself remains the sole body giving an opinion under comitology.</li> <li>• Within legislator’s margin: The legislator may prescribe how the Commission organises the committee’s work, as long as this does not alter the uniform procedures of Regulation 182/2011.</li> </ul> <p><b>Precedents</b></p> <ul style="list-style-type: none"> <li>• In Horizon Europe the legislator has required committees to meet in “configurations” or “formations” to reflect sectoral needs. These provisions were accepted without legal challenge.</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<p data-bbox="952 354 1749 379"><b>Possible objections</b></p> <p data-bbox="987 411 1749 475">➔ <b>Obliging the Commission to organise sectoral formations reduces our flexibility, increases costs and slows down implementation.</b></p> <p data-bbox="987 507 1167 533"><u>Draft arguments:</u></p> <ol data-bbox="987 571 1749 1219" style="list-style-type: none"> <li data-bbox="987 571 1749 635">1. The proposal for sectoral formations preserves the Commission's flexibility.</li> <li data-bbox="987 643 1749 707">2. It maintains the single Erasmus+ committee as required by Regulation (EU) No 182/2011.</li> <li data-bbox="987 715 1749 778">3. Sectoral formations are purely preparatory and do not introduce new procedural steps.</li> <li data-bbox="987 786 1749 890">4. Their purpose is to structure discussions transparently, enabling the plenary committee to focus on endorsement rather than technical detail.</li> <li data-bbox="987 898 1749 962">5. Similar configurations exist in other EU programmes (e.g. Horizon Europe) and have proven to be efficient and effective.</li> <li data-bbox="987 970 1749 1114">6. While sectoral formations <u>may require modest administrative effort</u>, this is proportionate to the scale of Erasmus+ (over €5 billion annually). <u>Furthermore, most sectoral meetings can be held online. Currently committee meetings are already held hybrid.</u></li> <li data-bbox="987 1121 1749 1219">7. Well-prepared, sector-specific input helps protect the investment by avoiding delays, flawed programming, or weak Member State ownership.</li> </ol>

Commission proposal	Drafting suggestions and Comments
	<p>8. Any additional cost is outweighed by benefits: improved transparency, stronger Member State engagement, and more efficient decision-making.</p>
	<p>HU (Comments):</p> <p>The draft regulation does not contain any reference to the comitology procedure (Article 34 in the current Regulation), which is red line for us. We understand the intentions of the Commission to simplify the programme. However, we believe that this in itself does not justify the abandonment of the comitology procedure. In this regard, we propose that the issue be reconsidered in order to ensure that the role and involvement of the Member States and institutional balance remain safeguarded. We would like to request that the article from the current Regulation be reinserted into the Proposal. We are also open to proposals that aim to strengthen the role of the Programme Committee. Therefore, we support the proposal tabled by Belgium.</p> <p>We would like to request that the article be supplemented with information on the minimum requirements for the work programme, like in the current Regulation (e.g. the amount of resources allocated to individual measures and beneficiaries).</p>

Commission proposal	Drafting suggestions and Comments
<p><i>Work programme</i></p>	<p>ES (Drafting suggestions): <b>Work programme and committee procedure</b></p> <p>ES (Comments): We consider it necessary to add an explicit reference to comitology or committee procedure (Erasmus+ Committee). We understand that the text of a regulation cannot be overly detailed, but that does not justify such significant omissions.</p> <p>FI (Comments): Programme committee or similar need to be added, we're flexible with wording and open to discuss further development of current one.</p> <p>PL (Drafting suggestions): <b>Work Programme and Committee procedure</b></p> <p>SI (Comments): Strong support for the BE proposal. We believe that the role of the Member States, as well as sound management, should be ensured.</p>
<p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509.</p>	<p>IE (Comments): IE agrees with the Presidency and with most delegations, that a programme committee is required.</p>

ERASMUS +

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>We feel that this is not a time just to implement and agree to the status quo, but that we should in fact consider how a programme committee can be redeveloped and realigned.</p> <p>IE notes the proposal from BE, particularly about having education, youth and sport subgroups, feeding into the overall programme committee.</p> <p>LV (Comments):</p> <p>It is essential to foresee the establishment and work of a Programme Committee in line with practice until now. It is important for NAs to maintain the possibility of multi-annual planning. Latvia welcomes the proposal presented by the Belgian delegation, particularly in relation to splitting implementing acts among pillars of the programme. The sectoral approach is still under scrutiny and has to be evaluated in connection with other structural issues.</p> <p>AT (Drafting suggestions):</p> <p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. <b><u>Work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article xy (new).</u></b></p> <p>AT (Comments):</p>

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Commission proposal	Drafting suggestions and Comments
	<p>Clear and binding rules which ensure a transparent and continuous involvement of Member States in the development and adoption of work programmes are an essential demand for Austria.</p> <p>In our view, the current Erasmus+ Committee has proven to be successful and could be further developed to strengthen the role of Member States and Programme Countries in the implementation of Erasmus+.</p> <p><i>Regarding the Belgian proposal:</i> we recognise the challenges with respect to the introduction of new policy proposals in the annual work programme. We are currently facing a situation where a last-minute change to the work programme has been introduced – the pilot for scholarships - without adequate discussion. Similar difficulties arose in the last two procedures for the adoption of annual work programmes in the European Solidarity Corps Programme.</p> <p>Therefore, we are open to discussions to strengthen MS roles in the adoption of work programmes.</p> <p>CY <b>(Drafting suggestions):</b></p> <p>The Programme shall be implemented through work programmes referred to in Article 110 of Regulation (EU, Euratom) 2024/2509. <b><u>Work programmes shall indicate the indicative allocation of funds per action, as well as the distribution between Member States and associated third countries, where relevant.</u></b></p> <p>CY</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>The proposed addition aims to ensure that work programmes specify clear funding allocations thereby strengthening transparency, flexibility, and accountability in the Programme's implementation.</p> <p>DE</p> <p><b>(Drafting suggestions):</b></p> <p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. <b><u>Work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15a.</u></b></p> <p>DE</p> <p><b>(Comments):</b></p> <p>We consider an appropriate influence of the Member States on the implementation of the programme to be central with regard to "ownership". Due to the factual connection with the work programme, we therefore request the addition of a programme committee and a more detailed description of the content of the annual work programme (see Art. 22 E+ Regulation 2021-2027).</p> <p>We ask for language to be developed that balances the Commission's ability to promote and develop new measures with the interest of the Council's bodies in helping to shape them.</p> <p>In order to ensure that Member States can continue to influence the annual work program and calls for proposals in the future, a program committee</p>

Commission proposal	Drafting suggestions and Comments
	<p>must be established in the regulation. In the current regulation, this only occurs in Article 34 (i.e., here it would be analogous to Chapter IX), which is probably more correct in terms of the structure of the regulation. Due to the factual connection with the work program, we have included it here.</p> <p>EE (Comments):</p> <p>We support the restoration of the Programme Committee. The Programme Committee should not be merely an advisory body</p> <p>ES (Drafting suggestions):</p> <ol style="list-style-type: none"> <li>1. The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. With a certain degree of flexibility, work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. They shall also set out the priorities and expected results for the relevant components and sectors of the Programme. The Commission shall adopt work programmes by means of implementing acts.</li> <li>2. The Commission shall be assisted by a committee composed of expert representatives from the Member States. The committee may meet in specific configurations to deal with sectoral issues.</li> </ol> <p>ES (Comments):</p> <p>This article is much more concise than the one in Regulation 2021-2027 and omits the role of Member States in drawing up work programmes (annual</p>

Commission proposal	Drafting suggestions and Comments
	<p>until now). It merely refers to the common rules set out in Article 110 of the aforementioned regulation.</p> <p>Our position here would be to propose including part of what was in Articles 22 and 34 of the previous 2021-2027 Regulation: work programme and comitology. The Council's Legal Service commented that there were no legal reasons for not being more explicit in this article, and we believe that it is necessary to guarantee the role of the Member States.</p> <p>We are making a proposal that is not too exhaustive, insisting on the most important points, but with a degree of flexibility.</p> <p>We do not include the relevant legal references, in case they differ from those previously established.</p> <p>FR (Drafting suggestions):</p> <p>The Programme shall be implemented by <b><u>means of work programmes as referred to in Article 110 of the Financial Regulation. Work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 24.</u></b></p> <p>FR (Comments):</p> <p>"FR delegation objects to the removal of the explicit reference to comitology. It therefore proposes to retain the wording of the current Article 22, in order to underline the importance of this governance body, which is essential for taking the opinion of the Member States into consideration.</p>

Commission proposal	Drafting suggestions and Comments
	<p>Furthermore, in Chapter IX, it is proposed to reinstate an article devoted to the “committee” (new Article 24), modeled on Article 34 of the current programme.”</p> <p>HR (Drafting suggestions):</p> <p>The Programme shall be implemented by annual and multiannual work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509</p> <p>HR (Comments):</p> <p>Following good practice where national agencies submit multiannual work plan each three years and plan strategically their core activities, we propose to adopt this practice for the programme implementiton in general as well. We consider that the dynamic nature of annual work programmes does not provide the level of stability and predictability in Programme implementation required for both beneficiaries and national authorities and agencies. We therefore believe that it is necessary to introduce the development and adoption of multiannual work programmes, which should be subject to an active consultation process.</p> <p>HU (Comments):</p> <p>We would like to request that the article be supplemented with information on the minimum requirements for the work programme, like in the current Regulation (e.g. the amount of resources allocated to individual measures and beneficiaries).</p> <p>IT</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>This Article states that the Programme shall be implemented through work programmes, but it does not specify whether these work programmes should indicate the amounts allocated to each action and the distribution of funds among the Member States and the third countries associated with the Programme for actions to be managed by the national agency. In this regard, we would prefer wording similar to that used in the current Regulation.</p> <p>LT</p> <p><b>(Drafting suggestions):</b></p> <p><b>New article on Annual Work Programmes</b></p> <p>4. The Programme shall be implemented by means of an annual work programme adopted by the Commission in the form of implementing acts, in accordance with the examination procedure referred to in Article 5 of Regulation (EU) No 182/2011.</p> <p>5. The annual work programme shall constitute a single coherent framework, covering all components of the programme. It shall be adopted through two separate implementing acts, both in accordance with the examination procedure referred to in Article 5 of Regulation (EU) No 182/2011:</p> <ul style="list-style-type: none"> <li>(a) Part A, covering the section on Learning Opportunities for All;</li> <li>(b) Part B, covering the section on Capacity Building and Support.</li> </ul> <p>6. The annual work programme shall set out the priorities, expected results and the indicative allocation of funds for the relevant components and sectors of the programme.</p> <p>LT</p> <p><b>(Comments):</b></p> <p>We strongly support BE proposal on Erasmus+ implementation measures.</p> <p>LU</p> <p><b>(Comments):</b></p>

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>Luxembourg requests an explicit reference to adoption by implementing act (comitology) and for the re-establishment of a programme committee.</p> <p>Luxembourg suggests dividing the work programme into two implementing acts, in line with the Commission's two-pillar structure.</p> <p>Luxembourg would like to stress the importance of maintaining an institutional balance between the Commission and the Member States.</p> <p>NL <b>(Drafting suggestions):</b></p> <p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 34.</p> <p>NL <b>(Comments):</b></p> <p>The Commission proposal does not provide an explicit implementation framework. This only refers indirectly to the annual work programme. This raises questions about transparency and oversight by Member States and reduces Member States' effective control over budgetary priorities. In the recent past, the Erasmus+ annual work programme has been used several times to implement new policy proposals without sufficient discussions and oversight by Member States. The Netherlands would therefore like to see the continuation of the programme commit as in the current Regulation. Furthermore, the Netherlands would like an additional provision which stipulates that Member States will have sufficient time to prepare a response to a draft working programme.</p> <p>PL</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Drafting suggestions):</b></p> <ol style="list-style-type: none"> <li>1. The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509.</li> <li>2. <b>Work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. The Commission shall adopt work programmes by means of implementing acts.</b></li> <li>3. <b><u>The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u></b></li> <li>4. <b><u>The committee may meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u></b></li> </ol> <p>PL</p> <p><b>(Comments):</b></p> <p>The We consider it essential to maintain a formal Programme Committee under the comitology framework, as previously provided for in the Erasmus+ Regulation 2021–2027.</p> <p>This mechanism ensures the effective participation of Member States in shaping and monitoring the Programme. Its removal would significantly weaken Member States’ role in decision-making and oversight, which is particularly important given the growing links between Erasmus+ and other EU funding instruments, such as the European Competitiveness Fund.</p>

Commission proposal	Drafting suggestions and Comments
	<p>We therefore recommend reinstating this provision as an integral part of the “Work Programme and Committee procedure” section.</p> <p>We find it necessary to reinstate the provisions on the Programme Committee in the new financial perspective, defining its status, competences and role in the Programme.</p> <p>The Committee should remain a decision-making forum composed exclusively of representatives of the Member States and the European Commission.</p> <p>SE (Drafting suggestions):</p> <p>The Programme shall be implemented by means of work programmes as referred to in Article 110 of the Financial Regulation. Work programmes shall give an indication of the amount allocated to each action and of the distribution of funds between the Member States and third countries associated to the Programme for the actions to be managed by the national agency. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article X.</p> <p>SE (Comments):</p> <p>SE (comments):</p> <p>SE suggests going back to the wording in the current regulation (art. 22) or wording that allows for more flexibility. As education, youth and sports remains a national competence, MS influence over how the program is</p>

Commission proposal	Drafting suggestions and Comments
	<p>implemented is essential for the program. Ensuring this influence is key to achieving the best possible implementation of the program.</p> <p>Article X would be the art that refers to the committee procedure. SE suggest the wording for this article is also taken from the current regulation (art. 34).</p> <p>SK (Comments):</p> <p>Within the management of the programme, we are missing a clarity of its governance, namely the role of member states as national authorities in this regulation., e.g. in joint drafting of the work programme which could be suitable and acceptable form of participation in management. How the committee's role will be reflected in the Erasmus+ programme? What will be the method of consulting of the work programme with member countries?</p> <p>The paras dedicated to the programme committee could be stated either in this Art. 15, or in Chapter IX Transitional and Final Provisions as new Art. 23.</p> <p>RED LINE</p>
	<p>AT (Drafting suggestions):</p> <p><b><u>NEW Article</u></b></p> <p><b><u>Committee procedure</u></b></p> <p><b><u>1.The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>2. The committee may meet in specific configurations to deal with sectoral issues.</u></b></p> <p><b><u>3. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u></b></p> <p>AT (Comments): A “committee procedure” as set out in the current Article 34 of the Erasmus+ Regulation is absolutely necessary.</p> <p>DE (Drafting suggestions): <b><u>Article 15a Committee procedure</u></b> <b><u>1.The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u></b> <b><u>2.The committee may meet in specific configurations to deal with sectoral issues.</u></b> <b><u>3.Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u></b></p> <p>DE (Comments): See comment above.</p> <p>We kindly ask the COM for further information on how the evaluation is planned.</p>

Commission proposal	Drafting suggestions and Comments
	<p>HR (Drafting suggestions):</p> <p>Indicators to report on the progress of the Programme are set out in Annex XY. The performance reporting system shall ensure that data for monitoring Programme implementation and for evaluation are collected efficiently, effectively, in a timely manner and at the appropriate level of detail. To that end, proportionate reporting requirements shall be imposed on beneficiaries of Union funds and, where appropriate, on Member States.</p> <p>HR (Comments):</p> <p>It is extremely important to define the indicators for measuring performance within the Regulation, so that performance can be measured from the first year of the Programme implementation, but also to ensure continuity in monitoring throughout the seven-year implementation period. The indicators should be aligned with the performance framework indicators for monitoring the implementation of the Multiannual Financial Framework for the period 2028–2034. Finally, implementing bodies need to have functional IT tools to extract and monitor data. We propose to introduce text from the current regulation (2021-2027).</p> <p>LT (Drafting suggestions):</p> <p><b>New article on Programme Committee and Sectoral Formations</b></p> <ol style="list-style-type: none"> <li>4. The Commission shall be assisted by a committee within the meaning of Regulation (EU) No 182/2011.</li> <li>5. The Commission shall ensure that the committee meets in sectoral formations covering <b>education</b> and training, <b>youth and European Solidarity Corps</b>, <b>sport</b> for the purpose of examining draft work programmes related to their respective sectoral areas.</li> </ol>

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>6. The sectoral formations shall meet in advance of the plenary meeting. The outcome of their discussions shall be presented to the committee.</p> <p>LT <b>(Comments):</b> We suggest to keep youth chapter seperated from sport and note that European Solidarity Corps and youth programs ar not the same thing.</p> <p>SE <b>(Comments):</b> In order to fully take advantage of the increased flexibility in the budget according to current proposal (article 9) it is important that the Commission, in a timely manner, provides the necessary documentation regarding the annual work plan, thereby creating conditions for National Authorities and National Agencies to have a dialogue concerning the Work Plan.</p>

Commission proposal	Drafting suggestions and Comments
CHAPTER VII	<p>HR (Drafting suggestions):</p> <p>The Commission shall perform an interim evaluation of the Programme. That interim evaluation shall be accompanied by a final evaluation of the 2028-2034 Programme, which shall feed into the interim evaluation. The interim evaluation of the Programme shall assess the overall effectiveness and performance of the Programme, including as regards new initiatives and the delivery of inclusion and simplification measures.</p> <p>Member States shall submit to the Commission, by 31 May 2031, a report on the implementation and the impact of the Programme in their respective territories.</p> <p>The Commission shall transmit evaluations to the European Parliament, to the Council, to the European Economic and Social Committee and to the Committee of the Regions.</p> <p>HR (Comments):</p> <p>Impact study needs to be implemented in order to secure evidence-based approach.</p>

Commission proposal	Drafting suggestions and Comments
<p><b>COMMUNICATION AND DISSEMINATION</b></p>	<p>BE (Comments): Executing the programme is the responsibility of the National Agency, not the National Authority. This distinction is important, and should be safeguarded. The text should reflect as such.</p> <p>Additionally, if the programme undergoes major changes, Belgium believes it is essential that these are accompanied by strong pedagogical and communication measures from the Commission.</p>
<p><i>Article 16</i></p>	<p>SI (Comments): We would like to include field indicators, as stipulated in the current Regulation, and propose a new paragraph 16.4, in line with the envisaged Performance Regulation.</p>
<p><i>Information, communication and dissemination</i></p>	<p>BE (Drafting suggestions): In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of activities supported under the actions they manage within the Programme. <del>The national authorities referred to in Article 18 shall support the national agencies in exploiting the results of projects with high potential for impact.</del></p>
<p>1. In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of</p>	<p>CY (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
<p>activities supported under the actions they manage within the Programme. The national authorities referred to in Article 18 shall support the national agencies in exploiting the results of projects with high potential for impact.</p>	<p>In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of activities supported under the actions they manage within the Programme. <b><u>Communication strategies shall ensure multilingual accessibility, disability friendly formats and targeted outreach to underrepresented groups.</u></b> The national authorities referred to in Article 18 shall support the national agencies in exploiting the results of projects with high potential for impact.</p> <p>CY (Comments): The proposed addition aims to strengthen the Programme's inclusiveness and equal access, ensuring that dissemination and exploitation of results reach all relevant audiences effectively, in line with EU policy priorities.</p> <p>EE (Comments): We need explanation, what does it practically mean that national authorities support national agencies in using the results of high-impact projects?</p> <p>ES (Drafting suggestions): 1. In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of activities supported under the actions they manage within the Programme. The national authorities referred to in Article 18 shall support the national agencies in exploiting and disseminating the results of projects with high potential for impact.</p>

Commission proposal	Drafting suggestions and Comments
	<p>ES (Comments):</p> <p>We notice as a new development in this article that more work is being asked of National Authorities to support National Agencies in exploiting the results of projects with high potential impact. What exactly would this support consist of?</p> <p>Furthermore, we do not understand why it does not also, or above all, involve supporting the dissemination of these results.</p> <p>We propose adding this.</p> <p>IT (Drafting suggestions):</p> <p>In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of activities supported under the actions they manage within the Programme.</p> <p><del>The national authorities referred to in Article 18 shall support the national agencies in exploiting the results of projects with high potential for impact.</del></p> <p>IT (Comments):</p> <p>The provision, shareable in terms of objectives, appears to be of limited effectiveness as it is formulated in general terms: it does not define operational methods or tools, does not clarify the division of responsibilities between the two bodies, and does not provide for monitoring or performance indicators, thus running the risk of remaining purely programmatic.</p> <p>Moreover, we suggest to remove the provision stating that national authorities shall support national agencies in exploiting the results of projects with high potential for impact, as this could result in additional commitments or obligations for the NAs, including administrative ones.</p>

Commission proposal	Drafting suggestions and Comments
	<p>NL  <b>(Drafting suggestions):</b>                      In cooperation with the Commission, the national agencies referred to in Article 19 shall develop a consistent communication strategy with regard to effective outreach and to the dissemination and exploitation of the results of activities supported under the actions they manage within the Programme.</p> <p>NL  <b>(Comments):</b>                      It is not clear to us what is meant by the the last sentence, and if this will imply new obligations for the national authorities. Unless we get more clarity we suggest deleting or an alternative wording.]</p> <p>SE  <b>(Comments):</b>                      (Question:)                      We note that the word “communication” is new, compared to the current regulation. Will this strategy be part of the NA:s planning documents as referred to in art 19.2 (like the NA:s inclusion action plans)? If yes, then this needs to be clarified further.</p> <p>Could you shed some light as to what the NAU:s “support to the NA:s in exploiting the results of projects [...]”) will entail for the NAU:s?</p>
<p>2. The national agencies referred to in Article 19 shall assist the Commission in its general task of disseminating information concerning the Programme, including information in respect of actions and activities managed at national and Union level, and its results. National agencies shall inform relevant target groups about the actions and activities undertaken in their respective countries.</p>	<p>CY  <b>(Drafting suggestions):</b>                      The national agencies referred to in Article 19 shall assist the Commission in its general task of disseminating information concerning the Programme, including information in respect of actions and activities managed at national and Union level, and its results. National agencies shall inform relevant</p>

Commission proposal	Drafting suggestions and Comments
	<p>target groups about the actions and activities undertaken in their respective countries. <b><u>The Commission will ensure that the National Agencies receive all relevant information and degree of freedom in disseminating Union level actions.</u></b></p> <p>CY (Comments):</p> <p>Our proposal aims to ensure that the National Agencies receive all relevant information and have sufficient flexibility in disseminating Union-level actions. This is important because, due to GDPR issues, a MoU has been signed with the EC, but no further details have been provided, creating a gap regarding the extent to which National Agencies can inform and act. It also underlines the need for relevant and effective training so that National Agencies can fully fulfill their role.</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>The Commission shall implement information and communication actions relating to the Programme, to actions taken pursuant to the Programme and to the results obtained. The Commission shall ensure that, where relevant, Programme results are made publicly available and are widely disseminated in order to promote exchange of best practices among stakeholders and Programme beneficiaries.</u></b></p> <p><b><u>Concerning the centralized actions, the European Education and Culture Executive Agency provides in due time national authorities and national agencies appropriate information about the calls for proposals and their results.</u></b></p> <p><b><u>Concerning the centralized actions, the European Education and Culture Executive Agency provides in due time national authorities and national agencies appropriate information about the calls for proposals and their results.</u></b></p>

Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments):</p> <p>FR delegation wishes to use the terminology of the memorandum of understanding between EACA and the national agencies, but adding the fact that the national authorities also receive the information, which is not currently the case in the of the memorandum of understanding.</p> <p>FR delegation will also request the addition of a paragraph to ensure information and transparency regarding the results of centralized calls for projects. This is inspired by the Memorandum of Uns that were signed by the EACEA with national agencies, extending the information to national authorities as well.</p>
<p>3. [The actions and activities referred to in paragraph 1 and 2 shall be implemented in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance] which establishes the rules for the expenditure tracking and the performance framework for the budget, including the rules applicable to all Union programmes regarding information, communication and visibility obligations, including in particular obligations for beneficiaries and implementing partners.]</p>	<p>ES (Comments):</p> <p>We understand that this section relating to the new Performance Regulation will be negotiated horizontally within the framework of the new MFF, but we do not consider it appropriate that this proposal for an E+ Regulation does not refer in any section to the need to monitor and evaluate the Programme (adapted to its objectives and specific characteristics) and that no explicit role is recognised for Member States in these processes.</p> <p>FR (Comments):</p> <p>The French delegation suggests presenting, in this section, the indicators related to communication and dissemination in order to clarify the objectives. These two elements are essential to ensure the sustainability of the projects. It would therefore be appropriate to give them greater consideration.</p> <p>PL (Comments):</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

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Commission proposal	Drafting suggestions and Comments
	It is necessary to clarify what rules will be introduced Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]
	<p>ES (Drafting suggestions):</p> <p>4. The Commission shall implement information and communication actions relating to the Programme, to actions taken pursuant to the Programme and to the results obtained. The Commission shall ensure that, where relevant, Programme results are made publicly available, <b>including through easily accessible databases and platforms</b>, and are widely disseminated in order to promote exchange of best practices among stakeholders and beneficiaries <b>in all sectors of the Programme</b>.</p> <p>ES (Comments):</p> <p>On the other hand, we also notice that, in Article 16, the entire burden of exploiting the results of projects and their necessary dissemination falls essentially on national agencies with the support of national authorities. Article 25 of the previous Regulation is broader and did refer to the Commission's work in this effort to exploit and communicate results. Therefore, the generic reference in paragraph 3 of Article 16 does not seem sufficient to us. We consider it necessary to reinstate at least an explicit reference to the Commission's tasks in these matters. We propose adding a new paragraph 4 that partially reproduces paragraph 4 of Article 25 of the E+ Regulation 2021-2027.</p> <p>One of the shortcomings of the current programme, in terms of dissemination, is that it is very difficult to easily access information on the results of projects at EU level, both directly and indirectly managed. There are many projects and data, probably available, but it is very difficult to find what one is looking for. Furthermore, it would be useful to be able to break</p>

Commission proposal	Drafting suggestions and Comments
	down and better present the most noteworthy projects in each sector. NAs can do this at national level, but not at EU level. If this is too detailed for an article, then it should be included in one recital at least.
CHAPTER VIII	
<b>MANAGEMENT AND AUDIT SYSTEM</b>	
<b>Article 17</b>	<p>BE (Comments): <b>Belgium wishes to designate more than one authority or agency.</b></p> <p>This respects the structures and choices of the Member States. For us, this is self-evident.</p> <p>In the previous regulation, there was a <b>well-drafted paragraph</b> on the <b>designation of multiple National Agencies</b> and the <b>relationship between the Member State and its Agencies</b>. We would like to see <b>this paragraph reinstated</b>.</p> <p>All mentioning of national agencies and authorities should reflect that multiplicity.</p>
<i>Arrangements for indirect management at national level</i>	

1. *In accordance with the third subparagraph of Article 157(1) of Regulation (EU, Euratom) 2024/2509, the implementation of the Programme under indirect management requires the designation of a national authority and a national agency, as specified in Articles 18 and 19.*

BE

**(Drafting suggestions):**

In accordance with the third subparagraph of Article 157(1) of Regulation (EU, Euratom) 2024/2509, the implementation of the Programme under indirect management requires the designation of a **one or more** national authority**ies** and a **national agency**ies****, as specified in Articles 18 and 19.

ES

**(Drafting suggestions):**

1. In accordance with the third subparagraph of Article 157(1) of Regulation (EU, Euratom) 2024/2509, the implementation of the Programme under indirect management requires the designation of a national authority and a national agency, as specified in Articles 18 and 19. Member States may designate more than one national authority and/or agency, where appropriate or in accordance with their national circumstances.

ES

**(Comments):**

Although the Commission has confirmed that it will be possible to have more than one national agency in the future programme, the fact is that the text only explicitly refers to one national agency and one national authority, and the recitals mention limiting the number of agencies.

Therefore, it should be made clear in the rest of the text that when referring to a national authority or agency in the singular, we may be referring to them in the plural.

It is important to have this option in order to be able to adapt to national circumstances and realities (competences of different ministries).

Streamlining management and achieving economies of scale does not necessarily mean reducing or limiting the number of agencies. Bringing together sectoral actions that are managed in different ways, according to their particular characteristics, into a single structure could, in fact, lead to inefficiencies, discontinuities and inconsistencies in the work of that structure.

Commission proposal	Drafting suggestions and Comments
	<p>IT (Drafting suggestions):</p> <p>1. In accordance with the third subparagraph of Article 157(1) of Regulation (EU, Euratom) 2024/2509, the implementation of the Programme under indirect management requires the designation of a national authorityies and a national agencyies, as specified in Articles 18 and 19.</p> <p>IT (Comments):</p> <p>We request to reinstate the possibility for Member States to designate more than one national authority and more than one national agency, as provided for by Regulation (EU) 2021/817, for the management of the Programme. To this end, a change is proposed in the “Drafting suggestions” column, or alternatively, the following new wording is suggested: <b>“of a minimum of one national authority and one national agency.”</b></p> <p>In addition, we suggest explicitly using the plural “national authorities” and “national agencies” to make clear that Member States may designate more than one.</p> <p>SE (Comments):</p> <p>We believe that it should be up to each member state to decide whether one or more NAU:s and NA:s are needed.</p> <p>SI (Comments):</p> <p>We would prefer that the percentage of funds for indirect management be defined (75%).</p>

Commission proposal	Drafting suggestions and Comments
	<p>SK (Comments):</p> <p>It is necessary to clarify the wording of this point so that the regulation clearly states that one or more national authorities and one or more national agencies may be designated, based on the decision of a specific Member State.</p>
<p>2. The national authority and the national agency shall both be considered as implementing bodies under point (c) of Article 62(1) of the Financial Regulation to the extent of their responsibility for budget implementation tasks as agreed with the Commission, with the national authority retaining principal responsibility towards the Commission for the overall implementation of EU funds by the national agency it designates and supervises as referred to in Article 18(10).</p>	<p>BE (Comments):</p> <p><b>In the previous regulation, there was no direct reference to National Agencies and National Authorities as implementing bodies. Is the NAU now considered an implementing body? This seems to introduce a new classification, as the NAU's role is to designate and supervise.</b></p> <p>CY (Drafting suggestions):</p> <p>The national authority <b>shall be considered as monitoring body and</b> the national agency shall <del>both</del> be considered as implementing body under point (c) of Article 62(1) of the Financial Regulation to the extent of their responsibility for budget implementation tasks as agreed with the Commission, with the national authority retaining principal responsibility towards the Commission for the overall implementation of EU funds by the national agency it designates and supervises as referred to in Article 18(10).</p> <p>CY (Comments):</p> <p>The NAU provides oversight, coordination, and ensures compliance and is responsible for the monitoring and supervision of the programme at national level.</p> <p>DE</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>The intended role of the national authority appears to be changing: it is now designated as an "implementation body", see Article 17.2. We request further information on the background to this change in role. We reject this redistribution of roles.</p> <p>FR</p> <p><b>(Comments):</b></p> <p>FR delegation will issue a scrutiny reservation on this part of the article in view of the extension of the role of implementing body to national authorities, and will ask the Commission why the national authority is now considered in the proposal for the future regulation as an implementing body.</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>2. The national authority<del>ies</del> and the national agency<del>ies</del> shall both be considered as implementing bodies under point (c) of Article 62(1) of the Financial Regulation to the extent of their responsibility for budget implementation tasks as agreed with the Commission, with the national authority<del>ies</del> retaining principal responsibility towards the Commission for the overall implementation of EU funds by the national agency<del>ies</del> it designates and supervises as referred to in Article 18(10).</p> <p>IT</p> <p><b>(Comments):</b></p> <p>The last part of the paragraph makes explicit reference to the “<i>main responsibility</i>” of the national authority towards the Commission for the overall implementation of EU funds by the national agency. It is not clear why this type of responsibility has been so strongly emphasized in the present Regulation compared to the previous one.</p>

Commented [A1]: Proposition DJEPVA.

Commission proposal	Drafting suggestions and Comments
	<p>However, we could propose to include this reference only in the article dedicated to the NAs and to remove it from this one.</p> <p>In addition, we suggest explicitly using the plural “national authorities” and “national agencies” to make clear that Member States may designate more than one.</p> <p>SE (Drafting suggestions):</p> <p>The <del>national authority and the national agency</del> shall both be considered as implementing <del>body</del> <b>bodies</b> under point (c) of Article 62(1) of the Financial Regulation to the extent of their responsibility for budget implementation tasks as agreed with the Commission, with the national authority retaining principal responsibility towards the Commission for the overall implementation of EU funds by the national agency it designates and supervises as referred to in Article 18(10).</p> <p>SE (Comments):</p> <p>Question: Regarding “<i>The national authority and the national agency shall both be considered as implementing bodies</i>”, what is the reason for this revised role of the NAU:s and what does it entail in practice? According to point c of art. 61.2 the NAU:s could be entrusted with budget implementation task. Does it mean that the NAU would be dealing with project applications, payments to BEN:s etc. In this case, this is problematic for several reasons. Further clarification is needed here.</p>
	<p>BE (Drafting suggestions):</p> <p>New paragraph 3: <b>Overall, at least 75 % of the Programme budget should be</b></p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

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Commission proposal	Drafting suggestions and Comments
	<p><b>implemented under indirect management by the national agencies.</b></p> <p>BE <b>(Comments):</b></p> <p><b>We want to add that at least 75% of the programme Budget is indirect management, it can, also be 80, but 75 is the minimum.</b></p>
Article 18	

Commission proposal	Drafting suggestions and Comments
<p><i>National authority</i></p>	<p>BE                      (Drafting suggestions):  <i>National authority/ies</i></p> <p>IT                      (Drafting suggestions):  <i>National authorities</i></p> <p>IT                      (Comments):                      Differently from the current Regulation, the proposal does not specify the possibility for the national authority to appoint more than one national agency.                      Such a provision would conflict with the governance of the Erasmus+ Programme in Italy, based on different national agencies that manage the Programme’s activities and related resources effectively and efficiently, while respecting the distinct identities of the different sectors.</p> <p>In addition, we suggest explicitly using the plural “national authorities”.</p>

<p>1. <i>The Member States and the third countries associated to the Programme shall notify the Commission, through their Permanent Representation or Mission to the European Union, of the public law body designated as the national authority for the purposes of this Regulation, and the person or persons legally authorised to act on its behalf.</i></p>	<p>BE (Drafting suggestions):</p> <p>1. The Member States and the third countries associated to the Programme shall notify the Commission, through their Permanent Representation or Mission to the European Union, of the public law body designated as the national authority/ies for the purposes of this Regulation, and the person or persons legally authorised to act on its behalf, <b>no later than 6 months of the date of entry into force of this Regulation.</b></p> <p>BE (Comments):</p> <p>1. While we understand the intention to streamline the text, Belgium believes it is important to maintain a clear procedural structure. In particular, we would advocate reintroducing the 2 months response period for the Commission and a 6 months time period for Member States to designate a National Agency. This provides predictability and ensures timely validation of national arrangements, which is essential for smooth programme implementation.</p> <p>2. We would like to return to the issue of indirect management and the participation of legal entities from third countries not associated to the programme. In the current Erasmus+ and European Solidarity Corps programmes, this has enabled meaningful cooperation—for example, youth exchanges and volunteering projects involving participants from neighbouring countries such as Palestine or Georgia. These projects are often submitted to EU national agencies and funded under Heading 2.</p> <p>3. We understand that this practice may not be continued under the next MFF, and that the future use of Global Europe funds remains uncertain. This</p>
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Commission proposal	Drafting suggestions and Comments
	<p>raises concerns, especially since such cooperation represents a significant share, for example between 20 and 25% in the youth and solidarity actions of the mobility budget. We would appreciate clarification from the Commission on how this type of participation will be ensured, managed, and financed under the new regulation.</p> <p>CY (Drafting suggestions):</p> <p>The Member States and the third countries associated to the Programme shall notify the Commission, through their Permanent Representation or Mission to the European Union, of the public law body designated as the national authority for the purposes of this Regulation, and the person <del>or persons</del> legally authorised to act on its behalf.</p> <p>CY (Comments):</p> <p>The plural “persons” was deleted to clarify that each National Authority designates only one legally authorised representative. This ensures clear accountability and avoids potential ambiguity or overlap in legal responsibility when acting on behalf of the National Authority.</p> <p>ES (Drafting suggestions):</p> <p>1. The Member States and the third countries associated to the Programme shall notify the Commission, through their Permanent Representation or Mission to the European Union, of the public law body designated as the national authority, or national authorities where appropriate, for the purposes of this Regulation, and the person or persons legally authorised to act on its behalf.</p> <p>ES (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We also propose mentioning “national authorities” in plural at least once at the beginning of this article corresponding to the obligations of any national authority.</p> <p>IT (Drafting suggestions):</p> <p>1. The Member States and the third countries associated to the Programme shall notify the Commission, through their Permanent Representation or Mission to the European Union, <del>of the one or more</del> public law body designated as the national authorities for the purposes of this Regulation, and the person or persons legally authorised to act on its behalf.</p> <p>IT (Comments):</p> <p>See 17.1</p> <p>We suggest explicitly using the plural “national authorities”</p> <p>NL (Comments):</p> <p>We miss a concrete date / time span for this notification]</p> <p>SI (Comments):</p> <p>SI advocates for having more than one NA. This remark applies to all articles, all provisions regulating the functioning of the NA and <u>NAU</u>.</p> <p>SK (Comments):</p> <p>As in Art. 17(1)</p>
	<p>BE (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>National authorities may designate more than one national agency. In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level, particularly with a view to ensuring coherent and cost-efficient implementation of the Programme and effective contact with the Commission in that respect, and to facilitating the possible transfer of funds between national agencies, thereby allowing for flexibility and better use of funds allocated to Member States. Each Member State shall determine how it organises the relationship between its national authority and the national agency, including tasks such as the establishment of the national agency's work programme.</b></p> <p>BE <b>(Comments):</b></p> <p>We propose to reinstate paragraphe 3 of article 26 of the current Erasmus+ regulation, in line with the Member States internal competences and their constitution.</p>
<p>2. The national authority shall designate a national agency for the duration of the Programme and notify the Commission thereof. The national authority shall not designate a ministry as a national agency and the national agency shall be organisationally separate from the national authority.</p>	<p>IE <b>(Drafting suggestions):</b></p> <p>The national authority shall designate national agencies for the duration of the Programme and notify the Commission thereof. The national authority</p>

Commission proposal	Drafting suggestions and Comments
	<p>shall not designate a ministry as a national agency and the national agency shall be organisationally separate from the national authority.</p> <p>IE (Comments):</p> <p>Some countries have more than one agency so changing text here to reflect that</p> <p>BE (Drafting suggestions):</p> <p>The national authority/ies shall designate a national agency for the duration of the Programme and notify the Commission thereof, the latest 2 months following the communication to the Commission of the designation of the national authority/ies. The national authority shall not designate a ministry as a national agency and the national agency shall be organisationally separate from the national authority/ies.</p> <p>DE (Drafting suggestions):</p> <p>2. The national authority shall designate a national agency for the duration of the Programme and notify the Commission thereof. <b><u>National authorities may designate more than one national agency. In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level.</u></b> The national authority shall not designate a ministry as a national agency <del>and the national agency shall be organisationally separate from the national authority.</del></p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The sector-specific national agencies in DE contribute significantly to the success of the programme. The sector-specific expertise required in Article 19.1(d) is already provided by the existing national agencies in DEU. We also point out that the federal structure necessitates the retention of several national agencies. This also advocates the greatest possible decentralized implementation of the program.</p> <p>We therefore request that the following text from the previous regulation be reinstated.</p> <p>This aspect is problematic for the since long established administrative Erasmus+ structures in Germany. We strongly suggest to delete this phrase or at least to change it to „...should be...“ or „should preferably be...“</p> <p>FR (Drafting suggestions):</p> <p>2.The national authority <del>shall designate a national agency</del> <b>one or more national agencies</b> for the duration of the Programme and notify the Commission thereof. The national authority shall not designate a ministry as a national agency and the national agency shall be organisationally separate from the national authority. <b><u>In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level, particularly with a view to ensuring coherent and cost-efficient implementation of the Programme and effective contact with the Commission in that respect, and to facilitating the possible transfer of funds between national agencies, thereby allowing for flexibility and better use of funds allocated to Member States.</u></b></p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>France proposes to reintroduce here the possibility of having several national agencies, in line with the organizational freedom that it asserts.</p> <p>Consequently, national authorities in Member States must be able to appoint more than one national agency depending on the administrations responsible for governing the Erasmus+ program. The wording used is that of Article 26, paragraph 3, of the current regulation</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>2. The national authorities shall designate <del>a</del> <b>one or more</b> national agencies, including sector specific agencies where justified by national governance structures, for the duration of the Programme and notify the Commission thereof. The national authorities shall not designate a ministry as a national agency and the national agencies shall be organisationally separate from the national authority.</p> <p>IT</p> <p><b>(Comments):</b></p> <p>See 17.1</p> <p>Moreover, we suggest to add a clarification “including sector-specific agencies, where justified by national governance structures”</p> <p>In addition, we suggest explicitly using the plural “national authorities” and “national agencies” to make clear that Member States may designate more than one.</p> <p>LT</p> <p><b>(Drafting suggestions):</b></p> <p>The national authority shall designate a national agency for the duration of the Programme and notify the Commission thereof. A national authority shall</p>

Commission proposal	Drafting suggestions and Comments
	<p>not designate a ministry as a national agency. <b>National authorities may designate more than one national agency. In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level, particularly with a view to ensuring coherent and cost-efficient implementation of the Programme and effective contact with the Commission in that respect, and to facilitating the possible transfer of funds between national agencies, thereby allowing for flexibility and better use of funds allocated to Member States. Each Member State shall determine how it organises the relationship between its national authority and the national agency, including tasks such as the establishment of the national agency’s work programme.</b></p> <p>LT (Comments): We suggest to keep the same regulation regarding national agencies as it is set in present regulation.</p> <p>PL (Drafting suggestions): <b>+ National authorities may designate more than one national agency. In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level. Each Member State shall determine how it organises the relationship between its national authority and the national agency, including tasks such as the establishment of the national agency’s work programme.</b></p> <p>PL (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We consider it essential to maintain a clear definition of the relationship between the National Authority and the National Agency.</p> <p>The overall responsibility for the implementation of the Programme at national level should remain with the national authority, as was the case under the Erasmus+ Regulation for 2021–2027. Such clarity is key to ensuring sound governance and accountability in the management of the Programme.</p> <p>SE (Drafting suggestions):</p> <p>SE: Suggest adding (below) from current regulation after the first sentence in the suggested regulation:</p> <p>National authorities may designate more than one national agency. In cases where there is more than one national agency, Member States shall establish an appropriate mechanism to coordinate the management of the implementation of the Programme at national level, particularly with a view to ensuring coherent and cost-efficient implementation of the Programme and effective contact with the Commission in that respect, and to facilitating the possible transfer of funds between national agencies, thereby allowing for flexibility and better use of funds allocated to Member States. Each Member State shall determine how it organises the relationship between its national authority and the national agency, including tasks such as the establishment of the national agency’s work programme.</p> <p>SE (Comments):</p> <p>SE Comments:</p>

Commission proposal	Drafting suggestions and Comments
	<p>The wording reg. number of NA:s per MS needs to be added, as well as the role of NAU:s to coordinate the management at national level and the task of establishing the NA:s work program. Suggest adding wording from current regulation on this topic.</p> <p>SI (Comments):</p> <p>We propose to revise the article based on the wording of the existing provision.</p> <p>SK (Drafting suggestions):</p> <p>2. The national authority shall designate a national agency/<u>agencies</u> for the duration of the Programme and notify the Commission thereof. The national authority shall not designate a ministry as a national agency and the national agency shall be organisationally separate from the national authority.</p> <p>SK (Comments):</p> <p>The indefinite article "a" signals one national agency. Even though the Commission claims that nowhere in the regulation does it state that there cannot be more national agencies, it is not clear explicitly. Its claim that for new countries there will be an obligation to have only 1 NA and that it is actually more of a communication to new countries, it is not possible to just "guess" It is necessary to rethink the wording.</p>
<p>3. The national authority shall designate an independent audit body as referred to in Article 21.</p>	<p>IT (Drafting suggestions):</p> <p>3. The national authorities shall designate an independent audit body as referred to in Article 21.</p> <p>IT</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b> See 17.1 we suggest explicitly using the plural “national authorities”</p>
<p>4. The national authority shall provide the Commission with an appropriate ex ante assessment that the national agency satisfies the minimum requirements set out in Article 157(1) to (5) of Regulation (EU, Euratom) 2024/2509 and the Union requirements for internal control standards for national agencies and rules for the management of Programme funds.</p>	<p>IT <b>(Drafting suggestions):</b> 4. The national authorities shall provide the Commission with an appropriate ex ante assessment that the national agencies satisfy the minimum requirements set out in Article 157(1) to (5) of Regulation (EU, Euratom) 2024/2509 and the Union requirements for internal control standards for national agencies and rules for the management of Programme funds. IT <b>(Comments):</b> See 17.1 we suggest explicitly using the plural “national authorities” and “national agencies” to make clear that Member States may designate more than one SK <b>(Comments):</b> As in Art. 17(1)</p>
<p>For the purposes of the first subparagraph, the following arrangements shall apply:</p>	<p>CY <b>(Drafting suggestions):</b> For the purposes of the first subparagraph 4, the following arrangements shall apply:</p>

Commission proposal	Drafting suggestions and Comments
	CY <b>(Comments):</b> The term “first subparagraph” was replaced with “paragraph 4” to ensure structural accuracy, as point 4 contains a single paragraph rather than multiple subparagraphs. This change eliminates ambiguity and aligns the wording with the actual <b>format</b> of the provision.
(a) for the procedures specifically required by the Commission, including its own and those specified in this Regulation, no ex ante assessment shall be done in line with point (b) of Article 157(7) of Regulation (EU, Euratom) 2024/2509;	
(b) for procedures other than those specified in point (a), the national authority shall make an ex ante assessment, which shall be based on its own controls and audits or on controls and audits undertaken by the independent audit body;	IT <b>(Drafting suggestions):</b> (b) for procedures other than those specified in point (a), the national authorities shall make an ex ante assessment, which shall be based on its own controls and audits or on controls and audits undertaken by the independent audit body;  IT <b>(Comments):</b> See 17.1  we suggest explicitly using the plural “national authorities”
(c) where the national agency designated for the Programme is the same as the national agency designated in accordance with Regulations (EU) 2021/817 and (EU) 2021/888, the scope of the ex ante assessment shall be limited to the requirements that are new, unless otherwise justified.	ES <b>(Drafting suggestions):</b> (c) where the national agency/agencies designated for the Programme is/are the same as the national agency/agencies designated in accordance with

Commission proposal	Drafting suggestions and Comments
	<p>Regulations (EU) 2021/817 and (EU) 2021/888, the scope of the ex ante assessment shall be limited to the requirements that are new, unless otherwise justified.</p> <p>ES (Comments):</p> <p>These provisions refer in the singular to the national agency implementing the Erasmus+ and ESC programmes until 2027, so we consider it necessary to explicitly mention here that it can be “agencies” in plural, given that in many Member States there are several NAs.</p> <p>IT (Drafting suggestions):</p> <p>(c) where the national agency , <b>or one of the national agencies, where more than one is</b> designated for the Programme is the same <b>entity</b> as the national agency designated in accordance with Regulations (EU) 2021/817 and (EU) 2021/888, the scope of the ex ante assessment shall be limited to the requirements that are new, unless otherwise justified.</p> <p>IT (Comments):</p> <p>See 17.1</p> <p>We suggest to add “<b>or one of the national agencies, where more than one</b>” to make clear that Member States may designate more than one. Moreover, we suggest to add the word “<b>entity</b>” to make the sentence clearer.</p>
<p>5. In the event that the Commission rejects the designation of the national agency based on its evaluation of the ex ante assessment, or if the national agency does not comply with the minimum requirements set by the Commission, the national authority shall ensure that the necessary remedial</p>	<p>IT (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
<p>steps are taken to ensure compliance, subject to approval by the Commission, or shall designate another body as national agency. In exceptional cases where a national agency ceases to operate or to exist and the national authority itself carries out budget implementation tasks in accordance with this Regulation and relevant agreements thereunder, it shall be exempted from the ex ante assessment.</p>	<p>5. In the event that the Commission rejects the designation of the national agency <b>or one of the national agencies, where more than one is designated for the Programme</b>, based on its evaluation of the ex ante assessment, or if the national agency <b>or more than one</b> does not comply with the minimum requirements set by the Commission, the national authority shall ensure that the necessary remedial steps are taken to ensure compliance, subject to approval by the Commission, or shall designate another body as national agency. In exceptional cases where a national agency ceases to operate or to exist and the national authority itself carries out budget implementation tasks in accordance with this Regulation and relevant agreements thereunder, it shall be exempted from the ex ante assessment.</p> <p>IT (Comments): See 17.1 for the number of national authorities and national agencies.</p> <p>Furthermore, the provision, although aimed at ensuring compliance with EU standards, presents some critical issues: it centralises decision-making power within the Commission, reduces national autonomy and, by making corrective measures subject to its prior approval without providing for accelerated procedures, risks slowing down interventions and jeopardising the continuity of the programme's management.</p> <p>We suggest to add "<b>or one of the national agencies, where more than one</b>" and "<b>or more than ones</b>" to make clear that Member States may designate more than one.</p> <p>PL (Drafting suggestions): In the event that the Commission rejects the designation of the national agency based on its evaluation of the ex ante assessment, or if the national</p>

Commission proposal	Drafting suggestions and Comments
	<p>agency does not comply with the minimum requirements set by the Commission, the national authority shall ensure that the necessary remedial steps are taken to ensure compliance, subject to approval by the Commission, or shall designate another body as national agency. <del>In exceptional cases where a national agency ceases to operate or to exist and the national authority itself carries out budget implementation tasks in accordance with this Regulation and relevant agreements thereunder, it shall be exempted from the ex-ante assessment</del></p> <p>PL  <b>(Comments):</b></p> <p>We consider that such detailed descriptions of exceptional or hypothetical situations are not necessary in the Regulation.</p> <p>These matters can be addressed through implementing arrangements or practical cooperation between the Commission and the Member States, without overburdening the legal text with procedural detail.</p> <p>SE  <b>(Drafting suggestions):</b></p> <p>In the event that the Commission rejects the designation of the national agency based on its evaluation of the ex ante assessment, or if the national agency does not comply with the minimum requirements set by the Commission, the national authority shall ensure that the necessary remedial steps are taken to ensure compliance, subject to approval by the Commission, or shall designate another body as national agency. <del>In exceptional cases where a national agency ceases to operate or to exist and the national authority itself carries out budget implementation tasks in accordance with this Regulation and relevant agreements thereunder, it shall be exempted from the ex-ante assessment.</del></p> <p>SE</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>SE Comments: Regarding “<i>In exceptional cases where a national agency ceases to operate or to exist and the national authority itself carries out budget implementation tasks in accordance</i>”. As commented on in art. 17.2 further clarification on this revised role of the NAU:s needs to be provided from the EC.</p> <p>SK <b>(Comments):</b></p> <p>It is necessary to discuss further the competencies as sometimes it is not clear. In practice, NAUs usually don’t have own personal capacities to “carry out budget implementation tasks” in order to replace a NA for a limited time adequately.</p> <p>As a more realistic option, we propose, in agreement with the Commission, the possibility of temporarily and conditionally entrusting another relevant organization with the performance of the duties of the national agency. Conditionally entrusted national agency cannot award grants.</p>
<p>6. The national authority shall provide adequate co-financing, at least equivalent to the contribution referred to in Article 20(5), point (b), for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p>	<p>IE <b>(Comments):</b></p> <p><i>Ireland cannot support this inclusion, This stipulation of a match is new, 20(5) point b is... a contribution in support of the national agency’s Programme management tasks;...at the moment the NAU has to give adequate co-financing ....if we were to agree to match the EU contribution to the management costs and possibly training and cooperation activities it will mean a significant increase in the allocation that we currently provide to the national agencies. This would have to be factored into</i></p>

Commission proposal	Drafting suggestions and Comments
	<p>the estimates process for the exchequer each year and the contribution we currently provide is more than sufficient.</p> <p>AT (Comments): Please explain the modalities of “at least equivalent” since co-financing of the national agency by the national authority is planned over a longer period of time and the delegation agreement between the EC and the NA are sometimes published during the actual year of implementation.</p> <p>BE (Drafting suggestions): The national authority shall provide adequate co-financing, <del>at least equivalent</del> <b>sufficient to run the agency</b> to the contribution referred to in Article 20(5), point (b), for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>BE (Comments): Belgium would like to seek clarification on the new wording regarding co-financing by national authorities. The draft regulation now requires national authorities to provide co-financing “at least equivalent” to the EU contribution, which differs from the current regulation where the requirement was less explicit (“sufficient to run the agency”).</p>

Commission proposal	Drafting suggestions and Comments
	<p>CY (Drafting suggestions):</p> <p>The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>CY (Comments):</p> <p>The proposed deletion reverts point 6 to its wording within the 2021-2027 regulations. The National contribution depends on the actual requirements for the administration costs of the NA, as well as the national circumstances.</p> <p>DE (Drafting suggestions):</p> <p>6. The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We ask for clarification of what is meant by "equivalent" in Article 18, point 6: <i>"The national authority shall provide adequate co-financing, at least equivalent to the contribution referred to in Article 20(5), point (b), for the operations of its national agency to ensure that the programme is managed in accordance with the applicable Union rules"</i>. The proposal refers to Article 20, but no further details/figures are given there. We would like to point out that we cannot agree with this increase in the co-financing mode.</p> <p>In addition, we ask what is meant with "applicable Union rules".</p> <p>ES (Drafting suggestions):</p> <p>6. The national authority shall provide adequate co-financing for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>ES (Comments):</p> <p>We understand that it is important for there to be adequate co-financing between the EU and Member States to support the functioning of NAs, but we prefer what was stated in the previous Regulation, which did not refer to a necessary 50-50 financing arrangement.</p> <p>FR (Drafting suggestions):</p> <p>The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules. »</p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>France requires to delete this reference, which does not recognize the different ways by which the Member States already contribute to the functioning of the agencies, including through staff allocation, and which poses a significant financial risk for Member States, and to reintroduce the wording of the current regulation. France also requires to reintroduce a minimum threshold for the EU's financial contribution to the operational costs of national agencies, in order to safeguard the level of this contribution (Chapter IX).</p> <p>HU (Drafting suggestions):</p> <p>The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>HU (Comments):</p> <p>In Point 6, we propose deleting the sentence stating that the national agency should receive at least as much support as the operating support from the Commission. In our opinion, the current flexibility of co-financing the national agency should be kept for the national authorities.</p> <p>IT (Drafting suggestions):</p> <p>The national authorities shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency <del>or agencies, where more than one</del>, to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>IT (Comments):</p>

Commission proposal	Drafting suggestions and Comments	
	<p>It will be important for Italy to delete the wording “at least equivalent to the contribution referred to in Article 20(5), point (b),” in this sentence. We would prefer that this Article would be more similar to the current one (art. 26 of the EU Regulation on Erasmus+ (EU) 2021/817.</p> <p>In addition, we suggest explicitly using the plural “national <b>authorities</b>” and adding “<b>or agencies, where more than one,</b>” to make clear that Member States may designate more than one.</p> <p>LU (Drafting suggestions):</p>	
	<p>6. The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b),</del> for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p>	<p>We would like to seek clarification on this new wording, as it differs from the current regulation. At this point Luxembourg cannot guarantee this.</p>
	<p>LU (Comments):</p> <p>NL (Comments):</p> <p>Study reservation; furthermore the wording ‘at least equivalent’ gives legal uncertainty that Member States could be asked to contribute more than 50/50.</p> <p>] PL (Drafting suggestions):</p>	

Commission proposal	Drafting suggestions and Comments
	<p>The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>PL (Comments):</p> <p>We strongly oppose the introduction of new provision that would impose on Member States the obligation to co-finance the operational costs of National Agencies at least equivalent to the EC contribution.</p> <p>The Erasmus+ Programme is financed entirely from the Union budget, and Member States already contribute through their membership fees. Any requirement for additional national co-financing would be inconsistent with this principle and is therefore unacceptable.</p> <p>SE (Comments):</p> <p>SE Comments: Reg. “<i>at least equivalent to the contribution referred to</i>” needs to be clarified. Will this mean an increased co-financing from the NAU:s?</p> <p>SI (Comments):</p> <p>We prefer the existing wording and suggest deleting the phrase “at least equivalent to the contribution”.</p> <p>SK (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>6. The national authority shall provide adequate co-financing, <del>at least equivalent to the contribution referred to in Article 20(5), point (b)</del>, for the operations of its national agency to ensure that the Programme is managed in accordance with the applicable Union rules.</p> <p>SK (Comments): Adequate co-financing in the amount necessary for the agency to fulfil all its tasks and successfully implement the programme at national level is always a priority for the national authority. Co-financing of the national agency by the national authority is planned over a longer time frame and the EC resources under Article 20(5) are published sometimes during the actual year. Therefore, we propose to omit the exact determination of equivalence.</p> <p>RED LINE</p>
<p>7. The national authority shall ensure that appointments of persons responsible for the management of the national agency are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</p>	<p>LV (Comments): This level of detailing may go beyond what should be regulated by this regulation.</p> <p>BE (Comments): Belgium would like to raise a concern regarding the new provision in Article 18, paragraph 7. The draft regulation now allows the Commission to reject the appointment of a person responsible for managing a national agency, should it have serious concerns about the fairness or transparency of the procedure.</p> <p>While we fully support the principles of fair recruitment and avoiding conflicts of interest, we believe this provision goes beyond the current</p>

Commission proposal	Drafting suggestions and Comments
	<p>regulation and may interfere with national autonomy. Recruitment processes are already subject to national rules and oversight, and introducing a veto power for the Commission could complicate procedures unnecessarily. This does not align with the competences of Member States in managing their national agencies.</p> <p>CY (Drafting suggestions):</p> <p>The national authority shall ensure that appointments of persons responsible for the management of the national agency <del>are justified by the nature of the action</del>, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. <del>In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</del></p> <p>CY (Comments):</p> <p>The NAU ensures that the appointment should follow fair and transparent rules without intervention by the Commission.</p> <p>DE (Comments):</p> <p>This is difficult under labour law and Article 18.7 must therefore be called into question.</p> <p>ES (Drafting suggestions):</p> <p>7. The national authority shall ensure that appointments of persons responsible for the management of the national agency follow fair and transparent rules and procedures and do not give rise to a conflict of interest.</p>

Commission proposal	Drafting suggestions and Comments
	<p>In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</p> <p>ES (Comments):</p> <p>It is not clear to us what ‘justified by the nature of the action’ means or implies, so we would prefer it to be removed, unless it is clearly defined. We believe that vague concepts should not be included in the criteria.</p> <p>FI (Comments):</p> <p>Need to make sure that it will be clear how this will technically and process-vice work out and make sure process does not violate implementation, legal base or add workload</p> <p>FR (Drafting suggestions):</p> <p>The national authority shall ensure that appointments of persons responsible for the management of the national agency are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. <del>In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</del></p> <p>FR (Comments):</p> <p>FR delegation will request the deletion of the second part of the point because direct intervention by the Commission in the recruitment of staff for national agencies is not acceptable. It would call into question the independence of national authorities and contravene the process of appointment to public posts in the Member States.</p>

Commission proposal	Drafting suggestions and Comments
	<p>HU (Comments):</p> <p>The wording of Point 7 suggests that heads of national agencies can only be appointed with the Commission's approval. This provision does not exist in the current Regulation, it is a red line for us.</p> <p>IT (Drafting suggestions):</p> <p>The national authorities shall ensure that appointments of persons responsible for the management of the national agency <b>or agencies, where more than one</b>, are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. <del>In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</del></p> <p>IT (Comments):</p> <p>We propose to delete the last paragraph of the provision, as it appears to introduce interference by the Commission in the procedure for appointing the heads of the national agencies.</p> <p>In addition, we suggest explicitly using the plural “national <b>authorities</b>” and add “<b>or agencies, where more than one</b>” to make clear that Member States may designate more than one</p> <p>PL (Drafting suggestions):</p> <p>The national authority shall ensure that appointments of persons responsible for the management of the national agency are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. <del>In case of serious concerns about compliance with</del></p>

Commission proposal	Drafting suggestions and Comments
	<p>these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</p> <p>PL (Comments):</p> <p>We strongly oppose granting the European Commission the right to reject appointments of persons responsible for the management of the national agency made by national authorities.</p> <p>This provision would represent an excessive and unjustified intervention in the competences of the Member States, undermining their responsibility for the implementation of the Programme at national level. Such a solution is therefore unacceptable.</p> <p>SE (Drafting suggestions):</p> <p>The national authority shall ensure that appointments of persons responsible for the management of the national agency are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest.</p> <p>SE (Comments):</p> <p>SE: The last sentence implies that proposed appointments, prior to the appointment being made, would have to be approved by the Commission. The sentence shall be deleted since the Commission should not be involved in the appointment of the management of national authorities in such a way.</p> <p>SI (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We understand the reasoning behind it, but we would prefer to soften the wording regarding the appointments of persons responsible for the management of the NA.</p> <p>SK (Drafting suggestions):</p> <p><del>7. — The national authority shall ensure that appointments of persons responsible for the management of the national agency are justified by the nature of the action, follow fair and transparent rules and procedures and do not give rise to a conflict of interest. In case of serious concerns about compliance with these principles, the Commission may reject the proposed appointment and request the national authority to ensure that the selection procedure is repeated.</del></p> <p>SK (Comments):</p> <p>Verifying the procedures and processes of the organisation acting as the national agency is part of a comprehensive ex-ante assessment process. This assessment also covers the procedure for appointing individuals to oversee the operation of the national agency. The ex-ante assessment is governed by a detailed document prescribed by the Commission.</p> <p>In view of paragraphs (4) and (5) of this article, we propose deleting article (7). Compared to the other articles in the regulation, Article 7 is disproportionately detailed and inappropriately worded in places. According to Article 18(2), the national authority should be organisationally separated from the national agency. Direct intervention in personnel policy would call this independence into question and may not be possible.</p> <p>RED LINE</p>
<p>8. The national authority shall monitor and supervise the budget implementation tasks entrusted to its national agency. It shall inform and</p>	<p>BE</p>

Commission proposal	Drafting suggestions and Comments
<p>consult the Commission in due time prior to taking any decision that may have a significant impact on the management of the Programme and the Programme funds.</p>	<p><b>(Comments):</b></p> <p>Compared to the current regulation, <b>the national agency must now consult the Commission before decisions</b> that may have a significant impact. Now this signaling is done after the actions or as requested. We fear that this might have an impact on the work load of the national agencies, and we need more time to discuss with them what the consequences of this will be.</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>8. <del>The Each</del> national authority shall monitor and supervise the budget implementation tasks entrusted to its national agency , <b>or agencies, where more than one</b>. It shall inform and consult the Commission in due time prior to taking any decision that may have a significant impact on the management of the Programme and the Programme funds</p> <p>IT</p> <p><b>(Comments):</b></p> <p>See 17.1</p> <p>we suggest to add “<b>or agencies, where more than one</b>” to make clear that Member States may designate more than one</p> <p>SE</p> <p><b>(Comments):</b></p> <p>SE</p> <p>Question:</p> <p>Is there no longer a need for the NAU:s to supervise the management of the programme at national level, or will this task be conducted by another body, the EC?</p> <p>See wording in current regulation “<i>The national authority shall monitor <u>and supervise the management</u> of the Programme at national level.</i>”</p>

Commission proposal	Drafting suggestions and Comments
<p>9. The national authority shall, each year, provide the Commission with a report on its monitoring and supervision activities and, where appropriate, a statement on its follow-up to any observations issued by the Commission in response to such report.</p>	<p>BE (Comments): The new regulation asks that the national authorities should <b>report to the Commission on any “observations” issued by the Commission</b>. This is new. We fear that this will also have an additional administrative burdens on the national authorities and the agencies.</p> <p>CY (Comments): Is this the October report?</p> <p>IT (Drafting suggestions): 9. <del>The Each</del> national authority shall, each year, provide the Commission with a report on its monitoring and supervision activities and, where appropriate, a statement on its follow-up to any observations issued by the Commission in response to such report.</p> <p>IT (Comments): See 17.1</p> <p>SE (Comments): In order to assess possible needs of adjustments in this part, it would be good to understand if there are any practical and/or substantial differences between <i>provide a report</i> (as stated in proposal for this new regulation) and <i>provide information</i> (as expressed in Regulation 2021/817 of the European Parliament and of the Council, establishing Erasmus+).</p>

Commission proposal	Drafting suggestions and Comments
<p>10. The national authority shall take and retain responsibility for the proper management of the Union funds transferred by the Commission to the national agency in the framework of the Programme.</p>	<p>IT (Drafting suggestions):</p> <p>10. <del>The</del> <b>Each</b> national authority shall take and retain responsibility for the proper management of the Union funds transferred by the Commission to <del>the its</del> national agency <b>or agencies, where more than one</b> in the framework of the Programme.</p> <p>IT (Comments):</p> <p>See 17.1</p> <p>we suggest to add “<b>or agencies, where more than one</b>” to make clear that Member States may designate more than one</p>
<p>11. In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency, the national authority shall reimburse and indemnify the Commission for such claims.</p>	<p>BE (Comments):</p> <p>The <b>new draft makes the national authority directly liable to the Commission for any irregularities or underperformance by the national agency</b>. This is a more explicit formulation than in the current regulation, and we would like to return to the wording in the current regulation.</p> <p>In particular, we need clarity on <b>who determines whether an irregularity or shortcoming has occurred, and how is this assessed?</b> We are concerned that this provision may place disproportionate responsibility on the national authority.</p> <p>ES (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>11. In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency, the national authority shall reimburse the Commission for such claims.</p> <p>ES (Comments):</p> <p>This idea of ‘indemnifying’ the Commission does not appear to have been provided for in the previous Regulation. We believe that the liability of the agency and the national authority should be limited to reimbursing the damage caused and that no reference should be made to a possible compensation (for what exactly is not clear).</p> <p>FR (Drafting suggestions):</p> <p>In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency, the national authority shall reimburse and indemnify the Commission for such claims.</p> <p>FR (Comments):</p> <p>FR delegation will request the deletion of “indemnify” which does not appear in the current regulation and will ask the Commission what this compensation of national authorities implies to the Commission. The FR delegation also wonders how, and by whom, such an indemnity would be estimated.</p> <p>HU (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency, the national authority shall reimburse <del>and indemnify</del> the Commission for such claims</p> <p>HU (Comments):</p> <p>Like other delegations, we also support the deletion of “idemnify” from the text.</p> <p>IT (Drafting suggestions):</p> <p>In the event of any irregularity, negligence or fraud attributable to the national agency <b>or agencies, where more than one</b>, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency <b>or agencies</b>, the national authority<del>ies</del> shall reimburse <del>and indemnify</del> the Commission for such claims.</p> <p>IT (Comments):</p> <p>See 17.1</p> <p>Unlike Regulation (EU) 2021/817, Article 26(11), the proposal (cf. Article 18(11)) provides that, in cases of irregularities, negligence or fraud caused by the national agency, the national authority should not only reimburse but also indemnify the Commission. This formulation seems to go beyond what was envisaged in the previous Regulation with regard to the sound management of EU resources.</p>

Commission proposal	Drafting suggestions and Comments
	<p>In this respect, <b>it might be more appropriate to limit the responsibility of the national authority to the reimbursement of funds not recovered from its agency, without the additional obligation of indemnification.</b></p> <p>The concern is reiterated regarding the proposal to introduce a general obligation for the national authority to indemnify for any irregularities, negligence, or non-compliance on the part of the Erasmus+ agencies. Such an obligation would impose an additional, undefined, and indeterminable financial liability, as no maximum limit is specified. Moreover, it seems to underestimate the central role of the Commission in defining eligibility rules, IT systems, guidelines, and contractual templates.</p> <p>The current liability regime, under which the national authority reimburses the Commission only for funds that have not been effectively recovered from the national agency, has ensured effective protection of the EU budget while safeguarding the principles of proportionality and fair distribution of responsibilities between the Commission and the Member States. Therefore, we ask to reinstate the currently applicable liability regime.</p> <p>In addition, we suggest to add “<b>or agencies, where more than one</b>” to make clear that Member States may designate more than one</p> <p>LU  <b>(Comments):</b>                      Luxembourg is concerned that this provision may place disproportionate responsibility on the national authority.</p> <p>SE  <b>(Drafting suggestions):</b>                      In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to</p>

Commission proposal	Drafting suggestions and Comments
	<p>claims by the Commission against the national agency, the national authority shall reimburse and indemnify the Commission for such claims.</p> <p>SE (Comments):</p> <p>SE Question: Is there a reason for the sharper wording “indemnify” here?</p> <p>SK (Drafting suggestions):</p> <p>11. In the event of any irregularity, negligence or fraud attributable to the national agency, or of serious shortcomings, liabilities or underperformance on the part of the national agency, where any of these instances gives rise to claims by the Commission against the national agency, the national authority shall reimburse and indemnify the Commission for such claims <b>not recovered</b>.</p> <p>SK (Comments):</p> <p>The contractual relationship is concluded between the NA and EC (Art. 20/2).</p>
<p>12. In the circumstances referred to in paragraph 11, the national authority may, on its own initiative or at the request of the Commission, revoke the mandate of the national agency. Where the national authority wishes to revoke that mandate for any other justified reason, it shall notify the Commission within a reasonable time before the envisaged date of termination of the mandate. In such cases, the national authority and the Commission shall formally agree on specific and time-limited transition measures.</p>	<p>BE (Comments):</p> <p>See previous intervention on irregularities.</p> <p>IT (Drafting suggestions):</p> <p>12. In the circumstances referred to in paragraph 11, the national authority <del>ies</del> may, on its own initiative or at the request of the Commission,</p>

Commission proposal	Drafting suggestions and Comments
	<p>revoke the mandate of the national agency <b>or agencies, where more than one</b>. Where the national authority <b>wishes</b> to revoke that mandate for any other justified reason, it shall notify the Commission within a reasonable time before the envisaged date of termination of the mandate. In such cases, the national authority <b>and</b> the Commission shall formally agree on specific and time-limited transition measures.</p> <p>IT (Comments): See 17.1</p> <p>The expression “<i>within a reasonable time</i>” is too vague and could lead to uncertainty and delays in the transition between agencies. To ensure continuity and orderly planning, it would be preferable to specify a clear and mandatory deadline, such as the six months provided for in the current regulation.</p> <p>In addition, we suggest to add “<b>or agencies, where more than one</b>” to make clear that Member States may designate more than one</p>
<p>13. In the event of revocation as referred to in paragraph 12, the national authority shall carry out the necessary controls regarding the Union funds entrusted to the national agency whose mandate has been revoked and shall ensure that those funds and all documents and management tools required for the management of the Programme are transferred to the new national agency in an unimpeded manner. The national authority shall provide the national agency whose mandate has been revoked with the necessary financial support to continue to meet its contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission pending the transfer of those obligations to a new national agency. Should there be a transitional period between the</p>	<p>IT (Drafting suggestions):</p> <p>13. In the event of revocation as referred to in paragraph 12, the national authority <b>wishes</b> shall carry out the necessary controls regarding the Union funds entrusted to the national agency <b>or agencies, where more than one</b> whose mandate has been revoked and shall ensure that those funds and all documents and management tools required for the management of the Programme are transferred to the new national agency <b>or agencies</b> in an</p>

Commission proposal	Drafting suggestions and Comments
<p>revocation of this mandate and the designation of a new national agency as accepted by the Commission, the national authority shall, during such period, be responsible for all the obligations of the national agency as laid out in this Regulation and for all of its outstanding contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission.</p>	<p>unimpeded manner. The national authorities shall provide the national agency <b>or agencies</b> whose mandate has been revoked with the necessary financial support to continue to meet its contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission pending the transfer of those obligations to a new national agency <b>or agencies, where more than one</b>. <del>Should there be a transitional period between the revocation of this mandate and the designation of a new national agency as accepted by the Commission, the national authority shall, during such period, be responsible for all the obligations of the national agency as laid out in this Regulation and for all of its outstanding contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission.</del></p> <p>IT (Comments):</p> <p>See 17.1</p> <p>We suggest to carefully review the provisions of this paragraph, also taking into account what is currently established in Article 26, paragraph 13. In particular, we ask to delete the last paragraph and to insert a provision establishing that the responsibility of the national agency is suspended or revoked until its obligations are transferred to a new agency, in order to ensure continuity in programme implementation, protect beneficiaries, provide legal certainty, and maintain compliance with the principles of sound financial management and transparency. Moreover, a similar provision is already included in the current Regulation (Article 27, paragraph 7), whereas in the draft of the new Regulation, under Article 19 dedicated to the national agency, this responsibility is no longer provided for.</p> <p>In addition, we suggest to add “<b>or agencies, where more than one</b>” and “<b>or agencies</b>” to make clear that Member States may designate more than one</p>

Commission proposal	Drafting suggestions and Comments
	<p>SE (Drafting suggestions):</p> <p>In the event of revocation as referred to in paragraph 12, the national authority shall carry out the necessary controls regarding the Union funds entrusted to the national agency whose mandate has been revoked and shall ensure that those funds and all documents and management tools required for the management of the Programme are transferred to the new national agency in an unimpeded manner. The national authority shall provide the national agency whose mandate has been revoked with the necessary financial support to continue to meet its contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission pending the transfer of those obligations to a new national agency. <del>Should there be a transitional period between the revocation of this mandate and the designation of a new national agency as accepted by the Commission, the national authority shall, during such period, be responsible for all the obligations of the national agency as laid out in this Regulation and for all of its outstanding contractual obligations vis à vis the beneficiaries of the Programme and the Commission.</del></p> <p>SE (Comments):</p> <p>SE Comments: See earlier comments on art. 17.2 and 18.5 reg. last sentence in this article.</p> <p>SK (Comments):</p> <p>See para 5. It requires significant resources to run the programme and the NAUs do not have such capacity. It is necessary to review this paragraph.</p>

Commission proposal	Drafting suggestions and Comments
	<p>As a more realistic option, we propose, in agreement with the Commission, the possibility of temporarily and conditionally entrusting another relevant organization with the performance of the duties of the national agency. Conditionally entrusted national agency cannot award grants.</p>
<p>14. Where a national agency ceases to operate or to exist and no new national agency is designated as a result of the withdrawal of a third country from the Programme, the national authority shall be principally responsible for all the obligations of the national agency and for the fulfilment and closure of all the outstanding contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission.</p>	<p>BE (Comments): See previous comment on para 11.</p> <p>CY (Drafting suggestions): Where a national agency ceases to operate or to exist and no new national agency is designated as a result of the withdrawal of a third country from the Programme, the national authority <b>shall take all the necessary steps to promptly assign the new NA</b> to be principally responsible for all the obligations of the national agency and for the fulfilment and closure of all the outstanding contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission.</p> <p>CY (Comments): How is it expected for NAU to continue the obligations of NA itself?</p> <p>SE (Comments):</p> <p>SE Comments: See comment above and art. 17.2 and 18.5. This needs to be further clarified as the responsibility and role of the NAU:s are significantly changed with this article and the ones mentioned above.</p> <p>SK</p>

ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>(Comments): Same as in para 5 and 13.</p>
<p>15. At the request of the Commission, the national authority shall designate the institutions or organisations, or the types of such institutions and organisations eligible to participate in an action of the Programme in its territory.</p>	<p>FR (Drafting suggestions): « At the request of the Commission, the national authority shall designate the institutions or organisations, or the types of such institutions and organisations eligible to participate in an action of the Programme in its territory. <b><u>In addition, the national authority supplements the programme guide with measures for accessing funding tailored to the national context.</u></b></p> <p>FR (Comments): Beyond questions of eligibility, the national authorities provide beneficiaries with clarifications on the terms of access to funding (financial and operational capacity, risk management)."</p> <p>IT (Drafting suggestions): 15. At the request of the Commission, the national authorities shall designate the institutions or organisations, or the types of such institutions and organisations eligible to participate in an action of the Programme in its territory.</p> <p>IT (Comments): See 17.1 we suggest explicitly using the plural “national authorities”</p>

Commission proposal	Drafting suggestions and Comments
<p>16. The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes.</p>	<p>AT (Comments): Could the Commission please provide further information on this paragraph. In our view, it has not been very successful to promote such synergies on the EU level in the past. Therefore, we are not sure how this should work on the national level. <b>We believe that this para should be under Art. 20.</b></p> <p>BE (Drafting suggestions): “The national authority <del>shall</del> <b>should endeavour to</b> promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes, <b>where possible.</b>”</p> <p>BE (Comments): Belgium would like to suggest softening the wording of paragraph 16 in Article 16. While we support the aim of promoting synergies with other Union, national or regional programmes, national authorities are not always in a position to actively facilitate such links, especially when programmes target different groups or operate under different frameworks.</p> <p>We propose rephrasing the sentence to reflect this reality, for example: “<i>The national authority should endeavour to promote and facilitate synergies, where possible.</i>” We will get the feedback to you in writing. We would also welcome further clarification from the Commission on how this provision is expected to be implemented in practice.</p> <p>CY (Drafting suggestions): The EC shall provide specific and actionable guidelines to the national authority, in order to <del>shall</del> promote and facilitate effective synergies and</p>

Commission proposal	Drafting suggestions and Comments
	<p>complementarities with other Union, national or regional funds or programmes.</p> <p>CY (Comments): Synergies should be facilitated/promoted by the EC by providing specific measures towards it.</p> <p>DE (Comments): New in the draft text is that national authorities should promote and facilitate effective synergies and complementarities with other funds or programmes of the Union, the Member States or the regions. We request further information on what specific tasks are meant by this.</p> <p>EE (Drafting suggestions): The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes, where possible.</p> <p>EE (Comments): We believe that facilitating effective synergies and complementarities with other Union programmes should primarily be enabled and coordinated by the Commission. The national authority can only promote and facilitate such synergies if they are practically feasible. Therefore, we propose that the relevant provision be moved under Article 20: “The Commission shall promote and facilitate effective synergies and complementarities with other Union funds and programmes”.</p> <p>ES (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>16. The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes, in accordance with Commission's guidelines and recommendations regarding Union programmes.</p> <p>ES (Comments):</p> <p>We propose adding that this will be done with the cooperation of the Commission. Some guidelines or recommendations are needed. We believe it would be difficult for a national authority — which is not familiar with the details of all EU funding programmes — to promote these synergies and complementarities between Erasmus+ and the other new EU programmes on its own. It will not even be that easy to do with other national/regional funds...</p> <p>FR (Drafting suggestions):</p> <p>The national authority shall, <b>in cooperation with the Commission where relevant</b>, promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes.</p> <p>FR (Comments):</p> <p>The FR delegation will ask to add "in cooperation with the Commission where relevant" because the Commission has a role to play in synergy with other EU funds and programmes.</p> <p>HU (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p><del>The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes.</del></p> <p>HU (Comments):</p> <p>We would like to request that Point 16 be deleted, as this task did not exist previously for the national authority and is an unrealistic expectation. In our opinion, it is the Commission who is able to monitor synergies with other Union programmes.</p> <p>IT (Drafting suggestions):</p> <p>The national authorities, <b>in cooperation with the Commission</b>, shall <b>ensure that all necessary and appropriate measures are taken to limit and remove any legal and administrative obstacles to</b> promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes.</p> <p>IT (Comments):</p> <p>Given the importance that has been, and is increasingly being attached to the role of synergies among funds, and also according to the lessons learned during the current programming period, it is essential to strengthen, <b>in Article 11 and Article 18</b>, both the joint effort of the Member States and the Commission to remove legal and administrative obstacles to the promotion of complementarity between funds, and a clearer indication to avoid cases of duplication or overlapping of rule systems concerning a funding source where this contributes to the implementation of Erasmus+ Programme interventions.</p> <p>In addition, we suggest explicitly using the plural “national authorities”</p>

Commission proposal	Drafting suggestions and Comments
	<p>NL (Drafting suggestions):</p> <p>16. — The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes.</p> <p>NL (Comments):</p> <p>This is not realistic, to require the National Agency to promote synergies etc. at EU level when this does not exist at that level; but also promoting synergies with national or regional funds cannot be expected from an implementation agency without such policy decision capacity.</p> <p>SE (Drafting suggestions):</p> <p>The national authority shall promote and facilitate effective synergies and complementarities with other Union, national or regional funds or programmes, <b>with the support of the Commission.</b></p> <p>SE (Comments):</p> <p>SE Comment: Would be useful to receive further information on what type of tasks this could entail for the NAU:s as well as further information on what synergies the EC envisages would be possible. See also suggested additional wording.</p>
<p>17. The national authority shall ensure that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the</p>	<p>IE (Comments):</p> <p>Reference to the Programme Committee need to be inserted into this article.</p>

Commission proposal	Drafting suggestions and Comments
<p>same situation or at addressing difficulties in obtaining visas or residence permits.</p>	<p>BE  <b>(Drafting suggestions):</b>                      The national authority <del>shall ensure that</del> <b>should endeavour to adopt</b> all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including, <b>where possible</b>, measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p>BE  <b>(Comments):</b>                      Belgium would like to suggest softening the wording of paragraph 17 in Article 18. While we fully support the goal of removing legal and administrative barriers to participation, national authorities are not always in a position to address issues such as visa or residence permits, especially in federal systems where competences are shared.</p> <p>The current phrasing places a strong responsibility on national authorities to ensure participant status and access, which may in practice fall under other actors/ministries.</p> <p>CY  <b>(Drafting suggestions):</b>                      The <del>national authority</del> <b>Member States</b> shall ensure that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p>CY</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>As was stated in the previous regulation 2021-2027,</p> <p>FI</p> <p>(Comments):</p> <p>In current regulation there is “where possible” – something similar would need here also – visas and residence permits are in another administrative field.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>The national authority shall ensure that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p><b><u>The Member States shall take all necessary and appropriate measures to remove any legal and administrative obstacles to the proper functioning of the Programme, including, where possible, measures aimed at resolving issues that give rise to difficulties in obtaining visas or residence permits.</u></b></p> <p>FR</p> <p>(Comments):</p> <p>We do not understand what is meant by “status of participants / other national in the same situation”, and propose to stick to the wording of the former regulation</p> <p>HU</p> <p>(Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The <b>Member States</b> <del>national authority</del> shall ensure that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p>HU (Comments):</p> <p>In Point 17, it is the Member State that is addressed by the requirement in the current Regulation (<i>Article 26 point 2: The Member States shall take all necessary and appropriate measures to remove any legal and administrative obstacles to the proper functioning of the Programme, including, where possible, measures aimed at resolving issues that give rise to difficulties in obtaining visas or residence permits.</i>). However, the new requirement is not compatible with the legal systems of every Member State. As an example, we could mention that for example a ministry responsible for education usually does not have the authority to deal with visa or residence permits. Therefore, we would like to request that it be reworded to match the current Regulation's wording.</p> <p>IT (Drafting suggestions):</p> <p>17. The national authorities shall ensure that all necessary and appropriate measures are taken to <b>limit and</b> remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p>IT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We suggest explicitly using the plural “national authorities”</p> <p>LU (Comments):</p> <p>We would like to point out that in the national context, the national agency is not the body responsible for addressing difficulties in obtaining visas or residence permits. The current wording is misleading.</p> <p>NL (Drafting suggestions):</p> <p><del>The national authority shall ensure that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the same situation or at addressing difficulties in obtaining visas or residence permits.</del></p> <p>NL (Comments):</p> <p>We are worried about this provision, which we believe contains elements outside education policy, based on national competences. This needs be to checked with the wording of the current Regulation. It may be better to mention this commitment at the level of the national governments/administrations].</p> <p>SE (Drafting suggestions):</p> <p>The <i>Member States</i> shall <i>endeavour</i> that all necessary and appropriate measures are taken to remove any legal and administrative obstacles to the proper functioning of the Programme, including measures aimed at aligning the status of participants in the Programme with that of other nationals in the</p>

Commission proposal	Drafting suggestions and Comments
	<p>same situation or at addressing difficulties in obtaining visas or residence permits.</p> <p>SE (Comments):</p> <p>SE: The national authority does not have legislative powers that are conferred to the national parliament. This section shall not be more far-reaching than in the present Erasmus-regulation.</p>
	<p>FR (Drafting suggestions):</p> <p><b><u>The national agency shall have the requisite expertise to cover all sectors of the Programme. Where a Member State or third country associated to the Programme has more than one national agency, those national agencies shall collectively have the requisite expertise to cover all sectors of the Programme.</u></b></p> <p>FR (Comments):</p> <p>FR delegation will request to reinstate the article 27.3 of the current regulation to take into account the fact that there could be more than one national agency</p>
Article 19	
	<p>IT (Drafting suggestions):</p> <p><b>7. Where the mandate of a national agency or agencies, where more than one, is revoked, that national agency or agencies shall remain legally responsible for meeting its contractual obligations vis-à-vis the beneficiaries of the Programme and the Commission pending the transfer of those obligations to a new national agency.</b></p>

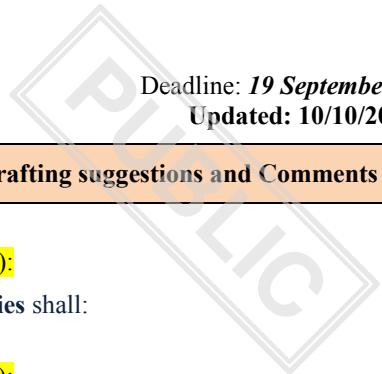
ERASMUS +

From: IE, LV, AT, BE, CY, DE, EE, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SI, SK

Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p>IT (Comments): As already noted in paragraph 13 of Article 18, it is requested to include in Article 19 the provisions set out in Article 27, paragraph 7, of the current Regulation.</p> <p>In addition, we suggest to add “<b>or agencies, where more than one</b>” and “<b>or agencies</b>” to make clear that Member States may designate more than one</p>
<p><i>National agency</i></p>	<p>BE (Drafting suggestions): National agency/ies</p> <p>BE (Comments): Same interventions for NAs apply as previous comments of NAU.</p>



Commission proposal	Drafting suggestions and Comments
<p>1. <i>The national agency shall:</i></p>	<p>BE (Drafting suggestions): The National agency/ies shall: ES (Drafting suggestions): 1. The national agency, or national agencies where appropriate, shall: ES (Comments): We also propose mentioning “national agencies” in the plural, at least once at the beginning of this article corresponding to the obligations of any national agency.</p>
<p>(a) be a body within the meaning of Article 62(1), point (c), (v) or (vi) of Regulation (EU, Euratom) 2024/2509 and be governed by the law of the Member State or of the third country associated to the Programme concerned;</p>	
<p>(b) have the adequate management capacity, staff and infrastructure to fulfil its tasks satisfactorily, ensuring efficient and effective management of the Programme and sound financial management of Union funds;</p>	<p>BE (Comments): What does the Commission see as adequate management capacity?</p>
<p>(c) have the operational and legal means to apply the administrative, contractual and financial management rules laid down at Union level;</p>	
<p>(d) have the requisite expertise to implement effectively the actions in all the sectors of the Programme for which it receives a Union contribution;</p>	<p>SE (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>(d) have the requisite expertise to implement effectively the actions in all the sectors of the Programme for which it receives a Union contribution. <b>Where a Member State or third country associated to the Programme has more than one national agency, those national agencies shall collectively have the requisite expertise to cover all sectors of the Programme.</b></p> <p>SE (Comments): For countries with more than one National Agency, such as Sweden, “the national agency” (in singular) seldom have the “<i>expertise... in all the sectors of the programme</i>”.</p>
<p>(e) offer, if required by the Commission, adequate financial guarantees, issued preferably by a public authority, corresponding to the level of Union funds it is called upon to manage.</p>	
<p>2. The national agency shall adequately plan its tasks for the implementation of the relevant actions as set out in the work programme referred to in Article 15 and the relevant agreements with the Commission, as well as for the information, communication and dissemination activities referred to in Article 16(2).</p>	<p>SE (Drafting suggestions): The national agency shall adequately plan its tasks for the implementation of the relevant actions as set out in the work programmes referred to in Article 15 and the relevant agreements with the Commission, as well as for the information, communication and dissemination activities referred to in Article 16(2).</p> <p>SE (Comments): SE Comment/question: Suggest plural is used here or does the EC foresee only one work programme?</p>

Commission proposal	Drafting suggestions and Comments
<p>3. The national agency shall manage all the stages of the project lifecycle of the Programme actions under its responsibility in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509 and the relevant agreements with the Commission.</p>	<p>SE (Drafting suggestions): The national agency shall manage all the stages of the project lifecycle of the Programme actions under its responsibility, <b>as set out in work programmes as referred to in Article X of this Regulation</b>, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509 and the relevant agreements with the Commission.</p> <p>SE (Comments): SE Comment: Suggested addition as per current regulation.</p>
<p>4. The national agency shall issue grant support to beneficiaries within the meaning of Article 2, point (5) of Regulation (EU, Euratom) 2024/2509 by way of grant agreements as specified by the Commission for the Programme action concerned.</p>	
<p>5. The national agency shall not, without prior written authorisation from the national authority and from the Commission, delegate to a third party any task related to the Programme or budget implementation conferred on it. The national agency shall retain sole responsibility for any tasks delegated to a third party.</p>	<p>IT (Drafting suggestions): The national agency, <b>or agencies, where more than one</b>, shall not, without prior written authorisation from <del>the their</del> national authorities and from the Commission, delegate to a third party any task related to the Programme or budget implementation conferred on it. The national agency <b>or agencies</b> shall retain sole responsibility for any tasks delegated to a third party.</p> <p>IT</p>

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Deadline: 19 September 2025 12:00

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>See 17.1</p> <p>We suggest to add “or agencies, where more than one” and “or agencies” to make clear that Member States may designate more than one. In addition, we suggest explicitly using the plural “national authorities”</p>
<p>6. The national agency shall, each year, provide its national authority and the Commission with a management declaration, a report and any other documents as required in accordance with Article 158 of Regulation (EU, Euratom) 2024/2509.</p>	
<p>7. The national agency shall implement in due time the observations issued by the Commission following its analysis of the yearly management declaration and report and of the independent audit opinion thereon.</p>	
<p>Article 20</p>	

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><i>European Commission</i></p>	<p>BE (Comments):</p> <p>We note that while the draft regulation refers to direct management in various parts of the text, there is currently no explicit mention of it in the relevant articles or recitals. This creates ambiguity, especially for national agencies that are tasked with managing Union-wide networks and European organisations. These activities often fall under direct management by the Commission, and it is important that the regulation clearly reflects this reality. We would therefore welcome clarification from the Commission on how its role in direct management will be defined and operationalised in the final text.</p> <p>Belgium believes that the regulation should more clearly define the Commission's role in direct management, clarify its responsibilities in relation to national agency appointments, and ensure continued support for cooperation with third countries not associated to the programme. These elements are essential for maintaining a coherent and inclusive implementation framework. The PowerPoint that was presented did not provide clarity on that matter and has no legal value.</p>
<p>1. On the basis of the compliance requirements for national agencies referred to in Article 18(4), the Commission shall review the national management and control systems, using in particular the ex ante assessment provided by the national authority, the national agency's yearly management declaration and the opinion of the independent audit body thereon, and the national authority's yearly report referred to in Article 18(9).</p>	<p>CY (Comments):</p> <p>Is this the October Report?</p>
<p>2. On the basis of the ex ante assessment referred to in Article 18(4), the Commission shall accept, conditionally accept or reject the designation of the</p>	<p>IE</p>

Commission proposal	Drafting suggestions and Comments
<p>national agency. The Commission shall not enter into a contractual relationship with the national agency until it has accepted the ex ante assessment as satisfactory or taken appropriate supervisory measures in accordance with Article 157(5) of Regulation (EU, Euratom) 2024/2509. In the event of conditional acceptance, the Commission may apply proportionate precautionary measures to its contractual relationship with the national agency. Where the national agency no longer complies with the minimum requirements, the Commission may suspend its contractual relationship with the national agency until remedial action has been taken to ensure compliance, failing which it may request the national authority to revoke the mandate of the national agency and designate a new one, subject to a positive ex ante assessment.</p>	<p><b>(Comments):</b></p> <p>This article gives the Commission stronger powers to suspend its agreement with a National Agency if minimum requirements are not met. While this improves oversight, the suspension process is not clearly explained.</p> <p>For transparency, the Regulation should point to the procedures in the National Agency Guide or other implementing documents.</p> <p>Alternatively, this article could include basic guarantees (such as notice, the right to reply, and timelines for corrective action) so National Agencies understand how a suspension would work.</p> <p>BE <b>(Drafting suggestions):</b></p> <p><b>“Within two months of receipt from the national authority On the basis of the ex ante assessment referred to in Article 18(4), the Commission shall accept, conditionally accept or reject the designation of the national agency.”</b></p> <p>BE <b>(Comments):</b></p> <p>Belgium wants to bring to the attention that the draft regulation introduces a new formal step whereby the Commission may accept, conditionally accept, or reject the designation of a national agency based on the ex ante assessment. This is a significant shift from the current regulation, as it gives the Commission a more explicit veto power and introduces a gradual response mechanism, including precautionary measures and the possibility of suspending contractual relations.</p> <p>While we understand the importance of ensuring quality and compliance, Belgium believes this new approach requires further clarification. In particular, we would like to revisit our earlier point regarding the need for clear timeframes. In the current Erasmus+ regulation, Member States are given six months to designate their national agencies, and the Commission is</p>

Commission proposal	Drafting suggestions and Comments
	<p>expected to respond within two months. These deadlines provide predictability and help ensure timely programme implementation. This is in line with our earlier comments on Article 18 on a return to a time frame for both the Member States and the Commission.</p> <p>In the new draft, these timeframes have been removed. Belgium would therefore propose reintroducing the two-month response period for the Commission, starting from the moment it receives the designation and ex ante assessment. This would help avoid delays and provide national authorities and agencies with greater certainty.</p> <p>It is important that this process remains proportionate and respects the autonomy of Member States in managing their national structures.</p> <p>HU  <b>(Drafting suggestions):</b></p> <p>On the basis of the ex ante assessment referred to in Article 18(4), the Commission shall accept, conditionally accept or reject the designation of the national agency <b>within two months of receipt from the national authority</b>. The Commission shall not enter into a contractual relationship with the national agency until it has accepted the ex ante assessment as satisfactory or taken appropriate supervisory measures in accordance with Article 157(5) of Regulation (EU, Euratom) 2024/2509. In the event of conditional acceptance, the Commission may apply proportionate precautionary measures to its contractual relationship with the national agency. Where the national agency no longer complies with the minimum requirements, the Commission may suspend its contractual relationship with the national agency until remedial action has been taken to ensure compliance, failing which it may request the national authority to revoke the mandate of the national agency and designate a new one, subject to a positive ex ante assessment.</p> <p>HU</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>The current regulation (Article 28) gave the Commission two months to either accept or reject the designation of a national agency, with or without conditions. However, the Proposal does not include such a time limit, leaving the timeframe open. We therefore request that a time limit be included for the Commission in Point 2 to complete the procedure, and to prevent any possibility for the process being prolonged for an unreasonable period of time.</p> <p>IT</p> <p><b>(Drafting suggestions):</b></p> <p>2. On the basis of the ex ante assessment referred to in Article 18(4), the Commission, <b><u>within two months</u></b>, shall accept, conditionally accept or reject the designation of the national agency <b>or agencies, where more than one</b>. The Commission shall not enter into a contractual relationship with the national agency <b>or agencies</b> until it has accepted the ex ante assessment as satisfactory or taken appropriate supervisory measures in accordance with Article 157(5) of Regulation (EU, Euratom) 2024/2509. In the event of conditional acceptance, the Commission may apply proportionate precautionary measures to its contractual relationship with the national agency. Where the national agency/<b>agencies</b> no longer complies with the minimum requirements, the Commission may suspend its contractual relationship with the national agency/<b>agencies</b> until remedial action has been taken to ensure compliance, failing which it may request the national authority/<b>ies</b> to revoke the mandate of the national agency/<b>agencies</b> and designate a new one, subject to a positive ex ante assessment</p> <p>IT</p> <p><b>(Comments):</b></p>

Commission proposal	Drafting suggestions and Comments
	<p>We propose to restore the two-month period within which the Commission must provide its opinion on the proposed designation of the national agency (see Article 28, paragraph 2, of the current Regulation).</p> <p>We suggest to add “or agencies, where more than one” , “or agencies” and “/agencies” to make clear that Member States may designate more than one.</p> <p>NL  <b>(Drafting suggestions):</b></p> <p>On the basis of the ex ante assessment referred to in Article 18(4), and within two months of receiving this assessment, the Commission shall accept, conditionally accept or reject the designation of the national agency. The Commission shall not enter into a contractual relationship with the national agency until it has accepted the ex ante assessment as satisfactory or taken appropriate supervisory measures in accordance with Article 157(5) of Regulation (EU, Euratom) 2024/2509. In the event of conditional acceptance, the Commission may apply proportionate precautionary measures to its contractual relationship with the national agency. Where the national agency no longer complies with the minimum requirements, the Commission may suspend its contractual relationship with the national agency until remedial action has been taken to ensure compliance, failing which it may request the national authority to revoke the mandate of the national agency and designate a new one, subject to a positive ex ante assessment.</p> <p>NL  <b>(Comments):</b></p> <p>We suggest to add the time span within the Commission should accept the designation of (a) national agency/agencies. In the current Regulation this is two months.</p>
<p>3. The Commission shall provide the national authorities and the national agencies with appropriate information and guidance in order to ensure</p>	<p>BE</p>

Commission proposal	Drafting suggestions and Comments
<p>consistent and high-quality implementation and management of the Programme. In particular, it shall specify planning, project management and reporting arrangements and ensure that these arrangements follow simple procedures.</p>	<p><b>(Drafting suggestions):</b></p> <p>“The Commission shall provide <b>in a transparent and timely manner</b> the national authorities and the national agencies with appropriate information and guidance [...]”</p> <p>BE</p> <p><b>(Comments):</b></p> <p>Belgium believes that in order to provide national authorities and national agencies with good information and guidance, a strong programme committee is needed. That is why we support an inclusion of the programme committee in the new regulation. We must also ensure that communication is also done in a transparent and timely manner.</p> <p>CY</p> <p><b>(Drafting suggestions):</b></p> <p>The Commission shall provide the national authorities and the national agencies with appropriate information and guidance in order to ensure consistent and high-quality implementation and management of the Programme. In particular, it shall specify planning, project management and reporting arrangements and ensure that these arrangements follow simple procedures. <b>In addition, clear Handover procedures shall be provided by the EC.</b></p> <p>DE</p> <p><b>(Comments):</b></p> <p>Are changes to the previous procedures planned?</p> <p>EE</p> <p><b>(Drafting suggestions):</b></p>

Commission proposal	Drafting suggestions and Comments
	<p>The Commission shall provide the national authorities and the national agencies with appropriate information and guidance in order to ensure consistent and high-quality implementation and management of the Programme. In particular, it shall specify in the yearly Work Programme that will be adopted in the programme committee, the planning, project management and reporting arrangements and ensure that these arrangements follow simple procedures and are delivered in a timely manner.</p> <p>EE (Comments): Relevant information should be provided periodically and in a structured manner. Based on past experience, the most appropriate channel for this is the annual work programme, adopted by the Programme Committee, which serves as a reference for national agencies</p> <p>FI (Comments): Please specify how the Commission shall provide information and guidance</p> <p>FR (Drafting suggestions): “The Commission shall provide the national authorities and the national agencies with appropriate information and guidance in order to ensure consistent and high-quality <b>promotion</b>, implementation and management of the Programme, <b>both for direct and indirect management</b>. In particular, it shall specify planning, project management and reporting arrangements and ensure that these arrangements follow simple procedures.</p> <p>FR (Comments): The EACEA is an Erasmus+ agency, just like the Erasmus+ national agencies. The principle of proper communication on all actions, including</p>

Commission proposal	Drafting suggestions and Comments
	<p>centralized ones, must therefore apply to it as much as to the other agencies, and particularly with regard to the centralized actions it manages.</p> <p>SE (Drafting suggestions):</p> <p>The Commission shall provide the national authorities and the national agencies with appropriate <b>and timely</b> information and guidance in order to ensure consistent and high-quality implementation and management of the Programme. In particular, it shall specify planning, project management and reporting arrangements and ensure that these arrangements follow simple procedures.</p> <p>SE (Comments):</p> <p>SE Comments: Positive addition. See suggested additon.</p>
<p>4. The Commission shall not make Programme funds available to the national agency until it has approved its planning documents in accordance with Article 19(2).</p>	<p>CY (Comments):</p> <p>Is this the Annual Work Programme?</p> <p>SE (Comments):</p> <p>SE Comments: No referens to the work program here as in current regulation (p. 4). Could further clarification on what the planning documents are be provided? Art 19.2 does not make it clear.</p>

Commission proposal	Drafting suggestions and Comments
<p>5. The Commission shall make the following Programme funds available to the national agency:</p>	<p>CY (Drafting suggestions): The Commission shall make the following Programme funds available to the national agency <b>on an annual basis</b>:</p> <p>CY (Comments): The addition of “on annual basis” clarifies that the provision of Programme funds by the Commission is recurring on an annual basis, rather than a one-time allocation.</p> <p>DE (Comments): We ask the COM to set up a contract with the NAs that regulates all aspects that a NA has to manage in one single contract.</p>
<p>(a) a contribution for grant support for the Programme actions the management of which is entrusted to the national agency;</p>	<p>CY (Drafting suggestions): <del>a contribution</del> <b>funds</b> for grant support for the Programme actions the management of which is entrusted to the national agency;</p> <p>CY (Comments): The term “contribution” was replaced with “funds” to remove ambiguity. While “contribution” may imply only partial payment, the new wording clearly indicates that the financial support covers the full grant obligations for the Programme actions managed by the national agency.</p> <p>ES (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>(a) a contribution for grant support for the Programme actions the management of which is entrusted to the national agency, indicating the budget allocation for each action and sector;</p> <p>ES (Comments): We would like to add that this allocation of funds to national agencies should specify the budget allocation for each action and sector, given that we do not yet know whether we will have sectoral chapters or how the allocation of funds by sector will be decided.</p> <p>SE (Comments): SE Comments: We notice a slight difference in wording compared to the current regulation. Is this to be understood as a stronger emphasis/demand on contributions from the MS?</p>
<p>(b) a contribution in support of the national agency's Programme management tasks;</p>	<p>IE (Comments): From an NA perspective, greater clarity is needed to ensure that this contribution remains stable and predictable throughout the programme period.</p> <p>CY (Drafting suggestions): a <b>financial</b> contribution in support of the national agency's Programme management tasks, <b>to be determined based on the amount of Union funds for grant support entrusted to the national agency.</b></p> <p>CY</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>The amendment clarifies that the financial contribution to the national agency is linked to the amount of Union grant funds entrusted to it, making the support proportional to the Programme resources it manages rather than a fixed general contribution.</p> <p>SE</p> <p><b>(Drafting suggestions):</b></p> <p><i>(b)a contribution in support of the national agency's Programme management tasks, including if relevant an additional contribution for actions under Article 7, points (a) and (b).</i></p>
<p>(c) if relevant, an additional contribution for actions under Article 7, points (a) and (b).</p>	<p>NL</p> <p><b>(Drafting suggestions):</b></p> <p>(c) if relevant, an additional contribution for actions under Article 7, points (a) and Article 16 points 1 and 2.</p> <p>NL</p> <p><b>(Comments):</b></p> <p>It should be made clearer that national agencies also have responsibilities for communication and dissemination of centralised actions under indirect management – and that they also receive budget for this responsibility. Maybe a cross-reference to article 16 is a possibility.</p> <p>SE</p> <p><b>(Drafting suggestions):</b></p> <p><i>e) if relevant, an additional contribution for actions under Article 7, points (a) and (b).</i></p> <p>SE</p>

Commission proposal	Drafting suggestions and Comments
	<p><b>(Comments):</b></p> <p>If left as proposed, this passage opens for an increased numbers of contracts (for example regarding Euroguidance, Europass, Eurydice, Enic-Naric, EPALE and eTwinning) with subsequent administrative burden for National agencies.</p>
<p>6. The Commission shall communicate to the national authority and the national agency the outcome of its analysis and observations on the yearly report and management declaration as referred to in Articles 18(9) and 19(6) and on the audit opinion as referred to in Article 21(2).</p>	<p>NL</p> <p><b>(Drafting suggestions):</b></p> <p>6. The Commission shall communicate to the national authority and the national agency the outcome of its analysis and observations on the yearly report and management declaration as referred to in Articles 18(9) and 19(6) and on the audit opinion as referred to in Article 21(2).</p> <p>NL</p> <p><b>(Comments):</b></p> <p>We suggest to add a time span within the Commission shall communicate this to national authority and agency/agencies.</p>
<p>7. Where the Commission does not accept the yearly management declaration or the independent audit opinion thereon, or in the event of unsatisfactory implementation by the national agency of the Commission's observations, the Commission may implement any precautionary and corrective measures necessary to safeguard the Union's financial interests in accordance with Article 132 of Regulation (EU, Euratom) 2024/2509.</p>	
<p>8. The Commission shall encourage and maintain an active dialogue and cooperation with and between the national agencies and the national authorities, including the exchange and transfer of good practice, with a view to improving and ensuring the consistent implementation and management of</p>	<p>CY</p> <p><b>(Drafting suggestions):</b></p> <p>The Commission shall encourage and maintain an active dialogue and cooperation with and between the national agencies and the national</p>

Commission proposal	Drafting suggestions and Comments
<p>the Programme. It shall also ensure that appropriate conditions are in place for an effective exchange of information between the Union institutions, national agencies or other bodies and entities implementing the Programme.</p>	<p>authorities, including the exchange and transfer of good practices, with a view to improving, <b>simplifying</b>, and ensuring the consistent implementation and management of the Programme. <b><u>Regular meetings shall be organised with the network of national agencies to support high-quality information sharing and effective implementation across all Member States and associated third countries.</u></b> It shall also ensure that appropriate conditions are in place for an effective exchange of information between the Union institutions, national agencies or other bodies <del>and</del> <b>or</b> entities implementing the Programme.</p> <p>CY <b>(Comments):</b></p> <p>Our proposed wording builds on the Commission’s original text by adding clarity and operational detail. It emphasizes the simplification of procedures, the importance of high-quality information sharing, and the organisation of regular meetings with national agencies to support consistent implementation across all Member States and associated third countries. This makes the provision more practical and actionable while keeping the overall intent of promoting dialogue, cooperation, and effective Programme management.</p> <p>DE <b>(Comments):</b></p> <p>Are changes to the previous procedures planned?</p> <p>FI <b>(Comments):</b></p> <p>Please clarify what measures will be taken to ensure the appropriate conditions are in place for an effective exchange of information...</p> <p>FR <b>(Drafting suggestions):</b></p> <p>“8. The Commission shall encourage and maintain an active dialogue and cooperation with and between the national agencies and the national</p>

Commission proposal	Drafting suggestions and Comments
	<p>authorities, including the exchange and transfer <b><u>of information regarding direct and indirect management</u></b>, of good practice, with a view to improving and ensuring the consistent implementation and management of the Programme”</p> <p>FR (Comments):</p> <p>The transmission of information to the national agencies must be improved, particularly concerning centralized actions,.</p> <p>IT (Comments):</p> <p>The provision, while outlining clear principles of cooperation and the exchange of good practices, is rather vague, as it does not specify the tools, operational methods, or frequency of dialogue between the Commission, national agencies, and national authorities. This lack of specificity leaves a wide margin of discretion. Similarly, the reference to the “<i>exchange and transfer of good practice</i>” does not clarify concrete methods or the periodicity of the exchange, reducing its practical effectiveness. Although the text emphasizes the need for appropriate conditions for effective information exchange, it does not specify which tools, channels, or mechanisms should be adopted, creating significant operational uncertainty and potential difficulties in the consistent implementation of the planned activities.</p> <p>NL (Drafting suggestions):</p> <p>The Commission shall encourage and maintain an active dialogue and cooperation through regular meetings with and between the national agencies and the national authorities, including the exchange and transfer of good</p>

Commission proposal	Drafting suggestions and Comments
	<p>practice, with a view to improving and ensuring the consistent implementation and management of the Programme. It shall also ensure that appropriate conditions are in place for an effective exchange of information between the Union institutions, national agencies or other bodies and entities implementing the Programme.</p> <p>NL (Comments): We suggest to reintroduce regular meetings as is the case in the current Regulation]</p>
<p>9. The Commission shall deliver the necessary information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management.</p>	<p>AT (Drafting suggestions): The Commission <b>shall must</b> deliver the necessary <b>efficient, stable and user-friendly</b> information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management.</p> <p>AT (Comments): We support the German proposal regarding IT problems. It must be ensured that the information technology systems to be provided by the European Commission are sufficiently tested before the start of the programme and are fully operational at its launch! Reference is made to the “Beneficiary Module” of the current programme, which was only made available with a delay of half a year and continued to exhibit numerous problems over an extended period even afterwards.</p> <p>BE (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>“The Commission shall deliver the <b>necessary user-friendly and easy accessible</b> information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management. The optimal functioning of the IT environment of the programme should be guaranteed.”</p> <p>BE (Comments):</p> <p>We think it is important to stress that attention should be paid to IT systems that are user-friendly and that information is easily accessible. We support an additional clause that states that the optimal functioning of the IT environment of the programme should be guaranteed.</p> <p>We are open to any other suggestion</p> <p>CY (Comments):</p> <p>The IT tools have had functioning problems throughout the programming period and the EC should make sure that they are fully operational.</p> <p>DE (Drafting suggestions):</p> <p>9. The Commission <del>shall</del> <b>must</b> deliver the necessary <b>efficient, stable and user-friendly</b> information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management. <b><u>The Commission continues to support the higher education institutions in establishing the tools that were developed in the European Student Card Initiative.</u></b></p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>Based on experience with IT problems, we would like to see wording that is as binding as possible. In view of the fact that the IT structure situation will only improve towards the end of the current programme, we believe that it is not sufficient that the draft regulation only mentions the provision of an IT structure. The existing IT system must be stabilised, optimised and taken over. We request that aspects such as integrated architecture, punctual provision, customer friendliness, stable performance and user-friendly access be added to the draft text.</p> <p>In the higher education sector, it would be desirable to complete the measures initiated by the European Student Card initiative.</p> <p>EE (Drafting suggestions):</p> <p>The Commission shall deliver the necessary information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management. IT systems must ensure easy access and be user-friendly, while reducing data entry duplication and administrative burden.</p> <p>EE (Comments):</p> <p>As simplification and the reduction of administrative burden are key priorities, we would like to briefly reflect this by adding a corresponding sentence to the Regulation.</p> <p>ES (Drafting suggestions):</p> <p>9. The Commission shall deliver the necessary information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management, which shall be efficient, stable and user-friendly to national agencies and beneficiaries.</p>

Commission proposal	Drafting suggestions and Comments
	<p>ES (Comments): We believe that there should be a commitment to provide efficient, stable and user-friendly tools for users. In recent years, Member States and beneficiaries of the Programme have complained about the performance of some of the IT tools made available for the management of the Programme. Certain decisions to replace existing electronic tools and platforms that were working reasonably well with new, untested ones have also had poor results, causing many problems and proving to be unstable (merging/integrating eTwinning in ESEP, for example). If this is too detailed for an article, then it should be included in a recital.</p> <p>FI (Drafting suggestions): The Commission shall deliver the necessary information technology systems for the implementation of the Programme objectives laid down in Article 3, including <b>for every aspect</b> of indirect management</p> <p>FR (Drafting suggestions): The Commission shall <b>ensure and</b> deliver the necessary <b>effective and user-friendly</b> information technology systems <b>which work in an appropriate and timely manner</b> to support the implementation of the Programme objectives laid down in Article 3, including for indirect management.</p> <p>FR (Comments): FR delegation will be able to support the SK delegation's proposed wording for the Commission to further strengthen IT systems to support the implementation of the programme's objectives, in view of the IT problems encountered in the current programme.</p>

Commission proposal	Drafting suggestions and Comments
	<p>HU (Drafting suggestions):</p> <p>The Commission shall deliver the necessary information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management, <b>are developed in an appropriate and timely manner and in such a way as to provide easy access and to be user-friendly. The Programme shall support the development, operation and maintenance of such information technology systems.</b></p> <p>HU (Comments):</p> <p>As for the information technology systems in Point 9, we propose to reinsert the wording from the current Regulation about them being developed in an appropriate and timely manner and in such a way as to provide easy access and to be user-friendly.</p> <p>IT (Drafting suggestions):</p> <p>9. The Commission shall deliver the necessary <b>and efficient</b> information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management. <b><u>The Commission shall ensure that the information technology systems are developed in an appropriate and timely manner and in such a way as to provide easy access and to be user-friendly</u></b></p> <p>IT (Comments):</p> <p>We propose to reaffirm the need to adopt technological tools that are effective, in light of the experiences of the last two programming periods, during which this aspect caused significant problems for the national</p>

Commission proposal	Drafting suggestions and Comments
	<p>agencies. Therefore, it is proposed to restore part of the provisions already included in the current Regulation, Article 28, paragraph 8.</p> <p>NL  <b>(Drafting suggestions):</b></p> <p>9. The Commission shall deliver the necessary information technology systems to support the implementation of the Programme objectives laid down in Article 3, including for indirect management and ensure that these are developed in such a way that they are easy to access and user-friendly</p> <p>NL  <b>(Comments):</b></p> <p>We suggest to reintroduce the user-friendliness which is part of the current Regulation.]</p> <p>SE  <b>(Comments):</b></p> <p>Comments:                      We would like to stress the importance of having fully functioning IT-tools at the launch of the coming program period. We must strive to avoid the situation in the current program period as it undermines the strong reputation of the Erasmus+ program. Without functioning IT-tools we increase the administrative burden, both for the beneficiaries, the NA, the NAU:s as well as for the EC.</p> <p>SK  <b>(Drafting suggestions):</b></p> <p>9. The Commission shall <b>ensure and</b> deliver the necessary information technology systems <b>which work in an appropriate and timely manner in</b></p>

Commission proposal	Drafting suggestions and Comments
	<b>order</b> to support the implementation of the Programme objectives laid down in Article 3, including for indirect management.
	<p>HR (Drafting suggestions): The Commission shall facilitate effective synergies and complementarities with other Union funds or programmes.</p> <p>HR (Comments): Commission needs to facilitate this process since Union programmes and funds are subject of common interest. It would facilitate creating synergies at the national level, notably with the ESF+</p>
Article 21	
<b><i>Independent audit body</i></b>	
1. <i>The independent audit body shall:</i>	
(a) have the necessary professional competence to carry out public sector audits;	
(b) ensure that its audits take account of internationally accepted audit standards;	

Commission proposal	Drafting suggestions and Comments
<p>(c) not be in a position of conflict of interest with regard to the legal entity of which the national agency forms part; in particular, the independent audit body shall be independent, in terms of its functions, of the legal entity of which the national agency forms part.</p>	<p>IE (Comments): IE welcomes this. However, IE is of the view that this paragraph needs to point towards the conflict-of-interest declaration procedures or practical guidance, so that the rules are applied consistently across all Member States</p>
<p>2. The independent audit body shall issue an audit opinion on the yearly management declaration as referred to in Article 158(1) of Regulation (EU, Euratom) 2024/2509. It shall form the basis of the overall assurance pursuant to Article 127 of Regulation (EU, Euratom) 2024/2509.</p>	<p>DE (Comments): Please insert a date for the IAB report that is well after 15 March.  We request information on whether it is a new obligation for the independent audit body to issue an audit opinion on the annual management declaration in accordance with Article 158(1) of Regulation (EU, Euratom) 2024/2509.</p>
<p>3. The independent audit body shall give the Commission and its representatives and the Court of Auditors full access to all documents and reports in support of the audit opinion that it issues on the national agency's yearly management declaration.</p>	
<p>Article 22</p>	<p>SI (Drafting suggestions): <u>Committee procedure 1.</u> <u>The Commission shall be assisted by a Programme Committee. The committee may meet in specific configurations to deal with sectoral issues.</u> <u>Where appropriate, in accordance with its rules of procedure and on an ad</u></p>

Commission proposal	Drafting suggestions and Comments
	<p><u>hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers.</u></p> <p>SI (Comments):</p> <p>Many thanks to the PRE decision to reintroduce the Program Committee. We propose introducing a new article to define comitology, linked to Article 15.</p>
<p><i>Principles of the control system</i></p>	<p>FR (Comments):</p> <p>The French delegation will request clarification on the deletion of Articles 30.1 and 31 of the current regulation.</p>
	<p>CY (Drafting suggestions):</p> <p>The Commission shall take appropriate measures to ensure that, when actions financed under this Regulation are implemented, the financial interests of the Union are protected by the application of preventive measures against fraud, corruption and any other illegal activities, by effective controls and, if irregularities are detected, by the recovery of the amounts wrongly paid and, where appropriate, by effective, proportionate and dissuasive administrative and financial penalties.</p> <p>In addition, the EC should provide explicit guidelines as to the management of suspected fraud cases to the NAU and the NA, as well as prompt support.</p> <p>CY (Comments):</p> <p>To be added as was in the previous regulation.</p> <p>In addition, the EC should provide explicit guidelines as to the management of suspected fraud cases to the NAU and the NA, as well as prompt support.</p>

Commission proposal	Drafting suggestions and Comments
	<p>HU (Drafting suggestions):</p> <p>The Commission shall take appropriate measures to ensure that, when actions financed under this Regulation are implemented, the financial interests of the Union are protected by the application of preventive measures against fraud, corruption and any other illegal activities, by effective controls and, if irregularities are detected, by the recovery of the amounts wrongly paid and, where appropriate, by effective, proportionate and dissuasive administrative and financial penalties.</p> <p>HU (Comments):</p> <p>We miss this paragraph from the current Regulation and would like to request that this article be reinserted into the Proposal.</p> <p>IT (Drafting suggestions):</p> <p><b><u>1.The Commission shall take appropriate measures to ensure that, when actions financed under this Regulation are implemented, the financial interests of the Union are protected by the application of preventive measures against fraud, corruption and any other illegal activities, by effective controls and, if irregularities are detected, by the recovery of the amounts wrongly paid and, where appropriate, by effective, proportionate and dissuasive administrative and financial penalties.</u></b></p> <p>IT (Comments):</p> <p>We propose to restore in this article the provisions set out in the current Regulation, Article 30, paragraph 1, regarding the measures that the</p>

Commission proposal	Drafting suggestions and Comments
	Commission undertakes to adopt to protect the financial interests of the EU, including in cases of fraud.
<p>1. <i>The Commission shall be responsible for the supervisory controls with regard to the Programme actions and activities managed by the national agencies. The Commission shall set the minimum requirements for the controls by the national agency and the independent audit body.</i></p>	
<p>2. The national agency shall be responsible for the primary controls of grant beneficiaries for the actions it manages as set out in the work programmes referred to in Article 15. Those controls shall give reasonable assurance that the grants awarded are used as intended and in compliance with the applicable Union rules.</p>	
<p>3. With regard to the Programme funds transferred to the national agencies, the Commission shall ensure proper coordination of its controls with the national authorities and the national agencies, on the basis of the single audit principle and following a risk-based analysis.</p>	<p>IE (Comments): Compared with the 2021–2027 wording, the role of National Agencies in carrying out and contributing to the risk-based analysis seems to have been reduced. It is unclear who will now be responsible for this analysis and how the NAs input will be taken into account.</p>
	<p>DE (Comments): AOB: Further elements not mentioned in the text: - <u>European added value</u>: In order to focus the Commission's competences on European added value and thus to differentiate them from the competences of the member states, we request the partial inclusion of the article on "European added value" from the current regulation (Article 4): <i>"The Programme shall support only those actions and activities which present a potential European</i></p>

Commission proposal	Drafting suggestions and Comments
	<p><i>added value and which contribute to the achievement of the Programme objectives laid down in Article 3."</i></p> <p>- <u>Horizontal priorities</u>: The current proposal of the new regulation includes only one chapter on inclusion and diversity. The other three topics previously listed as horizontal priorities (participation, environmental sustainability, digital transformation) are emphasised to varying degrees in the draft regulation. We consider it sensible to retain and continue the four topics as horizontal priorities at the level of the programme guide.</p> <p>- <u>EPALE, Europass, Agenda Adult Education</u>: We ask for clarification as to whether the platforms and instruments will be funded from one contract with the EU Commission in future ("simplification")?</p> <p>- <u>VET platform</u>: In our view, the creation of an electronic platform for vocational education and training is very important. We ask for information as to whether this is planned? European networking must also take place in VET.</p> <p>- <u>Networking</u>: Will the cross-sector and transnational networking opportunities of the National Agencies be continued? Are there plans to implement and optimise platforms for partner identification and networking?</p> <p>- <u>In comparison with the previous version</u>, the following articles appear to have been deleted without replacement for the new version: Article 33 (old) "Exercise of the delegation"</p> <p>Article 34 (old) "Committee procedure". What is the background?</p> <p>- <u>Please add the following aspects</u>:</p> <ul style="list-style-type: none"> <li>• An article on the establishment of a programme committee including its rights (see Art. 33 and 34 D+ Regulation 2021-2027)</li> <li>• A statement on the interim evaluation of the programme, including a binding date for submitting the report to the EP and MS (cf. Art. 24 D+ Regulation 2021-2027). So far, only the "legislative financial and digital statement" refers to the interim report to be submitted.</li> </ul>

Commission proposal	Drafting suggestions and Comments
	<p>FR (Drafting suggestions):</p> <p><b>ARTICLE 23</b> <b>Exercise of the delegation</b></p> <p><b><u>1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.</u></b></p> <p><b><u>2. The power to adopt delegated acts referred to in Article 3 shall be conferred on the Commission for the duration of the Programme.</u></b></p> <p><b><u>3. The delegation of power referred to in Article 3 may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.</u></b></p> <p><b><u>4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.</u></b></p> <p><b><u>5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.</u></b></p> <p><b><u>6. A delegated act adopted pursuant to Article 3 shall enter into force only if no objection has been expressed either by the European Parliament or by the Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or of the Council.</u></b></p> <p><b>Article 24</b></p>

Commission proposal	Drafting suggestions and Comments
	<p><b><u>Committee procedure</u></b></p> <p><b><u>1. The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u></b></p> <p><b><u>2. The committee may meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers.</u></b></p> <p><b><u>3. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.”</u></b></p> <p>FR  <b>(Comments):</b></p> <p>Art. 23  This new Article 23 reproduces the content of the current Article 33. It allows the use of delegated acts to amend the content of the reintroduced Annex I, in order to set out, with the necessary concern for transparency, the actions of the programme, as indicated in the previous point</p> <p>Art. 24  [In order to allow the Member States to continue participating in the governance of the programme, and as indicated in relation to Article 15 (“work programme”), France proposes to introduce here a new Article 24, similar to Article 34 of the current regulation (“Committee”). Furthermore, given the new architecture of the programme and the absence of chapters</p>

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Deadline: *19 September 2025 12:00*

Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
	dedicated to the three main sectors of the current programme, it is proposed to strengthen the possibility of convening the committee in specific configurations to address sectoral issues.]
CHAPTER IX	

**TRANSITIONAL AND FINAL PROVISIONS**

IT

**(Drafting suggestions):****Committee procedure**

1. **The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.**
2. **The committee may meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers. ENOfficial Journal of the European Union 28.5.2021 L 189/29**

**Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.**

IT

**(Comments):**

Regulation (EU) 2021/817, Article 33, and Regulation (EU) 2021/888, Article 30, provide the Commission with the power to adopt delegated acts.

Regulation (EU) 2021/817, Article 34, and Regulation (EU) 2021/888, Article 31, provide that the Commission shall be assisted by a Committee, pursuant to Regulation (EU) 2011/182, which may meet in specific configurations to address sectoral issues.

These provisions are not included in this draft Regulation and we therefore propose to include them under the Final and Transitional Provisions chapter.

We consider it appropriate to reintroduce Article 34 of the current Regulation on the Committee procedure.

This point is of equal importance for all Italian national authorities as the provisions set out:

Commission proposal	Drafting suggestions and Comments
	<ul style="list-style-type: none"> <li>• in Article 17, paragraph 1, on the number of national authorities and national agencies;</li> <li>• in Article 18, paragraph 6, on co-financing of the national agencies;</li> <li>• in Article 18, paragraph 11, on the obligation to indemnify.</li> </ul>
	<p>HU (Comments):</p> <p>The draft regulation does not contain any reference to the comitology procedure (Article 34 in the current Regulation), which is red line for us. We would like to request that this article be reinserted into the Proposal.</p> <p>SK (Drafting suggestions):</p> <p style="text-align: center;"><b><u>Article 23</u></b> <b><u>Committee procedure</u></b></p> <ol style="list-style-type: none"> <li><b><u>1. The Commission shall be assisted by a committee.</u></b></li> <li><b><u>2. The Committee may meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts may be invited to participate in its meetings as observers.</u></b></li> </ol> <p>SK (Comments):</p> <p>Issue of comitology and the role of the programme committee we perceive as an essential one, especially in the context of the tasks to be put on national authorities. NAUs as equal partners have to have the forum for discussion and cooperation at the European level in order to implement the programme in a proper and adequate way.</p> <p>RED LINE</p>

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><b>Article 23</b></p>	<p>SK (Drafting suggestions):</p> <p style="text-align: right;"><b>Article 24</b></p>
<p style="text-align: center;"><i>Repeal</i></p>	
<p><i>Regulation (EU) No 2021/817 and Regulation (EU) No 2021/888 are repealed with effect from 1 January 2028.</i></p>	
<p>Article 24</p>	<p>SK (Drafting suggestions):</p> <p style="text-align: right;"><b>Article 25</b></p>
<p style="text-align: center;"><i>Transitional provisions</i></p>	
<p><i>1. This Regulation shall not affect the continuation or modification of the actions concerned, until their closure, under Regulations (EU) 2021/817 and (EU) 2021/888, which shall continue to apply to the actions concerned until their closure.</i></p>	
<p><i>2. The financial envelope for the Programme may also cover technical and administrative assistance expenses necessary to ensure the transition</i></p>	

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Updated: 10/10/2025 13:09

Commission proposal	Drafting suggestions and Comments
between the Programme and the measures adopted under Regulations (EU) 2021/817 and (EU) 2021/888.	
3. Member States shall ensure at national level the unimpeded transition between the actions carried out under Regulations (EU) 2021/817 and (EU) 2021/888 and those to be implemented under this Programme.	
	<p>HR (Drafting suggestions):</p> <p>The Commission shall be assisted by a committee. The committee may meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers.</p> <p>HR (Comments):</p> <p>We strongly urge to retain the Erasmus+ committee format in which all Member States are represented and can, through appointed experts, monitor and discuss the implementation of the Programme.</p>
Article 25	<p>SK (Drafting suggestions):</p> <p style="text-align: right;"><b>Article 26</b></p>
<i>Entry into force and application</i>	

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Commission proposal	Drafting suggestions and Comments
<i>This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.</i>	
It shall apply from 1 January 2028.	
This Regulation shall be binding in its entirety and directly applicable in all Member States.	
Done at Brussels,	
For the European Parliament For the Council	
<i>The President</i>	<i>The President</i>
	<p>ES  <b>(Comments):</b>                      We reiterate that it would be useful to have an indicative list of actions for each sector in an Annex, as in the current Programme.                      It would also be useful to indicate which actions would be directly or indirectly managed.</p> <p>FR  <b>(Drafting suggestions):</b>  <u><b>ANNEX I</b></u>  <u><b>DESCRIPTION OF ACTIONS SET OUT IN CHAPTERS II, SECTIONS 1 AND 2, ART.4-7 »</b></u></p>

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Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments): France requests the reinsertion of Annex 1 of the current regulation in order to reinstate the reference to the program chapters. The title of this annex is amended to reflect the new structure of the draft regulation: “ANNEX I, DESCRIPTION OF ACTIONS SET OUT IN CHAPTERS II, SECTIONS 1 AND 2, ART.4-7.”</p>
	<p>FR (Comments): Other points The French delegation will request the addition of: - an article on comitology, as it appears in Article 34 of the current programme, and will question the Commission on the absence of a reference to comitology in the proposal for the future Erasmus+ programme. The French delegation will also support the European delegation in its proposal, which would allow the committee to meet in sectoral formations. - an annex with the actions that could be amended by delegated act by the Commission, as was the case during the current programme, - an article on delegated acts, to regulate this delegated act power.</p>