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INFORMATION

From:	General Secretariat of the Council
To:	Ad hoc Working Party on the Multiannual Financial Framework (AHWP MFF) - National and Regional Partnerships
N° Cion doc.:	11815/25 + COR 1 + REV 1 (en) + ADD1 + ADD 2
Subject:	NRPP proposal (Block 1): MS drafting suggestions and comments

Delegations will find attached MS drafting suggestions and comments on Block 1 of the NRPP proposal.

NRPP proposal (Block 1)

MS drafting suggestions and comments¹

Commission proposal	Drafting suggestions and Comments
Proposal for a	BE (Comments): General comment: We reserve the right to send in additional and/or adjusted comments and drafting suggestions in a later stage.
	HU (Comments): General comment: We maintain our general scrutiny reserve and oppose the proposed approach to the structure of the MFF at a political level. However, we welcome the opportunity to submit written proposals to the draft regulation.

¹ Delegations are reminded that Regulation (EC) No 1049/2001 of 30 May 2001 regarding public access to European Parliament, Council and Commission documents applies to all written comments, in whatever form provided.

Hungary does not consider the concept of the Single Fund – and the related concept of the Single National and Regional Partnership Plan (NRP Plan) – to be well-founded. The differences between the individual funds have developed over decades as a result of organic development and artificially merging them would not simplify matters but would result in additional administration and protracted negotiations.

Hungary's position is that the automatic implementation of rules common to cohesion policy and the CAP could jeopardize the achievement of the objectives pursued by home affairs policies, which are fundamentally different in many respects. The specific characteristics of the current Home Affairs Funds include, for example, greater dynamism; the level of implementation (national or EU level, but not regional or local).

General comment on the CAP:

We emphasise that proposals included in this document do not revise and pre-empt our opinion on the future of CAP.

General comment regarding Interreg:

„In the Single Fund regulation it should be indicated clearly which provisions shall not apply to the Interreg Plan and its chapters, similarly to Article 1(5) of the CPR (Regulation (EU)2021/1060).”

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	<p>IE</p> <p>(Comments):</p> <p>Drafting suggestions are made without prejudice to IE’s future position on these proposals. Where no suggestion is made, this does not infer IE agreement to the proposed text.</p>
establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509	<p>DE</p> <p>(Comments):</p> <p>DE: In terms of simplification and of reducing administrative burden, the proposals are insufficient and contradict the Commission's announcements. The level of ambition of reducing administrative burden while safeguarding policy objectives and high standards must be raised significantly.</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: Is it planned to adopt additional acts addressing the provisions on the eligibility of costs and, if so, which ones?</p>

**TITLE I
GENERAL PROVISIONS**

FI

(Drafting suggestions):

vi) instruments for migration, integrated border management and internal security”.

FI

(Comments):

We propose to include a dedicated sub-paragraph for instruments related to migration, integrated border management and internal security under Article 1. This would ensure that their mandate is visible and appropriately acknowledged within the Regulation. New: 1 a (vi) support to migration, integrated border management and internal security.”

Similar reference to home affairs policies should be made to articles 2 and 3.

IE

(Comments):

The proposal that the same rules be applied to individual farmers and fishers who are recipients of direct income supports under the CAP and beneficiaries of the structural and Cohesion Funds, security and defence capabilities and Interreg has the potential to create significant challenges

for the efficient and effective operation of the NRPP and delivery of NRPP policy objectives.

Implementing the proposal as it stands would involve creating rules flexible enough to apply equally to individuals receiving direct payments and very large public entities. It could be very difficult to develop provisions that take adequate account of the particular circumstances of each sector and there is a risk that of creating overly broad rules that do not adequately support or promote NRPP or Union objectives.

We continue to have questions about how the consolidation of funds is going to work in practice. There are key differences between CAP and other funds, including in the organisation of financial year, the timing of claims and the approach to general objectives. This is a cause of significant concern for Ireland in terms of the ability of the NRPP to move quickly to ensure the CAP objectives can be delivered in a timely, efficient and effective process.

SE

(Comments):

Please, see below for comments, drafting suggestions and still some questions from SE at this stage on block 1. We reserve the right to make further drafting suggestions later.

	SE has not commented on parts of the text in brackets.
<i>[Article 1 Subject matter</i>	
1. This Regulation establishes the ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ Fund (the Fund). It lays down rules on:	<p>BE</p> <p>(Drafting suggestions):</p> <p>This Regulation establishes the ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ Fund (the Fund). It lays down rules on:</p> <p>BE</p> <p>(Comments):</p> <p>Typographical correction (initial text reads as ‘it lays down rules on (b) the financial rules for support to...’)</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>This Regulation establishes the ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ Fund (the Fund). It lays down rules on:</p>

LT

(Comments):

“Fund” is already at the beginning of the title “European Fund for...”

RO

(Drafting suggestions):

This Regulation establishes the ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity **Migration, Borders** and Security’ Fund (the Fund).

It lays down rules on:

RO

(Comments):

As a general comment for the funds from Home Affairs field, we would like to continue to sustain our concern that the new proposal of programming and managing of Home Affairs funds, respectively within NRPP and the new Horizontal Regulation shall produce more bureaucracy and difficulties in the accessing and managing of these fund. A separated Horizontal Regulation with general rules of programming, implementation and reporting for Home Affairs funds will be welcomed by all Member States and also by the beneficiaries., taking into

	<p>consideration the specificity of the funds The fund's title is not suggestive and proportional to its funding areas, RO proposes the following title of the fund: ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity, <u>Migration, Borders</u> and Security’</p>
<p>(a) tasks, priority objectives, organisation and grouping under the Fund of:</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>Rules on</u> tasks, priority objectives and organisation <u>governance</u> of the fund and grouping under the Fund of:</p> <p>BE</p> <p>(Comments):</p> <p>It is not clear what is meant by the word “organisation” at this stage of the regulation: is it about “governance”, organization between the funds, relations between actors? We suggest the word governance.</p>
	<p>BE</p> <p>(Drafting suggestions):</p>

	<p><u>(b) the grouping under the Fund of the following instruments and funds</u></p> <p>BE</p> <p>(Comments):</p> <p>We think that the part concerning “the grouping under the fund of” deserve a separate line: this is an important contextual information. Indeed, at the moment, point a groups together heterogeneous elements: a list of funds (i), instruments, but without specifying the corresponding funds (ii)(iii)(iv), and objectives but limited to the support for security and defence capabilities (v). It would be helpful to know from the outset exactly which funds or instruments are grouped within the single fund. The list below lacks clarity and is</p> <p>Commission proposal Drafting suggestions Comments not harmonized. More clarity is needed as this is the first article of this regulation and one of the big novelties of this regulation.</p>
<p>(i) the Structural Funds and Cohesion Fund;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>(i) ERDF, ESF, Interreg and cohesion Fund;</u></p> <p>HR</p>

	<p>(Comments):</p> <p>HR comments: HR proposes to specify the structural funds</p> <p>IT</p> <p>(Comments):</p> <p>Embedding cohesion policy within an “umbrella” fund without predefined allocations based on regional categories risks weakening its mission and reducing its capacity to respond in a differentiated and targeted manner to the needs of Europe’s regions.</p> <p>It is necessary to introduce (Article 10) a pre-allocated share of resources for cohesion policy as a whole or, alternatively, for the three categories of regions (“less developed”, “transition” and “more developed”), which are maintained in the NRPP Regulation. It is also necessary to restrict the scope of the minimum allocation for “less developed regions” exclusively to cohesion policy, excluding funds for migration, border and visa management, internal security measures, as well as CAP funding and resources for rural and fisheries interventions.</p> <p>RO</p> <p>(Comments):</p>
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	<p><i>p.m. While fully aware of the brackets, RO considers that the Structural Funds should specified .</i></p>
<p>(ii) instruments for the common agriculture policy (the CAP);</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>(ii) instruments for the common agriculture policy (the CAP),</u></p> <p>RO</p> <p>(Comments):</p> <p>RO continues to believe that the CAP must remain a stand-alone policy, structured on 2 pillars, governed by its own specific regulation and supported by an ambitious and independent budget.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(ii) — instruments for the common agriculture policy (the CAP);</p> <p>SK</p> <p>(Comments):</p> <p>Slovakia supports a separate CAP. Slovakia does not support the integration of the CAP into a single fund together with other policies. CAP</p>

	<p>must remain separate policies with specific regulations, appropriate and substantial funding firmly earmarked for all activities under each policy.</p>
<p>(iii) instruments for the common fisheries policy;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>(iii) instruments for the common fisheries policy;</u></p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) instruments for the common fisheries policy <u>(the CFP)</u>;</p> <p>DE</p> <p>(Comments):</p> <p>The reference should be made in the same way as for the CAP (see (ii)).</p>
<p>(iv) instruments funded from the auctioning of allowances in the framework of the emission trading systems set up under Directive 2003/87/EC to address the social impacts of the introduction of an emission trading system for buildings and road transport on vulnerable households, vulnerable micro-enterprises and vulnerable transport users;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(v) (iv) instruments funded from the auctioning of allowances in the framework of the emission trading systems set up under Directive</p>

	<p>2003/87/EC to address the social impacts of the introduction of an emission trading system for buildings and road transport vulnerable households, vulnerable micro-enterprises and vulnerable transport users, <u>including Social Climate Fund (SCF)</u> ;</p> <p>BE</p> <p>(Comments):</p> <p>This point should come after the one on security and defence, as it is going to be translated as a “separate” chapter of the plan. It would be more logical to have first the list of the main funds/instruments that are part of the plan : cohesion, CAP & fisheries, Home affairs.</p> <p>Question: Instruments is plural in the original text. Beyond the SCF, what other instruments is the Commission talking about?</p>
(v) support to security and defence capabilities.	<p>BE</p> <p>(Drafting suggestions):</p> <p>(iv) <u>Instruments</u> for the security and defence capabilities of the EU,</p> <p>BE</p> <p>(Comments):</p>

In the list of point a., this is the only point that is drafted as an “objective”. If you cite one, it is then necessary to cite them all. If you harmonize with supra, and list the instruments, it is then more coherent and improve the continuity with point 2, which list the regulations linked to the fund.

IT

(Comments):

Further clarification is needed on the precise scope of the “security and defence” areas referred to in Article 1(1)(v) in relation to the Home Affairs Funds. More specifically, it remains unclear whether this formulation is intended to also encompass the AMI, IS and BMV instruments, which are explicitly mentioned in Article 1(2)(e)–(g) and Article 3(1)(b). Given that certain defence- and security-related capabilities are already addressed within the European Defence Fund (EDF), while key elements of security are structurally covered under the Home Affairs Funds, it is important to ensure coherence, avoid overlap and provide full legal certainty regarding the respective mandates of these instruments.

RO

(Drafting suggestions):

(v) support to security and defence capabilities, **for internal security, for asylum, migration and integration, for the Schengen area, for European integrated border management and for the common policy on visas.**

Or

(v) support to for **migration, borders** and security policies and **for** defence capabilities.

RO

(Comments):

As the Fund is also covering Home funds, the reference to security and defence should better reflect this scope.

We consider that this reference must be more developed with concrete elements which characterized the Home Affairs Funds and should be completed with elements of internal security, migration and border management and visa, at least. RO proposal for amending the text: (v) support to security and defence capabilities, **for internal security, for asylum, migration and integration, for the Schengen area, for European integrated border management and for the common policy**

	<p><u>on visas.</u> Or (v) support to for <u>migration, borders</u> and security policies and <u>for</u> defence capabilities.</p>
	<p>DE</p> <p>(Comments):</p> <p>Please refer to comment on Art. 3(1)(b)(iii) on page 23 below and the fact that the home funds are only mentioned in the specific objectives from a security perspective, while the aspects of migration and integration are not mentioned explicitly.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p><u>(vi) instruments for migration, integrated border management and internal security”.</u></p> <p>EL</p> <p>(Comments):</p> <p>On the explicit recognition of the HOME AFFAIRS , it is recommended to clearly <u>include “the HOME AFFAIRS “ as a distinct subject in Article 1</u>, with a dedicated sub-paragraph for instruments related to migration, integrated border management and internal security. This would ensure</p>

that their mandate is visible and appropriately acknowledged within the Regulation.

In addition, further clarification is needed on the precise scope of the “security and defense” areas referred to in Article 1(1)(v) in relation to the Home Affairs . More specifically, it remains unclear whether this formulation is intended to also encompass the AMI, IS and BMV instruments, which are explicitly mentioned in Article 1(2)(e)–(g) and Article 3(1)(b). Given that certain defense- and security-related capabilities are already addressed within the European Defence Fund (EDF), while key elements of security are structurally covered under the Home Affairs Funds, Greece considers it important to ensure coherence, avoid overlap and provide full legal certainty regarding the respective mandates of these instruments.

ES

(Drafting suggestions):

(vi) support to the area of freedom, security and justice without internal borders

ES

(Comments):

NEW POINT:

Without prejudice to the fact of having proposed three separate legal instruments which lay down specific rules in the area of Home Affairs, the NRPP encompasses measures under this policy field and thus the area of freedom, security and justice without internal borders should be explicitly integrated in the subject matter of the regulation.

FR

(Drafting suggestions):

(vi) support to migration management, integrated border management and the common policy on visas

FR

(Comments):

Les autorités françaises constatent l'absence de mention des instruments financiers affaires intérieures dans l'article et demandent à ce qu'une mention soit insérée.

IT

(Drafting suggestions):

(vi) instruments for migration, integrated border management and internal security”.

IT

(Comments):

On the explicit recognition of the HOME Funds, it is recommended to clearly include “the HOME Funds” as a distinct subject in Article 1, with a dedicated sub-paragraph for instruments related to migration, integrated border management and internal security. This would ensure that their mandate is visible and appropriately acknowledged within the Regulation.

PL

(Drafting suggestions):

New paragraph : (vi) instruments for migration, integrated border management and internal security.”

PL

(Comments):

On the explicit recognition of the HOME Funds, we suggest to clearly include “the HOME Funds” as a distinct subject in Article 1, with a dedicated sub-paragraph for instruments related to migration, integrated border management and internal security. This would ensure that their mandate is visible and appropriately acknowledged within the Regulation.

In addition, further clarification is needed on the precise scope of the “security and defence” areas referred to in Article 1(1)(v) in relation to the Home Affairs Funds. More specifically, it remains unclear whether this formulation is intended to also encompass the AMI, IS and BMV instruments, which are explicitly mentioned in Article 1(2)(e)–(g) and Article 3(1)(b). Given that certain defence- and security-related capabilities are already addressed within the European Defence Fund (EDF), while key elements of security are structurally covered under the Home Affairs Funds, PL considers it important to ensure coherence, avoid overlap and provide full legal certainty regarding the respective mandates of these instruments.

SK

(Drafting suggestions):

(vi) **instruments for migration, integrated border management and internal security.**

SK

(Comments):

In order to explicitly recognize the HOME Funds, we suggest to clearly include “the HOME instruments” as a distinct subject in Article 1, with a dedicated sub-paragraph for instruments related to migration, integrated

	border management and internal security. This would ensure that their mandate is visible and appropriately acknowledged within the Regulation.
(b) the financial rules for Union support to be implemented by means of the National and Regional Partnership Plans (the ‘NRP Plans’), the Interreg Plan as set out in the Regulation XX [Regional development, Chapter II on the Interreg Plan] (the ‘Interreg Plan’) and the EU Facility (the ‘Facility’);	
(c) the financial resources for the period from 1 January 2028 to 31 December 2034.	
2. The Regulations listed below may set out specific conditions to complement this Regulation which shall not be in contradiction with this Regulation:	<p>HU</p> <p>(Drafting suggestions):</p> <p>2. The Regulations listed below may set out specific conditions to complement this Regulation which shall not be in contradiction with this Regulation: <u>or, where appropriate, specific derogations for certain interventions under the [CAP Regulation].</u></p> <p>RO</p> <p>(Comments):</p>

	<p>If specific regulations establish that natural persons are not eligible, is such a provision complementary to or in contradiction with this regulation?</p>
<p>(a) Regulation XX [establishing the European Fund for Regional development including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034]</p>	<p>EL</p> <p>(Drafting suggestions):</p> <p>Regulation XX [establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034]</p> <p>EL</p> <p>(Comments):</p> <p>the initial letter ‘d’ in the title <i>European Fund for Regional Development</i> should be capitalised</p> <p>SK</p> <p>(Drafting suggestions):</p>

	<p>(a) Regulation XX [establishing the European Fund for Regional development European Regional and Development Fund including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034]</p> <p>SK</p> <p>(Comments):</p> <p>Technical comment: alignment with the official ERDF abbreviation.</p>
<p>(b) Regulation XX [establishing the European Social Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034]</p>	
<p>(c) Regulation XX [establishing the Common Agriculture Policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to support the implementation of the Common Agricultural Policy (CAP) of the Union</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>Regulation XX [establishing the Common Agriculture Policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing</p>

in accordance with Title III of Part III of the TFEU, ensuring a fair standard of living for the agricultural community and the availability of food, increasing agricultural productivity, stabilising markets, and supporting long-term food security from 2028 to 2034]

conditions for the implementation of the Union support to ~~support the implementation of the Common Agricultural Policy (CAP) of the Union~~ **for the period from 2028 to 2034]** ~~in accordance with Title III of Part III of the TFEU, ensuring a fair standard of living for the agricultural community and the availability of food, increasing agricultural productivity, stabilising markets, and supporting long-term food security from 2028 to 2034]~~ **and Regulation XX [amending Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the school fruit, vegetables and milk scheme ('EU school scheme'), interventions in certain sectors, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties and rules on the availability of supplies in time of emergencies and severe crisis, to the extent relevant to the support under this Regulation]**

BE

(Comments):

The regulation for the school scheme and the interventions in certain sectors AND the regulation establishing conditions for the implementation has to be seen together as the total package of sectoral regulations for the CAP. Therefore, point '(h) is integrated in point (c).

Art. 1(2) contains a list of the titles of the sectoral regulations for the Fund. The text ‘in accordance with Title III of ..., ensuring ...’ is not part of the title of the mentioned Regulation but mentions the objectives of the TFEU. It has to be part of article 2(1)(c). No additional information is added here for the other regulations either, apart from the quotation of the title of the regulation.

RO

(Comments):

RO continues to believe that all CAP rules and definitions, including those on implementation and performance, should be regulated in a single CAP Regulation; the current proposal creates fragmentation and additional bureaucracy. The CAP should also be simplified and made more transparent.

SK

(Comments):

Slovakia calls for simplification of CAP policy and therefore all CAP rules, including those relating to implementation and performance, should be regulated in a single CAP regulation; the current proposal creates fragmentation and additional bureaucracy.

<p>(d) Regulation XX [establishing Common Fisheries Policy and Union’s maritime policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of from 2028 to 2034]</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>Regulation XX [establishing Common Fisheries Policy and Union’s maritime policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of from 2028 to 2034] <u>and, to the extent relevant to support under this Regulation, Regulation (EU) No 1379/2013 of the European Parliament and of the Council on the common organisation of the markets in fishery and aquaculture products and Regulation (EU) No 1380/2013 of the European Parliament and of the Council on the Common Fisheries Policy.</u></p> <p>BE</p> <p>(Comments):</p> <p>Article 35 (11) refers to Regulation (EU) No 1379/2013. Regulation (EU) No 1380/2013 is important for the relevant definitions.</p> <p>EE</p> <p>(Drafting suggestions):</p>

	<p>d) Regulation XX [establishing <u>financing of</u> Common Fisheries Policy and Union's maritime policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of <u>the Union support to support the implementation of the Common Fisheries Policy (CFP) of the Union in accordance with Title III of Part III of the TFEU, ensuring the sustainability of fisheries and aquaculture, stabilising markets and supporting long-term food security from 2028 to 2034]</u></p> <p>EE</p> <p>(Comments):</p> <p>The NRP proposal does not establish CFP. CFP is established by the Treaty and the Regulation 1380/2013. There is no need to establish specific conditions for maritime policy. The wording has been aligned with the CAP wording in point (c).</p>
<p>(e) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 2028 to 2034</p>	<p>BE</p> <p>(Comments):</p>

	<p>It would be useful if the text were clearly structured so that it is more apparent which provisions apply to which fund. At first glance, there appear to be exceptions for the Home funds with regard to:</p> <ul style="list-style-type: none"> • The objectives • The involvement of stakeholders in drawing up the relevant chapters of the plans Approval by the Commission (separate implementing acts) • The template for drawing up the NRPP <p>RO</p> <p>(Drafting suggestions):</p> <p>Please, see our first comment related to the management of Home Affairs funds within a separated Horizontal Regulation, as it has been since the SOLID Programme.</p>
<p>(f) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 2028 to 2034</p>	

(g) Regulation (EU) [...] establishing the Union support for internal security for the period from 2028 to 2034	
(h) Regulation (EU) 202X/XXXX amending Regulation (EU) No 1308/2013 of the European Parliament and of the Council ² as regards the school fruit, vegetables and milk scheme ('EU school scheme'), interventions in certain sectors, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties and rules on the availability of supplies in time of emergencies and severe crisis, to the extent relevant to the support under this Regulation.	<p>BE</p> <p>(Drafting suggestions):</p> <p>Regulation (EU) 202X/XXXX amending Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards the school fruit, vegetables and milk scheme ('EU school scheme'), interventions in certain sectors, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties and rules on the availability of supplies in time of emergencies and severe crisis, to the extent relevant to the support under this Regulation.</p> <p>BE</p> <p>(Comments):</p>

² Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671, ELI: <http://data.europa.eu/eli/reg/2013/1308/oj>).

	<p>This regulation is part of the CAP. We suggest to mention all the CAP-sectoral regulations together in point (c).</p>
	<p>SE</p> <p>(Drafting suggestions):</p> <p><u>New para:</u></p> <p><u>Articles x, y, z etc do not apply to the Interreg plan.</u></p> <p>SE</p> <p>(Comments):</p> <p>If not all articles in the NRP Regulation apply to the Interreg plan, it should be stated in a collected way which articles do not apply for the Interreg Plan.</p>
<p>In case of doubt about the application between this Regulation and the policy-specific regulations referred to in the first subparagraph, this Regulation shall prevail.]</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>In case of doubt about the application between this Regulation and the policy-specific regulations referred to in the first subparagraph, this Regulation shall prevail. <u>the relevant sectoral regulation shall prevail in its respective field of application.</u></p> <p>CZ</p>

	<p>(Comments):</p> <p>CZ requires that, in the area of the CAP, the sectoral regulation takes precedence over the general regulation, in order to ensure legal certainty, continuity of practice, and respect for the specificities of the CAP. The general regulation should not interfere with the detailed mechanisms and rules of the CAP, which are essential for effective implementation at the national level. For the same reason, we also propose transferring specific provisions related to the CAP from the general regulation to the relevant sectoral regulation.</p>
	<p>EE</p> <p>(Drafting suggestions):</p> <p>New paragraph:</p> <p><u>3. Articles 1, 2, 3 (a) and (c), Articles 7, 10, 12, 13 (1) and (2), Articles 14, 15, 16 (1) to (2), 16 (4) to (5), Article 17 (2) to (3), Article 20 (3), Article 49, 51, 53, Article 58 to 61, Article 63 to 69, Articles 71 to 76, Articles 78, 79 shall apply to Interreg Plan.</u></p> <p>EE</p> <p>(Comments):</p>

	<p>Please add new paragraph 3 under the Article 1 “Subject matter” which lists the articles of current regulation which apply to Interreg Plan. This will ensure legal clarity.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>New paragraph: Articles 8, 9, 11, 13(3) to 13(5), 16(3), 16(6), 17(1), 18, 19, 20(1), 20(2), 20(4), 21 to 48, 50, 52, 54 to 56, 57, 62, 70, 77, 80 to 83 do not apply to Interreg Plan.</u></p> <p>PL</p> <p>(Comments):</p> <p>Proposal of adding a new paragraph – 1(3). During the SMOR meetings PL and many other MSs expressed the need to have clear list of articles from NRP regulation that do NOT apply for Interreg Plan. Such a list of derogations for Interreg was included in the CPR 2021-2027 (art. 1(5)). We prepared a proposal of derogations on the basis of Commission’s presentation for SMOR meeting on 10.10.2025 – derogations for Interreg.</p>
<p><i>Article 2</i></p> <p><i>General objectives of the Fund</i></p>	<p>BE</p> <p>(Comments):</p> <p>These elements are connected to the negobox.</p>

	<p>IE</p> <p>(Comments):</p> <p>We note that Article 22 (2) (a) provides that the NRP Plan shall “support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned” and we would like to hear the Commission’s view of how the provision for taking in account ‘specific challenges’ would work in practice.</p>
<p>1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives:</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>With the overall aim goal of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its values and democratic system, resilience and security and its preparedness and in accordance with the objective to maintain a level playing field within the Union and with the principle of subsidiarity, the Fund shall support aim the following general objectives:</p> <p>BE</p>

	<p>(Comments):</p> <p>The addition of ‘resilience’ is in line with the negobox.</p> <p>Support within the Union shall respect the level playing field.</p> <p>The principle of subsidiarity is important to attend to the real needs nationally, regionally and locally, and the most relevant EU priorities.</p> <p>This paragraph introduces the general objectives of the fund. The text covers – in an attempt to be transversal – most objectives, except the (e), about democracy and the values. To be coherent, they have to be included here as well.</p> <p>DE</p> <p>(Drafting suggestions):</p> <ol style="list-style-type: none">1. With the overall aim of promoting economic, social and territorial cohesion, potential growth, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives: <p>DE</p> <p>(Comments):</p>
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Fostering competitiveness is a main field of cohesion policy. With the second pillar of the MFF, the competitiveness fund, it must be clarified in both regulations, that competitiveness can be supported in both pillars.

Reinforce the general objective of potential growth increase in line with the CSRs that have to be addressed in the NRPPs by inserting ‘potential growth’ as an additional objective.

ES

(Drafting suggestions):

ES considers it important that the general objective more explicitly reflects the goal of environmental protection, biodiversity conservation and nature restoration. This is particularly relevant given the disappearance of the LIFE Programme, which, despite its limited resources, had been the only programme dedicated exclusively to the environment and nature until now.

FR

(Drafting suggestions):

1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security, **its border and migration management**, and its preparedness, the Fund shall support the following general objectives:

	<p>FR</p> <p>(Comments):</p> <p>Les autorités françaises maintiennent leur souhait de voir apparaître dans le PPNR un objectif general lié aux affaires intérieures.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>1. With the overall aim of promoting economic, social, and territorial cohesion, the sustainable development and competitiveness of the Union, its environment, its security and its preparedness, the Fund shall support the following general objectives:</p> <p>NL</p> <p>(Comments):</p> <p>Suggestion to also mention environmental cohesion as a general objective, as an umbrella of several specific objectives in relation to environment, climate and biodiversity in Article 3. NRPP can make a valuable contribution to decreasing environmental disparities and increasing cohesion.</p> <p>PL</p>
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(Drafting suggestions):

With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives, to be addressed by Member States and their regions, taking into account national and regional needs and challenges:

PL

(Comments):

The current wording may be interpreted as an obligation to fully implement all general objectives in every Member State, which significantly limits programming flexibility. The proposed wording preserves the comprehensive ambition of the Fund while allowing Member States and their regions to tailor interventions to their specific national and regional contexts.

RO

(Drafting suggestions):

With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union,

its security, **migration and borders policies** and its preparedness, the Fund shall support the following general objectives:

RO

(Comments):

The Home Affairs funds (HA) are not part of the general objectives, at least not specific if the COM has considered that the general objective from point (e) is referring to these domains and our proposal, considering the importance of HA funds (from many perspectives) to a secure Europe, is to be included in the general objectives.

SE

(Drafting suggestions):

1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security, **its resilience** and its preparedness, the Fund shall support the following general objectives:

SE

(Comments):

SE would like to add resilience.

	<p>SK</p> <p>(Drafting suggestions):</p> <p>1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives, <u>to be addressed by Member States and their regions, taking into account national and regional needs and challenges</u></p> <p>SK</p> <p>(Comments):</p> <p>The current wording may be interpreted as an obligation to fully implement all general objectives in every Member State, which significantly limits programming flexibility. The proposed wording preserves the comprehensive ambition of the Fund while allowing Member States and their regions to tailor interventions to their specific national and regional contexts.</p>
(a) to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial	<p>BE</p> <p>(Drafting suggestions):</p>

cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');

to reduce regional imbalances in the Union and the backwardness of the least favoured regions, **support all categories of regions with attention for less developed regions** and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');

BE

(Comments):

this is in line with the Belgian position on the negobox.

Rationale for the modification: Cohesion policy is a policy for all regions, albeit with the need of a particular attention to less developed regions.

This principle must be recalled in the general objective.

BG

(Drafting suggestions):

(a) to **support the implementation of the Cohesion Policy aimed at reduceing** regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in

accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');

BG

(Comments):

The aim of the proposed amendment is to enhance the visibility of the Cohesion Policy within the new architecture of the Fund. Moreover, the common objectives already include references to the CAP and the CFP. It would therefore be logical to also include a reference to the Cohesion Policy.

DE

(Comments):

Cohesion is an objective that encompasses all regions (Nuts2). Art. 174 para 3 requests that among the regions concerned, particular attention shall be paid to regions with specific investments needs. In the regulation proposal it is currently not sufficiently specified which regions (Nuts3) should be prioritised for funding. It is Germany's position that while the eligibility of all regions should be upheld, in particular structurally weak

and regions effected by transition as well as rural areas require viable funding allocation.

Moreover, disparities should be targeted at a more granular level than NUTS 2 – ensuring that a higher proportion of funding is directed towards the structurally weakest areas.

FR

(Drafting suggestions):

(a) to reduce regional imbalances in the Union, **including in outermost regions taking into account their structural social and economic situations in accordance with Article 349 TFEU** and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU (‘European Regional Development Fund and Cohesion Fund’);

FR

(Comments):

La Commission pourrait-elle apporter des précisions sur les infrastructures éligibles à ces financements ? En particulier, concernant les RUP et territoires insulaires, quelle articulation est prévue avec le MIE-T pour renforcer leur connectivité et intégration?

HR

(Drafting suggestions):

(a) **to support the implementation of the Cohesion Policy of the Union** ~~to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial co-operation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund')~~;

HR

(Comments):

HR requests the merging of the two objectives under points (a) and (b) into a single Cohesion Policy objective (a): **to support the implementation of the Cohesion Policy of the Union**

HR considers it necessary to reshape the structure of the general and specific objectives in such a way that Cohesion Policy is explicitly included among the general objectives set out in Article 2, alongside the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union. At the same time, we consider that the general objectives of “reducing regional disparities in the Union” (Article 2(1)(a)) and “supporting quality employment, education and skills, and social inclusion” (Article 2(1)(b)), which represent fundamental features of cohesion intervention, should therefore be moved to the level of specific objectives in Article 3 (1) and 3(3) within the framework of Cohesion Policy as a general objective.

HU

(Comments):

We absolutely agree that objective (1) (a) should be given priority, but for the sake of efficiency and coordination, it should be more closely linked to the implementation of at least two other objectives: (b) (employment, education, skills, social inclusion – covering Cohesion Policy ESF interventions - and socially fair transition to climate neutrality) and (c) (CAP rural development pillar). This approach should be reflected in Article 3.

	<p>PL</p> <p>(Drafting suggestions):</p> <p><u>to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure as well as other national, regional and local infrastructure contributing to territorial cohesion in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');</u></p> <p>PL</p> <p>(Comments):</p> <p>Limiting the objective primarily to TEN-T infrastructure risks excluding investments that are essential for territorial cohesion, particularly in peripheral, border and less accessible regions. The amendment reflects established Cohesion Policy practice and better aligns with the Treaty objective of reducing regional disparities.</p> <p>RO</p> <p>(Drafting suggestions):</p>
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(a) **to support the implementation of the Cohesion Policy of the Union** to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund') **and in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund');**

RO

(Comments):

RO strongly considers that the Cohesion Policy should be visible under the NRPP, reassuring thus the Member States and regions about its continuation in the MFF 2028-2034.

In this regard, RO supports the merging of the two objectives under points (a) and (b) into a single Cohesion Policy objective. This approach will put Cohesion Policy on equal footing with the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union.

Also, this approach will affirming its indispensable role as the Union's primary instrument for economic, social, and territorial development, as mandated by Article 174 TFEU. At the same time, by presenting Cohesion Policy as a particular objective, it would underscore its cross-cutting importance in fostering balanced territorial growth, preventing fragmentation in funding priorities, and signalling long-term political commitment.

The clear reference to the objectives of reducing regional imbalances in the Union and support for quality employment, education and skills and social inclusion should be included in Art. 3 (1)(a) and (c).

SI

(Drafting suggestions):

(a) to reduce regional **and development** imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');

SK

(Drafting suggestions):

(a) to **support the implementation of the Cohesion Policy aimed at reducing regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU (‘European Regional Development Fund and Cohesion Fund’); including supporting quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU (‘European Social Fund’) and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU**

SK

(Comments):

SK suggests merging of the two objectives under points (a) and (b) into a single Cohesion Policy objective (a): **to support the implementation of the Cohesion Policy of the Union**

	<p>We consider it necessary to reshape the structure of the general and specific objectives in such a way that Cohesion Policy is explicitly included among the general objectives set out in Article 2, alongside the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union. At the same time, we consider that the general objectives of “reducing regional disparities in the Union” (Article 2(1)(a)) and “supporting quality employment, education and skills, and social inclusion” (Article 2(1)(b)), which represent fundamental features of cohesion intervention, should therefore be moved to the level of specific objectives in Article 3 (1) and 3(3) within the framework of Cohesion Policy as a general objective.</p> <p>In the common objectives, there are references to the CAP and the CFP; therefore, it would be logical to include a reference to the Cohesion Policy as well.</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p><u>b) to support the socio-economic development of outermost regions by implementing specific measures and means to offset their structural, social and economic challenges in accordance with article 349 TFEU ;</u></p>

	<p>FR</p> <p>(Comments):</p> <p>Les spécificités des RUP doivent être reconnues par l’UE. Alors que des dispositifs spécifiques sont prévues dans les règlements, aucune référence générale à l’article 349 TFUE n’est prévue. Une référence explicite à l’article 349 TFUE au titre des objectifs généraux est nécessaire pour combler cette lacune.</p>
<p>(b) to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU (‘European Social Fund’) and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(b) to support <u>long-term</u> quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU (‘European Social Fund’) and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU <u>and the implementation of the European Pillar of social rights;</u></p> <p>BE</p> <p>(Comments):</p> <p>in line with BE position on the negobox</p> <p>ES</p>

	<p>(Drafting suggestions):</p> <p>(b) to support quality employment, education and skills and social inclusion <u>through the European Social Fund</u> in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU.</p> <p><u>(b)bis</u> to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU.</p> <p>ES</p> <p>(Comments):</p> <p>Although the preferred option for Spain is that the ESF regulation is completely independent form the NRP, in case it is part of NRP it should be made clear that the ESF is the instrument to address this objective.</p> <p>In addition, this objective should have two distinctive parts, one for the ESF remit and a different one for the SCPF remit.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>(b) to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a</p>
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~~socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;~~

HR

(Comments):

HR requests the merging of the two objectives under points (a) and (b) into a single Cohesion Policy objective (a): **to support the implementation of the Cohesion Policy of the Union**

HR considers it necessary to reshape the structure of the general and specific objectives in such a way that Cohesion Policy is explicitly included among the general objectives set out in Article 2, alongside the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union. At the same time, we consider that the general objectives of “reducing regional disparities in the Union” (Article 2(1)(a)) and “supporting quality employment, education and skills, and social inclusion” (Article 2(1)(b)), which represent fundamental features of cohesion intervention, should therefore be moved to the level of specific objectives in Article 3 (1) and 3(3) within the framework of Cohesion Policy as a general objective.

RO

(Drafting suggestions):

	<p>(b) — to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU (‘European Social Fund’) and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;</p> <p>RO</p> <p>(Comments):</p> <p><i>See comment above – merging letter (a) and (b)</i></p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(b) — to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU (‘European Social Fund’) and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;</p> <p>SK</p> <p>(Comments):</p>
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	<p>We propose merging of the two objectives under points (a) and (b) into a single Cohesion Policy objective (a): <u>to support the implementation of the Cohesion Policy of the Union.</u></p>
	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>To support industrial transformation, innovation and strategic value chains in line with the European Industrial Plan notably to support Europe's net-zero industry, with a view to enhancing Europe's competitiveness and decarbonisation, technological leadership and regional resilience</u></p> <p>BE</p> <p>(Comments):</p> <p>this is in line with the Belgian position on the negobox</p> <p>Rationale for the modification: at the light of the competitiveness challenge as well as the need of strengthening the open strategic autonomy of the EU, it is necessary to clearly highlight the objective of the industrial transformation and of innovation and value chains. In addition, as it is done for the two first paragraphs, it is important to</p>

	<p>highlight which instruments and funds are foreseen to support the industrial transformation.</p>
<p>(c) to support the implementation of the CAP of the Union in accordance with Parth Three, Title III of the TFEU;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>to support the implementation of the CAP of the Union <u>that guarantees fair prices for quality produce</u> in accordance with Parth Three, Title III of the TFEU, <u>ensuring a fair standard of living for the agricultural community, assuring the availability of supplies and ensuring that supplies reach consumers at reasonable prices, increasing agricultural productivity by promoting technical progress and by ensuring the rational development of agricultural production and the optimum utilisation of the factors of production, stabilising markets, and supporting long-term food security;</u></p> <p>BE</p> <p>(Comments):</p> <p>The addition of ‘that guarantees fair prices for quality produce’ is in line with the Belgian position on the negobox.</p>

The text related to the TFEU is replaced from article 1 (2)(c) to article 2 (1)(c) and should mention all CAP-objectives as mentioned in Article 39 of TFEU.

DK

(Drafting suggestions):

to support the implementation of the **Common Agricultural Policy** (CAP) of the Union in accordance with Part~~h~~ Three, Title III of the TFEU

FR

(Drafting suggestions):

c) to support the implementation of the CAP of the Union in accordance with Part~~h~~ Three, Title III of the TFEU;

FR

(Comments):

Correction d'une erreur dans la rédaction de « Part ».

HR

(Drafting suggestions):

(b) to support the implementation of the CAP of the Union in accordance with Part~~h~~ Three, Title III of the TFEU;

	<p>HR</p> <p>(Comments):</p> <p>Change of bullet letter.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>ZM: (c) to support the implementation of the CAP of the Union in accordance with <u>Title III of the</u> Part IIIThree, <u>Title III</u> of the TFEU;</p> <p>LV</p> <p>(Comments):</p> <p>The reference has been aligned with that used in Article 1(2)(c).</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>to support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU;</p> <p>NL</p> <p>(Comments):</p> <p>Correction of typo.</p>
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	<p>RO</p> <p>(Drafting suggestions):</p> <p>(b) to support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU;</p> <p>RO</p> <p>(Comments):</p> <p>Renumbering based on the proposals above.</p> <p>Grouping all objectives into a single regulation may lead to a reduction in the impact of sector-specific interventions.</p> <p>Thus, RO considers that direct payments and rural development should continue to operate as two independent pillars, each with its own structure, objectives and implementation logic. Furthermore, the exclusion of key areas, such as the LEADER programme, the European Innovation Partnership, advisory and training services and EU schemes in schools, endangers the vitality of rural areas.</p>
<p>(d) to support the implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU;</p>	<p>FR</p> <p>(Drafting suggestions):</p>

	<p>(d) to support the implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU, <u>the European Ocean Pact and the Union’s maritime and aquaculture policy;</u></p> <p>FR</p> <p>(Comments):</p> <p>Seule la politique commune des pêches est citée alors que la réglementation sectorielle prévoit le soutien à la PCP, le pacte Océan et la politique maritime et aquacole de l’Union.</p> <p>Comment s’articule cet objectif avec le règlement sectoriel établissant le soutien à la politique communes des pêches le pacte Océan et la politique maritime et aquacole de l’Union ?</p> <p>HR</p> <p>(Drafting suggestions):</p> <p><u>(c)</u> to support the implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU;</p> <p>HR</p> <p>(Comments):</p>
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Change of bullet letter.

HR comments: The reference is made to the Part Three, Title III of the TFEU. According to the Treaty the term “agriculture” shall be understood as also referring to fisheries, having regard to the specific characteristics of this sector. In order to ensure the clarity and legal certainty it is necessary to specify in all sections, chapters or articles whether they apply to CAP or CFP.

LV

(Drafting suggestions):

(d) to support the implementation of the common fisheries policy of the Union in accordance with **Title III of Part III** ~~Three, Title III~~ of the TFEU;

LV

(Comments):

Aligning approach as in previous point (c)

RO

(Drafting suggestions):

	<p><u>(c)</u> to support the implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU;</p> <p>RO</p> <p>(Comments):</p> <p>Renumbering based on the proposals above.</p> <p>The reference is made to the Part Three, Title III of the TFEU. According to the Treaty the term “agriculture” shall be understood as also referring to fisheries, having regard to the specific characteristics of this sector. In order to ensure the clarity and legal certainty it is necessary to specify in all sections, chapters or articles whether they apply to CAP or CFP.</p>
<p>(e) to protect and strengthen democracy in the Union and uphold Union values in accordance with Article 2 TEU.</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(e) to protect and strengthen democracy in the Union and uphold <u>fundamental rights and</u> Union values in accordance with Article 2 TEU.</p> <p>DE</p> <p>(Comments):</p>

With regard to the different scope of the Union values and fundamental rights of the EU, fundamental rights should be listed separately as it is also treated separately throughout the text.

The emphasis on objectives relating to security, defence and crisis preparedness in Article 3 Paragraph 1 lit b is not reflected here. We suggest to explicitly mention the general objectives of home funds and crisis preparedness among the political objectives.

EE

(Drafting suggestions):

(e) to protect and strengthen democracy **and civil society** in the Union and uphold Union values in accordance with Article 2 TEU.

EE

(Comments):

This addition explicitly recognizes the crucial role of civil society as a pillar of democratic life and the safeguarding of fundamental EU values.

ES

(Drafting suggestions):

ADDITIONAL POINT

(f) to support the area of freedom, security and justice without internal borders in accordance with Article 3 (2) TEU and Title V of the TFEU;

ES

(Comments):

In line with the suggestion made on Article 1, the general objective in the Home Affairs area should also be incorporated in this article.

FI

(Drafting suggestions):

to protect and strengthen **fundamental rights**, democracy ~~in the Union~~, **rule of law** and **to** uphold Union values in accordance with Article 2 TEU.

FI

(Comments):

For aligning the para with recital 20 and article 3.

HR

(Drafting suggestions):

(d) to protect and strengthen democracy in the Union and uphold Union values in accordance with Article 2 TEU.

HR

(Comments):

Change of bullet letter.

HU

(Comments):

With reference to the explanation provided by the Commission in its Fiche no. 24, the following questions were addressed to the Commission but remained essentially unanswered:

Does the system of positive incentives mean in practice that a Member State Plan would not be approved until the expected investments and reforms contributing to the protection and strengthening of the principles of rule of law are found not sufficient either in terms of quality or in terms of quantity in their National Plan? If so, why does the Commission call it „positive” and „incentives”?

Given that pursuant to the current proposal addressing all general and specific objectives could be set as a precondition for the approval of the NRP Plan based on a subjective and arbitrary assessment of the Commission, we consider this paragraph as part of the overall system of conditionalities related to Union values and thus cannot be handled

separately. Therefore, we request this paragraph to be bracketed and handled in a horizontal manner in the Negotiating Box and discussed in the MFF AHWP. It should depend on the decision of the European Council whether to maintain this general objective in the Regulation.

NL

(Drafting suggestions):

to protect and strengthen **fundamental rights**, democracy ~~in the Union~~, **rule of law** and **to** uphold Union values in accordance with Article 2 TEU.

NL

(Comments):

For sake of consistency, wording should mirror texts from recital 20 and article 3.

RO

(Drafting suggestions):

(d) to protect and strengthen democracy in the Union and uphold Union values in accordance with Article 2 TEU, **to contribute to the strenghtening of the administrative capacity and to support the**

implementation of Union policies in the area of freedom, security and justice in accordance with Article 3 TEU.

RO

(Comments):

Change of bullet letter.

RO support that future Cohesion Policy must prioritize strengthening administrative capacity to ensure effective absorption, implementation, and impact of EU funds. The NRPPs demand agile administration to handle merged funds (Cohesion, CAP, CFP) under centralized oversight, were capacity gaps risk opacity and inefficiency.

SE

(Drafting suggestions):

(e) to protect and strengthen **fundamental rights**, democracy ~~in the Union~~, **the rule of law** and **to** uphold Union values in accordance with Article 2 TEU.

SE

(Comments):

	<p>Wording should be consistent with recital 20 and article 3. It is crucial that fundamental rights and the rule of law is consistently applied in tandem with democracy and Union values throughout the regulation.</p>
	<p>AT</p> <p>(Drafting suggestions):</p> <p><u>New (f) to support actions in the area of Home Affairs in accordance with regulations (AMI; IS, BMV) while fully respecting the variable geometry.</u></p> <p>AT</p> <p>(Comments):</p> <p>Support for CZ-proposal to reflect general objectives of Home Affairs policies.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p><u>(f) to support actions in the area of Home Affairs in accordance with regulations (AMIF; IS, BMV) while fully respecting the variable geometry.</u></p> <p>CZ</p>

(Comments):

The support for Home Affairs policies will be funded through this Fund. It is thus necessary, that its general objectives reflect this situation. While it is understandable that variable geometry does not allow to set a binding objective for all member states, it still must be reflected here for the others. The concrete legal wording is subject to further discussion.

DE

(Drafting suggestions):

(f) acknowledge the need of crisis and disaster preparedness and prevention as well as civil protection in accordance with Article 196 TEU and Article 222 TEU.

(g) to support the implementation of EU policies in the area of border checks, asylum and immigration in accordance with Chapter II, Title V TFEU.

EE

(Drafting suggestions):

(f) to support actions in the area of home affairs in accordance with Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31

December 2034; Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034; Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034, while fully respecting the variable geometry.

EE

(Comments):

The support for home affairs policies will be funded through this Fund. It is thus necessary, that its general objectives reflect this situation. While it is understandable that variable geometry does not allow to set a binding objective for all member states, it still must be reflected here for the others. The specific legal wording is subject to further discussion.

EL

(Drafting suggestions):

(f) to support the implementation of the Home Affairs policies in accordance with Regulations AMI, BMV, IS.

OR

(f)To protect and strengthen democracy in the Union and to uphold Union values , while ensuring a safe and well-managed Union through a balanced approach to migration, asylum, border management and internal security

EL

(Comments):

For reasons of transparency, coherence, and equal treatment across policy areas, it would be beneficial for the Fund Regulation to set out distinct and clear general objective for the HOME AFFAIRS .Home Affairs appear placed under the broad horizontal objective of Article 2(1)(e), which **may risk diluting their specific mandate and creating overlaps or conflicting priorities** with wider national or Union strategies. Home Affairs are not part of the general objectives as currently defined. Considering their importance, EL proposes to add a subparagraph (f) in order to include Home Affairs funds in the general objectives of Article 2.Otherwise, if it is to be maintained the existing provision, it should include a clear reference to Home Affairs within the framework of democracy in the Union and Union values. Overall, we would like to underline the importance of ensuring greater visibility for

the Home Affairs Funds within the Regulation establishing the Single Fund.

FR

(Drafting suggestions):

f. to support projects in the area of climate, environment, and biodiversity ;

g. To support the implementation, strengthening and development of the common policy on asylum and the common immigration policy and of the European integrated border management and European visa policy, and ensuring a high level of internal security in the Union, in accordance with Parth Three, Title V of the TFEU.;

FR

(Comments):

Le financement de l'environnement et du climat apparait seulement dans le paragraphe a) sur la réduction des inégalités territoriales. Il conviendrait d'en faire un objectif à part entière.

IT

(Drafting suggestions):

(f) To support the well-being of European citizens by protecting and restoring nature and biodiversity, achieving climate neutrality, and strengthening resilience to climate and environmental risks.

(g) to support the implementation of the Home Affairs policies in accordance with Regulations AMI, BMV, IS.

IT

(Comments):

Article 191 of the TFEU highlights the principles and the objectives of one of the core Union’s policies, the Union’s environmental policy. Its objectives are to preserve the environment, protect human health, and ensure the prudent use of natural resources. Article 191 TFEU also mandates the Union to take urgent and appropriate measures against climate change.

The Regulation of the “Single Fund” should acknowledge the “Environmental Policy” as one of the fundamental policies of the EU Treaties, and therefore it should include an additional “policy objective” (“general objective”) fully dedicated to environmental protection, nature and biodiversity conservation, as well as climate action – in accordance with the principles and objectives of environmental protection and sustainable development enshrined in the TFEU.

This will also add consistency to the text of the Commission proposal in relation to the sustainability aspects mentioned in the overall aim of the “Single Fund” within Article 2(1), as well as in relation to several specific objectives of the same “Fund”, primarily those set out in letter (a) – points (ii), (iii), (vii), (viii), (ix) and especially (x) – of Article 3(1).

The support for Home Affairs policies will be funded through this Fund. It is thus necessary, that its general objectives reflect this situation. Considering their importance, it is proposed to add a subparagraph (g) in order to include Home Affairs funds in the general objectives of Article 2. Overall, we would like to underline the importance of ensuring greater visibility for the Home Affairs Funds within the Regulation establishing the Single Fund without prejudice to the variable geometry applicable in the area.

PL

(Drafting suggestions):

New paragraph: (f) to support the implementation of the Home Affairs policies in accordance with Regulations AML, BMV, IS.

PL

(Comments):

PL proposes to add a subparagraph (f) in order to include Home Affairs funds in the general objectives of Article 2. Overall, we would like to underline the importance of ensuring greater visibility for the Home Affairs Funds within the Regulation establishing the Single Fund.

The fact that the Home Affairs Funds appear placed under the broad horizontal objective of Article 2(1)(e) may risk diluting their specific mandate and creating overlaps or conflicting priorities with wider national or Union strategies. Home Affairs Funds are not part of the general objectives as currently defined.

PT

(Drafting suggestions):

PT: f) to enhance defence capabilities in accordance with the article 24 of the TEU;

g) to promote the internal security of the Union, in accordance with Part Three, Title V of the TFEU.

PT

(Comments):

PT: To align the wording between the general objectives and specific objectives, We propose to include new paragraphs for policy areas covered by specific objective b) included in article 3.

SE

(Drafting suggestions):

New objective (f) to support actions in the area of Home Affairs in accordance with regulations (AMI; IS, BMV) while fully respecting the variable geometry.

SE

(Comments):

The support for Home Affairs policies will be funded through the NRP-fund. SE is therefore of the opinion that it is necessary, that the general objectives reflect this situation. The concrete legal wording can be discussed.

SI

(Drafting suggestions):

New (f) to support actions in the area of Home Affairs in accordance with regulations (AMI; IS, SIBMV) while fully respecting the variable geometry.

SI

(Comments):

Since Home Affairs policies will be funded through this Fund it is necessary that general objectives of this Fund reflect this situation. Variable geometry does not allow binding objectives to be set for all member states, but they should be set in this act for other member states.

SK

(Drafting suggestions):

(f) **to support actions in the area of Home Affairs in accordance with regulations (AMI; IS, BMV) while fully respecting the variable geometry.**

SK

(Comments):

It is crucial that the Home Affairs policies are fully visible in the general objectives. We comprehend that because of “*variable geometry*” a binding objective cannot be set for all member states (some MS opt out - in accordance with special provisions laid down in Protocols annexed to the TEU and TFEU). However, the proposed general objective must be included for the rest of the member states that opt in. There needs to be a

	<p>logical link between general objectives, specific objectives and AMI/IS/BMV objectives. From the methodological point of view this link is missing now.</p> <p>We believe there is a legal way to add the general objective and to respect the “<i>variable geometry</i>” at the same time. We are very much open to discuss several options for the most correct legal wording (for. example the reference to variable geometry, technical term “Home Affairs” etc.). Absolute invisibility of Home Affairs policies among general objectives should not be an option.</p> <p>References to relevant TFEU articles are included directly in the AMI/IS/BMV regulations, so there is no need to duplicate this information in the horizontal regulation.</p>
<p><i>Article 3</i></p> <p><i>Specific objectives of the Fund</i></p>	<p>AT</p> <p>(Comments):</p> <p>Support of CZ proposal supporting amendment of art. 3 so as to explicitly encompass measures in the fields of internal security, migration, border management, and visa policy. Current wording does not adequately reflect the actual areas of support defined in the three draft regulations concerning internal affairs.</p> <p>BE</p>

(Comments):

in line with BE-position:

The CAP and CFP, including the specific CAP- and CFP-objectives, should remain a selfstanding instruments and therefore be implemented through a separate fund.

CZ

(Comments):

CZ requests art. 3 to be amended so as to explicitly encompass measures in the fields of internal security, migration, border management, and visa policy. The current wording of this article uses reference to Home Affairs regulations under specific objective which is not related to Home Affairs but to defense, resilience and security in different meaning then internal security. Current wording is confusing and not functional, it would suggest that defense objectives must be fulfilled while fully respecting unrelated regulations of Home Affairs. Current wording does not adequately reflect the actual areas of support defined in the three draft regulations concerning internal affairs. The domains of internal security, migration, asylum, border management, and visa policy should therefore be set out in a distinct subparagraph, clearly separated from provisions relating to defense policy.

Moreover this regulation clearly separates allocation for Home Affairs through reference to Home Affairs regulations. However it must be clear, which specific objectives are those, which should be supported by the Home Affairs allocation. Article 3 currently does not give an answer.

Annex V (template for the NRPP) sets in its part 5 table for definition of Milestones, targets and timeline. This table refers to primary and secondary specific objectives. For Home Affairs these parameters are missing. The specific regulations for Home Affairs set only objectives (without any adjective). It is necessary to include the Home Affairs into the structure of Article 3.

FR

(Comments):

La France maintient son souhait de voir les objectifs spécifiques liés aux affaires intérieures insérés dans ce paragraphe.

En effet, elles rappellent que les affaires intérieures couvrent un champ plus large que la sécurité de l'Union : asile, integration, politique des visas.. De plus, l'annexe V du règlement PPNR (Titre 1, 1.1) ne renvoie qu'aux objectifs spécifiques de l'article 3 du règlement PPNR Cf proposition d'amendement ci-dessous.

HR

(Comments):

HR comments –: There seems to be inconsistency in wording of the specific objectives. Several topics that are also relevant to CFP have been worded as CAP specific. For example, fair standard of living for fishermen, working conditions and fostering generational renewal, improving the ability to cope with crises, enhancing the access to knowledge and innovation and accelerating the digital and green transition. This causes legal uncertainty whether these topics can be addressed in the context of CFP. We also propose to establish a separate specific objective for blue economy and ocean governance since these objectives are much wider than CFP. CFP does not cover topics such as offshore energy, maritime transport, maritime safety or security.

IE

(Comments):

We note that Article 22 (2) (a) provides that the NRP Plan shall “support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned” and we would like to hear the Commission’s

view of how the provision for taking in account 'specific challenges' would work in practice.

IT

(Comments):

The analysis of COM(2025) 565 shows that the general and specific objectives (Articles 2 and 3) are formulated in a single, undifferentiated manner, without formally indicating which policies or funds under the umbrella fund are expected to contribute to each objective.

The formulation proposed by the Commission regarding the general and specific objectives risks creates ambiguity regarding the expected contribution of each policy or fund within the new framework. It is therefore necessary to clarify more explicitly the correspondence between the specific objectives and the main financing instruments (ERDF, ESF+), by establishing a dedicated and self-standing section for cohesion policy within the legislative framework.

MT

(Comments):

Malta underlines the need to ensure that the application of Article 3 remains proportionate and allows Member States to prioritise those

specific objectives that are most relevant to their national circumstances and financial allocation.

PT

(Comments):

PT1: Portugal asks for further explanation on several specific objectives, since it is not clear which investments / reforms are eligible. Dedicated fiches with indicative examples are welcomed-

PT2: Portugal reiterates that it would be important to give MS flexibility in selecting specific objectives that directly respond to the specific needs of MS and regions, in opposition on having to consider them all.

PT3: Also, as already mentioned, particularly in relation to Annex VI (methodology for contributing to social objectives), from our analysis of the various instruments relating to the ESF/social objectives quota, and specifically the specific objectives set out in Article 3 of the Fund/NRPP Regulation, **it is not clear how these should be linked, particularly with what is defined in Annex VI.**

PT4: **Still in regard to the specific objectives, we reiterate our comment on the need of not integrating social infrastructures within the social quota established in Article 10(5) of the Fund/NRPP Regulation** (subject to clarification of the provisions of the explanatory memorandum

and recitals of the proposed ESF Regulation - see, for example, recitals 10 and 12 - with regard to a possible definition of a minimum percentage of ESF and final discussion/conclusion on whether or not to implement eligibility at the level of sectoral regulations - see Article 8(2) of the Performance Regulation).

RO

(Comments):

There seems to be inconsistency in wording of the specific objectives from CFP and CAP perspective. Several topics that are also relevant to CFP have been worded as CAP specific. For example, fair standard of living for fishermen, working conditions and fostering generational renewal, improving the ability to cope with crises, enhancing the access to knowledge and innovation and accelerating the digital and green transition. This causes legal uncertainty whether these topics can be addressed in the context of CFP. We also propose to establish a separate specific objective for blue economy and ocean governance since these objectives are much wider than CFP. CFP does not cover topics such as offshore energy, maritime transport, maritime safety or security.

SE

(Comments):

	<p>SE advocates for shorter and less detailed specific objectives.</p> <p>SK</p> <p>(Comments):</p> <p>We suggest reordering of the specific objectives in line with the order of the common objectives: Cohesion Policy, Social cohesion, CAP/CFP, Home affairs/Defence, Rights/Democracy/Rule of Law.</p> <p>There seems to be inconsistency in wording of the specific objectives. Several topics that are also relevant to CFP have been worded as CAP specific. For example, fair standard of living for fishermen, working conditions and fostering generational renewal, improving the ability to cope with crises, enhancing the access to knowledge and innovation and accelerating the digital and green transition. This causes legal uncertainty whether these topics can be addressed in the context of CFP. We also propose to establish a separate specific objective for blue economy and ocean governance since these objectives are much wider than CFP. CFP does not cover topics such as offshore energy, maritime transport, maritime safety or security.</p>
	<p>BE</p> <p>(Comments):</p>

	<p>Question: Can the Commission explain what specific objectives are included in the promotion of healthy and local food and education on agriculture and food (through school schemes)?</p> <p>IE</p> <p>(Comments):</p> <p>Call for flexibility to propose which specific objectives to address, according to what is most suitable for their specific circumstances. Suggest a prioritisation of objectives.</p> <p>LV</p> <p>(Comments):</p> <p>Please clarify the possibility to develop an infrastructure within the scope of Article 3 (is the infrastructure development allowed in the field of defense, for the development of innovation and research, and for the development of the business environment).</p>
<p>1. The general objectives referred to in Article 2 shall be pursued across all regions through the following specific objectives:</p>	<p>AT</p> <p>(Comments):</p> <p>Some of the specific objectives formulated are not sufficiently clear. For example:</p>

- lit. a(i): What are “territorial services,” particularly in contrast to “services of general interest”?
- There are overlaps between the specific objectives under lit a (x) and lit d (v). How can these be distinguished/separated from one another?

BE

(Drafting suggestions):

The general objectives referred to in Article 2 shall **can** be pursued across all regions through the following specific objectives **under (a), (b), (c), (d) and (e) and at least one or more of their sub-specific objectives:**

BE

(Comments):

“Across all regions” seems to imply that it is obligatory to implement each general objective in each region, which should not be the case.

it should be made clear in the text that the Plan should address the specific objectives mentioned in point (a), (b), (c), (d) and (e), by addressing certain, but not all, sub-specific objectives, mentioned in points (i), (ii),... It should be up to the Member State to decide which measures are most relevant to address the overarching specific objectives

and national and regional priorities and to take into account the principle of proportionality.

DE

(Comments):

In principle, Germany agrees with the general and specific objectives of the proposed regulation and welcomes the fact that the various areas of support are adequately reflected therein.

The extent to which MS are obliged to contribute to the specific objectives of Art. 3 should follow the principle of proportionality with respect to the volume of funding (in relation to GDP), focus should be placed on the specific needs of MS and regions for investments and reforms, in order to strengthen competitiveness, EU-added value and EU-public goods.

MS should focus on their primary investment and reform needs (national or regional level) based on development concepts. Primary investment and reform needs of MS must be in line with the European policy objectives focused on EU added value.

The objectives in Article 3 differ considerably in nature. They range from overarching, horizontal objectives (such as strengthening industry or supporting the just transition) to sector-specific objectives (culture,

housing, integration). Member States and regions should be able to prioritise on the basis of actual investment needs at national and regional level.

Ultimately, this question needs to be answered in connection with Article 22, which stipulates that the NRPPs must contribute adequately and comprehensively to all specific objectives of Article 3.

DK

(Comments):

General comment:

Small and medium-sized enterprises (SMEs) are the backbone of the European economy, driving innovation, job creation, and regional development. Supporting SMEs fosters economic resilience and diversity, making the EU less vulnerable to external shocks. Targeted support also helps SMEs adapt to digital and green transitions. By empowering SMEs, the EU can enhance competitiveness and ensure sustainable, inclusive growth. This support is crucial for keeping local economies vibrant and dynamic.

The Draghi Report supports this view by highlighting the pivotal role of SMEs in fostering growth, innovation, and employment across the EU.

The report emphasizes the need for targeted policies and better access to

finance to help SMEs navigate digital and green transitions. It also calls for simpler regulations and enhanced support measures for SMEs, underlining their importance for both competitiveness and regional cohesion

FI

(Drafting suggestions):

The general objectives referred to in Article 2 shall be pursued across all regions through **all or a significant subset of** the following specific objectives:

FI

(Comments):

Taking into account the principle of proportionality and the size of the financial allocation, it should be up to the Member State to decide which specific objectives shall be included in the NRP plan.

FR

(Drafting suggestions):

1. The general objectives referred to in Article 2 ~~shall~~**may** be pursued across ~~all~~ regions through the following specific objectives:

	<p>FR</p> <p>(Comments):</p> <p>Les Etats membres devraient pouvoir choisir quels objectifs appliquer et à quelles regions en cohérence avec la version révisée du compromis proposé par la Présidence sur le bloc 5 du règlement PPNR (Article 22.2.a)</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: How are the general objectives linked to the specific objectives?</p> <p>HR questions: What is the meaning of ‘primary’ and ‘secondary’ specific objectives stated in the Plan template?</p> <p>The Regulation does not clarify what is their meaning.</p> <p>HR questions: What is the objective intended for social infrastructure investments?</p> <p>HR questions: What is the objective intended to finance investments in strategic technologies?</p>
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HR questions: What is the objective intended to finance investment from the Innovation Fund?

HU

(Comments):

As the legal construction of horizontal and specific regulations remain applied it should be considered to include the specific objectives in the fund-specific regulations. This would enable better detailing of the objectives and would bring closer the priorities to the policy fields, increasing also clarity and visibility.

The inconsistency between the general objectives under Article 2 and the specific objectives listed under the letters in Article 3 should be addressed. The way these articles are phrased renders the interpretation of the system of objectives difficult.

Therefore, we propose harmonise them by applying the objectives from the Treaties (Article 2). See wording proposals below.

IE

(Comments):

On the general objectives, there are 5 very broad objectives set out in article 3. However, the financial allocation for each Member State, and the funds

available to meet these objectives will vary widely. The CAP, in the current period, have common, specific objectives, that help to ensure a level playing field between Member States. It is difficult to see how NRP Plans will adopt this approach, given the breadth of the objectives listed.

Question: Greater clarity is need on the funding (e.g., PO schemes and non-ringfenced funds such as LEADER).

MT

(Comments):

Can the Commission clarify the intervention logic and hierarchy (reform vs measure vs investment) and how these tie into monitoring and performance assessment?

NL

(Drafting suggestions):

The general objectives referred to in Article 2 shall be pursued across all regions through **all or a subset of** the following specific objectives:

NL

(Comments):

Due to the limited envelopes of some member states, it is not realistic to contribute to all of the specific objectives. Member States should focus on the most relevant national and regional challenges.

PL

(Drafting suggestions):

The general objectives referred to in Article 2 shall be pursued across all regions through the relevant following specific objectives:

PL

(Comments):

The requirement to implement all the general and specific objectives of the Fund is excessive and does not allow for flexibility in programming. The objectives should be treated as an open catalogue for Member States to choose interventions most suited to their specific situation, also at regional level.

The phrase “across all regions” may be misinterpreted as requiring territorial coverage of all objectives in each region. The clarification prevents overly rigid interpretations and ensures consistency with the place-based approach, allowing for territorially differentiated intervention strategies.

	<p>Moreover, the present wording creates a doubt on how it should be interpreted in the context of CAP and HOME funds, where some interventions are only implemented in selected regions (e.g. border protection) and some at national level (like CAP direct income support).</p> <p>This amendment is consistent with the explanation provided by the European Commission, according to which: “the contribution to all the specific objectives is assessed/required at the level of the Plan, not in each region. It does include the national/central level.”.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>1. The general objectives referred to in Article 2 shall be pursued across all regions, <u>if appropriate according to their needs and challenges</u>, through the following specific objectives:</p> <p>PT</p> <p>(Comments):</p> <p>Portugal does not accept the one size fits all logic implicit in this article. The objectives (some of them at least) should be pursued if there is a need, in the regions, to do so. The regions are different and have different needs</p> <p>RO</p>
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(Comments):

It is necessary to have a better visibility of the EU policies referred to in art. 2. To this end we expect a better correlation between the general objectives outlined in Article 2 (which is anchoring the regulation within the framework of the Treaties on European Union (TEU) and the Functioning of the European Union (TFEU), and the specific objectives detailed in Article 3 which concentrate more on the operational agenda of the EU.

While Romania understands the Commission's approach of using a broad formulation of the specific objectives in order to allow any type of investment to be promoted, provided it can be justified in terms of its contribution to the relevant objectives, we also consider that some additions are necessary to avoid misunderstandings or the creation of an unintended link between the wording and eligibility, arising from inertia or established practice. The concrete proposals are inserted below: (a) (iii), (a) (viii), a (ix), a (x), (c).

SI

(Comments):

Art. 3 should be amended so as to explicitly encompass measures in the fields of internal security, migration, border management, and visa policy.

The current wording of this article uses reference to Home Affairs regulations under specific objective which is not related to Home Affairs but to Defense, resilience and security in different meaning than internal security. Current wording is confusing and not functional, it would suggest that defense objectives must be fulfilled while fully respecting unrelated regulations of Home Affairs. Current wording does not adequately reflect the actual areas of support defined in the three draft regulations concerning internal affairs. The domains of internal security, migration, asylum, border management, and visa policy should therefore be set out in a distinct subparagraph, clearly separated from provisions relating to defense policy.

Moreover this regulation clearly separates allocation for Home Affairs through reference to Home Affairs regulations. However it must be clear, which specific objectives are those, which should be supported by the Home Affairs allocation. Article 3 currently does not give an answer.

Annex V (template for the NRPP) sets in its part 5 table for definition of Milestones, targets and timeline. This table refers to primary and secondary specific objectives. For Home Affairs these parameters are missing. The specific regulations for Home Affairs set only objectives (without any adjective). It is necessary to include the Home Affairs into the structure of Article 3.

<p>(a) to support the Union's sustainable prosperity across all regions by:</p>	<p>BG</p> <p>(Drafting suggestions):</p> <p>(a) to support the Union's <u>economic, social and territorial cohesion</u> sustainable prosperity across all regions by:</p> <p>BG</p> <p>(Comments):</p> <p>With the proposed amendment, the objectives of the Cohesion Policy are more clearly and visibly reflected in the specific objectives.</p> <p>DE</p> <p>(Comments):</p> <p>It should be clarified that the support for the Union's sustainable prosperity should be based on regional development strategies.</p> <p>Art. 3 (1) (ii) does not exclude big companies from the NRPP support. We request a clarification on the relationship between NRPP and ECF funding. This accounts in particular for the possibility to support big companies under NRPPs and the new ECF (second pillar). NRPPs should</p>

be focussed on funding competitiveness of SMEs like beforehand under Cohesion Policy.

FR

(Drafting suggestions):

(a) to support the Union's sustainable prosperity across all regions, **with a special focus on outermost regions**, by:

HR

(Drafting suggestions):

(a) **to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund')** by supporting the Union's sustainable prosperity across all regions by;

HR

(Comments):

HR requests the inclusion of the general objective set out in Article 2(a) and its merging with the specific objective under point (a) of Article 3.

HR considers it necessary to reshape the structure of the general and specific objectives in such a way that Cohesion Policy is explicitly included among the general objectives set out in Article 2, alongside the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union. At the same time, we consider that the general objectives of “reducing regional disparities in the Union” (Article 2(1)(a)) and “supporting quality employment, education and skills, and social inclusion” (Article 2(1)(b)), which represent fundamental features of cohesion intervention, should therefore be moved to the level of specific objectives in Article 3 (1) and 3(3) within the framework of Cohesion Policy as a general objective.

HU

(Drafting suggestions):

a) ~~to support the Union’s sustainable prosperity across all regions by~~
to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation in accordance with Part Three, Title XVIII of the TFEU, including supporting projects in the area of environment and trans-

European networks in the area of transport infrastructure in accordance with Article 177(2) TFEU ('European Regional Development Fund and Cohesion Fund');

HU

(Comments):

From a territorial development perspective, it is crucial that the objectives serve the development of all regions, while at the same time focusing on reducing regional disparities. This requires both territorial objectives and sectoral objectives contributing to the territorial goals.

Therefore, it is necessary to strengthen the territorial dimension of the sectoral policies and reflect the territorial goals in all thematic objectives.

As for particular areas, in addition to industry and tourism, the thematic content could also include competitiveness and the development of businesses.

IT

(Drafting suggestions):

to strengthen economic, social and territorial cohesion across all regions, by supporting to support the Union's sustainable prosperity **across all regions** by:

IT

(Comments):

The specific objective that should represent the main area of intervention for the ERDF is Specific Objective (a), “to support the Union’s sustainable prosperity across all regions”, which is structured into ten sub-objectives.

However, in its current formulation, the Treaty objective relating to cohesion policy is not adequately highlighted. The Commission’s proposal explicitly refers to social cohesion only under point (c) of Article 3(1), while the other two essential pillars of cohesion — economic and territorial cohesion — appear to be downplayed or implicitly subsumed under the broader notion of “sustainable prosperity”.

This approach is problematic, as it does not reflect the Union’s primary legal basis: Articles 174–178 TFEU define economic, social and territorial cohesion as a fundamental objective of the Union, to be pursued through the reduction of regional disparities and the enhancement of disadvantaged areas.

Reducing this complex architecture to the sole concept of “sustainable prosperity” — although broad and generally acceptable — does not do justice to the central role of cohesion policy within the Treaties and risks

weakening the foundation, visibility and rebalancing function of the ERDF within the new single-fund framework.

For these reasons, it is necessary to strengthen the explicit reference to economic, social and territorial cohesion, in order to ensure full consistency with the Union's primary legal basis and to safeguard the strategic role of cohesion policy in the 2028–2034 programming cycle.

PL

(Drafting suggestions):

(a) to support the Union's economic, territorial and social cohesion and sustainable prosperity across all regions by

PL

(Comments):

The Treaty objective of Cohesion Policy should be clearly emphasised in this article as part of the specific objectives (the EC draft only includes social cohesion in point c) of Art. 3.1).

Reducing the objectives of cohesion policy in the field of economic and territorial cohesion solely to 'sustaining prosperity' seems inadequate and diminishes the importance of Cohesion Policy.

The amendment restores balance between competitiveness and cohesion, in line with Articles 174–178 TFEU.

RO

(Drafting suggestions):

(a) **to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation, including supporting projects in the area of environment and trans-European networks in the area of transport infrastructure,** by supporting the Union’s sustainable prosperity across all regions by;

RO

(Comments):

The proposed rewording reflects the approach indicated in Art. 2, as a result of merging letters (a) and (b), with a view to ensure a greater visibility to Cohesion Policy and its objectives of reducing regional imbalances and promoting social cohesion through all its Three Funds.

SK

(Drafting suggestions):

	<p>(a) to support the Union’s <u>economic, social and territorial cohesion</u> sustainable prosperity across all regions by</p> <p>SK</p> <p>(Comments):</p> <p>These are the objectives of the Cohesion Policy, with a clear focus on regions. The separate specific objective on social cohesion does not overlap, as it focuses instead on the Union’s social model.</p>
<p>(i) fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, including support for territorial services and infrastructure;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>(i) fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, including support for territorial services and <u>sustainable</u> infrastructure;</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of</p>

	<p>urban and rural areas, including support for territorial services and infrastructure</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(i) fostering the attractiveness of territories to support the right <u>reason</u> to stay <u>or return</u> including by supporting strategies for the integrated development of urban and rural areas, <u>and</u> including support for territorial services and infrastructure;</p> <p>DE</p> <p>(Comments):</p> <p>DE believes that Cohesion Policy should be a central instrument that fosters the attractiveness of all regions, also structurally weak regions, rather than postulating a ‘right to stay’.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, including support for territorial services and</p>
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infrastructure (incl. sustainable mobility and transport infrastructure);

HR

(Comments):

HR comments: We welcome the leading role that, through the Fund's specific objectives, is given to stimulating the development of territories, including urban areas, through integrated development strategies.

HR questions: Article 22 paragraph 2 (h) (i) refers also to coastal areas. Why the reference to coastal areas is not made here?

HU

(Comments):

See argument at (a) above.

For Cohesion Policy to contribute more effectively to the convergence of regions, the territorial objective (a) i) should not be just one specific objective but also an overarching objective at a higher level. Thus, the territorial dimension should be reflected throughout (1) (a), in all specific objectives, namely ii)-x)., which show sectoral approaches. Moreover, the territorial dimension should be reflected in the specific objectives under (c) and (d) as well.

IT

(Drafting suggestions):

fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, including support for territorial services and infrastructure, **particularly in regions affected by demographic decline.**

IT

(Comments):

The proposed integration is justified by the need to strengthen the territorial coherence and the structural effectiveness of the objectives of the NRPP Regulation, in light of one of the Union’s main structural challenges: demographic decline and territorial depopulation, particularly in rural, internal, peripheral and transition areas.

The concept of “right to stay” is shareable in its general intent, however the formulation proposed by the Commission is likely too broad to serve as a meaningful operational principle within the 2028–2034 programming framework. To avoid ambiguity in implementation, it would be appropriate to further specify the concept of “right to stay” from both a legal and operational perspective, clarifying, for example, which types of interventions contribute to its fulfilment: essential services (community-

based healthcare, local mobility, education, social infrastructure); investments to improve quality of life (culture, environment, territorial maintenance); economic opportunities (support for enterprises, digitalisation, self-employment); integrated interventions in inner areas and regions affected by demographic decline, etc.

A more precise definition, e.g. in the recitals, would help prevent divergent interpretations of a principle that is intended to become central to the future intervention framework of cohesion policy.

MT

(Comments):

Malta underlines that the **definition of rural areas** should be determined by Member States and applied flexibly, in order to reflect the specific territorial and demographic realities of small island Member States and avoid the unintended exclusion of areas with genuine rural characteristics and needs. This approach was already adopted in Regulation (EU) No 1305/2013, notably Article 50, which allowed Member States to define and target rural areas in accordance with national circumstances, and is consistent with the current CAP, in particular Article 110(c), which places responsibility on Member States to identify territorial needs and justify the targeting of interventions.

	<p>NL</p> <p>(Drafting suggestions):</p> <p>fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated <u>and inclusive social, economic and environmental</u> development of urban and rural areas, including support for territorial services and infrastructure;</p> <p>NL</p> <p>(Comments):</p> <p>We should limit the scope of this specific objective to support strategies for integrated territorial development.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>“fostering the attractiveness of territories to support the right to stay including by supporting integrated territorial strategies for the integrated development of for urban and rural areas, including urban regeneration, sustainable urban mobility and support for territorial services and infrastructure;”</u></p> <p>PL</p>
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(Comments):

Change in this point (integrated territorial strategies for urban and rural areas...) is in line with drafting suggestion for article 75 in block 6.

To avoid different interpretations, in which specific objective sustainable urban mobility may be financed, it should be explicitly added in the text, as it is 2021-2027 perspective.

In our view urban regeneration should be included in the text. This clarification reflects the integrated nature of territorial development and ensures that regeneration measures can be coherently addressed alongside sustainable urban mobility and territorial services and infrastructure.

PT

(Drafting suggestions):

i) fostering the attractiveness of territories to support the right to stay including by **supporting territorial services and infrastructure** **and by** supporting strategies for the integrated development of urban and rural areas, ~~including support for territorial services and infrastructure;~~

PT

(Comments):

Portugal considers that the support for territorial services and infrastructures should not be limited to strategies for the integrated development of urban and rural areas.

RO

(Drafting suggestions):

fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, **which encompasses the integrated territorial development and urban development strategies**, including support for territorial services and infrastructure;

RO

(Comments):

the integrated territorial development and urban development strategies, as defined in article 75

SE

(Drafting suggestions):

(i) ~~fostering the attractiveness of territories, to support the right to stay including by supporting strategies for the integrated development of~~

~~urban and rural areas, including support for territorial services and infrastructure;~~

SE

(Comments):

SE proposes to delete the paragraph. SE considers that the wording “right to stay” is far too unclear; the specific objectives need to be clear and concise to fit in a legal text and to simplify the implementation process

Furthermore, the scope of the objective is too broad and SE questions whether the “attractiveness of territories” could be further specified as it could include a great variety of measures.

Finally, strategies for integrated development are not an objective and should not be mentioned. The strategies are already pointed out specifically under article 22 (requirements of the plan) which should be considered enough in order to raise their relevance.

If a description/definition of attractiveness is needed it could be further developed, something along the lines “attractive and good living environments” or according to OECD: Regional attractiveness is defined as the ability to map, promote and improve a territory’s economic, social and environmental assets in order to attract and retain talent, investment and visitors” (OCDE, 2022[1]). OECD (2023),

	<p>SK</p> <p>(Drafting suggestions):</p> <p>(i) fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban areas and, rural areas and functional areas, including support for territorial services and infrastructure;</p> <p>SK</p> <p>(Comments):</p> <p>We propose adding 'functional areas'. In Slovakia, territorial development strategies (specifically SUD implemented via the ITI mechanism) are designed around functional areas (e.g., core city + surrounding commuting zone), rather than strictly administrative urban or rural borders. This reflects the reality of socio-economic flows.</p>
<p>(ii) strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises,</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>(ii) strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies as well as</p>

by fully integrating environmental and climate ambitions to accelerate a clean industrial transition:

pharmaceuticals, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean industrial transition:

AT

(Comments):

- The enhancement of sustainable manufacturing while safeguarding and boosting competitiveness in the pharmaceutical sector is crucial for achieving a clean industrial transition and should therefore be highlighted
- “supporting the competitiveness and growth of SMEs” should be added - either as an own sub-para or included in (ii)

BE

(Drafting suggestions):

supporting industrial transformation and strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing **and regional resilience**, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises,

by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;

BE

(Comments):

Link to art 174 TFEU

DE

(Drafting suggestions):

(ii) strengthening the Union's **competitiveness, including the support of the resilience and sustainability of its** industrial base, ~~resilient~~ supply chains ~~and boosting sustainable and competitive~~ manufacturing **sectors**, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean **industrial** transition;

DE

(Comments):

The list is too narrow, competitiveness must be strengthened in all areas, need to keep this specific objective broader.

Headings 1 and 2 need to be considered together, inter alia with regard to investment opportunities to strengthen competitiveness, innovation and economic growth. The relationship must be clearly regulated so that both complement each other optimally in terms of European added value. This applies in particular to the list of eligible measures.

EE

(Drafting suggestions):

KLIM: strengthening the Union's industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean industrial transition, **including through the sustainable use and value-added processing of forest resources, fostering the circular bioeconomy and long-lived wood products that contribute to carbon storage and substitution of fossil-based materials;**

EE

(Comments):

Including forestry and the bio-based economy under this objective (or at least in explanatory memorandum) is essential to reflect the Union's

strategic interest in sustainable raw materials and clean industrial transformation. The sustainable use and value-added processing of forest resources strengthens Europe's industrial base, creates high-quality jobs in rural areas and contributes to climate goals through carbon storage in long-lived wood products and the substitution of fossil-intensive materials such as steel and concrete. This ensures coherence between climate action, competitiveness and regional development.

FR

(Drafting suggestions):

strengthening the Union's industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of **very small**, small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;

FR

(Comments):

Afin de mieux prendre en compte les spécificités des RUP et de leur tissu économique, l'ajout d'une référence aux "très petites entreprises" est nécessaire.

Quelle articulation existe-t' il avec le FEC et Horizon sur le financement de projets, notamment pour les secteurs à haute intensité énergétique, comme les carburants durables ?

HU

(Drafting suggestions):

(ii) strengthening the Union's industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to ~~the competitiveness of small and medium sized enterprises,~~ by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;

HU

(Comments):

SMEs form the basis of economic activity, they provide the livelihood of many European families, therefore it is of utmost importance that the regulation ensures a broad framework for their development. The regulation has to represent the interests of SMEs both in its view and its wording, it has to ensure that SMEs can contribute to European Union's sustainable prosperity. Our position is that supporting the competitiveness and growth of SMEs must appear in a general sense among the specific

objectives. This must be phrased to cover a broad spectrum of activities, because although we generally agree with the currently outlined emphasis in the specific objectives, SMEs not only operate in a couple of key sectors but throughout the whole European economy. The regulation should provide the multitude of businesses with the flexibility necessary to react on unexpected or unwanted changes of their environment, regardless of the sector in which they are operating.

Therefore, we suggest adding an own sub-paragraph after (ii), dedicated to the competitiveness of SMEs.

IT

(Drafting suggestions):

(ii) strengthening the Union's industrial base **and small and medium-sized enterprises competitiveness**, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, ~~with special attention to the competitiveness of small and medium-sized enterprises,~~ **also by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;**

Alternatively, it is considered that a specific objective in support of SMEs could be introduced, similar to what is provided for in COM(2025) 555.

	<p><u>(ii. bis)</u></p> <p><u>enhancing competitiveness of SMEs, addressing market failures and suboptimal investment situations, including by productive investments and by facilitating access to credit, in order to deliver targeted financial support to companies throughout their entire life cycle.</u></p> <p>IT</p> <p>(Comments):</p> <p>The current wording should be made clearer and broader, in order to explicitly include support for SMEs among the objectives, also in line with what is set out in COM(2025) 555, taking into account the role that SMEs play in the composition of the EU's productive system, and the importance of cohesion policy resources in supporting their development.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>strengthening the Union's industrial base, resilient supply chains and boosting sustainable and competitive manufacturing <u>and productive investments</u>, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of</p>
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small- and medium-sized enterprises, by ~~fully~~ integrating environmental and climate ambitions to accelerate a clean industrial transition;

LV

(Comments):

We would suggest to supplement (ii) point with the productive investments and at the same time delete the word "fully" at the end of the sentence as redundant considering that corresponding areas will be implemented by integrating environmental and climate ambitions to accelerate a clean industrial transition.

MT

(Drafting suggestions):

(ii) strengthening the Union's industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, ~~in particular in the~~ **including** areas of net zero **technologies** and critical raw materials ~~technologies~~, with special attention to the competitiveness of small- and medium-sized enterprises, by ~~fully~~ integrating environmental and climate ambitions to accelerate a clean industrial transition;

Justification: Malta proposes these limited textual refinements to improve clarity and legal precision without altering the substance of the

objective. Replacing “*in particular in the*” with “*including*” ensures that the reference to specific areas remains illustrative rather than restrictive, preserving flexibility for Member States. The explicit reference to “*net-zero technologies*” aligns the wording with established Union terminology, while removing “*technologies*” in relation to critical raw materials reflects the broader focus on supply chains and security of supply.

MT

(Comments):

Malta would seek clarification as to whether the integration of environmental and climate ambitions, as formulated in the provision, implies that support for competitiveness measures targeting enterprises, in particular SMEs, would be limited to those activities or undertakings that demonstrate a clear environmental or climate-related objective. Malta would also welcome clarification as to whether this objective is intended to apply exclusively to manufacturing activities, or whether competitiveness support for enterprises in other sectors may also be covered.

NL

(Drafting suggestions):

strengthening the Union's **competitiveness, including the support of the resilience and sustainability of its** industrial base, ~~resilient~~ supply chains and ~~boosting sustainable and competitive~~ manufacturing **sectors**, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean ~~industrial~~ transition;

NL

(Comments):

Suggestion to signal that competitiveness must be strengthened in all areas. NL supports GER suggestion.

SE

(Drafting suggestions):

(ii) strengthening the Union's industrial base, ~~resilient supply chains and~~ ~~boosting sustainable and competitive~~**ness** manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of **on supporting** small- and medium-sized enterprises, ~~by fully integrating environmental and climate ambitions~~

~~and in particular and~~ to accelerate a clean industrial transition by fully integrating environmental and climate ambitions;

SE

(Comments):

SE would like to emphasize that the focus should be on strengthening competitiveness and SME's. A more general specific objective would simplify the implementation by making it possible to adapt the measures to the context of the Member State or region in question, for example by using smart specialisation strategies.

The mentioning of "net zero and critical raw material technologies" is important areas to support but is too narrow within this SO and can create lock-in effects

See comments below on (ix) on tourism and (x) on bioeconomy. SE argues that these actions can be supported within this SO (ii).

SI

(Drafting suggestions):

(ii) strengthening the Union's industrial **and economic** base, resilient supply chains and boosting sustainable and competitive manufacturing **and service sector**, in particular in the areas of **strategic technologies**

for Europe (STEP technologies), net zero and critical raw materials technologies, **digital and deep technologies and biotechnologies;** **enhancing sustainable growth, competitiveness of enterprises, job creation and productive investments,** with special attention to the competitiveness of small- and medium-sized enterprises, **while taking into consideration smart specialisation strategies,** by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;

SI

(Comments):

We suggest emphasising strategic technologies for Europe, as one of the key strategic orientations for EU. In order to successfully translate innovation into commercialisation, that Draghi report states as one of the top priorities for Europe, we should promote RDI as well as productive investments in strategic technologies.

The term “fully integrating” is vague, we suggest deleting the word “fully”.

The EU's economic base is diverse. In addition to its industrial base, particularly manufacturing, it also includes significant service sectors such as transportation, ICT, logistics, and tourism. Special emphasis

	<p>should be placed on small and medium-sized enterprises (SMEs), particularly in relation to smart specialisation strategies, which have been established as ex-ante conditionalities for the Multiannual Financial Framework (MFF) 2024-2020 and MFF 2021-2027 under EU cohesion policy. Thus, "the Fund" should not only support selected EU industry priorities (manufacturing) but also take a more comprehensive approach. This means considering the member states' specialisations and building on those strengths.</p>
	<p>AT</p> <p>(Drafting suggestions):</p> <p>new iii (or integration in ii): <u>supporting the competitiveness and growth of SMEs</u></p> <p>AT</p> <p>(Comments):</p> <p>“supporting the competitiveness and growth of SMEs” should be added - either as an own sub-para or included in (ii)</p> <p>HU</p> <p>(Drafting suggestions):</p>

	<p><u>(ii bis) supporting the competitiveness and growth of small- and medium-sized enterprises through a broad spectrum of measures;</u></p> <p>HU</p> <p>(Comments):</p> <p>See above.</p>
<p>(iii) supporting a just transition towards the Union’s 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition;</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) supporting a just transition towards the Union’s 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting <u>resource-efficiency and</u> a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition;</p> <p>DE</p> <p>(Comments):</p>

Resource-efficiency should be added as important aspect for enhancing competitiveness and conservation of resources, with a potential to reduce dependencies.

EE

(Drafting suggestions):

supporting a just transition towards the Union's 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular economy, **applying energy efficiency first principle**, ensuring that all territories and everyone can contribute and benefit from the clean transition;

EE

(Comments):

We would like to emphasize the role of energy efficiency first principle derived from Energy Efficiency Directive (EED, EU/2023/1791) that increases significantly EU energy efficiency ambition and set thresholds

for projects. Also, more methodological works is needed to implement this principle. Should this be highlighted in the objectives?

HR

(Comments):

HR comments: The specific objective (iii) lists support for a just transition, however, everything further stated in the title corresponds to standard investments which, in the programming period 2021-2027, fell under Policy Objective 2 – a greener Europe.

PL

(Drafting suggestions):

supporting a just transition towards the Union’s 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, mitigating negative social, environmental and economic effects of energy transition, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition;

PL

(Comments):

The current formulation narrows just transition mainly to the energy dimension, which does not fully reflect the experience of the Just Transition Fund. A broader scope is necessary to address the social, economic and territorial impacts of structural transition in affected regions.

We stress the need to continue support for territories covered by just transition plans in 2021-2027, since the process of implementing those plans is not completed and the support needs to be continued.

RO

(Drafting suggestions):

(iii) supporting a just transition towards the Union's 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids ~~also taking into account~~, **as well as** the Trans-European Network (TEN-E) and technology and promoting a circular economy, **interconnectivity and sustainable energy infrastructure for enhancing green transitions**

	<p><u>and energy security</u> ensuring that all territories and everyone can contribute and benefit from the clean transition;</p> <p>RO</p> <p>(Comments):</p> <p>The text should be clear that the NRPP can also support development of the TEN-E infrastructure in order to ensure better synergies with CEF.</p> <p>As mentioned in RO previous comments, we would appreciate explanations regarding the difference between circular economy under the point (iii) compared to the circularity under point (x)</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(iii) supporting the <u>just</u> transition towards the Union’s 2030, 2040 and 2050 targets for energy and climate, <u>in a technological neutral manner</u>, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular</p>
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economy, ensuring **a just transition where** ~~that~~ all territories and everyone can contribute and benefit from the clean transition;

SE

(Comments):

SE does not believe that the objective needs to be developed to the extent proposed by the Commission. The plans focus shall be decided through the interaction between the objective and the requirements of the plan in accordance with Article 22 and adapted to the challenges and conditions of the Member State and regions,

Technology neutrality should be an overarching principle for measures related to energy and climate.

SI

(Drafting suggestions):

(iii) supporting a just transition towards the Union's 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and

	<p>technology and promoting a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition <u>and supporting the development of skills and human resources to facilitate the just transition process;</u></p> <p>SI</p> <p>(Comments):</p> <p>A successful just transition requires both tangible and intangible investments, particularly in human resources.</p>
<p>(iv) supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally sovereign, secure, and inclusive Union, and promoting the development and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity, while addressing the digital divide;</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(iv) supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally sovereign, secure, and inclusive Union, and promoting the development and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity, while addressing the digital divide, <u>resource- and energy-efficiency;</u></p>

	<p>DE</p> <p>(Comments):</p> <p>Sustainability is an important aspect to be taken into account with a view to resource and energy consumption of digital tools, infrastructure (such as data centers), technologies and services.</p> <p>EE</p> <p>(Comments):</p> <p>more emphasis on data-driven policy-making, services, data valuation, collecting data in a secure and standardised manner, using once and only principle.</p> <p>Digital skills, could be elaborated also with AI and data skills?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>iv) supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally sovereign, secure, and inclusive Union, and promoting the development and use of <u>basic and advanced digital skills, digital public services, ICT connectivity and</u> advanced technologies, including AI secure and trusted</p>
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digital infrastructure and services, ~~basic and advanced digital skills, digital public services, and ICT connectivity~~, while addressing the digital divide;

HU

(Comments):

The insertion of “including AI secure and trusted digital infrastructure and services” after the advanced technologies breaks the logic of the list in the sentence. It is therefore proposed to include the advanced technologies element at the end of the list.

NL

(Drafting suggestions):

(iv) supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally **open** sovereign, secure, and inclusive Union, and promoting the development and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity, while addressing the digital divide;

NL

(Comments):

Open is in line with last week's Council Conclusions as approved by the Transport, Telecommunications and Energy Council: it recognises that Europe cannot and should not do everything alone. To strengthen our digital transformation, we need trusted global partners, interoperable systems, and open markets that allow innovation to flourish.

Council Conclusions on European Competitiveness in the Digital Decade:
[link](#)

PL

(Drafting suggestions):

(iv) supporting the digital transformation towards the EU digital Decade strategies and policies targets and objectives set out in the Digital Decade Policy Programme 2030, ...

PL

(Comments):

The Digital Decade Policy Programme 2030 does not cover the entire financial period 2028–2034. Therefore, it is advisable not to specify a specific policy or strategy for digitalisation, but to state that the goals of the currently applicable documents in this area should be achieved.

The same wording should be used throughout the document where the Digital Decade is mentioned.

RO

(Comments):

We would appreciate explanations regarding the difference between this point and (b) (iii) as regards cybersecurity

SE

(Drafting suggestions):

(iv) supporting ~~the~~ digital transformation, **in particular** towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, ~~thereby contributing to the achievement of a digitally sovereign, secure, and inclusive Union, and promoting the development and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity,~~ while addressing the digital divide;

SE

(Comments):

SE does not believe that the objective needs to be developed to the extent proposed by the Commission. The plans focus shall be decided through

	<p>the interaction between the objective and the requirements of the plan in accordance with Article 22 and adapted to the challenges and conditions of the Member State and regions,</p>
<p>(v) supporting research, development and innovation, including the diffusion of innovation across all regions;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>Supporting research, development and innovation including the diffusion and capacity of innovation across all regions, <u>which can also stimulate competitiveness and decarbonisation, aligned, where relevant, with Smart Specialisation Strategies.</u></p> <p>BE</p> <p>(Comments):</p> <p>S3 is absent in the regulation compared to the 21-27 period. We believe R&D should be based on place-based R&D strategies like S3. This paragraph is good opportunity to underline the added value of S3.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(v) supporting <u>the development of</u> research, development and innovation <u>capacities and the uptake of advanced technologies.</u></p>

including the diffusion of innovation across all regions **and cooperation across government, industry, academia, and civil society through smart specialisation strategies;**

DE

(Comments):

The focus should be on advanced technologies and smart specialisation strategies.

DK

(Drafting suggestions):

(v) supporting ~~research, development and innovation~~ **the development of research and innovation capacities and the uptake of advanced technologies, in particular in SME's,** including the diffusion of innovation across all regions **and cooperation across government, industry, academia, and civil society through smart specialisation strategies**

DK

(Comments):

We would like to stress the importance of ensuring that innovation, new ideas or technologies etc. are spread and adopted in all geographical areas

as well as in all sectors. It should also be highlighted in the text that RDI can happen outside the world of research institutions.

Focusing explicitly on the uptake and diffusion of innovation and advanced technologies, particularly in SMEs and across all sectors, is essential to ensure real economic needs. SMEs form the backbone of the European economy and are crucial drivers of job creation and growth. By emphasizing cross-sectoral adoption, the text recognizes the importance of leveraging innovation in diverse industries and regions, not just in traditional or high-tech areas. This approach fosters broader competitiveness, supports local and regional development, and maximizes the impact of public investments. Targeted support for SMEs also accelerates the transition to advanced technologies, helping Europe maintain its global leadership in innovation and resilience.

NL

(Drafting suggestions):

(v) supporting ~~research, development and innovation~~ **the development of research and innovation capacities and the uptake of advanced technologies**, including the diffusion of innovation across all regions **and cooperation across government, industry, academia, and civil society through smart specialisation strategies.**

	<p>NL</p> <p>(Comments):</p> <p>NL thinks the proposed text is vague and would like to emphasize the importance of building research and innovation capacities in line with current CPR provisions. NL also proposes an addition related to the importance of cooperation between actors of the so-called quadruple helix and usage of smart specialisation strategies.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(v) supporting research, development and innovation <u>the development of research and innovation, including capacities and the uptake of advanced technologies, including and the diffusion of innovation across all regions and cooperation across government, industry, academia, and civil society through smart specialisation strategies.</u></p> <p>SE</p> <p>(Comments):</p> <p>SE would like to emphasize the importance of building capacities in line with current CPR provisions. SE also proposes an addition related to the importance of cooperation between actors of the so-called quadruple helix</p>
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	<p>and the usage of smart specialisation strategies which has proven to be successful in the current program period</p>
<p>(vi) supporting measures, including reforms to further the Saving and investments Union and foster the development of market-based funding options;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>(vi) supporting measures, including reforms to further strengthen the Saving and investments Union and foster the development of market-based funding options;</p> <p>BE</p> <p>(Comments):</p> <p>The points above and below list investment priorities. This point is out of place among the others, and its placement within sub-objective (a) alone raises questions. The method of financing the measures—which is, after all, what this is about—should be grouped together in the regulation. Furthermore, this is the only time the word "reform" is mentioned. Does this mean that reforms to improve the "capture" of private funds in this savings and investment union are limited to objective 3.a? Overall, we are not against supporting measures and reforms to further the Saving and investments Union, but it should not be placed here.</p>

	<p>BG</p> <p>(Drafting suggestions):</p> <p>(vi) supporting measures, including reforms to <u>strengthen the functioning of the Single Market, remove remaining barriers</u> further the Savings and investments Union and foster the development of market-based funding options;</p> <p>BG</p> <p>(Comments):</p> <p>The proposed reference to the Single Market is aligned with the Strategic Agenda 2024–2029. Measures related to the Single Market have a broader scope than the Savings and Investment Union, which forms part of it.</p> <p>IT</p> <p>(Comments):</p> <p>This objective should be further specified in order to better clarify the areas of intervention and to better explain how it is connected within the main specific objective under point (a).</p> <p>PT</p> <p>(Comments):</p>
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	<p>PT: Examples of investments and reforms eligible under this specific objective are welcomed.</p> <p>SE</p> <p>(Comments):</p> <p>Reforms are not mentioned in other specific objectives. Can it be deleted here and instead added to Article 22. 2 (b) for example as follows: "... by implementing measures, including reforms, underpinning the Savings and Investments Union".</p>
<p>(vii) supporting social and affordable housing;</p>	<p>FI</p> <p>(Drafting suggestions):</p> <p>(vii) supporting social and affordable housing;</p> <p>FI</p> <p>(Comments):</p> <p>Finland supports the development of market-based funding options, which is already catered for in Article 3 a) (vi) above.</p> <p>NL</p> <p>(Drafting suggestions):</p>

	<p>-supporting <u>sustainable improvement through</u> social and affordable housing</p> <p>NL</p> <p>(Comments):</p> <p>Investments under the NRPP for social and affordable housing should contribute to sustainability and climate adaptation, and improve the quality of dwellings and their surroundings. In this regard, the investment possibilities under the current Cohesion Policy for the built environment should be leading. This includes qualitative improvements of buildings, and the built environment linked to innovation, renovation and sustainability, including contributions to climate objectives, such as the industrialisation of construction, circular economy approaches and the use of residual flows, as well as measures supporting the energy transition. The target group for social housing should be disadvantaged groups.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(vii) — supporting social and affordable housing;</p> <p>SE</p> <p>(Comments):</p>
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	<p>SE is against this specific objective. However, funding is possible under specific objectives (a) (iii) and (c) (iii).</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(vii) supporting social and affordable housing, <u>including the possibility of social housing cooperatives and social enterprises in construction and renovation;</u></p>
<p>(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>(viii) enhancing Union <u>sustainable</u> transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport;</p> <p>DE</p> <p>(Drafting suggestions):</p>

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral, **cross-border** and less connected areas; support the green and digital transition of transport;

DE

(Comments):

This specific objective should also contribute to improving connectivity, security and accessibility in cross-border areas, which is particularly relevant in the context of Interreg Plan chapters.

FR

(Drafting suggestions):

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, **multimodality, interoperability**, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport;

	<p>FR</p> <p>(Comments):</p> <p>Les autorités françaises proposent d'inclure « multimodalité » et « interopérabilité » afin de garantir des réseaux de transport européens intégrés, efficaces et coordonnés.</p> <p>En lien avec la question précédente relative à l'articulation avec le MIE, la Commission pourrait-elle apporter des précisions sur les actions éligibles dans l'objectif de soutien à une connectivité décarbonée ?</p> <p>Notamment, dans quelle mesure cet objectif peut-il s'inscrire en complémentarité avec les actions énumérées dans l'article 33 du règlement FEC concernant le soutien à la production et la distribution de carburants alternatifs à travers l'UE afin de faciliter la décarbonation des transports ?</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less</p>
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connected areas; support the green and digital transition of transport; **and contribute to sustainable mobility;**

Justification: Road transport is the main source of air pollution in Malta. Decarbonising alone will not alleviate all environmental concerns related to transport, since electric vehicles also produce pollution. Therefore, other solutions related to sustainable mobility are required, such as in terms of enabling walking and cycling.

NL

(Drafting suggestions):

enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral, **cross-border** and less connected areas; support the green and digital transition of transport;

NL

(Comments):

This specific objective should also contribute to improving connectivity, security and accessibility in cross-border areas, which is particularly relevant in the context of Interreg Plan chapters.

PT

(Drafting suggestions):

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport; **support urban mobility;**

PT

(Comments):

PT: It should be clear that the urban mobility is eligible under this specific objective.

RO

(Drafting suggestions):

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on

the core and extended core network, **including through construction of missing sections and urban nodes**, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport;

RO

(Comments):

Taking into account different explanations of the Commission given with various occasions regarding the eligibility of new motorways needed to contribute to the completion of the core and extended core network (including in relation to the intervention fields in the Performance Regulation), RO asks for a clear specification in the text that completion of the TEN-T network includes also construction of missing links.

SE

(Drafting suggestions):

(viii) enhancing Union transport infrastructure **and mobility, in particular the green and digital transition of transport** and contributing to the completion of the trans-European network for transport, ~~in particular on the core and extended core network~~, while ~~decarbonising and improving~~ connectivity, security and accessibility for

	<p>remote, peripheral and cross border and-less connected areas; support the the green and digital transition of transport</p> <p>SE</p> <p>(Comments):</p> <p>SE is missing a clear focus on mobility actions, especially on the TEN-T, which are developed at national, regional and local level and would like to emphasize the green and digital transition of infrastructure by moving the reference to the beginning of the objective.</p> <p>SE believes that the core and extended core-network are the main supported networks addressed due to its timelines for completion (core: 2030, extended: 2040). Hence, this doesn't need to be clarified in the objective. SE also believes that the TEN-T Regulation incorporates the decarbonisation rules clearly and therefore proposes to shorten the text.</p>
	<p>HU</p> <p>(Drafting suggestions):</p> <p>(viii bis) developing and enhancing sustainable, climate resilient, intelligent and intermodal national, regional and local mobility, including improved access to TEN-T and cross-border mobility, and promoting sustainable multimodal urban mobility;</p>

	<p>HU</p> <p>(Comments):</p> <p>Having regard to specific objectives of (EU) 2021/1058 Article 3, several dimensions of mobility shall be also presented along the development of the TEN-T network.</p>
<p>(ix) support for tourism, including sustainability;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(ix) support for tourism, heritage, including sustainability;</p> <p>BE</p> <p>(Comments):</p> <p>Wording CPR 2021-2027</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(ix) support for tourism, <u>with the aim of improving competitiveness, including sustainability and resilience;</u></p> <p>DE</p> <p>(Comments):</p>

	<p>It should be qualified that tourism should be funded in view of enhancing regional development and with the aim to promote a sustainable development of tourism.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p><u>ix) support for tourism, culture and heritage, including sustainability;</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR comments: We welcome the introduction of the tourism topic into specific objectives. However, we believe that in addition to tourism, culture and heritage must be found on the list of specific objectives.</u></p> <p><u>HR proposes to amend point 1, paragraph a, subparagraph ix by adding <i>culture and heritage</i>.</u></p> <p>IT</p> <p>(Drafting suggestions):</p>
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support for tourism, **culture and cultural heritage**, including sustainability”

IT

(Comments):

Culture and cultural heritage contribute significantly to the sustainable prosperity of European regions. This must be clearly and explicitly taken into account by the specific objectives. Moreover, looking at the investment categories (Reg. 545, Annex 1) for Tourism, we are concerned that investment for the protection, development and promotion of cultural heritage is considered only under/for tourism purposes, and (cultural heritage) infrastructures are also excluded.

This gap should be overcome by giving culture and cultural heritage the role they need to play, distinct by tourism, as in previous programming periods.

Such a vision might also facilitate managing and implementing the investments, given legal frameworks and institutional governance of the culture and tourism sectors at national level, whose responsibilities are usually split between several administrations.

Several comments and drafting suggestions have also been made to fields of interventions considered under this policy area (see Table of comments to Performance regulation).

Finally, we request a **clarification regarding the introduction of a specific objective for tourism**, in terms of scope and potentially eligible activities

MT

(Drafting suggestions):

(ix) support for tourism, including sustainability, **culture, cultural heritage, digitalization and skills**

Justification: In addition to sustainability, digitalisation is crucial in ensuring that the tourism industry remains competitive in an increasingly technology-driven global market, while supporting the preservation, promotion and valorisation of culture and cultural heritage as core assets of sustainable tourism. This should be complemented by targeted investments in skills, including those relevant to cultural and heritage-based tourism. Funding should support all tourism stakeholders, including public authorities and destinations, as well as the private sector, notably SMEs, start-ups, businesses and individuals working in the sector.

	<p>NL</p> <p>(Drafting suggestions):</p> <p>(ix) — support for tourism, including sustainability;</p> <p>NL</p> <p>(Comments):</p> <p>We should focus Cohesion Policy on convergence and competitiveness through investments in areas with the most EU-added value. Support for tourism is not part of the Council’s Strategic Agenda for 2024-2029.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>(ix) support for tourism, including culture, cultural heritage and sustainability</u></p> <p>PL</p> <p>(Comments):</p> <p>In order to align with the intervention field 93 Protection, development and promotion of cultural heritage and tourism services (excluding infrastructures) we request explicit inclusion of culture and cultural heritage in this objective.</p>
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	<p>Culture and cultural heritage supports the attractiveness of territories, not only in the context of tourism development, but also as liveable places, which has an impact on demographic policy and internal migration.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>(ix) — support for tourism, including sustainability;</p> <p>PT</p> <p>(Comments):</p> <p>PT: Support to the tourism sector is covered by a.i) (fostering the attractiveness of territories). Therefore, a specific sector should not be singled out.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(ix) support for tourism, including sustainability, <u>and culture and heritage;</u></p> <p>RO</p> <p>(Comments):</p>
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As tourism is frequently correlated with cultural settlements and heritage, RO considers that to these elements should be explicitly envisaged within the same specific objective.

SE

(Drafting suggestions):

~~(ix) — support for tourism, including sustainability;~~

SE

(Comments):

SE acknowledges the challenges within the field of sustainable tourism and believes that actions should be supported through the fund but is of the opinion that it is unbalanced and too detailed to have a specific objective only for tourism. It should instead be covered by a reformulated specific objective (a) (ii).

SI

(Drafting suggestions):

(ix) support for **sustainable** tourism, ~~including sustainability;~~

SI

(Comments):

	<p>The tourism sector should be sustainable, like other economic activities, considering the DNSH principle; this approach should be clearly stated.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>ix) support for tourism, <u>culture and heritage</u>, including sustainability;</p> <p>SK</p> <p>(Comments):</p> <p>We welcome the introduction of the tourism topic into specific objectives. However, we believe that in addition to tourism, culture and heritage must be found on the list of specific objectives.</p>
<p>(x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.</p>	<p>AT</p> <p>(Comments):</p> <p>Due to the inconsistency across the relevant Regulations, a precise definition of the specific climate and environmental goals is suggested.</p>

Terminology as used in other legislation such as “soil health” and “soil resilience” in the Soil Monitoring Law should be used. The term « soil potential » should not be used in the legal acts

DE

(Drafting suggestions):

(x) supporting efficient water management, quality and resilience, environmental protection, **marine protection, flood and coastal protection,** climate adaptation, climate resilience **including nature-based solutions,** ~~and~~ enhancing biodiversity, soil quality and natural resources, promoting circularity, **sustainable and environmentally friendly** bioeconomy and wider resource efficiency **and conservation,** strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

DE

(Comments):

Editorial note: “enhancing biodiversity” should be a standalone issue and not appear to be linked to climate resilience”.

Marine Protection should be explicitly mentioned due to the need of action because of the severe state of the European oceans and their manifold environmental, climate and social benefits, which need to be sustained and strengthened.

Re “nature-based solutions”:

Nature-based solutions for climate resilience (e.g. restoration of riverbeds and floodplains, greening of buildings and their surroundings, unsealing and greening of sealed surfaces) should be explicitly mentioned due to their manifold environmental, climate and social benefits.

Re “sustainable and environmentally friendly”:

Taking account of environmental impacts and a sustainable use of natural resources should be an essential aspect of the development of the bioeconomy sector.

Re: Aspect of resource conservation as equally important measure (and not included in the concept of “efficiency”) should be added.

EE

(Drafting suggestions):

supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and

enhancing biodiversity, soil quality and natural resources, promoting circularity **and efficient waste management**, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation **covering hazardous substances and other pollutants**, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

EE

(Comments):

We see the need to highlight waste management in the objectives as it is foreseen that we will not achieve sufficient level by 2029 and further investments are required. Also, the upcoming Circular Economy Act in 2026 will further support the efficient waste management and recycled materials' market. It would be necessary for the scope addressing pollution to also cover the management of hazardous substances from the perspectives set out in the European Union Chemicals Strategy for Sustainability (https://environment.ec.europa.eu/strategy/chemicals-strategy_en). At present, the proposal appears to place greater emphasis on air pollution and pollutants present in water; however, with regard to hazardous substances, it is equally important to address these issues at the

design and production stage, by promoting the substitution of hazardous substances in products and processes.

HR

(Drafting suggestions):

HR drafting suggestions:

x) supporting efficient water and waste management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

HR

(Comments):

HR comments: We believe sustainable waste management is a key prerequisite for reducing the total amount of waste, preserving and protecting the environment and its ecosystems, reducing emissions,

and improving soil and water quality and for increasing the quality and amount of recycled materials, which will have a positive impact on reduction of natural resource utilization, especially in terms of critical raw materials.

Integrating waste management is an essential part of a comprehensive and harmonized approach to sustainability for future generations. This is particularly important in the context of green policies and European regulations, which include achieving ambitious and cost-intensive environmental targets and assessing the sustainability of companies, especially regarding the protection of natural resources, strengthening resilience to climate change, and reducing ecological footprints. Environmental goals will be difficult to achieve without the support of financial instruments.

HR proposes amend to point 1, paragraph a, subparagraph x by adding “and waste”.

HU

(Drafting suggestions):

(x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, **air, noise and** soil quality and natural resources,

promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, **mitigation**, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

HU

(Comments):

Mitigation is not supported in the current period by the Commission. It should be of key importance to include it to the objectives of the next period.

Air quality and noise reduction are key elements of the environmental protection.

IT

(Drafting suggestions):

(x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, **including by ensuring**

safe and sustainable management of chemicals, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

IT

(Comments):

This clarification is necessary because actions to prevent, control, and remediate pollution do not necessarily encompass all the measures required to ensure the safe use of chemicals for humans, animals, and the environment. Additional steps –such as proper classification, labelling, packaging, and the substitution of hazardous chemicals with safer alternatives – are essential to address chemical safety comprehensively. The precautionary principle, transparency, and substitution of hazardous substances, which are usually applied to chemical management, go beyond traditional pollution prevention and control measures.

MT

(Drafting suggestions):

(x) supporting **all forms of environmental protection, including** efficient water management, quality and resilience, ~~environmental protection~~, climate adaptation, climate resilience and enhancing

biodiversity, soil quality, **promoting sustainable land use and supporting landscape quality and natural resources**, promoting circularity, **waste prevention**, bioeconomy and wider resource efficiency, strengthening **all types of** pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources **across all ecosystems**, as well as promoting the New European Bauhaus solutions, **nature based solutions and green infrastructure** in the built environment.

Justification: An integrated water management approach entails taking into account all available water sources and all categories of demand, including municipal, industrial and agricultural water supply. It is noted that stormwater is currently not included within this integrated water management framework.

MT

(Comments):

With reference to the New European Bauhaus, it is suggested that eligibility conditions for funding should take into account local specificities and national governance and administrative structures. In particular, in some Member States, responsibilities for spatial planning and land-use are exercised at national rather than municipal level, with

towns and cities having no jurisdiction in this area. In such cases, national public bodies responsible for spatial planning should be considered automatically eligible to access the relevant funding.

NL

(Drafting suggestions):

supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, ~~as well as~~ **including through** New European Bauhaus solutions in the built environment.

NL

(Comments):

We should focus Cohesion Policy on convergence and competitiveness through investments in areas with the most EU-added value. Support for promoting the New European Bauhaus does not suit this specific objective and is not part of the Council's Strategic Agenda for 2024-2029.

	<p>PT</p> <p>(Drafting suggestions):</p> <p>x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.</p> <p>PT</p> <p>(Comments):</p> <p>PT: Reference to the New European Bauhaus would be better placed in the preambular part of the Regulation (as a recital).</p> <p>NEB is a horizontal approach with potential to be considered in different specific objectives and not a specific objective itself.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>x) supporting efficient water, wastewater and waste management, quality, and resilience and related infrastructure, environmental</p>
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protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.

RO

(Comments):

RO considers that water management should be explicitly detailed to reflect also the wastewater management to better reflect the type of actions required to in the field of water management. Wastewater management at the quality standards required by the applicable directive are a prerequisite for ensuring both the quality of water bodies and soil, as well as to the efficient water management in general.

In addition, while waste management can be considered to be covered by circularity, RO considers that it should be distinctly mentioned to avoid misinterpretation.

SE

(Drafting suggestions):

	<p>(x) supporting <u>the transition towards a water resilient Europe by 2050, including by contributing to the implementation of the European Water Resilience Strategy</u>, efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting non-toxic circularity, [bioeconomy] and wider resource efficiency, supporting efficient ocean management, strengthening pollution prevention, control and remediation, preserving and restoring nature and ecosystem services, including in urban areas enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.</p> <p>SE</p> <p>(Comments):</p> <p>When drafting the proposals, the newly adopted water resilient strategy was not in place. In order to make the objective more relevant SE propose to add this strategy.</p> <p>Editorial comment: biodiversity and natural resources are mentioned twice.</p> <p>SE believes that support for bioeconomy actions is crucial. But due to its economical character, bioeconomy is supported within (a) (ii) and can</p>
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also be mentioned in that SO.

SE believes that actions to strengthen the European Bauhaus initiative is to narrow within this SO by pointing out a certain policy initiative

SK

(Drafting suggestions):

x) supporting efficient water **and waste** management, quality and resilience, environmental protection, climate adaptation **and mitigation**, climate resilience and enhancing biodiversity, soil quality and **sustainable use of** natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and **ecosystems** ~~enhancing biodiversity and natural resources~~, as well as promoting the New European Bauhaus solutions in the built environment.

SK

(Comments):

We believe sustainable waste management is a key prerequisite for reducing the total amount of waste, preserving and protecting the environment and its ecosystems, reducing emissions, and improving soil and water quality and for increasing the quality and amount of recycled

	<p>materials, which will have a positive impact on reduction of natural resource utilization, especially in terms of critical raw materials.</p> <p>Integrating waste management is an essential part of a comprehensive and harmonized approach to sustainability for future generations.</p> <p>Climate adaptation builds climate resilience. We need to make a reference to mitigation aspect of climate action as well. Removing repetitive text.</p>
<p>(b) to support the Union’s defence capabilities and security across all regions by:</p>	<p>BG</p> <p>(Drafting suggestions):</p> <p>(b) to support the Union’s defence capabilities and security across all regions by:</p> <p>BG</p> <p>(Comments):</p> <p>It is proposed to reorder the specific objectives in line with the order of the common objectives: Cohesion Policy, Social cohesion, CAP/CFP, Home affairs/Defence, and Rights/Democracy/Rule of Law.</p> <p>DE</p> <p>(Drafting suggestions):</p>

(b) to support the Union's defence **and civil protection** capabilities and security ~~across all regions~~ by:

DE

(Comments):

We welcome the emphasis on objectives relating to security, defence and crisis preparedness in Article 3. At the same time, we would appreciate an appropriate link to the general overarching objectives set out in Article 2.

Defence is an inherently national task, not regional.

HU

(Drafting suggestions):

~~(b) — to support the Union's defence capabilities and security across all regions by:~~

HU

(Comments):

In order to harmonise Article 2 and 3, and to make the listed policy areas clearer, we propose separating defence and Home Affairs. Moreover, even if the Single Fund regulation and the different fund-specific

regulations will include specific objectives as proposed by the Commission, Article 3 should name the Home Affairs areas.

IT

(Drafting suggestions):

(b) to support the Union's defence capabilities and security **across all regions** by:

IT

(Comments):

The formulation adopted for specific objective (b) appears to unduly constrain the objective within a predominantly ERDF-oriented perspective and to suggest that actions in the field of defence and security must inherently assume a territorial or regional dimension. In practice, however, a significant share of interventions in these areas are intrinsically national or supranational and cannot be implemented exclusively through a regional approach.

LT

(Drafting suggestions):

(b) to support the Union's defence capabilities and security across all regions, **as well as internal security, border management, asylum, migration, and integration**, by:

RO

(Comments):

RO requests the introduction of a separate and clear specific objective under which will be financed the objectives established in the specific Regulations COM(2025) 540 final –asylum, migration and integration, COM(2025) 541 final - Schengen area, borders and visas, COM(2025) 542 final – internal security. In the current form of the article, the areas covered by the 3 Home Funds regulations are not covered.

SE

(Drafting suggestions):

(b) to support the Union's defence capabilities, **resilience, preparedness** and security across all regions by:

SE

(Comments):

SE would also like to add resilience and preparedness.

IT

(Drafting suggestions):

- (i) **supporting asylum, migration, integration and return interventions.**
- (ii) **strengthening the Union’s external border management and visa policy.**
- (iii) **strengthening the Union’s internal security.**

IT

(Comments):

Unlike the detailed and clearly articulated objectives provided for other domains—such as sustainable prosperity under Article 3(1)(a) or social cohesion under Article 3(1)(c)—the specific objectives of the Home Affairs Funds are not reflected with the same level of precision. Article 3(1)(b) only mentions “*support to the Union’s defense capabilities and security across all regions,*” followed by a reference to the objectives of the three Home Affairs Regulations. For reasons of transparency, coherence, and equal treatment across policy areas, it would be beneficial for the Regulation to set out the specific objectives of the Home Affairs Funds in a similarly thorough manner in a dedicated subparagraph and

	<p>not falling under 3(1)(b)(iii). A clearer and more detailed reference to their distinct mandate would ensure alignment with the structure applied in other domains, while safeguarding the visibility and operational focus of the Home Affairs instruments within the overall architecture of the Fund.</p>
<p>(i) reinforcing the Union’s defence industrial base and military mobility, in particular by developing dual-use TEN-T infrastructure;</p>	<p>HU</p> <p>(Drafting suggestions):</p> <p>(i) reinforcing the Union’s defence industrial base and military mobility, in particular by developing dual-use TEN-T infrastructure;</p> <p>PL</p> <p>(Comments):</p> <p>Provisions related to transport infrastructure in defence specific objective (b) are in point (i) and (iii). This causes ambiguity as to which point (i or iii) is adequate to finance transport infrastructure that can be used for military mobility (i) and at the same time constitute critical transport infrastructure (iii). To avoid such ambiguity, we propose that all support for transport infrastructure in the context of defence and security be concentrated in a single point (either (i) or (iii)).</p>

	<p>Please explain if SMEs and large companies in the dual-use of defence sector will be supported under specific objectives in point (b) <i>to support the Union’s defence capabilities and security across all regions</i> or (a) <i>to support the Union’s sustainable prosperity across all regions</i>?</p> <p>If they could be supported under both (a) and (b), what would be the difference between them?</p> <p>PT</p> <p>(Comments):</p> <p>Portugal requires further information to better understand which kind of measures could be included. Concrete examples of investments eligible within this specific objective would be welcomed.</p>
<p>(ii) strengthening the Union’s preparedness to crises and disasters by mainstreaming the principle of ‘preparedness by design’;</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(ii) strengthening the Union’s preparedness to crises and disasters by mainstreaming the principle of ‘preparedness by design’ <u>as well as civil protection investments</u>;</p> <p>DE</p>

	<p>(Comments):</p> <p>GER explicitly supports the “Preparedness by Design” concept proposed by the Commission.</p> <p>However, this concept of mainstreaming has the character of a horizontal rule, applicable and to be respected throughout the various funding areas, wherever relevant. Therefore, we suggest to anchor this principle in an article settling horizontal requirements, such as Art. 7 NRPP Regulation (and/or in the Performance Regulation).</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(ii) strengthening the Union’s preparedness to crises and disasters by mainstreaming the principle of ‘preparedness by design’;</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>(ii) strengthening the Union’s preparedness to hybrid attacks, crises and disasters by mainstreaming the principle of ‘preparedness by design’;</p> <p>LT</p>
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	<p>(Comments):</p> <p>In current geopolitical instability hybrid attacks are becoming one of the main threats and preparedness to them should be strengthened.</p> <p>LV</p> <p>(Comments):</p> <p>Please include an explanation of "preparedness by design" in the definitions.</p> <p>PL</p> <p>(Comments):</p> <p>Please explain, if security of cultural heritage can be supported under this goal.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>(ii) strengthening the Union's preparedness, <u>prevention and response capacities</u> to crises, <u>health emergencies</u> and disasters by mainstreaming the principle of 'preparedness by design';</p> <p>PT</p> <p>(Comments):</p>
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PT1: Portugal requires further information to better understand which kind of measures could be included. Concrete examples of investments eligible within this specific objective would be welcomed.

PT2: For a clearer and more comprehensive article, we believe that this subparagraph should also mention prevention and response capacities to crises, as well as health emergencies, following the wording of the Strategic Agenda 2024-2029.

RO

(Comments):

We would appreciate a confirmation that responses to natural disasters, including prevention for all type of risks are covered by this point.

SE

(Drafting suggestions):

(ii) strengthening the Union's preparedness to crises and disasters, by mainstreaming the principle of 'preparedness by design';

SE

(Comments):

	<p>The principle of preparedness by design is important. However, SE is of the opinion that the principle is not an objective in itself. Instead, the principle should be used whenever relevant and could therefore also be included as a requirement in article 22. SEs believes that the principle could then have greater impact.</p>
<p>(iii) strengthening the Union’s security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) strengthening the Union’s security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;</p> <p>DE</p> <p>(Comments):</p> <p>GER supports mentioning “critical infrastructure”, but suggests deleting “energy and transport” in order not to exclude all the other critical infrastructure sectors as they are also laid down in Directive (EU) 2022/2557 (CER Directive).</p> <p>EE</p>

(Drafting suggestions):

strengthening the Union's security, **including by contributing to the prevention, detection, investigation and response to internal and external security threats, irregular migration, serious and organised crime, terrorism, and risks at the external borders, in a manner fully consistent with the objectives set out in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034; in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034; in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034, and also** by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;

•

EE

(Comments):

This change introduces an explicit reference to key internal and external security objectives—such as preventing and responding to serious crime, terrorism, irregular migration, and threats at the external borders—as set out in the related proposals of home affairs. It ensures better alignment and coherence with the home affairs regulations, while maintaining the original focus on strengthening critical infrastructure and cybersecurity. The revised wording reflects the Union’s integrated approach to security and enables coordinated use of funding mechanisms across different but interconnected policy areas.

EL

(Drafting suggestions):

(ii) strengthening the Union’s preparedness to crises and disasters by mainstreaming the principle of ‘preparedness by design’ **where applicable**:

EL

(Comments):

We propose this addition since “preparedness by design” is not explicitly referred to in Article 7 on “Horizontal principles”. Moreover, given the broad scope of preparedness, as outlined in the document “*Questions and*

	<p><i>Answers on the EU Preparedness Union Strategy” (26.5.2025), it is essential to provide guidance to ensure its consistent application.</i></p> <p>FR</p> <p>(Drafting suggestions):</p> <p>iii) strengthening the Union’s security by improving threat detection, prevention and response threat detection capabilities, including by strengthening, <u>border and migration management</u>, energy and transport critical infrastructure and cybersecurity;</p> <p>FR</p> <p>(Comments):</p> <p>En complément, au regard des objectifs en matière de sécurité et de résilience, les autorités françaises souhaitent obtenir des précisions sur la définition des infrastructures critiques de transport et son périmètre. Elles demandent si les infrastructures aéroportuaires peuvent s’inscrire dans ces objectifs, notamment celles situées dans des zones d’intérêt stratégique pour l’UE définies dans le cadre de Global Europe.</p> <p>Par ailleurs, au regard des objectifs en matière de sécurité et de résilience, la Commission peut-elle apporter des précisions sur la définition des infrastructures critiques de transport et son périmètre ? Les infrastructures</p>
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aéroportuaires peuvent-elles s’inscrire dans ces objectifs, notamment celles situées dans des zones d’intérêt stratégique pour l’UE définies dans le cadre de Global Europe?

HU

(Drafting suggestions):

~~(iii) — strengthening the Union’s security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;~~

HU

(Comments):

We propose restructuring Article 3 to harmonise it with the general Treaty-based objectives mentioned in Article 2.

Additionally, the Fund's objectives only marginally mention objectives relating to the field of home affairs, with the wording specifically referring to internal security objectives, but making no reference to border management and visas (integrated border management and visas) or migration (asylum, migration, and integration).

If the field of home affairs remains under the scope of the NRP Regulation, it would be advisable to include the three areas of home affairs as three separate specific objectives. In addition, the regulation's wording should provide Member States with greater leeway in identifying their own migration, border protection and internal security priorities and in formulating action measures.

LT

(Drafting suggestions):

(iii) strengthening the Union's security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity; **in a manner fully consistent with the objectives set out:**

PL

(Comments):

Provisions related to transport infrastructure in defence specific objective (b) are in point (i) and (iii). This causes ambiguity as to which point (i or iii) is adequate to finance transport infrastructure that can be used for military mobility (i) and at the same time constitute critical transport infrastructure (iii). To avoid such ambiguity, we propose that all support

for transport infrastructure in the context of defence and security be concentrated in a single point (either (i) or (iii)).

Please confirm if investments in bimodal rolling stock (locomotives) are eligible under this specific objective? This type of rolling stock is more appropriate in case of crises and would improve civil preparedness and mobility and evacuation capabilities.

Would investments in civil preparedness infrastructure be also eligible (types of investments that were introduced under MTR2 in 2021-2027 perspective) e.g. shelters?

RO

(Comments):

The description of this specific objective must be completed with references to internal security, asylum and migration and border management and visas, at least, to reflect the HA funds general objectives.

SE

(Drafting suggestions):

(iii) strengthening the Union's security by improving threat detection, prevention and response threat detection capabilities, including by

	<p>strengthening energy and transport critical infrastructure and cybersecurity.</p>
<p>in a manner fully consistent with the objectives set out:</p>	<p>AT (Drafting suggestions): in a manner fully consistent with the objectives set out:</p> <p>AT (Comments): See comment on CZ-proposal at the beginning.</p> <p>BE (Comments): The structure is unclear to us. Internal security is linked to defence, and migration is not visible at all.</p> <p>CZ (Drafting suggestions): in a manner fully consistent with the objectives set out:</p> <p>DE</p>

	<p>(Comments):</p> <p>The home funds are only mentioned in the specific objectives from a security perspective (Art. 3(1)(b)(iii)). This means that the aspect of integration in terms of migration is hardly taken into account. This makes it difficult to integrate integration into the NRP, particularly in terms of cooperation with the ESF (e.g. in connection with Art. 3(c)).</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>in a manner fully consistent with the objectives set out:</p> <p>in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.</p> <p>EE</p> <p>(Comments):</p> <p>Delete, only if the art 3(b)(iii) will be rephrased as suggested before.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>in a manner fully consistent with the objectives set out:</p> <p>IT</p>
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	<p>(Drafting suggestions):</p> <p>in a manner fully consistent with the objectives set out:</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>in a manner fully consistent with the objectives set out:</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>in a manner fully consistent with the objectives set out:</u></p> <p>PL</p> <p>(Comments):</p> <p>New paragraph proposed below</p> <p>PT</p> <p>(Comments):</p> <p>PT: Additional clarifications are welcomed, to better clarify the reference to Home Affairs regulation in this specific objective. This clarification could be relevant for a better understanding on which specific objectives the Home Affairs interventions are going to be programmed.</p>
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	<p>RO</p> <p>(Drafting suggestions):</p> <p><u>(b¹) supporting efficient and effective management of migration flows, of European integrated border management, of Schengen area and visa policy and to ensure a high level of internal security, in a manner fully consistent with the objectives set out:</u></p> <p>RO</p> <p>(Comments):</p> <p>See the comment above</p> <p>SE</p> <p>(Comments):</p> <p>SE is of the opinion that internal security, asylum, migration and integration and border management and visa policy shall be more visible in this article, despite the variable geometry. It must be possible to formulate overall objectives clarifying that these should be met in a manner fully consistent with the objectives set out in the regulations.</p> <p>SK</p> <p>(Drafting suggestions):</p>
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	<p>in a manner fully consistent with the objectives set out:</p> <p>SK</p> <p>(Comments):</p> <p>We propose to include the Home Affairs agenda under a separate specific objective, see the new proposal for letter c) below.</p>
<ul style="list-style-type: none"> • in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034; 	<p>AT</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>AT</p> <p>(Comments):</p> <p>See above.</p> <p>CZ</p> <p>(Drafting suggestions):</p>

	<p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>EE</p> <p>(Comments):</p> <p>Delete, only if the art 3(b)(iii) will be rephrased as suggested before.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>IT</p> <p>(Drafting suggestions):</p>
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	<p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</u></p> <p>PL</p> <p>(Comments):</p> <p>New paragraph proposed below</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</p> <p>SK</p> <p>(Drafting suggestions):</p>
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	<ul style="list-style-type: none"> • in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;
<ul style="list-style-type: none"> • in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034; 	<p>AT</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>AT</p> <p>(Comments):</p> <p>See above</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>EE</p>

	<p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>EE</p> <p>(Comments):</p> <p>Delete, only if the art 3(b)(iii) will be rephrased as suggested before.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>• in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>PL</p>
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	<p>(Drafting suggestions):</p> <p><u>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</u></p> <p>PL</p> <p>(Comments):</p> <p>New paragraph proposed below</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>• in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</p>

- in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.

AT

(Drafting suggestions):

~~in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.~~

AT

(Comments):

See above

CZ

(Drafting suggestions):

~~in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.~~

EE

(Comments):

Delete, only if the art 3(b)(iii) will be rephrased as suggested before.

HU

(Drafting suggestions):

	<p>in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.</u></p> <p>PL</p> <p>(Comments):</p> <p>New paragraph proposed below</p> <p>SI</p> <p>(Drafting suggestions):</p> <ul style="list-style-type: none">• in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.
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	<p>SK</p> <p>(Drafting suggestions):</p> <ul style="list-style-type: none">• in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.
	<p>AT</p> <p>(Drafting suggestions):</p> <p><u>New (f) to support actions in Home Affairs area in a manner fully consistent with the objectives set out in:</u></p> <ol style="list-style-type: none"><u>Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;</u><u>Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;</u><u>Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034</u>

While fully respecting the variable geometry

AT

(Comments):

In support of CZ-proposal it is suggested to create a new specific objective which will fully cover all Home Affairs areas. The objective will consist of three secondary objectives – AMI, IS and BMV.

CZ

(Drafting suggestions):

(f) to support actions in Home Affairs area in a manner fully consistent with the objectives set out in:

- iv) **Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;**
- v) **Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;**

- vi) **Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034**

While fully respecting the variable geometry

CZ

(Comments):

CZ proposes the establishment of a new specific objective that would comprehensively cover all Home Affairs policy areas. This specific objective would be structured into three sub-objectives corresponding to AMI, IS and BMV. The detailed scope and content of each sub-objective would be further defined in the relevant sectoral legislation under the three Home Affairs regulations.

PL

(Drafting suggestions):

New paragraph: f) to support actions in Home Affairs area in a manner fully consistent with the objectives set out in:

- vii) **Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;**

viii) **Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;**

Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034

PL

(Comments):

Unlike the detailed and clearly articulated objectives provided for other domains—such as sustainable prosperity under Article 3(1)(a) or social cohesion under Article 3(1)(c)—the specific objectives of the Home Affairs Funds are not reflected with the same level of precision. Article 3(1)(b) only mentions “*support to the Union’s defence capabilities and security across all regions,*” followed by a reference to the objectives of the three Home Affairs Regulations. For reasons of transparency, coherence, and equal treatment across policy areas, it would be beneficial for the Regulation to set out the specific objectives of the Home Affairs Funds in a similarly thorough manner in a dedicated subparagraph and not falling under 3(1)(b)(iii). A clearer and more detailed reference to their distinct mandate would ensure alignment with the structure applied

	<p>in other domains, while safeguarding the visibility and operational focus of the Home Affairs instruments within the overall architecture of the Fund.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p><u>New (f) to support actions in Home Affairs area in a manner fully consistent with the objectives set out in Home Affairs Regulations</u></p> <p>SI</p> <p>(Comments):</p> <p>We propose formation of a specific objective entirely related to Home Affairs. The objective would entail three secondary objectives – AMI, IS and SIBMV. The more detailed content of these specific objectives is described in three Home Affairs Regulations.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p><u>(c) to support actions in the area of Home Affairs in accordance with regulations:</u></p>
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(i)AMI;

(ii) IS,

(iii) BMV

while fully respecting the variable geometry.

SK

(Comments):

The Home Affairs agenda needs to be clearly visible (with all of its aspects) in the text of the regulation.

The distinct domains of internal security, migration, asylum, border management, and visa policy... should be set out under new specific objective in letter f).

The current text in letter b) is not reflecting the diverse and complex nature of the objectives of the Home Affairs policies as set out in the draft AMI/IS/BMV sectoral regulations. It seems that only policies set out in letters (i), (ii) and (iii) are eligible in a manner consistent with the AMI/IS/BMV regulations. Many AMI/IS/BMV objectives/activities cannot be connected to the text in letters (i), (ii), (iii) of b).

The horizontal regulation should not just merge different policies but also make them all visibly relevant and there should be clarity and

	<p>terminological consistency necessary for the planning and implementation.</p>
<p>(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by:</p>	<p>BG</p> <p>(Drafting suggestions):</p> <p>eb) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by:</p> <p>BG</p> <p>(Comments):</p> <p>It is proposed to reorder the specific objectives in line with the order of the common objectives: Cohesion Policy, Social cohesion, CAP/CFP, Home affairs/Defence, and Rights/Democracy/Rule of Law.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model <u>across all regions (measured at NUTS 2 level)</u> by:</p> <p>DE</p> <p>(Comments):</p>

DE: For the ESF to achieve its goals within the NRPP as the main instrument to support quality employment, education and skills and social inclusion, it is essential that it covers all eligible regions in each MS at NUTS 2 level.

FR

(Drafting suggestions):

(c) to strengthen social cohesion by supporting people **including most deprived persons** and strengthening the Union's societies and the Union's social model by:

FR

(Comments):

En cohérence avec le règlement FSE, il convient de souligner la nécessité de porter une attention particulière aux publics défavorisés.

HR

(Drafting suggestions):

(c) **to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a socially fair transition towards climate neutrality in accordance**

with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU

in order to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by;

HR

(Comments):

HR requests the inclusion of the general objective set out in Article 2(b) and its merging with the specific objective under point (c) of Article 3.

HR considers it necessary to reshape the structure of the general and specific objectives in such a way that Cohesion Policy is explicitly included among the general objectives set out in Article 2, alongside the Common Agricultural Policy and the Common Fisheries Policy, as it constitutes a key development policy of the Union. At the same time, we consider that the general objectives of “reducing regional disparities in the Union” (Article 2(1)(a)) and “supporting quality employment, education and skills, and social inclusion” (Article 2(1)(b)), which represent fundamental features of cohesion intervention, should therefore be moved to the level of specific objectives in Article 3 (1) and 3(3) within the framework of Cohesion Policy as a general objective.

HU

(Drafting suggestions):

c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by

to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;

HU

(Comments):

The specific objectives listed under 'social cohesion' are broadly in line with both the national and European priorities and due to their general definition provide opportunities to a wide range of measures. There are some areas though that need to be supported beyond what is included in the regulation. These are supporting the unemployed, the adaptation of workers, enterprises and entrepreneurs to change, the retention of workers, active and healthy ageing, and – in line with the general objectives strengthening of the dimensions of quality jobs. We propose therefore to complement the specific objectives under point (c) with these elements as indicated below.

In the case of the social cohesion pillar, it is necessary to establish coordinated planning and implementation with specific objective (a) i); its contribution to the territorial objective; and the possibility of implementation within the framework of territorial strategies. Specific objective (c).v) mentions addressing disparities between regions, but this is also important for all other specific objectives belonging to (c).

NL

(Drafting suggestions):

(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model

to contribute to the general objective as mentioned in article 2(1)(b) b

y:

NL

(Comments):

Linked to the general objective in order to connect it to a specific fund

PT

(Drafting suggestions):

(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model **European Pillar of Social Rights** by:

PT

(Comments):

PT: We reiterate the proposal made by PT (meeting of the Ad hoc working subgroup on NRPP, held on 20 November), to make explicit reference to the European Pillar of Social Rights in Article 3(c), the provision governing social objectives. Direct reference to the EPSR brings more clarity on what is intended/pursued.

SE

(Drafting suggestions):

to strengthen, social cohesion **and competitiveness** by supporting people, **building skills**, and strengthening Union's societies and the Union's social model by:

SE

(Comments):

	SE emphasizes that the objective is further in line with the EU Union of Skills which states that “Europe’s competitiveness relies on future-oriented skills, contributing to economic social and territorial cohesion.”
(i) supporting employment, equal access to the labour market, fair and quality working conditions and labour mobility;	<p>BE</p> <p>(Drafting suggestions):</p> <p>(i) supporting long-term quality employment, equal access to the labour market, fair and quality working conditions and labour mobility;</p> <p>BE</p> <p>(Comments):</p> <p>BE position negobox</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(i) supporting employment, including youth unemployment, equal access to the labour market, fair and quality working conditions and labour mobility;</p> <p>HU</p> <p>(Drafting suggestions):</p>

(i) supporting employment and **the unemployed, the adaptation of workers, enterprises and entrepreneurs to change, the retention of workers, active and healthy ageing, quality jobs**, equal access to the labour market, fair and quality working conditions and labour mobility;

HU

(Comments):

In the midst of the current rapid technological changes, geopolitical and global trade uncertainties, it is particularly important to support both the unemployed and workers, especially by developing their adaptability. The provisions of the TFEU concerning the ESF (Article 162 TFEU) specifically name the adaptation of workers to industrial changes and to changes in production systems as the objective of the fund. A related intervention field is also included in the draft regulation of the performance framework (Annex I, “Adaptation of workers, enterprises and entrepreneurs to change”), so it is necessary to establish it at the regulatory level. Supporting the retention of the workforce and supporting active and healthy ageing are also essential in the midst of the current demographic changes, also highlighted by the NRPP regulation. The quality dimension of jobs is already included in the general objective (‘to

support quality employment'), and improving the quality of work is a priority both at national and EU level.

PT

(Drafting suggestions):

(i) supporting employment, equal access to the labour market, fair and quality working conditions and labour mobility, **including employment infrastructures;**

PT

(Comments):

PT: It should be clear that employment infrastructures are eligible

RO

(Drafting suggestions):

(i) supporting employment **and** equal access to the labour market, **with a specific focus on disadvantage groups and women's employment, including through measures that promote a better work-life balance, such as access to affordable and quality childcare, flexible working arrangements, and the reduction of gender gaps in pay and career progression,** fair and quality working conditions and **facilitating** labour mobility;

	<p>RO</p> <p>(Comments):</p> <p><i>”specific objectives should more explicitly address the Union’s demographic challenges: support to women's employment by paying particular attention to the necessity of a better life-work balance youth employment, education, and vocational training must be clearly covered by the specific objectives. In terms of quality education, the intervention cannot be limited only to services; it must be correlated with the provision of proper infrastructure.”</i></p>
	<p>SI</p> <p>(Comments):</p> <p>We propose including also: “</p> <p>modernising labour market institutions and services to assess and anticipate skills needs and ensure timely and tailor-made assistance and support for labour market matching, transitions and mobility.</p> <p>This remains a very important objective if objectives from (i) and (ii) are to be effectively achieved.</p>
<p>(ii) enhancing labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling;</p>	<p>BE</p> <p>(Drafting suggestions):</p>

	<p>(ii) enhancing labour supply and improving education, <u>in particular focussing on quality and inclusive education and training</u>, and lifelong acquisition of skills, in particular by promoting upskilling and reskilling;</p> <p>BE</p> <p>(Comments):</p> <p>Wording 2021_2027</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(ii) enhancing labour supply, <u>promoting equal access to and completion of quality and inclusive education and training</u> and improving lifelong acquisition of skills, in particular by promoting upskilling and reskilling;</p> <p>FR</p> <p>(Comments):</p> <p>La délégation française propose cet ajout afin d'inclure les actions visant à lutter contre le décrochage scolaire.</p> <p>MT</p>
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(Drafting suggestions):

(ii) enhancing **skills intelligence as well as** labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling;

Justification: Not only do we want to improve the skills landscape through continuous learning, but we also want to strengthen the systems through which we monitor and anticipate skill levels in our workforce.

PL

(Drafting suggestions):

(ii) enhancing labour supply, and improving education, learning mobility and lifelong acquisition of skills, in particular by promoting upskilling and reskilling, supporting educational infrastructure;

PL

(Comments):

We suggest replacing ‘and’ with a comma between the objectives of enhancing labour supply and improving education. This will clarify that improving education and lifelong acquisition of skills do not have to be strictly and always connected with the labour market.

We suggest adding a reference to supporting learning mobility. The regulation package indicates the need for synergies with the Erasmus programme.

The specific objectives lack a direct reference to improving educational infrastructure. We suggest adding this, as has been done for health infrastructure and social services.

PT

(Drafting suggestions):

(ii) enhancing labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling, **including education and training infrastructures;**

PT

(Comments):

PT: It should be clear that education and training infrastructures are eligible.

RO

(Drafting suggestions):

	<p>(ii)enhancing labour supply by improving education, training and lifelong acquisition of skills learning, with particular emphasis on youth employment, vocational education and training (VET) and by promoting the upskilling and reskilling, <u>in line with labour market needs, digital and technological challenges, including by ensuring proper infrastructures and link between education and business environment.</u></p> <p>RO</p> <p>(Comments):</p> <p>According to Annex IV we consider that youth employment should be clearly mentioned at the level of specific objectives</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(ii) enhancing labour supply and improving education and lifelong acquisition of skills, <u>also through engagement in sport activities,</u> in particular by promoting upskilling and reskilling;</p>

(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure;

AT

(Drafting suggestions):

(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion, **combating health inequalities** and fighting poverty and homelessness **with a particular focus on children**, and supporting investment in social infrastructure;

AT

(Comments):

The improvement of health equity is crucial to the achievement of this specific objective and should be referred to in its wording. As in the current ESF regulation the importance of fighting child poverty is highlighted several times it is suggested to uphold this focus.

BE

(Drafting suggestions):

(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, **supporting investment in children and young people** and supporting investment in social infrastructure;

BE

	<p>(Comments):</p> <p>Wording 21-27 and in link with annex VI (c) & (d)</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(iii) 1 promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness,</p> <p>(iii) 2 supporting investment in social infrastructure;</p> <p>(iii) 3 promoting gender equality</p> <p>ES</p> <p>(Comments):</p> <p>The support to investment in social infrastructure should be placed in a separated strategic objective, so that the minimum amount to be dedicated to the Union's social objectives, as per art. 10.5 of the proposed NRP Regulation, is not cannibalised by investment in infrastructures.</p> <p>Mention gender equality as a specific objective, in line with the current framework</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness,</p>
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including measures addressing basic needs such as food and material assistance and supporting investment in social infrastructure;

FR

(Comments):

Les actions d'aide alimentaire et matérielle ne sont pas clairement adressées alors qu'elles font partie des actions que le règlement FSE demande de financer.

Le soutien aux infrastructures sociales ne répond pas à l'objectif spécifique (c) qui vise le soutien aux personnes.

IT

(Drafting suggestions):

promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness,

improving access and participation to culture and supporting investment in social **and cultural** infrastructures

IT

(Comments):

The proposed amendment is consistent with:

i) what is stated at par. 6 of the Regulation text: “...*This aims at ensuring that all citizens have the opportunities and resources to **fully participate in economic, social, and cultural life***”.....;

the need to continue with the 2021-2027 vision and approach, by investing in culture also for the purposes of inclusion and social innovation

LV

(Drafting suggestions):

(iii) promoting equal opportunities for all, **promoting gender equality and combating gender – based violence**, supporting strong social safety nets, fostering social inclusion and fighting **discrimination**, poverty and homelessness, **addressing material deprivation** and supporting investment in social infrastructure;

LV

(Comments):

Please add to the list of specific objectives: “**promoting gender equality and combating gender – based violence**” - ending gender-based violence was included among the European Commission’s priorities in its gender equality strategy for 2020–2025. This priority was renewed in September

2024 by Ursula von der Leyen, President of the European Commission, in her mission letter for the Commissioner-designate for Equality. In it, she included the task of renewing the Commission’s commitment to gender equality in the form of a new, post-2025, gender equality strategy; (<https://eige.europa.eu/publications-resources/publications/eu-gender-based-violence-survey-key-results>)

- “fighting **discrimination**” – please add in line with Article 7;

- “**addressing material deprivation**” – to ensure that the reduction of material deprivation continues to be defined as one of the essential types of support that has been successful so far and will continue to reduce poverty and social exclusion of the most deprived persons (also support/area of intervention remains in the ESF Regulation).

MT

(Drafting suggestions):

(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social **and cultural** infrastructure;

Justification: The inclusion of culture and cultural infrastructure under this social objective reflects their essential role in promoting social

	<p>inclusion, equal opportunities and community cohesion. Cultural participation enhances access to shared spaces, identity and expression, particularly for disadvantaged groups, and contributes to social integration, well-being and active citizenship. Investment in social and cultural infrastructure supports inclusive local development, strengthens social safety nets at community level and helps prevent social exclusion by creating accessible, participatory and resilient environments.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure;</p> <p>NL</p> <p>(Comments):</p> <p>Social investments should be focussed on investments in people and not on infrastructure.</p> <p>PL</p> <p>(Drafting suggestions):</p>
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(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social and cultural infrastructure, including improving accessibility for persons with disabilities;

PL

(Comments):

We suggest adding support related to improving accessibility for people with special needs, including disabilities. This comment was raised at the previous stage in October. The EC partially addressed it. However, for clarity, we believe it is worth explicitly mentioning the issue of accessibility for persons with disabilities in this section of the document.

RO

(Drafting suggestions):

promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, **with specific focus on child poverty and access of children to education, healthcare, nutrition, housing and care services** and supporting investment in social infrastructure;

	<p>RO</p> <p>(Comments):</p> <p>According to Annex IV, in line with the European Child Guarantee,</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(iii) promoting equal opportunities for all, supporting strong social protection, and safety nets, fostering social inclusion; and fighting poverty and homelessness, and supporting investment in social infrastructure;</p> <p>SE</p> <p>(Comments):</p> <p>The objective should be kept at a less detailed level. The focus within the various specific goals – formulated more generically – should be based on the challenges identified in each region and MS: There must be room for MS to design measures that fit the national context. If needed, examples can be given in the recitals.</p> <p>SI</p> <p>(Drafting suggestions):</p>
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	<p>(iii) promoting equal opportunities for all, <u>including the access to sports activities</u>, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure;</p>
<p>(iv) facilitating access to services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services;</p>	<p>MT</p> <p>(Drafting suggestions):</p> <p>(iv) facilitating access to <u>rights and</u> services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services;</p> <p>Justification: The term rights was included to highlight that access to services is not merely about availability, but about ensuring that individuals can exercise their legal and social entitlements. By explicitly referencing rights, the article reinforces a rights-based approach to social policy, aligning with the Union’s commitment to human dignity, equality, and social justice. This ensures that initiatives aimed at modernizing, digitalizing, and strengthening healthcare, child, and long-term care services are designed to protect and operationalize these entitlements, rather than being treated as optional services.</p>

	<p>NL</p> <p>(Drafting suggestions):</p> <p>facilitating access to <u>social</u> services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems,-child and long-term care services;</p> <p>NL</p> <p>(Comments):</p> <p>Social investments should be focussed on investments in people and not on infrastructure.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(iv) facilitating access to services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services, <u>including related infrastructure</u>;</p> <p>SE</p> <p>(Drafting suggestions):</p>
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	<p>(iv) facilitating access to and quality of services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services services;</p> <p>SE</p> <p>(Comments):</p> <p>Same comment as above on (iii).</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(iv) facilitating access to services and associated infrastructure, also by engagement of social economy organizations, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services;</p>
<p>(v) addressing the challenges of demographic change across the EU, which include labour shortages and disparities between generations and regions;</p>	<p>AT</p> <p>(Drafting suggestions):</p>

	<p>(v) addressing the challenges of demographic change across the EU, which include labour shortages, <u>increased demand for healthcare</u> and disparities between generations and regions;</p> <p>AT</p> <p>(Comments):</p> <p>Explicit reference to addressing the health systems challenges and pressing need for health system reforms that result from demographic change is proposed.”</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(v): addressing the challenges of demographic change across the EU, which include labour shortages and <u>social-economic</u> disparities between generations and regions;</p> <p>PT</p> <p>(Comments):</p> <p>PT: As mentioned by PT at the Ad hoc working subgroup on NRPP, held on 20 November, it is considered that it would be useful to obtain further information on what measures could fall under this objective - examples of</p>
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	investments and reforms eligible under this specific objective are welcomed.
(vi) addressing the social impacts of the inclusion of greenhouse gas emissions from buildings and road transport within the scope of Directive 2003/87/EC.	<p>ES</p> <p>(Drafting suggestions):</p> <p>This point should be placed in a different strategic objective, not under the ESF strategic objective, as it is clearly related to the Social Climate Fund.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(vi) — addressing the social impacts of the inclusion of greenhouse gas emissions from buildings and road transport within the scope of Directive 2003/87/EC</p> <p>FR</p> <p>(Comments):</p> <p>Afin de rationaliser les objectifs spécifiques, il est proposé de supprimer le point (vi), lequel renvoie à des problématiques sociales déjà couvertes de manière transversale par les points précédents. Les causes de ces difficultés ne sauraient être isolées dans un objectif spécifique, dans la</p>

	<p>mesure où elles résultent le plus souvent de facteurs multiples et interdépendants.</p> <p>PT</p> <p>(Comments):</p> <p>PT considers that the inclusion of the SCF should be optional.</p>
	<p>MT</p> <p>(Drafting suggestions):</p> <p><u>(vii) addressing environmental vulnerabilities and inequalities, including inclusive access to clean air and water, and living conditions conducive to health and wellbeing;</u></p> <p>Justification: This is being proposed to potentially support projects seeking to address environmental inequalities (https://www.eea.europa.eu/en/topics/in-depth/environmental-inequalities), with a view to integrate environmental considerations under the social pillar of the NRPP.</p> <p>PL</p> <p>(Drafting suggestions):</p>

	<p><u>(vii) supporting the development and implementation of social innovations as tools for addressing emerging social challenges and fostering inclusive social development.</u></p> <p>PL</p> <p>(Comments):</p> <p>Social innovation processes are, by nature, dynamic and cannot be predetermined for a nine-year programming period. Innovative solutions emerge ad hoc, in direct response to evolving social needs and challenges identified by communities, practitioners, and innovators. Because these ideas arise unpredictably and often require rapid testing and adaptation, they cannot be effectively planned within rigid, long-term thematic frameworks (should not be pre-allocated to specific objectives).</p> <p>Introducing a separate objective dedicated specifically to social innovation ensures the flexibility necessary to support the creation, testing, and scaling of a defined number of innovative solutions, while allowing the detailed scope of activities to be determined at the implementation stage.</p>
<p>(d) to sustain the quality of life in the Union by:</p>	<p>BG</p> <p>(Drafting suggestions):</p>

	<p>(dc) to sustain the quality of life in the Union by:</p> <p>BG</p> <p>(Comments):</p> <p>It is proposed to reorder the specific objectives in line with the order of the common objectives: Cohesion Policy, Social cohesion, CAP/CFP, Home affairs/Defence, and Rights/Democracy/Rule of Law.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>“To sustain the quality of life in the Union, <u>including competitive, sustainable, attractive and resilient agriculture, forestry and fishery sectors,</u> by “</p> <p>FR</p> <p>(Comments):</p> <p>La délégation française propose l’amendement ci-contre, car la notion de “quality of life” ne rend pas suffisamment compte des aspects de compétitivité et de production agricole, ainsi que des enjeux de résilience et d’attractivité qui sont clés.</p> <p>HR</p>
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(Comments):

HR questions: Why does the specific objective „sustain the quality of life in the Union“ lists only activities related to agriculture, fisheries, activities in rural areas, long-term food security. For example, do activities under point (a) (vii) supporting social and affordable housing also contribute to this specific objective?

If not, we propose to rename it.

HR comments: The introductory part “sustaining quality of life” is not reflecting the following provisions related to the CAP and CFP. It also seems that some previous provisions are more relevant to “sustaining quality of life”, such as “supporting affordable housing” or “supporting strong social safety nets”. It seems more appropriate to refer to “ensuring the food security”, which is a common denominator for CAP and CFP.

HU

(Drafting suggestions):

d) to sustain the quality of life in the Union by

to support the implementation of the CAP of the Union in accordance with Parth Three, Title III of the TFEU and support the

implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU;

HU

(Comments):

Taking into account that the Single Fund would also finance the sectoral interventions of CAP, which are part of the Common Market Organisation, specific objectives should also refer to the market orientation of CAP.

RO

(Comments):

RO proposes to change the name of the specific objectives taking into account that it is very broad and the majority of interventions under the specific objectives (a) and (c) contribute to the quality of life of the EU citizens.

SK

(Drafting suggestions):

(d) ~~to sustain the quality of life in the Union~~ **to support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU and to support the implementation of**

	<p><u>the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU</u> by:</p> <p>SK</p> <p>(Comments):</p> <p>In support of HU comment</p>
<p>(i) supporting fairer and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>supporting fairer and sufficient income for farmers and their long-term competitiveness and resilience, including the farmers' position in the value chain, <u>ensuring high-quality food and guaranteeing fair prices for sustainable production</u>;</p> <p>BE</p> <p>(Comments):</p> <p>The addition is in line with the Belgian position on the negobox.</p> <p>DE</p> <p>(Drafting suggestions):</p>

(i) **in execution of Art. 39 TFEU to increase agricultural productivity and to ensure supporting** fairer and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain;

HR

(Comments):

HR comments: This objective is relevant also to CFP and term “farmer” should be replaced with the term “primary producer”, which would cover farmers, fishers and aquaculture producers.

HU

(Drafting suggestions):

(i) supporting fairer and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain **with special attention to small and medium enterprises;**

IE

(Drafting suggestions):

(i) supporting fairer and sufficient income for farmers, **fishers, and aquaculture producers**, and their long-term competitiveness, including ~~the farmers'~~ **their** position in the value chain;

	<p>IE</p> <p>(Comments):</p> <p>This is equally applicable to fishers and aquaculture producers who have these same needs. These provisions should be expanded to include fisheries and aquaculture.</p>
<p>(ii) contributing to long-term food security;</p>	<p>SE</p> <p>(Drafting suggestions):</p> <p>(ii) contributing to long-term food security; <u>as well as to support resilience of the agriculture sector across the Union</u></p> <p>SE</p> <p>(Comments):</p> <p>In view of current global challenges, more focus should be given to fostering a resilient primary production in all areas and to ensure the economic sustainability of the production. SE believes that this should be reflected in the objectives.</p>
	<p>SE</p> <p>(Drafting suggestions):</p>

	<p>NEW!</p> <p><u>Enhancing market orientation and increasing farm competitiveness both in the short and long term; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;</u></p> <p>SE</p> <p>(Comments):</p> <p>SE believes that maintained market orientation of the CAP is central to ensure long-term competitiveness and facilitate open trade and that this should be reflected in the objectives for CAP. The last part of the sentence is moved from (iii) in order to make the structure more logical.</p>
<p>(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers’ preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;</p>	<p>AT</p> <p>(Comments):</p> <p>In connection with the implementation and achievement of the specific objective to improve attractiveness and living standards in rural areas rural development plays an essential role. This should be reflected in the proposed regulations.</p> <p>BE</p> <p>(Drafting suggestions):</p>

improving the attractiveness, **development** and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating **supporting** the **transition, including** digital and green transition, **towards a resilient, sustainable, innovative and market-oriented** for a thriving **agricultural and** agri-food sector;

BE

(Comments):

This in line with the negobox.

CZ

(Drafting suggestions):

(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal;

(iv) improving farmers' preparedness and ability to cope with crises and risks;

(v) enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;

	<p>CZ</p> <p>(Comments):</p> <p>CZ is of the opinion that all objectives outlined in the Article 3 must be clearly defined without overlapping as the link to objectives will be reflected in the description of measures.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector <u>and vibrant rural areas</u>;</p> <p>DE</p> <p>(Comments):</p> <p>DE recommends a linguistic revision of this paragraph.</p> <p>DK</p> <p>(Drafting suggestions):</p>
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	<p>(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;</p> <p>DK</p> <p>(Comments):</p> <p>“Including access to healthcare” is not related to agricultural policy</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food <u>and value-added processing</u> sector;</p> <p>EE</p> <p>(Comments):</p>
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The specific objectives do not explicitly encompass the food processing industry, focusing disproportionately on primary production. The specific mention of “value-added processing” is essential to ensure that the industrial stage of the value chain, where primary production is valorised is eligible for support. A thriving agri-food sector relies not just on farming, but on the industrial capacity to process, preserve, and add value to agricultural products.

HR

(Comments):

HR comments: The objectives listed in this provision are relevant also to CFP, therefore a general reference should be made to agriculture, fisheries and aquaculture

HU

(Comments):

The connection between specific objective (a) i) should be strengthened with (d) iii) otherwise no progress will be made compared to the previous practice.

IE

(Drafting suggestions):

(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers', **fishers', and aquaculture producers'** preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;

IE

(Comments):

This is equally applicable to fishers and aquaculture producers who have these same needs. These provisions should be expanded to include fisheries and aquaculture.

MT

(Comments):

Agreement is expressed with the proposed text, while underlining that crisis response and risk management tools should remain sufficiently flexible to accommodate the specific needs and administrative arrangements of different Member States.

It is also recommended that, in light of the increasing aridity and prolonged drought conditions experienced in certain regions, the limited availability of water for agriculture should be addressed through the collection of stormwater runoff, alongside the use of other non-conventional water resources.

PL

(Drafting suggestions):

improving the attractiveness and living standards, including access to healthcare and other social services, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;

PL

(Comments):

We propose to keep the wording more general by adding word “and other social services”

SE

(Drafting suggestions):

(iii) improving the attractiveness and living standards, ~~including access to healthcare, in rural areas and fair working conditions~~ and fostering generational renewal; **attracting young and new farmers and promoting gender equality, including the participation of women in farming,** improving farmers' preparedness and ability to cope with crises and risks; ~~enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;~~

SE

(Comments):

SE believes that the objective "including access to healthcare and fair working conditions and fair working conditions" are already covered by c) and should be deleted from this para to avoid duplications.

SE proposes that "attracting young and new farmers" are added. The objective for CAP only mentions generational renewal and SE is of the opinion that there is a need for a broader approach and continued emphasis on attracting young and new farmers. SE is also of the opinion that there is a need to emphasise gender equality in farming and rural areas. Hence, the

	<p>CAP should be designed in a way that makes it possible to strengthen female agribusiness in order to contribute to this</p> <p>SE lastly proposes that the last part “enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector” are moved to the new proposed para above.</p>
<p>(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>vi)</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;</p> <p>DE</p>

	<p>(Comments):</p> <p>According to Article 1 para. 1 lit. (b) CPF, specific rules and conditions apply to “financial measures in support of the implementation of the CFP”.</p> <p>Support to the blue economy, etc. is not governed by the same rules and regulations and thus, should be treated separately throughout the MFR/NRPP-framework.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector; <u>boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;</u></p> <p>EE</p> <p>(Comments):</p> <p>The CFP is a Treaty based policy, that covers also financing (1380/2013 art 1 para 1 b) and should therefore be programmed separately from</p>
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maritime policy. This would be in line with the structure of NRP plans, where the chapters can be focused on specific policy (Art 4 para 4 of the proposal).

HR

(Comments):

HR comments: The scope of the CFP is established in the Article 1 of the Regulation 1380/2013. In the context of financial measures CFP covers also processing and marketing of fisheries and aquaculture products. However, it seems that the current wording of Article 3 paragraph 1 (d) (iv) excludes the processing sector. At the same time in previous point (iii) agri-food sector that includes processing of agriculture products is included

HR questions: With regard of enhancing the socio-economic opportunities and the resilience of the local communities, what is the difference with specific objective in paragraph 1 (a) (i)?

MT

(Drafting suggestions):

(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, **including maritime and port infrastructure**, boosting the sustainable and competitive blue economy

in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;

Justification: The text being introduced mentions maritime and port infrastructure in order to ensure that the text in question can facilitate more than just port infrastructure.

RO

(Drafting suggestions):

(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, **including processing and marketing of fisheries and aquaculture products**, boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;

RO

(Comments):

Although it is commonly accepted that the fisheries and aquaculture sector also includes the processing and marketing of fishery products, we nevertheless consider it useful that this understanding be clearly expressed in this regulation.

RO underline the scope of the CFP is established in the Article 1 of the Regulation 1380/2013. In the context of financial measures CFP covers also processing and marketing of fisheries and aquaculture products. However, it seems that the current wording of Article 3 paragraph 1 (d) (iv) excludes the processing sector. At the same time in previous point (iii) agri-food sector that includes processing of agriculture products is included

With regard of enhancing the socio-economic opportunities and the resilience of the local communities, what is the difference with specific objective in paragraph 1 (a) (i)?

SE

(Comments):

SE notes that the objectives for the fisheries and aquaculture sector is worded differently than for (i, ii and iii). SE believes that what is expressed for agriculture in the indents above also applies to the fisheries and aquaculture sector and therefore proposes either (iv) to be revised or for fisheries and aquaculture to be implemented in the indents above.

DE

(Drafting suggestions):

NEW (v **bis**): boosting the sustainable, **environmentally sound** and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;

DE

(Comments):

To safeguard a further deterioration of the European oceans a safeguard for the environmental compatibility of the blue economy should be added.

EE

(Drafting suggestions):

New: boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;

(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.

AT

(Drafting suggestions):

(v) supporting enhancing sustainable agriculture **such as organic farming** and **sustainable** forestry management practices to promote, ~~resilient climate action,~~

the conservation and restoration of biodiversity; enhancing soil health and resilience, prevention and reduction of air pollution, maintenance and improvement of water quality, ~~provision of multiple ecosystem services, supporting~~ **support** efficient water management **and resilience;**

the contribution to climate change mitigation and adaptation;

animal health and welfare; ~~quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.~~

AT

(Comments):

Due to the inconsistency across the relevant Regulations, a precise definition of the specific climate and environmental goals is suggested.

Very general wording like “environmental protection” is unclear and covered by other listed objectives. Terminology as used in other legislation such as “soil health” and “soil resilience” in the Soil Monitoring should be used.

CZ

(Drafting suggestions):

vii

DE

(Comments):

For reasons of systematic coherence, sublists (iv) and (v) should be swapped.

FR

(Drafting suggestions):

(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources,

and improving **animal and plant health in a One health approach, as well as** animal welfare.

FR

(Comments):

Il est important, au-delà du bien-être animal, d'évoquer les enjeux liés à la santé des animaux et des végétaux, conformément à l'approche « une seule santé/One health ».

HR

(Drafting suggestions):

HR drafting suggestions:

(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water and waste management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.

HR

	<p>(Comments):</p> <p>HR comments: We believe sustainable waste management is a key prerequisite for reducing the total amount of waste, preserving and protecting the environment and its ecosystems, reducing emissions, and improving soil and water quality and for increasing the quality and amount of recycled materials, which will have a positive impact on reduction of natural resource utilization, especially in terms of critical raw materials.</p> <p>Integrating waste management is an essential part of a comprehensive and harmonized approach to sustainability for future generations. This is particularly important in the context of green policies and European regulations, which include achieving ambitious and cost-intensive environmental targets and assessing the sustainability of companies, especially regarding the protection of natural resources, strengthening resilience to climate change, and reducing ecological footprints.</p> <p>Environmental goals will be difficult to achieve without the support of financial instruments.</p> <p>HR proposes amend to point 1, paragraph d, subparagraph v by adding “<i>and waste</i>”.</p> <p>HU</p> <p>(Drafting suggestions):</p>
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	<p>(v) (...) environmental protection, enhancing the conservation and restoration of biodiversity, noise reduction, air quality soil and natural resources, and improving animal welfare.</p> <p>HU</p> <p>(Comments):</p> <p>Air quality and noise reduction are key elements of the environmental protection.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal health and welfare.</p> <p>LV</p> <p>(Comments):</p>
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	<p>Animal health is an essential prerequisite for good agricultural management practice and sustainable agriculture.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>enhancing contributing to sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening contributing to sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.</u></p> <p>PL</p> <p>(Comments):</p> <p>We suggest the wording to be amended for ensuring more clarity and flexibility for Member States to decide how to implement the CAP, taking into account their national or regional needs and challenges.</p> <p>RO</p>
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(Drafting suggestions):

(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water **and waste** management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare

RO

(Comments):

We believe sustainable waste management is a key prerequisite for reducing the total amount of waste, preserving and protecting the environment and its ecosystems, reducing emissions, and improving soil and water quality and for increasing the quality and amount of recycled materials, which will have a positive impact on reduction of natural resource utilization, especially in terms of critical raw materials.

Integrating waste management is an essential part of a comprehensive and harmonized approach to sustainability for future generations. This is particularly important in the context of green policies and European regulations, which include achieving ambitious and cost-intensive

environmental targets and assessing the sustainability of companies, especially regarding the protection of natural resources, strengthening resilience to climate change, and reducing ecological footprints. Environmental goals will be difficult to achieve without the support of financial instruments.

RO proposes amend to point 1, paragraph d, subparagraph v by adding “**and waste**”.

SK

(Drafting suggestions):

(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water **and waste** management, quality and resilience, the implementation of nature-based solutions, **strengthening economic and social development in rural areas,** ~~sustainable development~~, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, **thus contributing to overall sustainable development,** and improving animal welfare.

SK

(Comments):

	<p>We believe sustainable waste management is a key prerequisite for reducing the total amount of waste, preserving and protecting the environment and its ecosystems, reducing emissions, and improving soil and water quality and for increasing the quality and amount of recycled materials, which will have a positive impact on reduction of natural resource utilization, especially in terms of critical raw materials.</p> <p>Sustainable agriculture and forestry contribute to all three pillars of sustainability / sustainable development – environmental, economic and social, specifically in rural areas.</p>
<p>(e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values by:</p>	<p>HU</p> <p>(Drafting suggestions):</p> <p>e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values by <u>to protect and strengthen democracy in the Union and uphold Union values in accordance with Article 2 TEU</u></p> <p>HU</p> <p>(Comments):</p> <p>See relevant question at Article 2(1)e)</p>

Given that pursuant to the current proposal addressing all general and specific objectives could be set as a precondition for the approval of the NRP Plan based on a subjective and arbitrary assessment of the Commission, we consider this paragraph as part of the overall system of conditionalities related to Union values and thus cannot be handled separately. Therefore, we request this paragraph to be bracketed and handled in a horizontal manner in the Negotiating Box and discussed in the MFF AHWP. It should depend on the decision of the European Council whether to maintain this specific objective in the Regulation.

NL

(Comments):

PL

(Drafting suggestions):

to protect and strengthen fundamental rights, good governance, democracy, equality, the rule of law and to uphold Union values by

PL

(Comments):

	<p>The specific objective e) is defined too narrow with respect to specific objectives (i-iv) falling under its scope.</p> <p>Under current proposal specific objective e) is implemented by specific objectives (i-iv). However support under the specific objective (iii) <i>enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level</i>, goes beyond the scope of specific objective e) <i>to protect and strengthen fundamental rights, democracy, the rule of law and to uphold Union values</i>. Therefore we suggest adding to the specific objective e) good governance, corresponding to the support envisaged under specific objective (iii).</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(</p>
<p>(i) sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by building civil society and social partners' capacities to uphold Union values, citizenship education and youth participation;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by building civil society and social</p>

partners' capacities **where relevant** to uphold Union values, citizenship education and youth participation;

BE

(Comments):

Wording 21-27 Rglt UE 2021/1060 art. 8.2

CZ

(Drafting suggestions):

(i) sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by building civil society and social partners' capacities to uphold Union values, citizenship education and **democratic and** youth participation;

CZ

(Comments):

CZ requests that in Article 3(1)(e) the phrase democratic participation, be added. Limiting the text to youth participation is seen as insufficient, since broader participation is essential for an open, democratic and inclusive society and for strengthening European democracy. Adding this objective will ensure coherence with the European Democracy Shield, the EU Strategy for Civil Society, and Commission Recommendation

(EU) 2023/2836, which recalls Article 10(3) TEU granting every citizen the right to participate in the democratic life of the Union. It will also guarantee that financial support under the new scheme is not restricted to youth participation but promotes democratic engagement more broadly across the Union.

DE

(Drafting suggestions):

(i) sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by building civil society and social partners' capacities to uphold Union values, **strengthening voluntary activities**, citizenship education and youth participation;

DE

(Comments):

“Voluntary activities” are an indispensable element in relation to objectives under e) and should be mentioned.

PT

(Comments):

PT: Examples of investments and reforms eligible under this specific objective are welcomed.

	<p>SE</p> <p>(Drafting suggestions):</p> <p>(i) sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by <u>supporting the civic space and by</u> building civil society and social partners’ capacities to uphold Union values, citizenship education and youth participation;</p> <p>SE</p> <p>(Comments):</p> <p>SE would like to see the inclusion of the term civic space and that this should be supported as it is a relevant term encompassing wider aspects than civil society.</p> <p>SE would like to ask if there is a joint definition of the term “citizenship education”?</p>
<p>(ii) promoting and upholding the rule of law through strengthening justice systems, anti-corruption frameworks, media pluralism, information integrity, media literacy, and effective checks and balances;</p>	<p>LT</p> <p>(Drafting suggestions):</p> <p>(ii) promoting and upholding the rule of law through strengthening justice systems, anti-corruption frameworks, media pluralism,</p>

information integrity, media literacy, **including resilience to disinformation**, and effective checks and balances;

LT

(Comments):

In current geopolitical instability, rise of far-right movements and Euroscepticism, resilience to disinformation is one of the core skills that people should have.

MT

(Drafting suggestions):

(ii) promoting and upholding the rule of law through strengthening justice systems **whilst respecting the diverse national legal systems and traditions**, anti-corruption frameworks, media pluralism, information integrity, media literacy, and effective checks and balances;

Justification: This insertion is being suggested in order to further ensure that the generic concept of the rule of law is qualified by anything that is set out in national legal systems and traditions.

The notion of the rule of law is too wide and all-encompassing and unless this justification is inserted, anything could possibly fall within this notion.

	<p>PT</p> <p>(Comments):</p> <p>PT: Examples of investments and reforms eligible under this specific objective are welcomed.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(ii) promoting and upholding the rule of law through strengthening justice systems, anti-corruption frameworks, media pluralism, information integrity, media literacy, and effective checks and balances;</p> <p>RO</p> <p>(Comments):</p> <p>Acknowledging the vital role of media pluralism and media literacy in upholding the rule of law, supporting democratic governance, and safeguarding human rights in society, Romania still does not consider relevant and judicious to finance it in a distinct specific objective, and not allocating resources for EU emerging priorities. Thus, we advocate for removing the sub-objective e (ii), especially as these areas are currently</p>
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	<p>funded by other sources at EU level (ex. Media Pluralism Fund, Journalism Partnerships - Pluralism (2025) etc.)</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(ii) promoting and upholding the rule of law, <u>including</u> through strengthening justice systems, anti-corruption frameworks, media pluralism, information integrity, media literacy, and effective checks and balances;</p> <p>SE</p> <p>(Comments):</p> <p>SE believes that the list of examples should be flagged as non-exhaustive.</p>
<p>(iii) enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level;</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(iii) enhancing the efficiency of public administration and the institutional <u>and absorption</u> capacity of public authorities and stakeholders at national, regional and local level;</p> <p>CZ</p>

(Comments):

CZ considers the current wording of Article 3(1)(e)(iii) to be insufficient, as it focuses exclusively on administrative capacities. In order to ensure the effective use of the Fund in line with its objectives, it is essential to strengthen not only administrative but also absorption capacities on the part of beneficiaries, particularly in less developed regions.

IT

(Drafting suggestions):

(iii) — enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level;

IT

(Comments):

The current wording of the specific objective relating to institutional capacity — “(e)(iii) enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level” — appears to be positioned as a sub-objective under the specific objective “(e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values”.

In practice, however, strengthening administrative capacity is not merely a corollary of safeguarding Union values, but rather a horizontal and cross-cutting condition for the effective implementation of all public policies, including those aimed at economic, social and territorial cohesion, the green and digital transitions, competitiveness, security and crisis preparedness.

Linking institutional capacity exclusively to the “EU values” pillar risks unduly narrowing the scope of the intervention, confining it to functions related to democracy and the rule of law, and failing to reflect the well-established practice of cohesion policy, where capacity building is conceived as a horizontal enabler of overall administrative effectiveness.

For these reasons, it would be more consistent to establish institutional capacity as a standalone specific objective, linked to all the implementation challenges of the Plan.

PT

(Comments):

PT: Is digital transformation in the public administration eligible under this specific objective or in a.iv) (supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, ...)?

<p>(iv) promoting culture as a catalyst for European values and supporting a vibrant and diverse cultural sector.</p>	<p>ES</p> <p>(Drafting suggestions):</p> <p><u>v) to support the area of freedom, security and justice without internal borders by:</u></p> <p><u>(a) ensuring an efficient management of migration flows in line with the objectives set out in Regulation (EU) [asylum, migration and integration];</u></p> <p><u>(b) safeguarding a high level of internal security in the Union in line with the objectives set out in Regulation (EU) [internal security];</u></p> <p><u>ensuring strong and effective European integrated border management at the external borders, a well-functioning Schengen area and an efficient visa policy in line with the objectives set out in Regulation (EU) [border management].</u></p> <p>ES</p> <p>(Comments):</p> <p>Following the reasoning under Articles 1 and 2, the specific objectives to pursue in the Home Affairs area within the NRPP should be mentioned in this regulation.</p> <p>IT</p>

(Comments):

We appreciate taking into account culture in the frame of the specific objective devoted to fundamental rights, democracy and citizenship. At the same time there is the need of a more clear and explicit integration and connection of culture to the objectives of sustainable growth and prosperity of the Union as well as of attractiveness of regions. In facts, such a lack may weaken the potential of culture's role, so relevant for cohesion, development, reducing territorial disparities and social gaps, as largely experienced in the last programming cycles through SIE Funds. Moreover, looking at the "intervention fields" (and related output and result indicators) for "Culture, media and tourism" intervening on cultural heritage is considered only for tourism development purposes, and it is also not clear if cultural heritage assets and related infrastructures might be considered by those investments.

We therefore recall for a greater and more coherent consideration of culture throughout the specific objectives of the Fund, according to the "Joint Declaration. Europe for Culture, Culture for Europe" and following the "Culture Compass" (see drafting suggestions above, and also comments and drafting suggestions to Performance Reg. 545, Annex 1).

LT

(Drafting suggestions):

promoting ~~culture~~ **cultural and creative sectors (CCS)** as a catalyst for European values and supporting a vibrant and diverse cultural sector.

LT

(Comments):

In the challenging geopolitical situation, among conflicts, climate and demographic crises, EU need a new course of action. Culture, cultural heritage and creative sectors are certainly those value and society driven areas that have the capacity and potential to provide impetus and lead change.

PL

(Drafting suggestions):

(iv) promoting culture as a catalyst for European values and supporting a vibrant and diverse cultural and creative sector.

PL

(Comments):

In our opinion culture should be supported in general, not only as a catalyst for European values, but especially under specific objective 3 (a).

	<p>Please explain if cultural infrastructure (both landmarked/historical and modern), as well as cultural tourism, cultural heritage and security of cultural heritage can be supported under this objective).</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(iv) promoting culture <u>and creativity</u> as a catalyst for European values and supporting a vibrant and diverse cultural <u>and creativity</u> sectors.</p>
	<p>EL</p> <p>(Drafting suggestions):</p> <p><u>New (f) to support the efficient management of migration, external borders and internal security by:</u></p> <p>(iv) <u>supporting for asylum, migration, integration and return interventions.</u></p> <p>(v) <u>strengthening the Union’s external border management and visa policy.</u></p> <p><u>strengthening the Union’s internal security.</u></p> <p>EL</p>

(Comments):

The domains of internal security, migration, asylum, return, border management, and visa policy should be set out in a distinct subparagraph, clearly separated from provisions relating to defense policy. We suggest therefore to create new specific objective which fully cover all Home Affairs areas. Unlike the detailed and clearly articulated objectives provided for other domains—such as sustainable prosperity under Article 3(1)(a) or social cohesion under Article 3(1)(c)—the specific objectives of the Home Affairs are not reflected with the same level of precision. Article 3(1)(b) only mentions “*support to the Union’s defense capabilities and security across all regions,*” followed by a reference to the objectives of the three Home Affairs Regulations. For reasons of transparency, coherence, and equal treatment across policy areas, it would be beneficial for the Regulation to set out the specific objectives of the Home Affairs in a similarly thorough manner in a dedicated subparagraph and not falling under 3(1)(b)(iii). A clearer and more detailed reference to their distinct mandate would ensure alignment with the structure applied in other domains, while safeguarding the visibility and operational focus of the Home Affairs instruments within the overall architecture of the Fund.

FI

(Drafting suggestions):

(v) Supporting measures contributing to the protection and strengthening of fundamental rights, democracy, the rule of law and upholding Union values.

FI

(Comments):

New sub-para (v) suggestion

HU

(Drafting suggestions):

(1bis) In addition, the Fund shall support the following policy objectives:

a) to support the Union's defence and security capabilities by

(i) reinforcing the Union's defence industrial base and military mobility, in particular by developing dual-use TEN-T infrastructure;

(ii) strengthening the Union's preparedness to crises and disasters by mainstreaming the principle of 'preparedness by design';

(iii) strengthening the Union's security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;

b) to bolster security and migration management and the EU's external borders in the areas of

i) asylum, migration and integration;

ii) internal security;

iii) border management and visa policy;

in a manner fully consistent with the objectives set out:

• in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;

• in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

• in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.

HU

	<p>(Comments):</p> <p>In order to harmonise Article 2 and 3, and to make the listed policy areas clearer, we propose separating defence and Home Affairs. Moreover, even if the Single Fund regulation and the different fund-specific regulations will include specific objectives as proposed by the Commission, Article 3 should name the Home Affairs areas.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>f) <u>enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level.</u></p> <p>IT</p> <p>(Comments):</p> <p>See the previous comment.</p> <p>NL</p> <p>(Drafting suggestions):</p>
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Supporting measures contributing to the protection and strengthening of fundamental rights, democracy, the rule of law and upholding Union values.

NL

(Comments):

This list is not exhaustive and must remain open.

RO

(Drafting suggestions):

Each measure proposed in the Plan will answer to one primary specific objective, while a secondary objective is to be identified and selected, in order to better reflect the way the Plan contributes to their achievement in line with the requirements of Art. 22.

The investments that can be proposed can include all types of activities that are considered relevant to their achievement: strategic technologies or digitalisation under any relevant specific objectives, human resources activities in case of infrastructure, infrastructure elements in case of any type of social services,

RO

(Comments):

	<p>Proposal for an explanatory text to be introduced at the end of art. 3.</p> <p>Taking into account that the specific objectives are not meant to establish eligibility and as there is no strict delineation between them, RO considers that additional explanations are needed to ensure a consistent interpretation among interested parties and implementors in terms of coverage of investments. For example, the Member States should understand that strategic technologies can be proposed under any of the specific objectives where applicable or healthcare system can also include infrastructure. In addition, the clarification of the primary and secondary objective is also needed.</p>
<p><i>Article 4</i> Definitions</p>	<p>AT</p> <p>(Comments):</p> <p>General remarks:</p> <ul style="list-style-type: none"> • Consistent use and application of CAP definitions across all regulations (NRP Regulation, CAP Regulation, Performance Regulation) should be ensured in order to avoid contradictory or parallel definitions in different legal acts. Some relevant terms are not defined, which carries the risk of differing interpretations. • Terms for the 2021-2027 period are now used differently (e.g., “operation” – see also below for details). Important terms are missing,

e.g., “eligibility conditions” “national contribution” or “public expenditure” (for the moment a definition for “public expenditure” is only provided in the context of CAP) as well as ‘active farmer’ and ‘small legal person’. Important terms like ‘intervention’, ‘activity’ and ‘intervention field’ are only defined in the Performance Framework Regulation, but are also crucial for the NRP Regulation and need to be distinguished from other definitions (e.g. “measure”).

- Furthermore, terminology relating to simplified cost options is missing:
 - o In contrast to the previous Regulation 2021/2115, the term ‘simplified cost options’ (SCO) is no longer used and there is no clear definition of what is specifically meant by the terms ‘financing not linked to costs’, ‘unit costs’, ‘lump sums’ and ‘flat rate’.
 - o Requirements for the calculation of SCO and so-called ‘off-the-shelf’ options – such as a flat rate for overheads – are now also missing from the text of the regulation, with the exception of Article 77 (LEADER), which continues to explicitly refer to SCO.
 - o We therefore propose to include a clear definition of the terms ‘financing not linked to costs’, ‘unit costs’, ‘lump sums’, ‘flat rate’, ‘off-the-shelf’ and ‘simplified cost options’ in Article 4. If not, supplementary clarifications in the form of secondary legislation will be required.

o We also note that Article 78(1) of the NRP Regulation stipulates that projects with a total cost of less than EUR 400,000 must, as a rule, use simplified cost options or financing independent of individual costs, while this threshold has been lowered to EUR 100,000 for CAP interventions.

- Against the backdrop of results orientation, the term ‘estimated costs’ should also be defined

- Regarding the payment applications according to Art. 65 (2) and Annex XI, the NRP Regulation distinguishes between interventions with targets and milestones and output-based interventions. In Annex IX point 2, the NRP Regulation distinguishes between „Investments“, „Reform or Investments“ and „Other interventions (payments based on outputs)”. These terms need to be clearly defined in Art. 4.

BE

(Comments):

All sector-specific definitions relating to the CAP must be addressed within the CAP-regulation, including the identification of any missing essential definitions for the CAP. In the letter of COM, it is proposed to transfer certain CAP-specific articles (14, 15, 17, 22 and 23) to the CAP-regulation. The definitions of ‘farmer’ (art. 4(3)(c)), ‘operation in the context of the

CAP' (Art. 4(9)(c)), 'holding' (Art. 4(16)), 'public expenditure' (Art. 4(24)) and 'support rate for the purpose of the CAP (Art. 4(25)) are not mentioned, although they are also CAP-specific. Furthermore active farmer should be defined in the CAP Regulation.

All sector-specific definitions relating to the CFP (definitions nr. 26 to 34 of art. 4) must be addressed within the CFP-regulation.

We are missing the following definitions:

- intermediate body
- reform
- output-based interventions
- Union actions
- Transaction
- financial instrument

CZ

(Comments):

Annex 5 (Title II, Chapter 5) includes a column entitled "amount for managing authorities". However, the definition of this term is not included in the Regulation or in the Annex. CZ would therefore

appreciate clarification of this term/value and, if necessary, its inclusion in the definitions.

FR

(Comments):

S'agissant des définitions relatives au secteur de la pêche et de l'aquaculture, la délégation demandera leur transfert dans le règlement sectoriel PCP, il s'agit des définitions (26) (27) (29) (30) (31) (32) (33).

Quel est l'objectif poursuivi en choisissant d'intégrer les définitions spécifiques dans le règlement PPNR et non dans le règlement PCP ?

HR

(Comments):

HR comments: Article 4 lacks a paragraph or point (1).

Also, we see this article as an opportunity to clearly explain and define the distinction and interrelation between general objectives and specific objectives through their respective definitions

HR comments: The terminology specific to CFP should be transferred to specific proposal and consequently discussed in the Council WP on Fisheries Policy. Also, to ensure consistency, the definitions in existing legislation such as 1380/2013, 1379/2013 should be used, for example by

referencing to them. Without prejudice to the above comments on transferring the CFP specific definitions to sectoral regulation and referencing to existing legislation, there are two areas that require their own definitions as they are not included currently. These are definitions for ‘aquaculture’ as defined in the CFP regulation (EU) 1380/2013 and ‘producer organisations’ which are defined under the CMO Regulation (EU) 1379/2013. In defining producer organisations, there has to be a clear distinction between producer organisations that operate in agriculture sector and those that operate in the fisheries and aquaculture sector as both types of producer organisations are bound by two different CMO regulations. When the discussion of proposals proceeds, there might be a need for further definitions.

Furthermore, the terminology should be used consistently in all MFF proposals, that is not the case currently. For example, the NRP proposal defines “support rate” as CAP specific, CAP proposal uses terms “support rate” and “aid intensity” and CFP proposal uses term “aid intensity” that has not been defined. There is also inconsistency in the use of terms “measure” and “activity”, which has been used in NRP proposal mainly with regard of agriculture.

HU

(Comments):

It is extremely important to clarify the definitions and ensure consistent use of the terms applied in the regulations. For example, "measure" can mean reform, investment, or other intervention at the Member State-level or below. We also consider it necessary to address cases where the Single Fund Regulation and, for example, the Financial Regulation provide different definitions for a term.

The definition of the accounting year is missing.

The definitions of financial product and financial instrument are missing.

IE

(Comments):

We proposed moving relevant definitions to the CAP regulation Ireland considers that the technical detail in this article that is only relevant to the implementation of the CAP interventions should be moved to the CAP regulation or bracketed for discussion at the working party on horizontal agricultural questions. It is critical that CAP specific definitions are negotiated in the appropriate fora and by the relevant experts.

We welcome the Presidency's proposal at the AHWP NRPP regarding the movement of certain CAP specific provisions as a starting point to further discussions. In addition to the proposed movement of articles, and in order to ensure consistency, we propose the movement of following which reflect

pure CAP elements and could be moved while leaving core NRPP structures intact.

Included in Presidency Proposal: Article 4: (14), (15), (17), (22), (23)

Articles which we are also proposing to move: Article 4 Farmer (Point 3 (c) and Operation (CAP- specific) Point 9 (c), Public expenditure (CAP- specific) (Point 24), Support rate (CAP Specific) (Point 25)

Definitions will have significant impact on schemes as to who will be eligible for CAP schemes. The proposed definition state a farmer is a person whose 'principal activity' is agricultural activity. To define whether they are principally engaged in agricultural activities or not may lead to increased administrative procedures and coherence concerns.

Question:

- How will this account for part-time farmers?
- How will this interact with Generation Renewal as a new entrant's principal activity might not yet be agriculture. does this mean that part time farmers are excluded?
- The young farmer is defined as being 'head of the holding' – does this impact joint holdings/ farm partnerships etc.

- Ireland also feels that there are two areas that require their own definitions as they are not included currently. These are definitions for ‘aquaculture’ as defined in the CFP regulation (EU) 1380/2013 and ‘producer organisations’ which are defined under the CMO Regulation (EU) 1379/2013.
- In defining producer organisations, there has to be a clear distinction between producer organisations that operate in agriculture sector and those that operate in the fisheries and aquaculture sector as both types of producer organisations are bound by two different CMO regulations.

IT

(Comments):

It is preferable to include some missing definitions to ensure a better synergy with the other articles provided by the regulation, such as the definitions of *Financial Instrument*, *Management Costs*, *Management Fees*, *Relocation* (art. 69), *Accounting Period* (art. 68.4) and *Small mid-cap company* and *Small and medium-sized enterprise* or *SME*, as set out in the art. 2 of the regulation establishing the European Competitiveness Fund ('ECF').

Other definitions to be included:

- “prosperity”/“sustainable prosperity”;
- “territorial attractiveness” and “territorial services” (the term cohesion is of course present in the EU Treaties, but the expressions "territorial attractiveness" and "territorial services" are not);
- “right to stay”;
- “clean industrial transition”;
- “digitally sovereign Union”/“digital sovereignty”;
- “advanced technologies”;
- “AI secure and trusted digital infrastructure” (a concept not defined in the EU Treaties);
- “innovation diffusion”;
- “market-based funding options”;
- “Savings and investments Union” (a concept not defined in the EU Treaties);
- “bioeconomy”;
- “New European Bauhaus”;
- “strong social safety nets”;

- “critical (energy, transport) infrastructure” (a concept partially defined in other EU Regulations; a definition should be provided by cross-referencing these Regulations);
- “social and affordable housing” (a concept not defined in the EU Treaties; a definition based on secondary EU legislation is needed);

“remote, peripheral and less connected areas” (a concept not defined in the EU Treaties; however, it is necessary to establish criteria for its definition).

PT

(Comments):

PT1: As a general comment on common definitions across different regulatory proposals (with particular attention to the Budget expenditure tracking and performance framework), it is essential to ensure coherence on the definitions used in the various proposals, as this consistency is not always being observed – e.g. see different wordings for the definition of “operation” and “measure” under this regulation and the performance framework regulation.

PT2: This proposal excludes the following (current) definitions: ‘enabling condition’, ‘operation of strategic importance’ and ‘intermediary body’. **It**

is considered that the reference to intermediary bodies should be added.

Due to its relevance (also in relation to the Plans), we suggest that the **definition of “activity”** should also be regulated in the Fund/NRPP Regulation, particularly due to its relationship with the concepts of ‘measure’ and ‘operation’.

In fact, the difference observed in the definitions of “operation” and ‘measure’ in both Regulations has precisely to do with the fact that in the Performance Regulation these definitions are related to the concept of “activity.”

The Performance Regulation also contains the concept of ‘Plan’, which is related to the Fund/NRPP Regulation, and it is therefore considered that this definition should be maintained in both Regulations.

RO

(Comments):

The terms "operation" and "measure" are defined differently in the current regulation and in the Regulation on performance framework. Their harmonization is needed, along with consolidation into a single regulation.

The terms "primary specific objectives" and "secondary specific objective" should be clarified and defined.

SI

(Drafting suggestions):

"Home Affairs" means areas covered by Regulations AMIF, SIBMV, ISF.

SI

(Comments):

Inclusion of the definition of "Home Affairs" would allow to use it throughout the text of the Regulation.

SK

(Comments):

Article 4 lacks a paragraph or point (1).

The terminology specific to CFP should be transferred to specific proposal and consequently discussed in the Council WP on Fisheries Policy. Also, to ensure consistency, the definitions in existing legislation such as 1380/2013, 1379/2013 should be used, for example by referencing to them. Without prejudice to the above comments on transferring the CFP specific

definitions to sectoral regulation and referencing to existing legislation, there are two areas that require their own definitions as they are not included currently. These are definitions for ‘aquaculture’ as defined in the CFP regulation (EU) 1380/2013 and ‘producer organisations’ which are defined under the CMO Regulation (EU) 1379/2013. In defining producer organisations, there has to be a clear distinction between producer organisations that operate in agriculture sector and those that operate in the fisheries and aquaculture sector as both types of producer organisations are bound by two different CMO regulations. When the discussion of proposals proceeds, there might be a need for further definitions.

Furthermore, the terminology should be used consistently in all MFF proposals, that is not the case currently. For example, the NRP proposal defines “support rate” as CAP specific, CAP proposal uses terms “support rate” and “aid intensity” and CFP proposal uses term “aid intensity” that has not been defined. There is also inconsistency in the use of terms “measure” and “activity”, which has been used in NRP proposal mainly with regard of agriculture.

SK requests that specific definitions (Article 4) directly related to the conditions for CAP interventions (i e., farmer, holding, agricultural activity, agricultural area, eligible hectare, young farmer, new farmer) to

	<p>be set out in the draft CAP Regulation and be discussed in the Working Party on Horizontal Agricultural Questions.</p>
	<p>EL</p> <p>(Comments):</p> <p>The list of definitions included in Article 4, is too limited to ensure legal certainty and consistency in the implementation of the NRPP Regulation.</p> <p>A number of key notions that are essential for the architecture of Cohesion Policy are not defined, which may create ambiguity during programming, monitoring and assurance.</p> <p>In this context, we see merit in adding definitions such as:</p> <ul style="list-style-type: none"> - <i>relevant country-specific recommendations,</i> - <i>priority,</i> - <i>result indicator,</i> - <i>output indicator,</i> - <i>financial instruments,</i> - <i>financial product,</i> - <i>public contribution,</i> - <i>accounting year,</i>

- *irregularity,*
- *serious deficiency,*
- *assurance package,*
- *sustainable prosperity and*
- *security*
- *dual use TEN-T infrastructure,*
- *Local Action Group (LAG),*
- *Important Projects of Common European Interest (IPCEI),*
- *output indicator,*
- *result indicator*

We also note that the definition and description of a *reform* are not included in Article 4, despite reforms constituting a central component of the proposed implementation model.

Including these notions would enhance clarity, support a common interpretation across delegations and improve coherence with the sectoral Regulations

All definitions should be in Article 4 of Regulation (EU) [NRP Regulation] and the other Regulations should refer to the NRP Regulation.

LV

(Comments):

We would suggest including a definition of "Start-up" in Article 4

PL

(Drafting suggestions):

We propose to add the definition of Eastern border regions: NUTS II regions bordering *Russia, Belarus or Ukraine*

PL

(Comments):

Introducing this definition ensures coherence with proposed solutions under ERDF and Interreg and enables a more targeted response to long-term socio-economic and security impacts affecting Eastern border regions of the Union.

Relevant changes could also be made in the preamble to the text.

RO

(Comments):

RO has argued, since the beginning of the discussions in the AHWP PPNR meetings, that the provisions specific to the Common Agricultural Policy should be found in a single regulation, dedicated exclusively to agriculture, and not dispersed in distinct regulations, a situation that runs counter to the simplification objectives assumed by the Omnibus III package and diminishes the visibility of the CAP. The current fragmentation into several legislative acts leads to overlaps, inconsistencies and difficulties in correlation, with certain interventions being regulated simultaneously in the "Common Fund" Regulation, in the CAP Regulation and in the amended Regulation (EU) No. 1308/2013. This lack of structural and terminological coherence makes implementation difficult and may generate confusion at Member State level.

We consider that **a complete structural adjustment is appropriate**, ensuring a coherent legislative architecture for the period 2028–2034. In RO's view, the CAP Regulation must fully contain the provisions of the common agricultural policy – definitions, types of interventions, specific requirements and special agricultural regimes.

In this regard, Romania supports the transfer from the Common Fund Regulation to the CAP Regulation of the following provisions, as it also supported at the AHWP PPNR meeting of 5.12.2025, as agreed:

- para. 3 (c) on the definition of the beneficiary in the context of the CAP,
- para. 9 (c)- on the definition of the operation in the context of the CAP,
- para. 14 Agricultural Knowledge and Information System – AKIS,
- para. 15 – organic farming,
- para. 16 on the definition of the holding,
- para. 17 – the smaller Aegean islands,
- para. 22 – agricultural activity, agricultural area, eligible hectare and young farmer,
- art. 23 – the new farmer
- para. 24- public expenditure in the context of the CAP,
- para. 25- support rate in the context of the CAP.

SK

(Comments):

In relation to the definitions set out in Article 4, we are particularly concerned about the inconsistency of the definitions within the NRPP and

	<p>the Performance Regulation, where there are different definitions such as operation, measure, etc.</p> <p>At the same time, we lack a several definitions, like “reform“, ”investment“ or a “financial year”, as well as “just transition”, “socially fair transition” or „other intervention“. We also require a definition of the term “actors” in the context of the Territorial and local cooperation initiatives. We would appreciate these definitions being included in the Regulation.</p> <p>We consider the phrase "a serious non-compliance" mentioned in Art. 66, paragraph 3, letter a), Art. 67, paragraph 1, letter b) and Art. 68, paragraph 1, letter c) to be insufficiently understandable, which we request to be defined or explained. We would welcome more specific definitions or examples of what constitutes a "serious non-compliance" to be provided in the regulation.</p> <p>We would welcome a clearer definition of the terms "balanced" and “proportionate" mentioned in Article 13(4), as this may be a subjective decision by the MS, which could lead to uneven funding of certain priorities or regional chapters.</p>
For the purposes of this Regulation, the following definitions apply:	<p>DE</p> <p>(Comments):</p>

Definitions are laid down in Article 4 “for the purposes of this regulation”. They are obviously also intended to apply to the regulations referred to in Article 1 (2). Where does this come from?

FI

(Comments):

It is essential to ensure consistency of terms in different Regulations, Annexes etc. Considering the extent to which subsidies related to forests are proposed, as is the case in the CAP Regulation, the definition of forest owner does not exist in Article 4. However, the definition of forests should remain unchanged, i.e. the national definition, because of the differences concerning forest in the Member States.

IE

(Drafting suggestions):

'aquaculture' the rearing or cultivation of aquatic organisms using techniques designed to increase the production of the organisms in question beyond the natural capacity of the environment, where the organisms remain the property of a natural or legal person throughout the rearing and culture stage, up to and including harvesting;

Circumvention: ‘The act of a natural or legal person artificially creating conditions to receive benefits or gain advantages that they would otherwise be ineligible for under the established legislation for same’.

‘Seafood Producer Organisation’ refers to a Fishery Producer Organisation or an Aquaculture Producer Organisation established in accordance with the provisions of Regulation (EU) 1379/2013’ (include citation for same in the footnote)

‘public body’ means the State, regional or local authorities, bodies governed by public law or associations formed by one or more such authorities or by one or more of such bodies, governed by public law;

‘fishing vessel’ means any vessel equipped for commercial exploitation of marine biological resources or a blue fin tuna trap, registered on a Member State’s register of fishing vessels

IE

(Comments):

Additional definitions could be added:

- Aquaculture

- Circumvention (see art 62 2021/2116) - this term circumvention should be defined.
- A circumvention clause should be included as an additional point in Title X Management and Financial Rules, Chapter I General Management Rules, Article 58. Article 58 (1)(2) should have an additional point between current points (d) and (e) along the lines of Article 62 of Regulation 2021/2116
- Request for the Commission to define definition of ‘Business plan’
- Request for the Commission to define definition of ‘small farm’ or whether that definition wholly lies with Member States
- It is unclear if the definitions for ‘permanent pasture and crops’ or ‘family farm’ are missing or are left to the Member State to When defining producer organisations, there should be a clear distinction between producer organisations that operate in agriculture sector and those that operate in the fisheries and aquaculture sector as both types of producer organisations are bound by two different CMO regulations.
- While the terms public bodies and public authorities are used, there is no definition included for same

- A definition for ‘fishing vessel’ needs to be included, as the term is used in the definition for ‘small-scale coastal fishing’, suggest a definition aligned with CFP provisions/definitions

RO

(Comments):

The CAP legislative package is regulated by 5 EU Regulations, which runs counter to the simplification efforts initiated by the Omnibus III package. The information in the legislative proposals is difficult to correlate, leading to confusion, and contains overlaps and some inconsistencies. Moreover, certain interventions are regulated both in the “Common Fund” Regulation and in the CAP Regulation (LEADER, coupled support, degressivity), and other CAP interventions are not found in the CAP Regulation, but in the proposal to amend EU Reg. 1308/2013.

Also, for a number of elements, the terminology to be used should be clarified, as confusion between terms may arise. RO requested clarification on how to define milestones, targets, milestones, rural businesses, small legal person, new farmer

We consider that for certain aspects; the specific CAP terminology is not always correlated with the terminology used for other funds in previous programming periods.

	<p>SK</p> <p>(Drafting suggestions):</p> <p>We propose to add the definition of <u>Eastern border regions: NUTS II regions bordering <i>Russia, Belarus or Ukraine</i></u></p> <p>SK</p> <p>(Comments):</p> <p>Regarding the envisaged measures to address Eastern border regions, we propose to introduce this definition to ensure a coherence within proposed actions under ERDF and Interreg and enables a more targeted response to long-term socio-economic and security impacts affecting Eastern border regions of the Union.</p> <p>Relevant changes could also be made in the preamble to the text.</p>
<p>(2) ‘applicable law’ means Union law and the national law directly relating to its application;</p>	<p>DE</p> <p>(Comments):</p> <p>Potential for simplification of the management and control systems lies in the application of national law. We ask COM to consider an approach</p>

where it certifies the principal functioning of the national management and control systems for the application of national law to go ahead.

A clarification as to the definition of “applicable law” and the extent of its scope is needed, this is especially true for the applicability of national law. The effect on simplification by a performance-based approach will be reduced significantly if there will still be an intensive effort to review detailed requirements of public procurement or state aid in each underlying project. Due to certain thresholds, a verification of underlying expenditure seems to be inevitable which contradicts the intended effect.

EE

(Comments):

it needs to be clarified what the addition of “directly” means in practice compared to the 2021-2027 period.

HR

(Drafting suggestions):

HR drafting suggestions:

(2) ‘applicable law’ means Union law and the national law consisting of all the national rules relating to the application and implementation of Union legislation. directly relating to its application;

HR

(Comments):

HR comments: As regards the definition of the applicable law referred to in point (2), according to the Court of Justice of the EU, in addition to Union law, national law relating to the application of Union law and national law composed of all the rules of the domestic rules relating to the application and implementation of Union legislation. According to this definition, it is unclear what would include the notion of a direct link to Union law.

HR proposes amend to point 2 by adding: *consisting of all the national rules relating to the application and implementation of Union legislation.* and deleting 'directly relating to its application'.

IE

(Drafting suggestions):

(1) 'applicable law' means Union law and the national law directly relating to its application;

IE

(Comments):

Numbering

	<p>SK</p> <p>(Drafting suggestions):</p> <p>(2) ‘applicable law’ means Union law and the national law <u>consisting of all the national rules relating to the application and implementation of Union legislation</u>, directly relating to its application;</p> <p>SK</p> <p>(Comments):</p> <p>Definition of the applicable law referred to in point (2), according to the Court of Justice of the EU, in addition to Union law, refers to national law relating to the application of Union law and national law composed of all the rules of the domestic rules relating to the application and implementation of Union legislation. Based on current definition it is unclear what would include the notion of a direct link to Union law.</p>
	<p>LT</p> <p>(Drafting suggestions):</p> <p><u>‘application document’ means a tender, a request to participate, an application further to a call for expression of interest, a grant</u></p>

	<p><u>application, an application for a non-financial donation or an application in a contest for prizes</u></p> <p><u>‘financial instrument’ means a form of support delivered via a structure through which financial products are provided to final recipients</u></p> <p>LT</p> <p>(Comments):</p> <p>We propose to establish a definition of the term ‘application document’ like it is understood as a applicant for the purposes of Regulation (EU, Euratom) 2024/2509</p> <p>We propose to establish a definition of the term ‘financial instrument’ like it is understood in the Regulation (EU) 2021/1060</p>
<p>(3) ‘beneficiary’ means:</p>	<p>AT</p> <p>(Comments):</p> <p>We welcome the approach of clearly defining terms such as beneficiary (3), recipient (6), final recipient (7) and participant (8). However, these would need to be further clarified before the plans are implemented in order to ensure a uniform understanding in all Member States.</p>

For example, the term ‘beneficiary’ lacks clarification that all beneficiaries under Article 4(3)(a) of the NSRF Regulation are eligible for LEADER. This would enable integrated regional development and synergistic contributions to the general and specific objectives of the NSRF Regulation.

FI

(Comments):

Other beneficiaries are mentioned in the CAP Regulation, for example due to agri-environmental and climate actions under Article 10 of the CAP Regulation. Why are they not included in this definition?

FR

(Comments):

En comparaison avec le RPDC, nous constatons qu’il manque les éléments concernant les PPP, les regimes d’aides d’État et de minimis. Pourquoi ne pas les avoir repris?

HU

(Comments):

Terms such as beneficiary, recipient, final recipient, and participant should be defined more precisely, especially since the Single Fund and the Financial Regulation provide different definitions.

IE

(Comments):

In the context of CAP, the definition of a beneficiary does not include a legal person outside of agriculture which does not align with some CAP funded schemes such as LEADER.

The current drafting, where it could be read that since LEADER is under CAP, only farmers could be LEADER beneficiaries would cause a major fundamental change to the LEADER programme. LEADER should not be limited to farmers.

PL

(Comments):

In its replies to MS questions on Block 1 (ppt presentation, p. 25) the Commission clarified that (similarly to CPR 2021-2027) there would be no possibility of granting state aid by the beneficiary (*“No change in State aid rules in this regard. Where support provided falls within the remit of State aid rules, the undertaking receiving the aid is a beneficiary.”*)

	<p><i>In case of de minimis aid the undertaking can be a recipient.”</i>). It should be stressed that such an interpretation of the draft provisions is not legitimate – there is an obvious difference between the definition of beneficiary in CPR 2021-2027 and the drafted one in this scope. The Commission should adjust its interpretation to the tabled provisions or the drafted definition should be amended (stating clearly, who the beneficiary is in case of state aid and de minimis aid).</p>
	<p>FI</p> <p>(Drafting suggestions):</p> <p><u>(aa) a member state, a public or private law body or an entity with or without legal personality implementing a reform as measure under the NRP Plan.</u></p> <p>FI</p> <p>(Comments):</p> <p>There needs to be a possibility of a member state/other authorities being a beneficiary directly without operationalisation of measures (and, eg. selection process by the MA) for reform-type measures. Making reforms (and costs related to them) operations creates completely unnecessary</p>

	<p>administrative burden. For example, creating a selection process by the MA for legal reforms is not possible, since the Parliament alone has legislative powers. It should be possible for a reform-type measure to include costs without those costs being separated into an investment-type measure.</p> <p>Should this approach be taken (some measures (reforms) do not consist of operations and their beneficiary is the member state/other public body), amendments to other articles are needed. For example, new point in article 63 should be added to detail information requirements of such measures</p>
<p>(a) a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>a) a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and/or the Interreg Plan and to whom the document setting out the conditions for support has been provided;</p> <p>AT</p> <p>(Comments):</p>

From GAP-perspective “a group of natural or legal persons“ should also be added under this point

BE

(Drafting suggestions):

a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan ~~and~~ **or** the Interreg Plan and to whom the document setting out the conditions for support has been provided;

BE

(Comments):

Technical correction

DK

(Comments):

We strongly support this definition, as this will substantially simplify the definition of a beneficiary. There is an interlink with para. 6 of this Article (the definition of a recipient).

As of today, the definition of a beneficiary imposes complex application of requirements in terms of communication, cascade funding, legal obligations etc.

EE

(Comments):

1) Given that the beneficiary is authorised to pass on the support to the recipient, the concept of initiation should be clarified. 2) The Commission has explained (20 November 2025, Replies to Member States' questions on Block 1): "Where support provided falls within the remit of State aid rules, the undertaking receiving the aid is a beneficiary. In case of de minimis aid the undertaking can be a recipient". The definition does not reflect such a limitation, and we do not support introducing one. We support an approach whereby the concept of a beneficiary is not defined through the receipt of State aid or de minimis aid. Since the indicator "number of participants" is widely used in annex 1 of the performance framework regulation, the MSs might face difficulties since according to the definition provided, the natural person as a participant cannot match the same natural person as a beneficiary.

IE

(Drafting suggestions):

	<p>a) a public or private law-body in law, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided;</p> <p>IE</p> <p>(Comments):</p> <p>This clause is amended to provide for proper interpretation in Irish law</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>a) a public or private law body, an entity with or without legal personality, or a natural person who is not necessarily a participant, a natural person or a group of natural or legal persons responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided; (</p> <p>NL</p> <p>(Comments):</p>
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To cater for a collective approach under the CAP. Under the current agri environmental and climate measures under the CAP, a beneficiary can also be a collective which is constituted by a group of natural or legal persons which are carrying out the activities for which the collective is claiming support. The collective is thus the beneficiary. This is a EU best practice and recognised as such by the Commission and we want to create the necessary leeway in the definition to keep this approach.

PT

(Drafting suggestions):

(a) a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided;

PT

(Comments):

PT: Deletion of reference to the Plans in order to guarantee that this definition also applies to the other components of the “Fund”, namely the EU Facility.

	<p>RO</p> <p>(Drafting suggestions):</p> <p>a) a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided;</p> <p>It is mandatory to exempt the Home Affairs Funds (Borders and Visas, Asylum, Migration and Integration and Internal Security) from the definition of beneficiary – natural person of the Fund. Under no circumstances natural persons can be a beneficiary under Regulations COM(2025) 541 final - Schengen area, borders and visas, COM(2025) 542 final – internal security and under COM(2025) 540 final – asylum, migration and integration.</p> <p>RO</p> <p>(Comments):</p> <p>It is not necessary to specify” who is not a participant”; taking into account the fact that the definition of „participant” is given only further</p>
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	<p>on in the text of this article and indicates anyway that it is a person NOT responsible for initiating and implementing an operation</p> <p>SE</p> <p>(Comments):</p> <p>Does this definition allow for several entities collectively initiating and implementing the same operation and as such have the status as beneficiaries?</p>
<p>(b) in the context of financial instruments, the body that implements the holding fund or, where there is no holding fund structure, the body that implements the specific fund or, where the managing authority manages the financial instrument, the managing authority;</p>	
	<p>CZ</p> <p>(Comments):</p> <p>CZ is of the opinion that all definitions concerning CAP should be part of the CAP regulations</p>
<p>(c) in the context of the CAP, a farmer who is:</p>	<p>AT</p> <p>(Drafting suggestions):</p>

(c) in the context of the CAP, a farmer ~~who~~ is:

AT

(Comments):

A limitation of “beneficiary” only to “farmer” is unsuitable for several intervention categories mentioned in Article 35(1) NRPP, at least for i) LEADER, m) support for knowledge transfer and innovation and n) territorial and local cooperation.

As mentioned under lit. a, “groups of natural or legal persons” should be included in the definition.

BE

(Drafting suggestions):

(c)-in the context of the CAP, a farmer, ~~who is:~~ **to be defined in the CAP Regulation**

BE

(Comments):

The beneficiaries within the CAP are not limited to farmers. The CAP Regulation provides for each intervention the allowed beneficiaries. The definition of farmer should be a selfstanding definition.

CZ

(Drafting suggestions):

e) ~~in the context of the CAP, a farmer who is:~~

DE

(Drafting suggestions):

(c) in the context of the CAP **in addition to points (a) and (b) also a public or private law body, an entity with or without legal personality, or a natural person, even if not fulfilling point (a) or (b), when determined [in CAP-Regulation or in Regulation 2013/1308 or by Member States in their NRP Plans] as being permitted to benefit from a CAP type of support as, if applicable, for example a farmer.** ~~a farmer who is:~~

DE

(Comments):

DE: (1) We understand that point 3(c) is intended to define the term ‘farmer’ but do not see what in point 3(c) gives rise to this. (2) Point 3(c) should not mean that other beneficiaries are excluded from CAP interventions. Therefore, suggestion here und suggestion of definition “farmer” below.

In context with the categories of interventions mentioned in Art. 35 (1) NRPP at least for

- F) Agri-environmental and climate actions
- I) LEADER
- M) knowledge transfer/innovation/
- N) territorial and local cooperation
- Q) EU school scheme

the limitation of “beneficiary” to “farmers” is unsuitable. It makes it nearly impossible to achieve the objectives linked with those categories of interventions. Furthermore, it does not comply with the connected output/result indicators of Annex I to the proposal of a regulation establishing budget expenditures tracking and performance framework

Especially running nr: 18, 25, 26,335.

The wording of “public or private law body” should correspond with the wording in Art. 27 (3) of Reg. (EU) Nr. 1308/2013. This current draft currently refers to ‘public or private body’.

The same (“off-farm beneficiaries”) applies to current CAP (rural development) interventions that are not explicitly mentioned in the NRPP (unsolved issue).

DE: The CAP interventions are laid down in Article 35(1). There are interventions where not a farmer is the beneficiary, for example letter (n) [cooperation]: here producer organisations and cooperations are beneficiaries (cf. Article 74).

Producer organisations (Article 74(1)(f)), for example, are not necessarily engaged in agricultural activities.

The definition has a restrictive effect on the circle of beneficiaries, for example for Article 74.

On the other hand, the definition is inconsistent with Article 35(1)(i) [Investment] as it identifies ‘farmers **and forest holders’ owners²** as beneficiaries.

Point 3(c) is intended to define the term ‘farmer’. This essential provision must be made legally clear and unambiguous. We have already mentioned this in our written questions on the NRP-Reg. and also on the CAP-Reg. Simplification and red tape reduction are to be taken into account.

FI

(Drafting suggestions):

	<p>in the context of the CAP <u>income support interventions</u>, a farmer who is:</p> <p>FI</p> <p>(Comments):</p> <p>It is important in the context of Art 35 l-q CAP interventions (including LEADER, knowledge sharing and innovation, cooperation) a wider definition of beneficiary is used, not just farmers.</p> <p>FR</p> <p>(Comments):</p> <p>Les autorités françaises demandent à ce que le paragraphe 3 c) soit transféré dans le règlement PAC. Néanmoins, le cas échéant, nous formulons ci-dessous des propositions de modifications rédactionnelles.</p> <p>HU</p> <p>(Comments):</p> <p>This definition should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>(e) — in the context of the CAP, a farmer who is:</p>
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~~(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or~~
~~(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.~~

LU

(Comments):

The complete provisions of art 4 par 3 c) should be transferred to the CAP regulation

LV

(Drafting suggestions):

~~(e) — in the context of the CAP, a farmer who is:~~

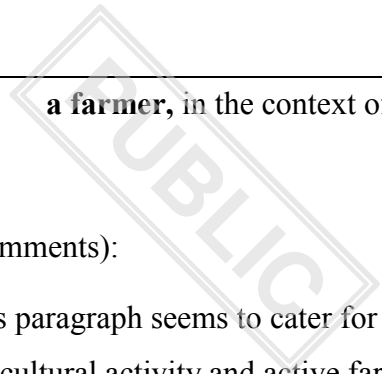
LV

(Comments):

This provision should be moved to the CAP post - 2027 Regulation

NL

(Drafting suggestions):



	<p>(c) a farmer, in the context of the CAP, a farmer who is defined as:</p> <p>NL</p> <p>(Comments):</p> <p>This paragraph seems to cater for both, the eligibility criteria for agricultural activity and active farmer. While the difference is minimal, we feel this proposed wording better emphasizes that it is not only farmers who might be beneficiaries within the CAP, as this does not sufficiently cover beneficiaries of LEADER. It is important we make clear, here and in (e.g.) article 18 that there are also other beneficiaries than farmers within the CAP.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(e) in the context of the CAP, a farmer who is:</p> <p>RO</p> <p>(Comments):</p> <p>RO proposes to be moved in the CAP Regulation</p>

<p>(i) a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</p> <p>CZ</p> <p>(Comments):</p> <p>Definition of the farmer should be included in the CAP Regulation.</p> <p>In order to ensure continuity with current programming period we consider retaining the same definition which gives flexibility to MS to set their own criteria for defining a farmer and propose this wording:</p> <p><i>natural or legal persons, or to groups of natural or legal persons, engaged in at least a minimum level of agricultural activity, while not</i></p>
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necessarily precluding the granting of support to pluri-active or part-time farmers. When determining who is a 'farmer', Member States shall apply objective and non-discriminatory criteria, such as income tests, labour inputs on the farm, company object and negative list disqualifying a farmer from being considered to be an active farmer. If a Member State considers to be 'farmers' those farmers who did not receive direct payments exceeding a certain amount for the previous year, such an amount shall not be higher than EUR 5 000 inclusion of their agricultural activities in national or regional registers. Such criteria may be introduced in one or more forms chosen by Member States, including through a negative list disqualifying a farmer from being considered to be an active farmer. If a Member State considers to be 'active farmers' those farmers who did not receive direct payments exceeding a certain amount for the previous year, such an amount shall not be higher than EUR 5 000.

DE

(Drafting suggestions):

~~(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or~~

DE

(Comments):

(i) to be deleted (but see proposed numbers (3a) and (3b)). The description of farmers in point 3(c) incorporates, with amendments, elements that are part of the term ‘active farmer’ in the current legislation. In this respect, we believe that this should be optional and that no provisions derogating from current EU law should be made.

EE

(Drafting suggestions):

a natural or legal person whose holding is situated in the Union and who **either owns forest land or holds recognised tenure rights** ~~se principal~~ activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or

EE

(Comments):

The Common Agricultural Policy (CAP) does not address only farmers but also covers forestry as a key part of sustainable land management, climate action and rural development. Explicitly including forest holders in the definition of “beneficiary” ensures that forestry measures under the CAP

can be accessed directly by forest owners and tenure right holders, without requiring them to also qualify as farmers. Without such clarification, support would in practice be limited to land managers who combine forestry with agricultural land, which would exclude a significant share of forest holders in Member States, where many holdings consist solely of forests. This amendment therefore safeguards equal treatment, legal clarity and the effective implementation of forestry-related measures within the CAP.

FI

(Drafting suggestions):

(i) a natural or legal person **or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law** whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation.

Member States may introduce the criteria for determining the principal activities referred to in points (i) and (ii) in one or more forms chosen by the Member State.

FI

(Comments):

It would be important that the definition remains consistent with previous programming periods, ensuring that it also refers to a group of natural or legal persons. This addition would facilitate the interpretation of the concept of a holding as referred to in point (16), allowing different units managed by the same person, and based on groups of natural or legal persons, to be considered as a single holding within the meaning of point (16). The artificial splitting of holdings has been identified during the current programming period as an issue requiring close attention. If the definition were amended and the reference to natural and legal persons removed, such a change in the definition of an applicant would lead to a new interpretation of a holding under point (16), making the splitting of holdings easier.

In the context of the CAP, both the farmer and other beneficiaries should be defined more broadly to take into account varieties of form of bodies and entities and keep status Q.

Nowadays the majority of income may come from sources other than agriculture, even if farming is the principal activity. Why are those farmers, outside the definition of farmer if share of agricultural income within the total income is the criteria defining the concept of principal activity? Can we accept those farmers because they are important because

agricultural areas are at a risk of abandonment of agricultural production in the Eastern border regions?

If the addition is not made, it is possible to divide the holding based on different juridical persons involved and get artificially supports more than accepted.

Recital 45 lists the ways in which the principal activity should be defined. Article 4(3) (c) it should be added that a Member State may introduce criteria for determining the principal activity **in one or more forms of its choice**.

FR

(Drafting suggestions):

(i) a natural or legal person whose holding is situated in the Union and **who exercises** ~~whose principal activity is~~ **an** agricultural activity. ~~in accordance with the criteria defined by the Member States in line with this Regulation; or.~~ **Member State may require a minimum level of agricultural activity for some interventions.**

FR

(Comments):

La proposition de la Commission exclut de la définition d'agriculteur des entités juridiques qui exercent une réelle activité agricole et qui bénéficiaient jusqu'à maintenant des aides de la PAC, en particulier les personnes morales de droit public (lycées agricoles, centres de recherche ou d'expérimentation, certaines communes), dont l'activité agricole est secondaire.

Il est donc préférable que le ciblage sur certaines catégories d'agriculteurs se fasse en fonction de l'objectif de l'aide comme aujourd'hui avec la notion d'agriculteur actif. Par ailleurs, cela crée une distorsion entre des exploitations agricoles de même taille en fonction de la proportion du reste de leur activité.

C'est pourquoi l'exigence d'une activité minimale, plus équitable que la notion d'activité principale, pourrait être retenue (au choix de l'Etat membre) pour certaines aides.

IE

(Drafting suggestions):

a natural or legal person whose holding is situated in the Union and whose **principal** activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or

	<p>IE</p> <p>(Comments):</p> <p>It is not clear how this definition provides for part-time farmers</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or a natural or legal person, or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law, whose holding is situated within the territorial scope of the Treaties, as defined in Article 52 of the Treaty on European</p>
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Union in conjunction with Articles 349 and 355 of the Treaty on the Functioning of the European Union (TFEU), and who exercises an agricultural activity as determined by Member States in accordance with Article 4(22) of this Regulation; and

NL

(Comments):

The two criteria (i) and (ii) are to be both fulfilled in order to define a “farmer”; this is why there needs to be an “and” and not an “or”. In addition, according to the explanations from the Commission, the definition of the current CAP are not expected to change. Therefore it is advisable to use the same wording as in the currently applicable provision in the CAP in order to avoid confusion in the implementation of the policy. Should the Commission intend to change the definition (not only in wording but also in its meaning), Member States would appreciate that the Commission could detail its intention and the purpose of such change.

~~The two criteria are to be both fulfilled in order to define a “farmer”. In addition, according to the explanations from the Commission, the definition of the current CAP are not expected to change. Therefore it is advisable to use the same wording as in the currently applicable provision in the CAP.~~

	<p>PL</p> <p>(Drafting suggestions):</p> <p><u>(f) a natural or legal person whose holding is situated in the Union and whose principal activity is performing agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</u></p> <p>PL</p> <p>(Comments):</p> <p>Current wording is too complex. Targeting of support under the CAP needs to be done in simple and effective way.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(i) — a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or</p> <p>RO</p> <p>(Comments):</p> <p><i>Idem</i></p>
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	<p>SE</p> <p>(Drafting suggestions):</p> <p>(i) a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or <u>who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</u></p> <p>SE</p> <p>(Comments):</p> <p>SE welcomes the idea that support should be better targeted towards active farmers. However, this targeting needs to be done in a simple and effective way. Since both full-time and part-time farmers contribute to food security, and both are eligible for support if they are engaged in at least a minimum level of activity, there is no need to first identify those who have agriculture as their principal activity and thereafter the others. All beneficiaries could be examined against the requirement of a minimum level of activity. A corresponding change has been proposed in article 6.5 in the CAP-regulation.</p>
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SE believes that without changes, the proposal risks leading to extensive investigative work as well as increased administration in order to identify farmers.

From a Swedish perspective, it would be very difficult to identify those with agricultural as their principal activity. At present, there is no detailed information available regarding a business's agricultural income as a share of total income, labour input in the agricultural enterprise, the purpose of the business, or registers of agricultural holdings. For example, it is not possible to use data from the national tax agency, since agricultural income is included under other business activity.

SK

(Drafting suggestions):

(i) a natural or legal person whose holding is situated in the Union and whose **significant principal** activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or

SK

(Comments):

	Slovakia proposes replacing the word "principal" to "significant", as farmers can diversify the activities of their enterprise.
(ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.	<p>BE</p> <p>(Drafting suggestions):</p> <p>(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p>

DE

(Comments):

(ii) to be deleted (but see proposed numbers (3a) and (3b)). The description of farmers in point 3(c) incorporates, with amendments, elements that are part of the term ‘active farmer’ in the current legislation. In this respect, we believe that this should be optional and that no provisions derogating from current EU law should be made.

DK

(Drafting suggestions):

(ii) natural person or ~~small~~ legal person, **as defined by Member States**, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.

DK

(Comments):

The term small legal person implies a limitation on the group of legal persons who can be considered beneficiaries under the CAP. This should be deleted.

If it is not deleted, Member States should have subsidiarity to decide which legal person may apply for agricultural policy.

	<p>ES</p> <p>(Comments):</p> <p>The concepts of “small legal person” and “minimum level of agricultural activity” should be clarified, perhaps including additional definitions.</p> <p>Small legal person: is it equivalent to SME as established in Recommendation 2003/361/CE?</p> <p>Is it only up to the MS to define these concepts?</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(ii) natural person or small legal person, <u>or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law whose holding is situated in the Union</u> <u>and</u> whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>FI</p> <p>(Comments):</p> <p>What about part-time farmers? Are they not accepted? What about legal persons that are not “small”? Are they not farmers who are engaged in at</p>
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least a minimum level of agricultural activity? Why such a delimitation and discrimination? Why there is no relationship between small farmer and holding?

FR

(Drafting suggestions):

~~(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.~~

FR

(Comments):

Proposition de suppression, car la proposition de définition alternative des autorités françaises ci-dessus au point 3)c(i) englobe ce point. Par ailleurs, comme déjà spécifié plus haut, les autorités françaises demandent à ce que ce point soit transféré dans le règlement sectoriel PAC.

HU

(Drafting suggestions):

(ii) natural person or ~~small~~ legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.

HU

(Comments):

The term "small legal person" in this definition is not clarified at all, and is very restrictive. It excludes a substantial group of legal entities from income support measures that actively contribute to food security, simply because their main activity is not agriculture and that they are not "small". It goes against the common objective of ensuring food security. There has to be at least one horizontal measure (DABIS) that is available to all farmers. The legal toolbox includes other measures to target small farms. We propose to continue with the current system, where the applicants have to be engaged in a minimum level of agricultural activity to be classified as active farmer. Therefore, we propose to delete the term "small" from the definition.

LV

(Drafting suggestions):

	<p>(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States. <u>natural or legal persons, or to groups of natural or legal persons, engaged in at least a minimum level of agricultural activity, while not necessarily precluding the granting of support to pluri-active or part-time farmers.</u></p> <p>NL</p> <p>(Comments):</p> <p>Use of the current CAP definition. <u>See above.</u></p> <p>PL</p> <p>(Drafting suggestions):</p>
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	<p>ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>PL</p> <p>(Comments):</p> <p>This amendment is a consequence of the amendment in point (i).</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(ii) — natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>RO</p> <p>(Comments):</p> <p><i>Idem</i></p> <p>SE</p> <p>(Drafting suggestions):</p>
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	<p>(ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>SE</p> <p>(Comments):</p> <p>See comments on (i)</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.</p> <p>SK</p> <p>(Comments):</p> <p>SK believes that the term "small legal person" is unclear. Moreover, it is not only small businesses that may not have agriculture as their primary activity.</p>
	<p>BE</p> <p>(Comments):</p>

Support under the CAP must be able to target active farmers. Active farmer has to be defined in the EU legislation. In our opinion the definition of active farmer should be inserted in the CAP Regulation. We intend to make a proposal to the HAQ WP.

DE

(Drafting suggestions):

(3a) “farmer” means: a public or private law body, an entity with or without legal personality, or a natural person whose holding is situated within the territorial scope of the Treaties, as defined in Article 52 of the Treaty on European Union in conjunction with Articles 349 and 355 of the Treaty on the Functioning of the European Union (TFEU), and who exercises an agricultural activity in accordance with number 22 of this Article;

(3b) “active farmer” means, where Member States decide to grant payments, which are provided according to CAP-Regulation to no other than farmers and/or young farmers, new farmers, small farmers, only to active farmers: farmers who are determined by the Member States in such a way as to ensure that support is granted only to public or private law bodies,

entities with or without legal personality, or natural persons engaged in at least a minimum level of agricultural activity, while not necessarily precluding the granting of support to pluri-active or part-time farmers.

When determining who is an ‘active farmer’, Member States shall apply objective and non-discriminatory criteria, such as income tests, labour inputs on the farm, company object and inclusion of their agricultural activities in national or regional registers. Such criteria may be introduced in one or more forms chosen by Member States, including through a negative list disqualifying a farmer from being considered to be an active farmer. If a Member State considers to be ‘active farmers’ those farmers who did not receive direct payments under Regulation (EU) 2021/2115 or payments under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (c) and (g) exceeding a certain amount for the previous year, such an amount shall not be higher than EUR 5 000.

DE

(Comments):

(3a):

Point 3(c) stipulates that, in the context of the CAP, the term “beneficiary” refers to a farmer who is a natural or legal person (“a farmer who is”) and who meets the conditions set out in points (i) or (ii). However, points (i) and (ii) do not include farmers who are legal persons but not small legal persons and whose main activity is not farming.

We do not see how the exclusion of farmers not covered by point 3(c) from the group of potential beneficiaries would be justified, particularly with regard to non-discrimination and against the background of freedom of choice of legal form.

The notion “farmer” is to be defined before introducing any possible limitations to this notion. Definition farmer proposed as in Reg. 2021/2115 covering all farmers, while wording to describe the legal status of the included persons etc. is aligned to (3)(a)

(3b):

No obligation but option for Member States to limit some or all CAP payments for farmers to active farmers. Basis of the text: Article 4 (5) Reg. 2021/2115, actualised.

IE

(Drafting suggestions):

In the case of LEADER, as referred to in Article 77 of Regulation (EU) 202X/XXXX [CAP Regulation] beneficiary means any natural or legal person established in the Union and carrying out activities in rural areas aimed at fostering the development of those areas.

IE

(Comments):

Proposed redrafting to reflect wider definition of beneficiary for LEADER

NL

(Drafting suggestions):

In order to define what constitutes a farmer, Member States shall apply objective and non-discriminatory criteria.

NL

(Comments):

In order to ensure that Member States can define what constitutes a farmer based on objective and non-discriminatory criteria. For example if a Member State decides not to preclude granting support to pluri-active or part-time farmers yet at the same time wants to avoid unnecessary administrative burden, they could decide to consider a beneficiary being a

	<p>farmer without checking the a minimum level of agricultural activity. The objective and non-discriminatory criteria is in that case based on a maximum amount of support that beneficiary is to receive/ received in previous year(s).</p> <p>RO</p> <p>(Comments):</p> <p><i>Idem</i></p>
<p>(4) ‘chapter of the NRP Plan’ means a part of the NRP Plan focusing on a specific challenge, sector, policy or geographic area,</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(4) ‘chapter of the NRP Plan’ means a part of the NRP Plan focusing on a specific challenge, sector, policy, <u>region</u> or geographic area, <u>or a combination of two or more of beforementioned elements,</u></p> <p>BE</p> <p>(Comments):</p> <p>since the COM clarified that Member States have flexibility to draft chapters as they wish, it should be clarified that Member States can have multiple Chapters combining the elements mentioned in the definition (e.g. multiple geographical chapters on the same policy area) and should take into account the constitutional structure of the Member State.</p>

	<p>It is not clear to us how the HOME funds should be integrated into these chapters, as they are not mentioned in the templates in the annex.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(4) ‘chapter of the NRP Plan’ means a part of the NRP Plan focusing on a specific challenge, sector, policy or geographic area; <u>or a combination of these criteria</u>;</p> <p>DE</p> <p>(Comments):</p> <p>A chapter may also refer to a combination of these criteria.</p> <p>EE</p> <p>(Comments):</p> <p>Consistency of that definition should be applied also to art 21(2) and in Annex V.</p> <p>HR</p> <p>(Comments):</p>
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HR comments: This chapter is an opportunity to clearly explain and define the distinction and interrelation between general and specific objectives through their definition.

LV

(Drafting suggestions):

‘chapter of the NRP Plan’ means a part of the NRP Plan focusing on a specific challenge, sector, policy or geographic area, **or target group**.

LV

(Comments):

(Article 4) Please supplement paragraph 4 with a reference to the target group.

RO

(Drafting suggestions):

(4) ‘chapter of the NRP Plan’ means a part of the NRP Plan focusing on a specific challenge, sector, policy, **region** or other geographic area

RO

(Comments):

For a clear support of programming at regional level

	<p>SE</p> <p>(Comments):</p> <p>SE questions the need of this definition.</p>
<p>(5) ‘contractor’ means an entity or a natural person with whom the beneficiary or the recipient enters into a contract for the specific purpose of implementing one or more operations or a part thereof;</p>	<p>DE</p> <p>(Comments):</p> <p>DE: The term is understood to be relevant only if EU funds are further distributed as through the national fund managers (administrative authorities) by the beneficiary (context of a multi-level distribution).</p> <p>Stations of the flow resources from the Union budget:</p> <p>The transfer by the beneficiary does not take the form of a contractual relationship (performance – payment), because then it would not be a ‘recipient’ but a ‘contractor’ in accordance with paragraph 5.</p> <p>EE</p> <p>(Comments):</p> <p>We propose to rely on the definition provided in Regulation (EU, Euratom) 2024/2509.</p> <p>FI</p>

	<p>(Drafting suggestions):</p> <p>(5) ‘contractor’ means an entity or a natural person with whom the beneficiary or the recipient enters into a contract above thresholds set in Union or national law on public procurement for the specific purpose of implementing one or more operations or a part thereof;</p> <p>FI</p> <p>(Comments):</p> <p>Alternative drafting suggestion: ‘contractor’ means in the case of public procurement an entity or a natural person with whom the beneficiary or the recipient enters into a contract for the specific purpose of implementing one or more operations or a part thereof where public procurement procedures above the Union thresholds are concerned</p>
<p>(6) ‘recipient’ means an entity with or without legal personality, or a natural person, who is not a participant, receiving resources from the Union budget through a beneficiary;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>See comment under (3) of this article</p> <p>EE</p> <p>(Comments):</p>

	<p>The selection of operations is the responsibility of the managing authority, but it is not entirely clear which conditions apply when selecting recipients. For example, is the beneficiary required to apply the selection criteria approved by the monitoring committee?</p> <p>FR</p> <p>(Comments):</p> <p>Les autorités françaises s'interrogent sur la définition de « recipients » et souhaiteraient obtenir une clarification.</p> <p>Notamment, ce terme couvre-t-il le cas des aides allouées à un tiers par un bénéficiaire qui est intermédiaire transparent dans le cadre d'un régime d'aide d'Etat ?</p> <p>Ce terme couvre-t-il les partenaires d'une opération en consortium ?</p> <p>HU</p> <p>(Comments):</p> <p>Are natural persons belonging to the target group of a given project also considered "participants" if they receive financial support within the framework of the project, e.g. a small incentive for volunteers participating in the project or accommodation support for third-country nationals?</p>
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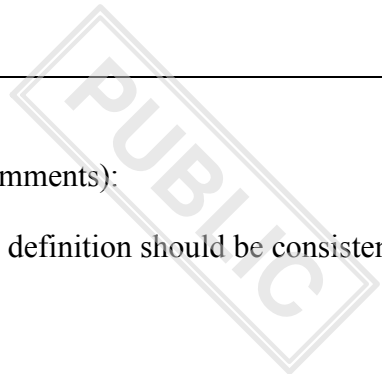
	<p>SE</p> <p>(Comments):</p> <p>SE would like to emphasize that the current suggested definition on recipient is in line with definitions within other legislative texts. For example, state aid regulations.</p>
	<p>EE</p> <p>(Drafting suggestions):</p> <p>‘Cascade funding’</p> <p>EE</p> <p>(Comments):</p> <p>We propose to add under the definitions cascade funding and specifying in the regulation the conditions that cascade funding must meet.</p>
<p>(7) ‘final recipient’ means an entity with or without legal personality or a natural person who is not a participant, receiving support under a financial instrument and who is understood as a recipient for the purposes of Article 38(1) of Regulation (EU, Euratom) 2024/2509;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>See comment under (3) of this article</p> <p>BE</p> <p>(Drafting suggestions):</p>

	<p>‘final recipient’ means <u>the final</u> entity <u>in the financial flow</u> with or without legal personality or a natural person who is not a participant, receiving support under a financial instrument and <u>who is not a contractor or subcontractor.</u></p> <p>HU</p> <p>(Comments):</p> <p>We note that this definition refers to the term financial instrument which is also missing from the regulation. See below.</p> <p>SE</p> <p>(Comments):</p> <p>SE believes that “and who is understood as a recipient for the purposes of Article 38(1) of Regulation (EU, Euratom) 2024/2509” should be clarified to give sufficient guidance on how to determine what constitutes a final recipient.</p>
	<p>HU</p> <p>(Drafting suggestions):</p> <p><u>(7a) financial instrument’: means a form of support delivered via a structure through which financial products are provided to final recipients as defined in Article 2 (30) of the Financial Regulation;</u></p>

	<p><u>(7b) ‘financial product’: means equity or quasi-equity investments, loans and guarantees as defined in Article 2 (30) of the Financial Regulation;</u></p> <p><u>(7c) ‘management fee’: means a price for services rendered, as determined in the funding agreement between the managing authority and the body implementing a holding fund or a specific fund; and, where applicable, between the body implementing a holding fund and the body implementing a specific fund;</u></p> <p>HU</p> <p>(Comments):</p> <p>We propose adding missing definitions in connection with financial instruments.</p> <p>Applying the definitions included in Article 2 2021/1060.</p>
<p>(8) ‘participant’ means a natural person benefiting directly from an operation without initiating or implementing the operation;</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>See comment under (3) of this article</p> <p>BE</p> <p>(Drafting suggestions):</p>

	<p>‘participant’ means <u>an entity with or without legal personality or</u> natural person benefiting directly from an operation without initiating or implementing the operation</p> <p>BE</p> <p>(Comments):</p> <p>Isn’t it also possible to have a ‘participant’ who is not a natural person (for example an entity with or without legal personality, such as a company)? The definitions of (final) recipient are not limited to natural persons.</p> <p>EE</p> <p>(Comments):</p> <p>The definitions should be as flexible as possible that would not hinder the later programming and execution of the NRPP, especially as regards HOME funds.</p> <p>RO</p> <p>(Comments):</p>
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	<p>the definition does not indicate that the ‘participant’ not benefit from resources and a financial instrument support (see point 6 and point 7)</p>
	<p>RO</p> <p>(Drafting suggestions):</p> <p><u>-(9) “reform” means organizational, procedural, administrative, or legislative actions to achieve structural improvements in governance, policy implementation capacity, or investment frameworks, including the operationalization of legislative measures and capacity-building initiatives required for structural improvements in governance frameworks, public administration efficiency, or investment delivery mechanisms essential for meeting EU policy objectives and for effective EU funds absorption.</u></p> <p>RO</p> <p>(Comments):</p> <p>Reforms shall encompass legislative acts as well as non-legislative actions, including organizational, procedural, and administrative measures to achieve structural improvements in governance, public administration capacity, or investment frameworks necessary for the effective delivery of policy objectives.</p>



<p>(9) 'operation' means:</p>	<p>FI</p> <p>(Comments):</p> <p>The definition should be consistent with article 2(1) of the PR.</p> <p>PT</p> <p>(Comments):</p> <p>PT: Although it should be borne in mind that the scope of the Performance Regulation covers the entire EU budget and is not limited to the Plans regulated by the Fund/NRPP Regulation, it is considered that it should be confirmed whether the inconsistency detected in the definitions of 'operation' and 'measure' in both Regulations is justified.</p> <p>RO</p> <p>(Comments):</p> <p>The definition of "operation" should be harmonized with the definition of "operation" as outlined in the Regulation on the performance framework and consolidated within a single regulation rather than appearing in both.</p>
<p>(a) a project, contract, action or group of projects or group of actions selected in the context of implementing a measure in the Plan;</p>	<p>BE</p> <p>(Drafting suggestions):</p>

(a) a project, ~~contract~~, action or group of projects or group of actions selected in the context of implementing a measure in the Plan

BE

(Comments):

A contract is not an operation and is of different nature (compared to a project or an action), it is a legally binding agreement.

EE

(Comments):

It is not 100% clear whether this refers only to the beneficiary's project or whether it could be recipient's project as well. Definition should clarify this.

PL

(Drafting suggestions):

(a) a project, contract, action or group of projects or group of actions selected in the context of implementing a measure in the Plan;
including a project scheme, under which the beneficiary provides financial grants to recipients for the implementation of project's objectives;

	<p>RO</p> <p>(Drafting suggestions):</p> <p>(a) a project, contract, action or group of projects or group of actions selected in the context of implementing a measure in the <u>NRP Plan</u> and <u>Interreg Plan</u>;</p> <p>RO</p> <p>(Comments):</p> <p>Drafting proposal made to align with the wording of the other paragraphs in this article and ensure coverage of Interreg</p>
<p>(b) in the context of financial instruments, a contribution from the NRP Plan and the Interreg Plan to a financial instrument and the subsequent financial support provided to final recipients by that financial instrument;</p>	
<p>(c) in the context of the CAP, a payment granted to farmers under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).</p>	<p>AT</p> <p>(Comments):</p>

The definition of an operation in connection with the CAP differs from the previous definition in Regulation 2021/2115 Art. 3 (4) and is considered too narrow, as it only covers area- and animal-related measures.

The definition should be broadened or clarified

BE

(Comments):

Question: Why is the wording 'payment granted' used for the interventions (a) to (g), (o) and (p) of Art. 35(1)?

CZ

(Drafting suggestions):

~~(c) — in the context of the CAP, a payment granted to farmers under area and animal based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).~~

CZ

(Comments):

Should be part of CAP regulation.

DE

(Drafting suggestions):

(c) in the context of the CAP, a payment granted to farmers **or, where applicable, other beneficiaries,** under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).

DE

(Comments):

DE: It is not really clear why “Operation” must be defined especially for the area- and animal-based CAP-Interventions.

We assume, that for the Categories of Interventions not mentioned in Art. 35, Art. 4 (9) a) have to apply.

Re ”or, where applicable, other beneficiaries,”: At least in the case of interventions referred to in Article 35(1), point (f) [= Agri-environmental and climate actions], payments may also be granted to “other beneficiaries”, cf. Art. 10(1), point (a) of the CAP Regulation.

FR

(Drafting suggestions):

A transférer dans le règlement “PAC”

~~(e) — in the context of the CAP, “Operation” means :~~ a payment granted to farmers under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).

FR

(Comments):

Les autorités françaises demandent le transfert de cette définition dans le règlement PAC, avec les modifications indiquées.

HU

(Comments):

The terminology used in the draft Single Fund and CAP regulations is inconsistent. The terms "operation," "measure," and "intervention" are used interchangeably, making it unclear when they refer to the same or different concepts. The difference between the concepts of intervention and measure needs to be clarified. Intervention is currently not defined in the regulation. This inconsistency affects several articles.

This definition should be moved to the CAP regulation.

IE

(Drafting suggestions):

in the context of the CAP, a payment granted to farmers **and other beneficiaries** under ~~area- and animal-based CAP income support~~ interventions referred to in Article 35(1) [Types of intervention], ~~points (a) to (g), (o) and (p).~~

LU

(Drafting suggestions):

~~in the context of the CAP, a payment granted to farmers under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).~~

“in the context of the common agricultural policy, a payment granted to farmers under area- and animal-based income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).and investments falling under the CAP.”

LU

(Comments):

The complete provisions of art 4 par 9 c) should be transferred to the CAP regulation

We would prefer to maintain the term “interventions” for all our measures as it is the case for the CAP SP. Also, in Annex V page 26, the table defines “Interventions of the Common Agriculture Policy”.

LV

(Drafting suggestions):

~~(c) in the context of the CAP, a payment granted to farmers under area and animal based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p):~~

LV

(Comments):

This provision should be moved to the CAP post-2027 regulation

NL

(Drafting suggestions):

~~(c) in the context of the CAP, a payment granted to farmers under area- and animal-based-CAP income -support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).~~

NL

	<p>(Comments):</p> <p>To ensure that beneficiaries under the CAP can also carry out an operation under point (a) or (b). To confirm that under the definition of an “operation” all possible beneficiaries under the CAP, i.e. not only farmers, are catered for under points (a), (b) and (c).</p> <p>RO</p> <p>(Comments):</p> <p>RO proposes to be moved in the CAP Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(c) in the context of the CAP, mainly a payment granted to farmers under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).</p> <p>SK</p> <p>(Comments):</p> <p>Slovakia requests an extension of the definition in the form of an addition to the text “mainly”.</p>

<p>(10) ‘measure’ means a reform, an investment or another intervention at national or sub-national level supported under the NRP Plan or the Interreg Plan;</p>	<p>AT</p> <p>(Comments):</p> <p>It is necessary to define the term ‘measure’ in relation to the terms ‘operation’ (point 9) and ‘intervention’, ‘activity’ and ‘intervention field’ from the Performance Framework Regulation, as well as their interaction.</p> <p>The terms have to be precisely defined and distinguished from one another. This would also contribute to administrative simplification</p> <p>DE</p> <p>(Comments):</p> <p>Does this mean that the term “measure” is synonymous with the term “intervention”? If not, where exactly is the difference between the two? Why is the term “intervention” not defined in Article 4?</p> <p>EE</p> <p>(Comments):</p> <p>2) We propose to consider adjusting the definition of the term ‘measure’ in the Performance Framework Regulation so that defining the term</p>
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	<p>separately in the NRPP Regulation would no longer be necessary. Defining the same term differently creates confusion.</p> <p>FI</p> <p>(Comments):</p> <p>The definition should be consistent with article 2(3) of the PR.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(10) ‘measure’ means a reform, an investment or another intervention at national or sub-national level supported under the NRP Plan or the Interreg Plan, <u>with the exception of certain interventions (to the extent as) specified in the [CAP Regulation]</u></p> <p>HU</p> <p>(Comments):</p> <p>The definition of “measure” needs further clarification. Area- and animal-based measures of the CAP are managed differently and are essential to the income stability of farmers and for food security, therefore their continuity must be ensured.</p> <ul style="list-style-type: none">• The hereby proposed modification of the ‘measure’ definition should be accompanied by adding a new para (2a) to Article 5. of the CAP
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regulation: *Interventions referred to in paragraph 1, points (a), b), c), d), e), f) and g) shall not constitute measures within the meaning of Article [list of Articles using the term 'measure', which should not be applied to these interventions] [NRPP Regulation] in accordance with Article 4(10) thereof.*

- Along the same logic, we propose to include a safeguard for the area- and animal-based CAP measures for the case the plan is not adopted in time: Article 21 Para 3 (New) Subparagraph 3: *In case the financing decision referred to in paragraph 7 of Article 23 is not adopted before 31 December 2027, by way of derogation from the first subparagraph, Member States may decide to submit expenditure incurred in 2028 related to area- and animal-based interventions referred to in Paragraph 2 of Article 65 of (Reg.) EU 2021/2116 for financing provided that these expenditures are effected in accordance with their CAP Strategic Plan in force on 31 December 2027 and with this regulation.*

(New) Subparagraph 4:

Financing decision adopted after the date that Members States has made the decision referred to in the third subparagraph shall not contain Union

expenditure for year 2028 related to interventions listed in article 35 (1) points a)-g).

IT

(Comments):

It would be appropriate to ensure greater alignment of terminology and definitions between the Performance Regulation and the NRPP Regulation. In particular, this concerns the definition of “activity” (which appears only in the Performance Regulation) and that of “measure” (which appears in both regulations but with differing formulations).

In the Performance Regulation:

- ‘**measure**’ means a reform, an investment or any other intervention included in plans drawn up by Member States or third countries, which may consist of one or more **activities**;
- ‘**activity**’ means the specific initiative undertaken to contribute to the achievement of an objective set, which may correspond to a measure in plans drawn up by Member States or by third countries.

LU

(Comments):

	<p>A definition for measure should be included in the CAP regulation, with a wording including farm investments</p> <p>PT</p> <p>(Comments):</p> <p>PT: In regard to the concept of ‘measure’, it is important to clarify whether it necessarily covers investments and reforms (as seems to be suggested by slide 36 of document WK 15356/2025 ADD 1) or whether it covers, alternatively, investments and/or reforms. If it is mandatory, then we believe that the definition of ‘measure’ in Article 4 needs to be improved.</p> <p>RO</p> <p>(Comments):</p> <p>The definition of "measure" should be harmonized with the definition of "measure" as outlined in the Regulation on the performance framework and consolidated within a single regulation rather than appearing in both.</p> <p>What is to be understood by „ another intervention” ?</p> <p>SI</p> <p>(Drafting suggestions):</p>
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	<p>(10) ‘measure’ means a reform, an investment, <u>part of an investment</u> or another intervention at national or sub-national level supported under the NRP Plan or the Interreg Plan;</p> <p>SI</p> <p>(Comments):</p> <p>We anticipate that the investment may consist of several different measures.</p> <p>SK</p> <p>(Comments):</p> <p>For the better clarity we would appreciate including of a specific definition for “reform” in this article.</p>
<p>(11) ‘milestone’ means a qualitative achievement used to measure progress towards the achievement of a measure;</p>	<p>BE</p> <p>(Comments):</p> <p>“Qualitative” is unclear here</p> <p>FI</p> <p>(Comments):</p>

The following definition is given: ‘milestone’ means a qualitative achievement used to measure progress towards the achievement of a measure. Where are the “qualitative” criteria defined if the milestones are qualitative? Would the indicators concerning CAP still mainly be output-based? Qualitative indicators may already be in use in some other areas. Can the intermediate target for quantitative targets also be milestones? In the current period, milestone concerning CAP is a quantitative milestone.

FR

(Drafting suggestions):

‘milestone’ means a **quantitative or** qualitative achievement used to measure progress towards the achievement of a measure;

FR

(Comments):

D’après les premiers retours de la Commission (GREX et réponses aux questions des EM), il existe une ambiguïté entre la présente définition du “*milestone*”, limitée aux réalisations qualitatives, et la présentation faite par la Commission lors du GREX, qui évoque des jalons correspondant à des points d’avancement intermédiaires, pouvant également être quantitatifs.

HU

(Comments):

The concepts of milestones need to be clarified. In the current CAP legislation, a milestone is an intermediate value in the period.

IT

(Drafting suggestions):

to ensure that the plan and its related measures have the actual capacity to request and obtain reimbursements on a yearly basis, it is considered appropriate to better define what is meant by the term 'milestone', extending the underlying concept to include procedural and/or temporal targets, as it follows:

(11) ‘milestone’ means a qualitative, procedural or temporal achievement used to measure progress towards the achievement of a measure;

NL

(Comments):

This regulation also uses the terminology “output”. It is not clear in how far this relates to a “milestone” or “target”. A clear definition is necessary.

	<p>PL</p> <p>(Drafting suggestions):</p> <p><u>‘milestone’ means a qualitative or quantitative achievement, used to measure progress towards the achievement of a measure, including in the form of an interim step;</u></p> <p>PL</p> <p>(Comments):</p> <p>PL considers that the milestone can also be quantitative when reflecting of progress towards achieving a final target (e.g. 50% of 100 km). It is important to have in the definition of the milestone the reference to the interim step taking into account their significant role in triggering payments.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(11)‘milestone’ means a qualitative or quantitative achievement, used to measure progress towards the achievement of a measure, including in the form of an interim step;</p> <p>RO</p>
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	<p>(Comments):</p> <p>RO considers that the milestone can also be quantitative when reflecting of progress towards achieving a final target (e.g. 50% of 100 km). It is important to have in the definition of the milestone the reference to the interim step taking into account their significant role in triggering payments.</p>
<p>(12) 'target' means a quantitative achievement used to measure progress towards the achievement of a measure;</p>	<p>FI</p> <p>(Drafting suggestions):</p> <p>12) 'target' means a quantitative achievement used to measure progress towards the achievement of a measure <u>and does not require 100 % control of the achievement ;</u></p> <p>FI</p> <p>(Comments):</p> <p>Agri demands at the moment 100 % control. Otherwise auditors think that there is a residual risk. This is not in line with the performance based approach and ambitious green architecture.</p> <p>FR</p>

(Drafting suggestions):

target' means a quantitative achievement used to ~~measure progress~~
towards report on the achievement of a measure »

FR

(Comments):

Différence entre les jalons, qui mesurent les progrès, et la cible qui fixe la valeur finale en fin de période.

HU

(Comments):

The concepts of targets need to be clarified. In the current CAP legislation, a target is the value to be achieved by the end of the period.

NL

(Comments):

This regulation also uses the terminology “output”. It is not clear in how far this relates to a “milestone” or “target”. A clear definition is necessary.

	<p><u>In addition it is necessary to detail for which measure/ type of intervention the definition of an “output” applies.</u></p> <p><u>Voorstel verduidelijkende vraag aan EC:</u></p> <p><u>For which interventions do outputs apply (as opposed to milestones and targets?)</u></p> <p>SE</p> <p>(Drafting suggestions):</p> <p>‘target’ means a quantitative achievement used to measure progress towards the achievement of a measure by using output- and result indicators.</p> <p>SE</p> <p>(Comments):</p> <p>SE would like to have a clearer description which clarifies that it’s both output and result indicators which are regarded as “target”</p>
	<p>EE</p> <p>(Drafting suggestions):</p> <p>(NEW12a) „national contribution“ means national public and private contribution</p>

<p>(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms;</p>	<p>BE</p> <p>(Comments):</p> <p>This definition does not seem to work for output-based interventions of the CAP, animal or area-based.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms <u>principle of proportionality</u>;</p> <p>CZ</p> <p>(Comments):</p> <p>CZ aim of this amendment is to provide a more comprehensive definition, enabling, for example, a separate pay-out value to be assigned to reforms that are not linked to further investments. At the same time, the principle of proportionality emphasises that the pay-out value assigned to a specific milestone or target should reflect its significance in achieving the overall measure.</p> <p>DE</p>
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(Drafting suggestions):

(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of the measures of the Plan, **in relation to a specific chapter of the Plan as defined ex ante**, taking into account the amounts set aside for reforms;

DE

(Comments):

Further refinements are needed regarding the Commission’s definition and criteria for assessing the achievement of milestones and targets.

Reforms and investments cannot simply be treated in the same manner.

To determine the pay-out value associated with a reform-related milestone, we need clear guidelines.

Transparency about payments by the Commission for the progress achieved is needed on a chapter base.

FI

(Drafting suggestions):

(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of

	<p>the measures of the Plan, taking into account the amounts set aside for reforms;</p> <p>FI</p> <p>(Comments):</p> <p>Reforms are measures and therefore have a pay-out value, too. There should be no additional amounts set aside for reforms</p> <p>If only the measures of the Plan have the pay-out value, what about operations? No pay-out value concerning operations, for example under area- and animal based CAP income support interventions (definition operation used, not definition measure)?</p> <p>FR</p> <p>(Comments):</p> <p>Que veut-on dire par “taking into account the amounts set aside for reforms”?</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of</p>
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the measures of the Plan, **taking into account the amounts set aside for reforms;**

NL

(Comments):

We request the Commission to come with more information on the practical and financial implications of the last phrase of this para. It is unclear to us how the amounts for reforms are set and what the interaction is between the payout value and these amounts. This should be clarified in the definition.

PL

(Drafting suggestions):

‘pay-out value’ means the amount to be paid by the Commission to the Member State, as proposed by the Member State for the progress achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms;

PL

(Comments):

	<p>PL proposes to reflect I the definition of pay-out value the recitals (56) and (57), as well as the fact stated repeatedly by the COM that the pay-out values are set by the MS.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms, <u>investments and another interventions</u>;</p> <p>PT</p> <p>(Comments):</p> <p>PT: Current wording is not aligned with the provision of article 23 (7a), where pay-out value should be established for every milestone and target, whether they are linked to a reform or an investment.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>13)‘pay-out value’ means the amount to be paid by the Commission to the Member State, as proposed by the Member State, for the progress achieved in the implementation of the measures of the <u>NRP Plan</u> or</p>
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Interreg Plan, taking into account **for the NRP Plan** the amounts set aside for reforms; **and reflecting both the estimated implementation pace of each measure as well as the need to ensure regular disbursement and timely delivery of the Union on the ground;**

RO

(Comments):

RO proposes to reflect I the definition of pay-out value the recitals (56) and (57), as well as the fact stated repeatedly by the COM that the pay-out values are set by the MS.

SE

(Comments):

SE does not understand the wording in the end “taking into account the amounts set aside for reforms” as pay-out-values shall be defined also for reforms.

SK

(Drafting suggestions):

(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State, **as proposed by the Member State**, for the progress achieved in the implementation of the measures of the

	<p>Plan, taking into account the amounts set aside for reforms; <u>measures and reflecting both the estimated implementation pace of each measure as well as the need to ensure regular disbursement and timely delivery of the Union on the ground;</u></p> <p>SK</p> <p>(Comments):</p> <p>SK proposes to reflect I the definition of pay-out value the recitals (56) and (57), as well as the fact stated repeatedly by the COM that the pay-out values are set by the MS.</p> <p>Does the “reform” here mean a “measure” as per the definition in the paragraph 10 of this Article? There will be an amount set aside for the achievement of a measure as such?</p>
	<p>EE</p> <p>(Drafting suggestions):</p> <p><u>(14a) ‘preparedness by design’ means enhanced Union’s and Member States’ capability to anticipate, prepare for, and respond to crises, disasters, and impacts of climate change, to protect the investments under the union budget, as well as to reinforce internal security.</u></p> <p>EE</p>

	<p>(Comments):</p> <p>Definition provided according to the answer provided by the Commission on 20 November 2025 that refers to recital 12 of the performance framework regulation. Since the overarching principle of ‘preparedness by design’ is within the scope of NRPP regulation, it is not correct to define it in the recital of other regulation. Also, the suggested wording takes into account the fact that the NRPP regulation applies also to union actions.]</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>We propose to add the definition of reform: organisational, administrative or legislative action carried out at the national or regional level.</u></p> <p>PL</p> <p>(Comments):</p> <p>Clear definition of reform allowing for designing regional reforms (in case of numerous countries e.g. Poland regions have no legislative power, however regional chapters could include reforms in some form).</p> <p>RO</p>
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	<p>(Comments):</p> <p>The definition of „measure” includes „reforms”. As long as ”...taking into account the amounts set aside for reforms” is mentioned, it should be clearly stated how reforms are specifically taken into account</p>
<p>(14) ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(14) ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>A transférer dans le règlement “PAC”</p>

~~(14) — ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].~~

FR

(Comments):

La France demande le transfert de cette disposition dans le règlement sectoriel PAC – sans autre modification

HU

(Comments):

This definition should be moved to the CAP regulation.

LU

(Drafting suggestions):

~~(14) — ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].~~

LU

(Comments):

The complete provisions of art 4 par 14 should be transferred to the CAP regulation.

LV

(Drafting suggestions):

~~(14) — ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].~~

LV

(Comments):

This provision should be moved to the **CAP** post-2027 regulation

SK

(Drafting suggestions):

(14) ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons,

	<p>organisations and institutions who use and produce knowledge and innovations for agriculture and rural development and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].</p> <p>SK</p> <p>(Comments):</p> <p>It is not fully clear what “interrelated fields” means in this context.</p>
<p>(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council³;</p>	<p>AT</p> <p>(Comments):</p> <p>Clarification/addition is needed to state that farms in conversion (for the sake of simplification) are included.</p> <p>BE</p> <p>(Drafting suggestions):</p>

³ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

	<p>‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council</p> <p>BE</p> <p>(Comments):</p> <p>The term ‘organic farming’ is only used in Articles 12 and 63 of the NRP-regulation and Articles 4 and 10 of the CAP-Regulation. The term ‘organic farming’ is not used in the Regulation (EU) 2018/848 concerning organic production. It is preferable to use immediately the correct terminology in the relevant articles, in accordance with the regulation (EU) 2018/848.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council⁴;</p>
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⁴ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

	<p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council⁵ <u>based on the whole or part of the farm;</u></p> <p>FI</p> <p>(Comments):</p> <p>Need to follow Omnibus III.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>A transférer dans le règlement “PAC”</p>
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⁵ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

	<p>(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council⁶;</p> <p>FR</p> <p>(Comments):</p> <p>A transférer dans le règlement sectoriel PAC – sans autre modification</p> <p>HU</p> <p>(Comments):</p> <p>This definition should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council⁷;</p>
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⁶ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

⁷ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

	<p>LU</p> <p>(Comments):</p> <p>The complete provisions of art 4 par 15 should be transferred to the CAP regulation</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council⁸;</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post-2027 regulation</p>
<p>(16) ‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same</p>	<p>BE</p> <p>(Drafting suggestions):</p>

⁸Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;

In the context of the CAP, ...

BE

(Comments):

Question: Why is the phrase ‘within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU’ inserted in this definition? Is the proposed definition (16) different from the current CAP following Regulation (EU) 2021/2115?

CZ

(Drafting suggestions):

~~(16) — ‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;~~

CZ

(Comments):

Should be part of CAP regulation.

FI

(Drafting suggestions):

(16) ‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU **The same person, as a natural or legal person, may manage more than one holding if it is not question about artificial conditions which give more support than based on one holding for at least one intervention;**

FI

(Comments):

Based on answers given by the CION the same person, as a natural or legal person, may manage more than one holding, acting e.g. as two different farmers: a natural and a legal person. Support is granted for each individual holding.

This approach should be seen in the definition.

It is important that the definition of beneficiary, as set out in points (3)(c)(i) and (ii), take into account groups of natural or legal persons. Such an approach has provided a stronger basis for considering as a single holding those agricultural activities which have been artificially splitted into different legal entities by the same natural person or persons, with the intention of circumventing the definition of a holding. Definition

is important so could the Commission prepare a working document on this subject?

FR

(Drafting suggestions):

A transférer dans le règlement “PAC”

~~(16) — ‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;~~

FR

(Comments):

A transférer dans le règlement sectoriel PAC – sans autre modification

HU

(Comments):

This definition should be moved to the CAP regulation.

LU

(Drafting suggestions):

~~‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;~~

LU

(Comments):

The complete provisions of art 4 par 16 should be transferred to the CAP regulation

LV

(Drafting suggestions):

(16) ~~‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;~~

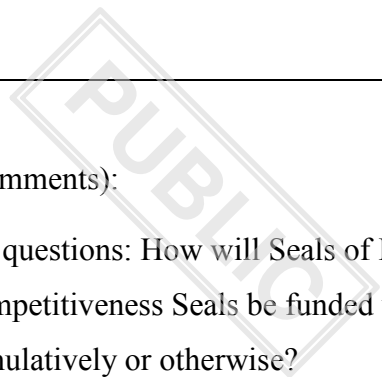
LV

(Comments):

This provision should be moved to the CAP post-2027 regulation

RO

	<p>(Comments):</p> <p>RO proposes to be moved in the CAP Regulation</p>
<p>(17) ‘the smaller Aegean islands’ means any islands in the Aegean Sea except the islands of Crete and Evia.</p>	<p>HU</p> <p>(Comments):</p> <p>This definition should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>‘the smaller Aegean islands’ means any islands in the Aegean Sea except the islands of Crete and Evia.</p> <p>LU</p> <p>(Comments):</p> <p>The complete provisions of art 4 par 17 should be transferred to the CAP regulation.</p>



<p>(18) ‘seals’ means Seals of Excellence and Sovereignty Seals granted in the implementation of Union programmes in the 2021 to 2027 programming period and Seals granted under Union programmes implemented in direct management in the 2028-2034 period such as the Competitiveness seal;</p>	<p>HR</p> <p>(Comments):</p> <p>HR questions: How will Seals of Excellence, Sovereignty Seals and Competitiveness Seals be funded under the NRP – alternatively, cumulatively or otherwise?</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(18) ‘seals’ means Seals of Excellence and Sovereignty Seals granted in the implementation of Union programmes in the 2021 to 2027 programming period and Seals granted under Union programmes implemented in direct management in the 2028-2034 period such as the Competitiveness seal <u>or any other seal that will be issued by the Commission within the 2028-2034 period;</u></p> <p>SI</p> <p>(Comments):</p> <p>We suggest to enable also possibility of any other seal that will be possible to obtain from the EC or its institutions.</p>

(19) ‘subcontractor’ means a person or entity with whom the contractor has concluded a contract to perform part of a contract for the specific purpose of implementing one or more operations or a part thereof;

EE

(Drafting suggestions):

‘subcontractor’ means a person or entity with whom the contractor has concluded a **the** contract to perform part of a **the** contract for the ~~specific~~ purpose of implementing one or more operations or a part thereof;

EE

(Comments):

The term ‘the contract’ is more precise, as it refers to the specific main contract under which the contractor performs the work. Using ‘a contract’ could imply any contractual relationship the contractor may have, even if unrelated to the operation in question. Replacing it with ‘the contract’ ensures that the definition applies only to subcontracting arrangements linked to the contract covered by this regulation, thereby avoiding ambiguity and ensuring legal clarity.

FI

(Drafting suggestions):

(19) ‘subcontractor’ means a person or entity with whom the contractor has concluded a **sub**-contract, **with a total value of the sub-contract**

	<p><u>exceeding 50 000 euro</u>, to perform part of a contract for the specific purpose of implementing one or more operations or a part thereof;</p> <p>FI</p> <p>(Comments):</p> <p>alternative drafting suggestion: 'subcontractor' means in the case of public procurement the first level of subcontractor and only for subcontracts above EUR 50 000 total value a person or entity with whom the contractor has concluded a contract to perform part of a contract for the specific purpose of implementing one or more operations or a part thereof where public procurement procedures above the Union thresholds are concerned;</p>
<p>(20) 'crisis' means crises as defined in Article 2, point (22) of Regulation (EU, Euratom) 2024/2509;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>'crisis' means crises a crisis as defined in Article 2, point (22) of Regulation (EU, Euratom) 2024/2509</p> <p>BE</p> <p>(Comments):</p>

	<p>correction to be in line with Reg. 2024/2509</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>‘crisis’ means crises as defined in Article 2, point (22) of Regulation (EU, Euratom) 2024/2509 <u>and in Article 1 paragraph 4 of Regulation (EU) 2024/1359;</u></p> <p>EE</p> <p>(Comments):</p> <p>As the NRPP Regulation applies to the field of migration and asylum, and a separate regulation specifically addresses crisis situations in that context, it should be explicitly referenced in the definition for the sake of legal clarity.</p>
	<p>EL</p> <p>(Drafting suggestions):</p> <p><u>(20a) “crisis situations” as defined in Article 1(4) of Regulation EU 2024/1359;</u></p> <p>EL</p>

(Comments):

EL considers that crisis definition as defined in HOME AFFAIRS Regulation should be added. The current definition of “*crisis*” in Article 4(20) NRPP—which refers to Article 2(22) of Regulation (EU, Euratom) 2024/2509—is too broad for the purposes of the Home Affairs Funds. More specifically, Article 2(22) of the Financial Regulation ((EU, Euratom) 2024/2509) sets out a very broad concept of situations—ranging from armed conflict and instability to natural disasters, pandemics, environmental degradation, food security emergencies, and energy deprivation—which does not correspond to the specific characteristics and needs of all migration-related crises, especially the ones related to the external sea borders of EU.

In this context, EL considers it essential that the term “*crisis*” is aligned with Art 1(4) of Regulation (EU) 2024/1359. This definition accurately captures the nature of the crises that have already arisen in the field of migration at the external borders of the EU, such as large-scale arrivals that may render asylum, reception, or return systems non-functional, as well as cases of instrumentalization aimed at destabilizing a Member State or the Union.

IT

(Drafting suggestions):

(21) “crisis situations” means crises situations in the field of home affairs as defined in Article 1(4) of Regulation EU 2024/1359;

IT

(Comments):

The current definition of “*crisis*” in Article 4(20) NRPP—which refers to Article 2(22) of Regulation (EU, Euratom) 2024/2509—is too broad for the purposes of the Home Affairs Funds. More specifically, Article 2(22) of the Financial Regulation ((EU, Euratom) 2024/2509) sets out a very broad concept of situations—ranging from armed conflict and instability to natural disasters, pandemics, environmental degradation, food security emergencies, and energy deprivation—which does not correspond to the specific characteristics and needs of all migration-related crises, especially the ones related to the external sea borders of EU.

In this context, IT considers essential that the term “crisis” is aligned with Art 1(4) of Regulation (EU) 2024/1359. This definition accurately captures the nature of the crises that have already arisen in the field of migration at the external borders of the EU, such as large-scale arrivals that may render asylum, reception, or return systems non-functional, as

	well as cases of instrumentalization aimed at destabilizing a Member State or the Union.
(21) ‘pillar assessment’ means the assessment referred to in Articles 157(3) and (4) of Regulation (EU, Euratom) 2024/2509;	
(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>In the context of the CAP, ...</u></p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p>

	<p>(Drafting suggestions):</p> <p>(22) — Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>DE</p> <p>(Comments):</p> <p>It is not clear what is the flexibility for Member States to define the terms in point 22 in detail. It seems there are elements in point 22 for which Member States have no margin of flexibility. It is not clear from the introductory part of point 22, or in part from the individual terms dealt with, what flexibility the Member States still have in the scope of definitions. On the one hand, it is said that the MS define, on the other hand, for example, point (a)(i) defines what an activity is. In particular, unlike Article 4(1) of Regulation (EU) 2021/2115, the introductory part does not state that the Member States are also required to lay down the relevant conditions. Otherwise, too, less leeway is expressly referred to as such than in Regulation 2021/2115. To a large extent, the formulations used can already be regarded as indefinite legal concepts that could be applied in each individual case. Where there is no room for flexibility,</p>
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directly applicable definitions should be laid down in accordance with the general rule laid down in Article 4.

In the sense of legal clarity where the definitions for the CAP provide for regulatory leeway or obligations for Member States, this should be clearly limited to those parts of the respective definition where this is the case.

To the extent that Member States do not have some leeway with regard to individual definitions, these parts of the definitions should be directly regulated in EU law, in accordance with the general rule of Article 4, so that there is no need for Member States to transpose them. This applies in particular to paragraph 22. But also point 3 (3) (c) seems to be affected here.

The following proposals aim to clarify this.

FR

(Drafting suggestions):

Article à transférer dans le règlement “PAC”

~~(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.~~

	<p>FR</p> <p>(Comments):</p> <p>Les autorités françaises demandent à ce que le paragraphe 22 soit transféré dans sa totalité dans le règlement PAC, avec les modifications rédactionnelles proposées aux points ci-dessous :</p> <p>HU</p> <p>(Comments):</p> <p>This definition with all its points and subpoints from (a) to (d) should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>LU</p> <p>(Comments):</p>
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	<p>The complete provisions of art 4 par 22 should be transferred to the CAP regulation</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>NL</p>
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	<p>(Comments):</p> <p>The principle of proportionality comes into play when implementing the defined criteria, but not when establishing the definitions as such.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p><u>(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, ‘active farmer’ and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</u></p> <p>PL</p> <p>(Comments):</p> <p>In point 44 of the preamble to the Regulation it is written that “CAP support should be focused on active farmers defined in compliance with WTO rules.”. Therefore it is justified to add legal basis concerning the definition of active farmer.</p> <p>SK</p> <p>(Drafting suggestions):</p>
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	<p>(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(a) ‘agricultural activity’ shall be determined through one or both of the following activities:</p>	<p>AT</p> <p>(Comments):</p> <p>i + ii) Clarification/addition is needed here to state that part time farms and farms whose main focus is landscape conservation or nature conservation are also included.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(a) ‘agricultural activity’ shall be determined through one or both of the following activities:</p> <p>CZ</p>

	<p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(a22) ‘agricultural activity <u>means activity</u>’ shall be determined through one or both of the following activities:</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(a) ‘agricultural activity’ shall <u>may</u> be determined through one or both of the following activities, <u>but (i) is compulsory</u></p> <p>FI</p> <p>(Comments):</p> <p>One or both means that maintenance of agricultural areas can be left out of MS definition? Why can't Member States be given a genuine opportunity to define agricultural activity without dividing it into these two categories? How to boost the active contributing to food security if maintenance of agricultural areas are allowed?</p> <p>LU</p>
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(Drafting suggestions):

~~(a) — ‘agricultural activity’ shall be determined through one or both of the following activities:~~

~~(i) — production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;~~

~~(ii) — maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.~~

LV

(Drafting suggestions):

(a) — ‘agricultural activity’ shall be determined through one or both of the following activities:

LV

(Comments):

	<p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(a) — ‘agricultural activity’ shall be determined through one or both of the following activities:</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(i) production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(i) — production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;</p> <p>CZ</p> <p>(Comments):</p>

	<p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(ai) production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton, and short rotation coppice <u>and any products produced by way of paludiculture</u>;</p> <p>DE</p> <p>(Comments):</p> <p>“Which consists of all activities aimed at obtaining those products’: Is the interpretation correct that this [for example] also includes the storage of inputs for the production of agricultural products? What other differences to the current provision in Article 4(2) of Regulation (EU) 2021/2115 (‘Production of agricultural products’) result from the amended wording? Is the production itself still covered by the formulation?</p> <p>It is appropriate to supplement other products not listed in Annex I TFEU, in particularly - against the background of the importance of rewetting former moorland - ‘products produced by way of paludiculture’.</p>
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	<p>FI</p> <p>(Drafting suggestions):</p> <p>(i) production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton, <u>construction and non food materials</u> and short rotation coppice;</p> <p>FI</p> <p>(Comments):</p> <p>Where are the products cultivated for purposes such as bioenergy (in addition to short rotation coppice) or for uses other than Annex I products, even though agricultural land is used for their cultivation? Ambiguities should be eliminated — for example, young common reed (<i>Phragmites australis</i>) can be used as fodder, but older reed used for roofs is not eligible for support. Eligibility should no longer be determined based on the intended use.</p> <p>LU</p> <p>(Drafting suggestions):</p>
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- (i) — production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;
- (ii) — maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.
- (b) — ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.
- (c) — ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:
- (i) — agricultural areas on which an agricultural activity is performed under the farmer’s control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.

LV

(Drafting suggestions):

~~(i) — production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;~~

LV

(Comments):

This provision should be moved to the CAP post - 2027 Regulation

NL

(Drafting suggestions):

(i) production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means cotton and short rotation coppice as well as products listed in Annex I to the TFEU with the exception of fishery products, as well as cotton and short rotation coppice;

SK

	<p>(Drafting suggestions):</p> <p>(i) — production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(ii) maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation, <u>without preparatory action going beyond the use of usual agricultural methods and machinery</u>; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.</p> <p>BE</p>

(Comments):

Addition in line with Article 4(2) of Regulation (EU) 2021/2115.

The last part '*where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered 'maintenance'*', forms part of the phrase '*maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation, without preparatory action going beyond the use of usual agricultural methods and machinery*', based on the definition in the current Regulation (EU) 2021/2115.

Question: why is this last part being added, given that it is already covered by maintenance in the implementation of the Regulation 2021/2115? Is the intention of this addition to give Member States the choice of counting extensive grazing by farmers as maintenance?

CZ

(Drafting suggestions):

~~(ii) — maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons,~~

~~extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.~~

CZ

(Comments):

Should be part of CAP regulation.

DE

(Drafting suggestions):

(iih**)** maintenance of agricultural areas, which consists of ~~the~~ activities **as determined by the Member States** aiming at keeping the land in a state suitable for grazing or cultivation; **where an area not used for production remains in the condition to be maintained throughout the year this may also be determined to be sufficient; Member states may determine that where duly justified** for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production, **as determined by the Member States**, for the farmers concerned may also be considered ‘maintenance’.

DE

(Comments):

Clarification that Member States may determine that it is sufficient that a farmer must not carry out an activity of conservation on an area not used for production during a claim year, provided that the area remains in the condition to be maintained throughout the year.

‘extensive grazing’: Should be an option for reasons of simplification and red tape reduction. As there the requirements how to determine that extensive grazing does not lead to an increase (compared to what?) in agricultural production for all ‘farmers concerned’ Member States choosing this option should have to define this.

It should be made clear that ‘farmers concerned’ are no other than those who indicate the area in the application for reasons of simplification and red tape reduction.

It is unclear why this needs to be justified when the reason is clear (“animal welfare or environmental reasons”).

FI

(Drafting suggestions):

(ii) maintenance of agricultural areas **up to 40 % of the agricultural area of the holding**, which consists of the activities aiming at keeping the

land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered 'maintenance'. **As a derogation from the 40 % rule higher percentage can be used to support regions facing challenges related to specific object related to the right to stay and risk that the countryside will be inhabited and unsafe to face challenges in border regions.**

FI

(Comments):

Maintenance of agricultural areas is part of agricultural activity (if MS so wish). How big share of the farm can be under maintenance of agricultural areas and the farmer is still a farmer who actively contributes to food security? Why is maintenance of agricultural areas accepted? Why don't we move towards requiring the production of ecosystem services instead of merely maintenance of agricultural areas? There should be no need to pay support merely for maintaining areas. Wouldn't making the production of ecosystem services a condition for receiving support be more appropriate? Ecosystem services — including those

beyond food production — are a reality today, and they are not simply about maintenance of agricultural areas.

FR

(Drafting suggestions):

ii) maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; ~~where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be~~ considered ‘maintenance’.

FR

(Comments):

Les autorités françaises ne comprennent pas la portée de l’ajout fait sur la définition du maintien. L’entretien peut se faire par le pâturage des animaux ou par d’autres moyens mécaniques. Le lien entre entretien et activité animale interroge par ailleurs au regard des règles de l’OMC.

LU

(Drafting suggestions):

- ~~(ii) — maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’;~~
- ~~(b) — ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.~~
- ~~(c) — ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:~~
- ~~(i) — agricultural areas on which an agricultural activity is performed under the farmer’s control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.~~
- ~~(ii) — areas for which support is provided under Article 35(1) points (a) and (g) [degressive income support, small farmers] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or~~

~~national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives~~

~~(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel~~

~~(d) ‘young farmer’ shall be defined in such a way as to fulfil at least the following conditions:~~

~~(i) an upper age limit set between 35 years and 40 years;~~

~~(ii) being ‘head of the holding’.~~

~~Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.~~

LV

(Drafting suggestions):

~~(ii) maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental~~

	<p>reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(ii) — maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>

<p>(b) ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.</p>	<p>AT</p> <p>(Comments):</p> <p>In contrast the current CAP, this is a general formulation. As a result, there are specifications regarding grassland conversion, for example</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(b) ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p><u>(22ab)</u> ‘agricultural area’ <u>means</u> shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems <u>where agroforestry system is to be defined by the Member States.</u></p>
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DE

(Comments):

It should be ensured, that, e.g., habitat types whose conservation depends on agricultural use can in all cases be classified as “agricultural area.”

Information about the reasons for adopting a new approach to the definition of ‘agricultural area’, which no longer refers to the crops on the land but to the agricultural activity would be welcomed.

Is the interpretation correct that this definition is an extension of the agricultural area compared to the status quo in so far as, in the future, not only areas which are arable land, permanent crops or permanent grassland within the meaning of the current Regulation 2021/2115 are included, but also other areas used for the production of Annex I products, e.g. areas used for livestock farming, which are not agricultural areas within the meaning of the current Regulation 2021/2115 or also areas with Christmas tree crops?

FI

(Drafting suggestions):

(b) ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including **where such**

land forms productive or non-productive agroforestry systems, without prejudice to the possibility for Member States to exclude land used for agricultural activities that is not defined as agricultural area.

FI

(Comments):

We welcome the fact that sub-categories of agricultural areas are no longer defined at the EU level. However, according to Article 63(1)(a)(viii), the MSs have to collect and report the total number of hectares of those sub-categories (permanent grassland and permanent crops). Does this mean that the MS use their own definition of sub-categories for collecting and reporting data? Why is that data still needed when no sub-categories exist? Do agroforestry areas have to be productive by definition?

A Member State should have the possibility to exclude certain areas from agricultural land, even if they are used for agricultural activities.

Agricultural area' shall be defined so as to comprise only land that is used for agricultural activities, including where such land forms part of agroforestry systems, without prejudice to the possibility for Member States to exclude eligible land that is not designated as agricultural area.

FR

	<p>(Comments):</p> <p>Les autorités françaises s’interrogent sur l’utilisation du terme “land”. La Commission peut-elle confirmer que comme aujourd’hui, seules les cultures en contact direct avec la terre peuvent bénéficier des aides à la surface de la PAC ?</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(b) — ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SE</p> <p>(Comments):</p> <p>SE support the idea that MS have the possibility to define arable land, permanent grassland and permanent crops, but it might be useful to</p>
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	<p>include some basic aspects of the definitions in the regulation since MS shall report the area under the different categories.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(b) — ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(c) ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:</p>	<p>AT</p> <p>(Comments):</p> <p>Applies for (i) and (ii): Here too, ‘groups of natural or legal persons’ should be included in the definition.</p> <p>It is also noted that, as in the previous period, there is no definition of the term ‘active farmer’ in accordance with Article 4(5) of Regulation 2021/2115.</p>

	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(e) — ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(e22b) ‘eligible hectare’ <u>means shall be defined in such a way as to comprise only</u> areas which are at the farmers’ disposal <u>on a date or in an period fixed by the Member States, which both may be differentiated for different types of support,</u> and which comprise:</p> <p>DE</p> <p>(Comments):</p> <p>The disposal of an area declared for CAP support in an application by a farmer could go to another farmer later in the year. This should not as such result in the exclusion of an area still fulfilling the conditions.</p>
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	<p>LV</p> <p>(Drafting suggestions):</p> <p>(c) — ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(c) ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and on which an agricultural activity is performed under the farmer’s control in terms of management, benefits and financial risks, and which comprise:</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(c) — ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:</p> <p>SK</p>
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	<p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(i) agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(i) — agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(ai) agricultural areas on which <u>an are used for an</u> agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be</p>

predominant where such predominance is to be determined by the Member States as is the period during which the area has to be an eligible area, where the latter may be differentiated for different types of support. Where duly justified for environmental, biodiversity and climate-related reasons, Member States may decide that eligible hectares also include certain areas used for agricultural activities only every second year.

DE

(Comments):

Deletion of: 'on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks':

no reason apparent for this requirement in addition to the requirement that the area must be at the farmers disposal in order to be an eligible area. Such requirement seems also not to take into account the event of a change of area from one farmer to another over the course of a year and would not be in line with the objective of simplification and red tape reduction.

'used' instead of 'performed': same word as in definition agricultural area in point (b).

It should be made clear that it is up to the Member States to define when the agricultural activity is predominant.

The possibility to include, for environmental, biodiversity and climate-related reasons, also areas used for agricultural activities only every second year (cf. Art. 4(4), point (a) of Regulation (EU) 2021/2115) should be retained.

FR

(Drafting suggestions):

(i) agricultural areas on which an agricultural activity is performed under the farmer's control ~~in terms of management, benefits and financial risks~~. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.

FR

(Comments):

Les autorités françaises demandent la suppression de “in terms of management, benefits and financial risk” car ces notions semblent faire doublon avec l'exigence que l'exploitant ait les terres à disposition (cf. jurisprudence de la CJUE) et sont des notions peu claires et difficiles à contrôler.

LV

(Drafting suggestions):

	<p>(i) agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(i) agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.</p> <p><u>any agricultural area of the holding that, during the year for which support is requested, is used for an agricultural activity or, where the area is also used for non-agricultural activities, is predominantly used for agricultural activities;</u></p> <p>NL</p>
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	<p>(Comments):</p> <p>According to the explanations from the Commission, the definition of the current CAP are not expected to change. Therefore it is advisable to use the same wording as in the currently applicable provision in the CAP.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(i) — agricultural areas on which an agricultural activity is performed under the farmer’s control in terms of management, benefits and financial risks. If non agricultural activities are also performed on these areas, the agricultural activity shall be predominant.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(ii) areas for which support is provided under Article 35(1) points (a) and (g) [<i>degressive income support, small farmers</i>] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [<i>BISS [all incl. entitlements], small farmers scheme</i>], of Regulation (EU) 2021/2115, where agricultural activity is not</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(ii) — areas for which support is provided under Article 35(1) points (a) and (g) [<i>degressive income support, small farmers</i>] of this Regulation, or</p>

performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives

~~under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives~~

CZ

(Comments):

Should be part of CAP regulation.

DE

(Drafting suggestions):

(iib**)** areas for which support **is was** provided under Article 35(1) points (a) and (g) [*degressive income support, small farmers*] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [*BISS [all incl. entitlements], small farmers scheme*], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions **according to the NRP Plan** or other programmes which contribute to the environmental and climate-related CAP specific objectives **or as a result of the application of**

Directive 92/43/EEC, 2009/147/EC or 2000/60/EC to that area, as well as any area covered by landscape features subject to a retention obligation under farm stewardship

DE

(Comments):

All measures covered by Article 4(4)(b)(ii) and (c) of Regulation (EU) 2021/2115 should be covered here and in case this would not yet be the case should also be included.

What does ‘other programmes’ include, which here stands alongside the term ‘interventions’? Should this be further specified, in particular if not meant as open?

Sublit. should be clarified in many respects [...]: What are “Union or national interventions or other programmes”?; which “environmental and climate-related CAP specific objectives” are meant and why are they not mentioned in Art. 3.

DK

(Drafting suggestions):

(ii) areas for which support is provided under Article 35(1) points (a) and (g) [*degressive income support, small farmers*] of this Regulation, or

under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental, **biodiversity** and climate-related CAP specific objectives.

Member States shall, where relevant, establish the definition of ‘other pro-programmes’ in relation to eligible hectare.

DK

(Comments):

Firstly, Biodiversity is listed in Article 3(1)(d)(v) of the proposal as one of the specific objectives of the Fund in relation to the quality of life in the Union, and therefore biodiversity should be mentioned on an equal footing with environmental and climate-related CAP specific objectives.

To ensure that the regulation does not place unintended constraints on the implementation of the green transition by Member States, biodiversity should be explicitly mentioned as one of the reasons why agricultural activity cannot be carried out on agricultural land.

It is therefore proposed to include commitments and obligations in relation to biodiversity as one of the reasons why agricultural activity

cannot be carried out on agricultural land the following amendment:
'which contribute to the environmental, biodiversity and climate-related CAP specific objectives.'

Secondly, the term "programmes" is not defined in the draft regulation, nor is it specified whether the programmes must be national or could be private programmes or both. Member States should therefore be able to further specify which programmes contain commitments or obligations that can qualify the area to continue to be considered eligible hectares when, as a result of commitments or obligations, no agricultural activity is carried out on the area

FI

(Comments):

Is it mandatory to pay decreasing area-based support also for forest pastures and wetlands if those are under commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives? Or is the obligation after the commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives has expired? Or does this mean that certain types of climate

and environmental protection areas are eligible for degressive area-based support, even if they are no longer used for agricultural activities, provided they were classified as eligible agricultural area prior to any commitments or agreements?

FR

(Drafting suggestions):

ii) areas for which support is provided under Article 35(1) points (a) and (g) [*degressive income support, small farmers*] of Regulation (EU) 202X/XXXX [CAP Regulation], or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [*BISS [all incl. entitlements], small farmers scheme*], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives

FR

(Comments):

Changement de référence en indiquant l'article 5 du projet de règlement PAC et non l'article 35 du projet de règlement PPNR.

LV

(Drafting suggestions):

~~(ii) — areas for which support is provided under Article 35(1) points (a) and (g) [degressive income support, small farmers] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives~~

LV

(Comments):

This provision should be moved to the CAP post - 2027 Regulation

NL

(Drafting suggestions):

(ii) Any area of the holding areas for which support is provided under Article 35(1) points (a) and (g) [degressive income support, small farmers] of this Regulation, or under the basic income support

for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives

NL

(Comments):

Point (ii) is limited to “the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115” and does not take into account commitments which arose from agricultural environmental and climate measures of Regulation (EU) 2021/2115. This appears to be inconsistent and excludes areas where an agricultural activity could not be performed due to such a commitment, which has been approved by the Commission in the context of the national strategic plan compliant to Regulation (EU) 2021/2115.

SE

(Comments):

	<p>SE: It would be good if it is clarified that an agricultural activity does not need to be carried out every year to be considered eligible for DABIS etc, if it is essential to achieve environmental objectives. Currently this is stated in the SP in section 4.1.3.4.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(ii) areas for which support is provided under Article 35(1) points (a) and (g) [degressive income support, small farmers] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [BISS [all incl. entitlements], small farmers scheme], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>

<p>(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features to be determined by the Member States, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel both to be determined by the Member States</p> <p>DE</p>
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(Comments):

It should be made clear that it is up to the Member States to set the conditions under which landscape features are included in the eligible area.

DK

(Drafting suggestions):

(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), ~~provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel~~ **on an area of the holding that gave right to degressive area-based income support or payments under Title III, Chapter II, Section 2, Subsection 2 of Regulation (EU) 2021/2115. In implementing that principle Member States may set a maximum share of the agricultural parcel covered by other landscape features.**

DK

(Comments):

Regarding other landscape features, the proposal by the Commission spells out that these must not become predominant and must not significantly hamper the performance of the agricultural activity due to the area they occupy on the agricultural parcel. The result of this setup is a very complex regulation, which discourages the farmers from establishing these non-productive elements, whereby the farmers primarily lay out fallow land that can cover the entire area. Less complex rules are needed to ease the burden on farmers and give incentives to increase biodiversity in the parcels.

FI

(Drafting suggestions):

(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features **including such as solar panels**, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel

FI

(Comments):

Could a landscape feature be something other than natural feature, for example, solar panels? The proposal does not define “landscape feature.”

LV

(Drafting suggestions):

~~(iii) — Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel~~

LV

(Comments):

This provision should be moved to the CAP post - 2027 Regulation

SE

(Drafting suggestions):

(ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel **In implementing that principle, Member States may set a maximum share of the agricultural parcel covered by those other landscape features. As regards permanent grassland with scattered ineligible features, Member States may decide to apply fixed reduction coefficients to determine the area considered eligible.**

SE

(Comments):

SE: Like today, the definition makes it possible for MS to include landscape features in the eligible area for direct payment, which is positive for biodiversity. However, it is unclear how this will be applied on permanent grasslands with scattered landscape features. Such features are today seen as ineligible above a certain share and could be deducted by the application of pro rata.

It would be a substantial simplification if these features could be included in the eligible area, but if these elements still need to be deducted it should be possible to use pro rata. In such case the suggested text could be added, i.e. the same text as in the current legislation.

In addition, the provision allowing land used every other year to be classified as eligible hectares has also been removed and would be good to reinstate.

SK

(Drafting suggestions):

~~(iii) — Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and~~

	<p>schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(d) 'young farmer' shall be defined in such a way as to fulfil at least the following conditions:</p>	<p>AT</p> <p>(Comments):</p> <p>Minimum qualification (defined in the NRPP) as a prerequisite for receiving support should be included.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(d) — 'young farmer' shall be defined in such a way as to fulfil at least the following conditions:</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p>

DE

(Drafting suggestions):

~~(d22c)~~ ‘young farmer’ means shall be defined in such a way as to a farmer who is a natural person and who fulfils ~~at least~~ the following conditions:

FR

(Comments):

Les autorités françaises expriment une réserve d’examen sur la formulation de cette définition de “young farmer”.

IE

(Comments):

Definition for young farmer at 22(d) should be expanded to include an education requirement.

LV

(Drafting suggestions):

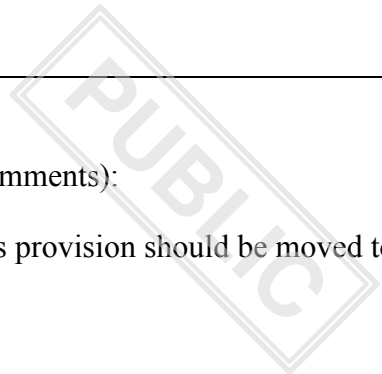
~~(d)~~ — ‘young farmer’ shall be defined in such a way as to fulfil at least the following conditions:

LV

	<p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(d) — ‘young farmer’ shall be defined in such a way as to fulfil at least the following conditions:</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(i) an upper age limit set between 35 years and 40 years;</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(i) — an upper age limit set between 35 years and 40 years;</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>LV</p>

	<p>(Drafting suggestions):</p> <p>(i) — an upper age limit set between 35 years and 40 years;</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(i) — an upper age limit set between 35 years and 40 years;</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(ii) being ‘head of the holding’.</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(ii) — being ‘head of the holding’.</p> <p>CZ</p> <p>(Comments):</p>

	<p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(ii) being ‘head of the holding’;</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>being ‘head of the holding <u>either as a sole head or as a joint head of the holding, including where the holding is jointly managed with one or more farmers who do not meet the age requirement, provided that the young farmer has effective managerial control.</u>’</p> <p>IE</p> <p>(Comments):</p> <p>The definition of ‘head of the holding’ may impact holdings/ farm partnerships etc.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(ii) being ‘head of the holding’.</p>
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	<p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(ii) being 'head of the holding'.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
	<p>DE</p> <p>(Drafting suggestions):</p> <p><u>(c) other conditions which the Member States may determine.</u></p> <p>DE</p> <p>(Comments):</p> <p>Does not seem necessary, but would give the option to Member States who would want to further apply for example a training criterion.</p> <p>IE</p>

	<p>(Drafting suggestions):</p> <p><u>iii) c) the appropriate training or skills required, as determined by Member States</u></p> <p>IE</p> <p>(Comments):</p> <p>Similar wording to Regulation (EU) 2021/2115 Article 4, point 6) c) the appropriate training or skills required, as determined by Member States</p>
<p>Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>LV</p>

	<p>(Drafting suggestions):</p> <p>Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the CAP post - 2027 Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.</p> <p>SK</p> <p>(Comments):</p>
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	<p>See SK's general comment on definitions.</p>
	<p>DE</p> <p>(Drafting suggestions):</p> <p><u>In order to guarantee the protection of the rights of beneficiaries and to avoid discrimination among them, the Member States shall establish the conditions under which a farmer who is not a natural person is to be considered to be eligible to receive CAP payments for young farmers.</u></p> <p>DE</p> <p>(Comments):</p> <p>Unlike farmers, young farmers are always defined as a natural person (age, head of the holding). On the other hand, it has so far been recognised that farmers who are not organised as a natural person should also be able to participate in benefits for young farmers to an extent in order to safeguard their rights and avoid discrimination. Therefore, it appears appropriate, particularly in view of the fact that support for young farmers is to be given a more prominent position in the future, to supplement a system for dealing with such cases. These are all characterised by the fact that it is not the natural person with the status of</p>

	<p>young farmer who is eligible, but only the farmer who is different from him.</p> <p>Proposal based on Article 50 (11) Reg. 1307/2013.</p>
<p>(23) ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p>	<p>AT</p> <p>(Comments):</p> <p>Minimum qualification (defined in the NRPP) as a prerequisite for receiving support should be included.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(23) ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p>

(23) ‘new farmer’ ~~means: shall be determined in such a way as to refer to~~ a farmer who is a natural person other than a young farmer and who is head of the holding for the first time and fulfilling other conditions which the Member States may determine. In order to guarantee the protection of the rights of beneficiaries and to avoid discrimination among them, the Member States shall establish the conditions under which a farmer who is not a natural person is to be considered to be eligible to receive CAP payments for new farmers.

DE

(Comments):

As in the case of young farmer there should be an option to set further conditions and supplements for a system dealing with cases of farmers who are not natural persons.

FI

(Drafting suggestions):

(23) ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time. If the farmer has been involved in farming earlier, s/he /it is new farmer after being outside farming for at least five years.

	<p>FI</p> <p>(Comments):</p> <p>If a farmer has earlier been part of a body or entity, but starts the farming by him/herself s/he is still the head of the holding for the first time?</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>A transférer dans le règlement sectoriel PAC</p> <p>(23) — ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p> <p>FR</p> <p>(Comments):</p> <p>A transférer dans le règlement sectoriel PAC, avec une réserve d’examen quant à la formulation de cette définition de « new farmer ».</p> <p>HR</p> <p>(Comments):</p>
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HR questions: What is the definition of “head of the holding for the first time”? Does this mean that the farmer is the first-time holder of that holding or any agricultural holding?

HU

(Comments):

This definition should be moved to the CAP regulation.

IE

(Drafting suggestions):

(23) ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time **and has the appropriate training or skills required, as determined by Member States.**

IE

(Comments):

Definition for new farmer at 23 should be expanded to include an education requirement

Similar wording to Regulation (EU) 2021/2115 Article 4, point 6) c) the appropriate training or skills required, as determined by Member States.

	<p>LU</p> <p>(Drafting suggestions):</p> <p>‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p> <p>LU</p> <p>(Comments):</p> <p>The complete provisions of art 4 par 23 should be transferred to the CAP regulation</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(23) ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p> <p>LV</p> <p>(Comments):</p> <p>This provision should be moved to the post-2027 CAP regulation</p> <p>SK</p>
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	<p>(Drafting suggestions):</p> <p>(23) — ‘new farmer’ shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
<p>(24) ‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;</p>	<p>BE</p> <p>(Comments):</p> <p>Question: Why does this definition focus on the CAP and is the term ‘public expenditure’ not necessary for the other (non-CAP) measures of the NRPP?</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(24) — ‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the</p>

~~budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;~~

CZ

(Comments):

Should be part of CAP regulation.

DE

(Drafting suggestions):

(24) ‘public expenditure’ for the purposes of the CAP **and the CFP**, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;

DE

(Comments):

This definition should also apply to CFP.

DK

(Drafting suggestions):

(24) ‘public expenditure’ for the purposes of the CAP **and CFP**, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;

DK

(Comments):

Same applies for financing of CFP.

EE

(Drafting suggestions):

(24) ‘public expenditure’ for the purposes of the CAP **and CFP**, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;

EE

(Comments):

	<p>Same applies to financing of CFP.</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: Should this provision refer also to the CFP? Namely, the proposal of the CFP financing regulation refers to “aid intensity”, which is, in our understanding the same as “support rate”. If that is the case, “public expenditure” would be relevant also for the CFP.</p> <p>HU</p> <p>(Comments):</p> <p>This definition should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;</p> <p>LU</p>
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	<p>(Comments):</p> <p>The complete provisions of art 4 par 24 should be transferred to the CAP regulation</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(24) — ‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;</p> <p>RO</p> <p>(Comments):</p> <p>RO proposes to be moved in the CAP Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(24) — ‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of</p>
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	<p>the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;</p> <p>SK</p> <p>(Comments):</p> <p>See SK's general comment on definitions.</p>
	<p>NL</p> <p>(Drafting suggestions):</p> <p><u>‘public contribution’ for the purposes of other policies referred to in [...] means any contribution to the financing of operations the source of which is the budget of national, regional or local public authorities or of any European grouping of territorial cooperation (EGTC) established in accordance with Regulation (EC) No 1082/2006 of the European Parliament and of the Council, the budget of the Union made available to the Funds, the budget of public law bodies or the budget of associations of public authorities or of public law bodies and, for the purpose of determining the co-financing rate for ESF+ programmes or priorities, may include any financial resources collectively contributed by employers and workers;</u></p> <p>NL</p>

	<p>(Comments):</p> <p><u>The proposal appears to neglect public contribution that is currently applicable under the Common Provision Regulation in other policy areas than the CAP.</u></p>
<p>(25) ‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;</p>	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(25) ‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;</p> <p>CZ</p> <p>(Comments):</p> <p>Should be part of CAP regulation.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(25) ‘support rate’ for the purposes of the CAP <u>and the CFP</u>, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as</p>

defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;

DE

(Comments):

At various points the draft regulations, and in particular the CFP sectoral regulation proposal, refer to the term “aid intensity (rate)”. GER recommends either including a definition of this term in the NRP Regulation (especially in distinction to the term “support rate” – if there is any) or using the same term throughout all regulations.

In case of the latter, this definition would also apply to the CFP.

EE

(Drafting suggestions):

(25) ‘support rate’ for the purposes of the CAP **and CFP**, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014 **or in Article 2 (17) of Commission Regulation (EU) No 2022/2473.**

EE

	<p>(Comments):</p> <p>Same applies to financing of CFP.</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: Same question as for point (24)</p> <p>HU</p> <p>(Comments):</p> <p>This definition should be moved to the CAP regulation.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014</p> <p>LU</p> <p>(Comments):</p>
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	<p>The complete provisions of art 4 par 25 should be transferred to the CAP regulation</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(25) — ‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;</p> <p>RO</p> <p>(Comments):</p> <p>RO proposes to be moved in the CAP Regulation</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(25) — ‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;</p> <p>SK</p>
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	<p>(Comments):</p> <p>See SK's general comment on definitions.</p>
	<p>FR</p> <p>(Comments):</p> <p>Sur les définitions relatives au secteur de la pêche, la délégation rappellera la demande de la France de transférer un certain nombre de dispositions du règlement PPNR vers le règlement sectoriel PCP. Les définitions des points 26 à 34 en font partie.</p>
<p>(26) 'small-scale coastal fishing' means fishing activities carried out by:</p>	<p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(26) 'small-scale coastal fishing' means fishing activities carried out by:</p> <p>LV</p> <p>(Comments):</p>

	<p>CFP specific definitions should be moved to the CFP Conditions regulation.</p>
<p>(a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in Article 2, point (1) of Council Regulation (EC) No 1967/2006 ⁽²⁸⁾; or</p>	<p>DE</p> <p>(Comments):</p> <p>The definition of SSCF on the basis of these characteristics has not proven useful in practice. The transitions between smaller-scale fishing and other fleet segments are often fluid.</p> <p>Provision should be made for a definition which leaves room for consideration of regional specificities.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in Article 2, point (1) of Council Regulation (EC) No 1967/2006 ⁽²⁸⁾; or</p> <p>LV</p> <p>(Comments):</p>

	<p>CFP specific definitions should be moved to the CFP Conditions regulation.</p>
<p>(b) fishers on foot, including shellfish gatherers;</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(b) fishers on foot, including shellfish gatherers; <u>or</u></p> <p>NEW: (c) <u>fishers involved in family-owned, artisanal fishing.</u></p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(b) fishers on foot, including shellfish gatherers;</p> <p>LV</p> <p>(Comments):</p> <p>CFP specific definitions should be moved to the CFP Conditions regulation.</p>
<p>(27) ‘fisher’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</p>	<p>DE</p> <p>(Drafting suggestions):</p>

	<p>(27) ‘fisher’ means any natural or legal person engaging in commercial fishing activities, as recognised by the Member State concerned;</p> <p>DE</p> <p>(Comments):</p> <p>Even though, the current EMFAF regulation does only recognize natural persons (see Art. 2 para. 2 no. 5), it should be considered to expand this to legal persons as in some MS also e. g. producer organisations are recognized and awarded fishing rights.</p> <p>DK</p> <p>(Drafting suggestions):</p> <p>‘fisher’ means any natural or legal person engaging in commercial fishing activities, as recognised by the Member State concerned;</p> <p>DK</p> <p>(Comments):</p> <p>Similar to farmers fishers operate as legal persons in different enterprise structures.</p> <p>EE</p>
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(Drafting suggestions):

(27) 'fisher' means any natural **or legal** person engaging in commercial fishing activities, as recognised by the Member State concerned;

EE

(Comments):

Similarly to farmers some fishermen operate as legal persons eg cooperatives, limited liability companies etc.

FR

(Comments):

Pourquoi les définitions de « fishing » et de « fisher » sont-elles identiques ?

La France souhaite transférer cette disposition vers le règlement PCP.

HR

(Drafting suggestions):

HR drafting suggestions:

(27) 'fisher' means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;

or alternatively:

(27) ‘fisher’ means any natural or legal person engaging in commercial fishing activities, as recognised by the Member State concerned;

HR

(Comments):

HR comments: The term “fisher” should include also legal persons. Some fishermen operate as companies or cooperatives. Similar approach has been taken in case of the term “farmer” in Article 4 paragraph 3(c).

Without prejudice to previous comments on transferring CFP specific definitions into sectoral regulation and referring to existing legislation (such as Regulation 1380/2013, 1379/2013), we propose different drafting.

HR proposes amend to point 27 by deleting “natural” or alternatively by adding “or legal”

LV

(Drafting suggestions):

~~(27) 'fisher' means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;~~

LV

(Comments):

CFP specific definitions should be moved to the CFP Conditions regulation.

RO

(Drafting suggestions):

(27) 'fisher' means any natural **or legal** person engaging in commercial fishing activities, as recognised by the Member State concerned

RO

(Comments):

The definition proposed by the Commission for "fisherman" is identical to the definitions given in the previous sectoral regulations. It is worth noting that a comprehensive definition for natural and legal persons is provided by the CFP Regulation (Reg. (EU) No 180/2013) - "'operator" means a natural or legal person who operates or owns an undertaking carrying out any of the activities linked to any of the stages of the production,

processing, marketing, distribution and retail chains of fishery and aquaculture products".

The term "fisher" should include also legal persons. Some fishermen operate as companies or cooperatives. Similar approach has been taken in case of the term "farmer" in Article 4 paragraph 3(c).

Without prejudice to previous comments on transferring CFP specific definitions into sectoral regulation and referring to existing legislation (such as Regulation 1380/2013, 1379/2013), we propose different drafting.

RO proposes amend to point 27 by deleting "natural" or alternatively by adding "or legal"

SE

(Drafting suggestions):

'fisher' means any natural **or legal** person engaging in commercial fishing activities, as recognised by the Member State concerned;

SE

(Comments):

SE proposes that legal persons is included since fishing licenses can be granted them as well.

<p>(28) ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</p>	<p>BE</p> <p>(Drafting suggestions):</p> <p>(28) ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</p> <p>BE</p> <p>(Comments):</p> <p>This definition is already mentioned under (27) as the definition for “fisher”.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(28) ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</p> <p><u>‘fishing’ [or: ‘fishing activity’] means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transshipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products;</u></p> <p>DE</p>

	<p>(Comments):</p> <p>See corresponding definition in Art. 4 para. 1 no. 28 CFP regulation.</p> <p>DK</p> <p>(Drafting suggestions):</p> <p>'fishing' [or: 'fishing activity'] means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transhipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products;</p> <p>DK</p> <p>(Comments):</p> <p>See corresponding definition in Art. 4 para. 1 no. 28 CFP regulation.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(28) 'fishing' means any natural or legal person engaging in commercial fishing activities, as recognised by the Member State concerned;</p>
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	<p>EE</p> <p>(Comments):</p> <p>Similarly to farmers some fishermen operate as legal persons eg cooperatives, limited liability companies etc.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>The text of the definition does not correspond to “fishing” but to “fisher” (same definition as nr. 27.</p> <p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p><u>HR drafting suggestions:</u></p> <p><u>(28) ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</u></p> <p><u>(28) 'fishing activity' means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, trans</u></p>
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hipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products

HR

(Comments):

HR comments: The text of the definition does not correspond to “fishing” but to “fisher” (same definition as the one included in definition under point (27)).

Without prejudice to previous comments on transferring CFP specific definitions into sectoral regulation and referring to existing legislation (such as Regulation 1380/2013, 1379/2013), we propose a definition in line with point 28 of Article 4 of Regulation 1380/2013, taking into account also that term “fisher” in point (27) refers to “fishing activity” not “fishing”.

HR proposes amend to point 28 by replacing “fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned” with “‘fishing activity’ means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, trans hipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products”

IE

	<p>(Drafting suggestions):</p> <p>'fishing activity' means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transshipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products</p> <p>IE</p> <p>(Comments):</p> <p>This definition duplicates the definition of 'fisher' and is not aligned with the definition in the CFP. Proposed the text be amended to reflect the definition set out in the CFP</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(28) 'fishing' means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;</p> <p>LV</p> <p>(Comments):</p> <p>The definition duplicates the definition of fisher (27).</p> <p>RO</p>
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(Drafting suggestions):

~~(28) — ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;~~

(28) ‘fishing activity’ means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transhipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products

RO

(Comments):

The text of the definition does not correspond to “fishing” but to “fisher” (same definition as the one included in definition under point (27)).

Without prejudice to previous comments on transferring CFP specific definitions into sectoral regulation and referring to existing legislation (such as Regulation 1380/2013, 1379/2013), we propose a definition in line with point 28 of Article 4 of Regulation 1380/2013, taking into account also that term “fisher” in point (27) refers to “fishing activity” not “fishing”.

RO proposes amend to point 28 by replacing “**fishing’ means any natural person engaging in commercial fishing activities, as**

recognised by the Member State concerned” with “‘fishing activity’ means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transhipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products”

SE

(Drafting suggestions):

‘fishing’ means ~~any natural person engaging in commercial fishing activities~~ **of the kind**, as recognised by the Member State concerned, **carried out by natural or legal persons**;

SE

(Comments):

SE notes that the definition in the proposal is identical to that given for ‘fisher’ in para 27.

SK

(Drafting suggestions):

(28) — ~~‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;~~

	<p><u>(28) 'fishing activity' means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transhipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products</u></p> <p>SK</p> <p>(Comments):</p> <p>The text of the definition does not correspond to “fishing” but to “fisher” (same definition as the one included in definition under point (27)).</p> <p>Without prejudice to previous comments on transferring CFP specific definitions into sectoral regulation and referring to existing legislation (such as Regulation 1380/2013, 1379/2013), we propose a definition in line with point 28 of Article 4 of Regulation 1380/2013, taking into account also that term “fisher” in point (27) refers to “fishing activity” not “fishing”.</p>
<p>(29) ‘sustainable blue economy’ means all sectoral and cross-sectoral economic activities throughout the internal market relating to ocean, seas, coasts and inland waters, covering the Union’s insular and outermost regions and landlocked countries, including emerging sectors and non-market goods and services, aimed at ensuring environmental, social and</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(29) ‘sustainable blue economy’ means all sectoral and cross-sectoral economic activities throughout the internal market relating to ocean, seas,</p>

<p>economic sustainability in the long term and which are consistent with the SDGs, and in particular SDG 14, and with Union environmental legislation;</p>	<p>coasts and inland waters, covering the Union's insular and outermost regions and landlocked countries, including emerging sectors and non-market goods and services, aimed at <u>the preservation and restoration of the health of marine ecosystems and the services they provide</u>, ensuring environmental, social and economic sustainability in the long term and which are consistent with the SDGs, and in particular SDG 14, and with Union environmental legislation;</p> <p>DE</p> <p>(Comments):</p> <p>The long-term viability of the Blue Economy depends on its ability to mitigate its impact on marine biodiversity and ecosystem services. A sustainable Blue Economy therefore requires to take into account its effects on marine ecosystems. Further activities in the ocean may not accelerate the deterioration of its ecosystems, but aim to preserve and restore those ecosystems.</p> <p>EE</p> <p>(Comments):</p> <p>Is this definition needed?</p> <p>FR</p>
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	<p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>
<p>(30) ‘maritime policy’ means Union policy that aims to foster integrated and coherent decision making to maximise the sustainable development, economic growth and social cohesion of the Union, particularly of the coastal and insular areas and of the outermost regions, and of the sustainable blue economy sectors, through coherent maritime-related policies and relevant international cooperation;</p>	<p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>
<p>(31) ‘maritime security and surveillance’ means activities carried out in order to understand, prevent wherever applicable and manage in a comprehensive way all the events and actions related to the maritime domain which would impact the areas of maritime safety and security, law enforcement, defence, border control, protection of the marine environment, fisheries control, trade and economic interest of the Union;</p>	<p>ES</p> <p>(Drafting suggestions) :</p> <p>(31) ‘maritime security and surveillance’ means activities carried out in order to understand, prevent wherever applicable and manage in a comprehensive way all the events and actions related to the maritime domain which would impact the areas of maritime safety and security, law enforcement, defence, border <u>surveillance, management and</u> control, protection of the marine environment, fisheries control, trade and economic interest of the Union;</p>

	<p>ES</p> <p>(Comments):</p> <p>Alignment with the terminology agreed under the relevant acquis, e.g. Article 2 of Regulation 2016/299 on the Schengen Borders Code.</p> <p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>
<p>(32) ‘European marine observation and data network’ or ‘EMODnet’ means a partnership assembling marine data and metadata in order to make those fragmented resources more available and usable by public and private users by offering quality-assured, interoperable and harmonised marine data;</p>	<p>DK</p> <p>(Drafting suggestions):</p> <p>(32) — ‘European marine observation and data network’ or ‘EMODnet’ means a partnership assembling marine data and metadata in order to make those fragmented resources more available and usable by public and private users by offering quality-assured, interoperable and harmonised marine data;</p> <p>DK</p> <p>(Comments):</p>

	<p>There is no reference anywhere in the NRPP regulation proposal to EMODnet. Hence, there is no need to include the corresponding definition.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(32) — ‘European marine observation and data network’ or ‘EMODnet’ means a partnership assembling marine data and metadata in order to make those fragmented resources more available and usable by public and private users by offering quality-assured, interoperable and harmonised marine data;</p> <p>EE</p> <p>(Comments):</p> <p>this term is not used in the main text of the proposal.</p> <p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>

<p>(33) ‘maritime spatial planning’ means a process by which the relevant Member State’s authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives;</p>	<p>DK</p> <p>(Drafting suggestions):</p> <p>(33) — ‘maritime spatial planning’ means a process by which the relevant Member State’s authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives;</p> <p>DK</p> <p>(Comments):</p> <p>There is no reference anywhere in the NRPP regulation proposal to ‘maritime spatial planning’. Hence, there is no need to include the corresponding definition.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p><u>(33) — ‘maritime spatial planning’ means a process by which the relevant Member State’s authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives;</u></p> <p>EE</p> <p>(Comments):</p>
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	<p>this term is not used in the main text of the proposal.</p> <p>FR</p> <p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>
<p>(34) ‘ocean observation’ means the foundation of all marine knowledge. It forms the basis of understanding of marine ecosystems and factors that influence them. It provides critical data for weather forecasting, climate change mitigation and adaptation strategies, extreme events monitoring, civil security – sea condition, floods-, maritime shipping, offshore energy, fisheries and aquaculture and increasingly security and defence. It creates the foundation for evidence-based decision-making and it provides crucial information on how human activities influence ocean health and what services the ocean provides to societies.</p>	<p>DK</p> <p>(Drafting suggestions):</p> <p>(34) ‘ocean observation’ means the foundation of all marine knowledge. It forms the basis of understanding of marine ecosystems and factors that influence them. It provides critical data for weather forecasting, climate change mitigation and adaptation strategies, extreme events monitoring, civil security – sea condition, floods-, maritime shipping, offshore energy, fisheries and aquaculture and increasingly security and defence. It creates the foundation for evidence-based decision-making and it provides crucial information on how human activities influence ocean health and what services the ocean provides to societies.</p> <p>DK</p> <p>(Comments):</p>

There is no reference anywhere in the NRPP regulation proposal to ‘ocean observation’. Hence, there is no need to include the corresponding definition.

EE

(Drafting suggestions):

~~**(34) — ‘ocean observation’ means the foundation of all marine knowledge. It forms the basis of understanding of marine ecosystems and factors that influence them. It provides critical data for weather forecasting, climate change mitigation and adaptation strategies, extreme events monitoring, civil security — sea condition, floods, maritime shipping, offshore energy, fisheries and aquaculture and increasingly security and defence. It creates the foundation for evidence-based decision-making and it provides crucial information on how human activities influence ocean health and what services the ocean provides to societies.**~~

EE

(Comments):

this term is not used in the main text of the proposal.

FR

	<p>(Comments):</p> <p>La France souhaite transférer cette disposition vers le règlement PCP.</p>
	<p>DE</p> <p>(Drafting suggestions):</p> <p><u>NEW (XX): [definition of deep-sea mining]</u></p> <p>DE</p> <p>(Comments):</p> <p>In its responses to questions relating to the CFP sectoral regulation proposal, the Commission indicated that the prohibition of deep-sea mining applies not only to the scope of that sectoral regulation but to the entire scope of the NRPP Regulation, including the EU Facility. GER therefore suggests defining “deep sea mining” in the NRPP Regulation and also setting out the prohibition in the horizontal regulation.</p> <p>DK</p> <p>(Drafting suggestions):</p> <p>NEW (XX): [definition of deep-sea mining]</p> <p>DK</p> <p>(Comments):</p>

	<p>In its responses to questions relating to the CFP sectoral regulation proposal, the Commission indicated that the prohibition of deep-sea mining applies not only to the scope of that sectoral regulation but to the entire scope of the NRPP Regulation, including the EU Facility. Therefore it is suggested to define “deep sea mining” in the NRPP Regulation and also setting out the prohibition in the NRPP regulation, and not only in the CFP regulation.</p>
<p>(35) ‘irregularity’ means any breach of applicable law, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;</p>	<p>AT (Comments): In our view, this definition needs to be revised in light of the results-oriented nature of the budget. Among other things, it needs to be clarified whether violations of applicable law (e.g., conflict of interest) constitute an “irregularity” in case a milestone/target/output is achieved.</p> <p>BE (Comments): We miss a reference to the CAP definition within the meaning of Article 1(2) of Regulation (EC, Euratom) No 2988/95 and Article 2(31) of the CPR regulation and would like an explication of the implications of this shift by omission of economic operator.</p>

	<p>CZ</p> <p>(Drafting suggestions):</p> <p>(35) ‘irregularity’ means any breach of applicable law, which has, or would have, the effect of actual or potential prejudicing to the budget of the Union caused by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;</p> <p>CZ</p> <p>(Comments):</p> <p>According to CZ, the original wording reduces potentially legal certainty by broadening the scope for interpretation of which breaches of applicable law may have an impact on the achievement of milestones, targets or outputs and to what extent. In the performance model, the decisive factor should be only the actual or potential reimbursement of unjustified milestones/targets/other outputs from the Union budget, not any breach of applicable law affecting the budget of the Union.</p> <p>EE</p> <p>(Comments):</p> <p>The term ‘output’ is used in the definition, but it is not defined elsewhere in the regulation. Using an undefined term in a legal definition may create</p>
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ambiguity regarding its scope and interpretation. For legal clarity and consistency, either the term should be defined or replaced with terminology that is already defined in the regulation. We understand that the concept of irregularities is linked solely to the achievement of results. However, it remains unclear whether other types of irregularities (e.g. breaches related to visibility requirements, procurement breaches etc.) are also considered irregularities. If so, we kindly ask that these be explicitly included in the definition.

EL

(Drafting suggestions):

(35) ‘irregularity’ means any breach of applicable law, **resulting from an act or omission by an economic operator**, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;

EL

(Comments):

The addition is made for reasons of consistency between the definition provided here and the corresponding definitions in the Financial Regulation and in Regulation (EU) 2021/1060 (CPR).

In Regulation (EU) 2024/2509, Article 138(f), the term “irregularity” is defined by reference to Article 1(2) of Council Regulation (EC, Euratom) No 2988/95, which provides the following: “2. 'Irregularity' shall mean any infringement of a provision of Community law **resulting from an act or omission by an economic operator**, which has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure.

ES

(Comments):

This definition should be further clarified- relation between the breach of applicable law and reimbursements based on milestones, targets and outputs?

FI

(Drafting suggestions):

(35) ‘irregularity’ means any breach of applicable law, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget. **In the context of the CAP, the interpretation of**

irregularity takes into account that the granted compensation may be also justified based on another relevant milestone, target or output. An overall error rate above the 2 % materiality threshold is accepted when it is question about ambitious green architecture and interventions based on that.

FI

(Comments):

The definition of irregularity does not take into account the diversity of the CAP, particularly its climate and environmental objectives. Even if the outcome — for example, due to weather conditions — does not meet the seed mixture requirements of the applicable law, a plant cover may still have been established that plays a significant role, for instance, in carbon sequestration. **Why does the definition fail to consider the broader context?** On is the intention to penalize those farmers and MS who have **ambitious green architecture** and interventions based on that. Based on the Court of Auditors latest findings spending across eco-schemes, rural development & environmental & climate measures are above the 2% materiality threshold. The Commission should support Member States in designing schemes that are less complex without reducing ambitions and share the responsibility that the 2 % materiality threshold may be overrun

when it is question about ambitious green architecture and interventions based on that.

There is a need for broader and more flexible measures to simplify both their application and monitoring. More attention should be paid to the **overall impact** of practices than to a detailed examination of the objectives and fulfillment of individual eligibility conditions of individual farms, which currently imposes a significant administrative burden on both farmers and paying agencies as main control bodies.

Auditors should be involved **earlier to pre-empt implementation difficulties. Auditors interpretations should not be surprises as today.**

FR

(Drafting suggestions):

(35) 'irregularity' means any **irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95** ~~breach of applicable law, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;~~

FR

(Comments):

Nous avons signalé que cette nouvelle définition n'était pas celle figurant à l'art 1 du R 2988/95 PIF.

Dans les réponses de la Commission (parmi lesquelles aucune réponse ne porte sur l'articulation avec le Règlement PIF), figure *“the definition of irregularity was adapted to the new delivery model. As payments would be based on the delivery of milestones and targets, the (potential or real) prejudice to the European Union budget is also linked with that. Issues with applicable law which do not affect the payments are nevertheless followed-up in management verifications and audits and corrective measures (including net financial corrections)”*.

Il n'apparaît pas pertinent de qualifier d'irrégularité la non-atteinte des cibles/jalons, cette notion doit renvoyer à celle du règlement encadrant la protection des intérêts financiers de l'Union (PIF).

HR

(Comments):

HR comments: With regard to the definition of an irregularity set out in point (35), we draw attention to the definition provided in Article 1(2) of Council Regulation (EC, Euratom) 2988/95, **according to which "irregularity" means any infringement of a provision of Community law resulting from an act or omission by an economic operator, which**

has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure. The same definition defines an irregularity for any non-compliance with applicable law which has an actual or potential impact on the EU budget.

The text of the Regulation provides for corrective measures to be taken when regulating the obligations of Member States in Art. 58, whereas the provisions regulating the obligations of the Commission in Article 58 provide for the adoption of financial corrections. However, the text of this Regulation does not clearly define the distinction between these two concepts.

NL

(Drafting suggestions):

(35) — ‘irregularity’ means any breach of applicable law, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget; **an irregularity within the meaning of Article 1(2) of Regulation (EC, Euratom) No 2988/95;**

(35) ‘irregularity’ means any breach of applicable law resulting from an act or omission by an economic operator, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget; within the meaning of Article 1(2) of Regulation (EC, Euratom) No 2988/95;

NL

(Comments):

All definitions of ‘irregularity’ in current EU-legislation contain the notion that any breach of law results from an act or omission of the economic operator.

This notion is also the rationale behind the obligations to prevent, detect and correct irregularities in article 58 NRPP, which in its turn reflects the obligations for a Member State following from Regulation (EC, Euratom) nr. 2988/95 on the protection of the financial interests of the Union.

In addition, the current Financial Regulation that will also be applicable under the NRPP continues to refer to Regulation (EC, Euratom) nr. 2988/95 as regards irregularities (cf. article 138 (1) (f) of Regulation (EU, Euratom) 2024/2509).

It is therefore essential that the words ‘resulting from an act or omission of the beneficiary’ are included in the NRPP definition of ‘irregularity’.”

PL

(Drafting suggestions):

(35) ‘irregularity’ means any breach of applicable law, resulting from an act or omission by an economic operator, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;

PL

(Comments):

We suggest aligning the definition of irregularity with those applied in the previous financial perspectives.

PT

(Drafting suggestions):

(35) ‘irregularity’ means any breach of applicable law, **resulting from an act or omission by an economic operator**, which has, or would have,

the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget.

PT

(Comments):

PT considers that it should be clarified that the irregularity results from an act or omission.

RO

(Comments):

With regard to the definition of an irregularity set out in point (35), we draw attention to the definition provided in Article 1(2) of Council Regulation (EC, Euratom) 2988/95, according to which "irregularity" means any infringement of a provision of Community law resulting from an act or omission by an economic operator, which has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure. The same definition defines an irregularity for any non-compliance with applicable law which has an actual or potential impact on the EU budget.

	<p>The text of the Regulation provides for corrective measures to be taken when regulating the obligations of Member States in Art. 58, whereas the provisions regulating the obligations of the Commission in Article 58 provide for the adoption of financial corrections. However, the text of this Regulation does not clearly define the distinction between these two concepts.</p> <p>SK</p> <p>(Comments):</p> <p>We request that the definition of irregularity be reviewed and left as stated in Regulation 1060/2021. The definition of irregularities does not correspond to the tasks of the managing authority under the principle of sound financial management and the responsibilities of the Member State under Article 58 of the proposed regulation.</p>
	<p>DK</p> <p>(Drafting suggestions):</p> <p>NEW PROVISION</p> <p><u>(34) bis ‘relocation’ means a transfer of the same or similar activity or part thereof within the meaning of point (61a) of Article 2 of Regulation (EU) No 651/2014;</u></p>

DK

(Comments):

As the relocation rule is continued in Article 69 of the NRP regulation, there is a need to have a clear definition and reference to applicable State aid rules

RO

(Drafting suggestions):

(36) Serious non-compliance means a deficiency in the effective functioning of the management, control and audit systems of the NRP Plan for which substantial improvements are required and where more of the key requirements referred in Annex IV are assessed into categories 3 and 4;

(37) Reversal means undoing of previously fulfilled milestones or targets required for EU funding within the durability period or the retraction of a reform that was already officially met within 3 years after that time;

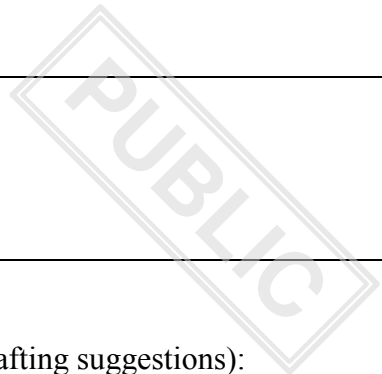
RO

(Comments):

To enhance legal certainty, interpretative clarity, and regulatory coherence, it is essential that the concept of serious non-compliance be explicitly defined within Article 4. This term appears repeatedly throughout the proposed regulation — most notably in Article 66 (Time limits and interruption of the payment deadline), Article 67 (Suspension of payments), and Article 68 (Financial corrections by the Commission), each entailing significant financial consequences for Member States. The absence of a clear definition risks inconsistent application, divergent interpretations by managing authorities and audit bodies, and potential legal disputes concerning the proportionality and justification of financial corrections.

The concept of reversals should be explicitly defined in order to ensure legal certainty and interpretative clarity. Given that the Commission is required to apply the procedures laid down in Articles 66, 67, and 68, pertaining respectively to the interruption of payment deadlines, the suspension of payments, and the adoption of financial corrections, the absence of a clear definition may generate ambiguity in the implementation of measures that carry direct financial implications for the Member State concerned. Establishing a precise and operational definition would therefore promote consistency in enforcement, enhance

	<p>transparency in financial management, and safeguard the predictability of the regulatory framework.</p>
<p>(36) ‘holding fund’ means a funds set up under the responsibility of a managing authority under one or more chapters of the Plan;</p>	<p>PL</p> <p>(Drafting suggestions):</p> <p><u>(36) ‘holding fund’ means a funds- set up under the responsibility of a managing authority under one or more chapters of the Plan, to implement one or more specific funds</u></p> <p>PL</p> <p>(Comments):</p> <p>We suggest supplementing the definition in line with the definition used in the 2021–2027 perspective.</p>
<p>(37) ‘specific fund’ means a fund through which a managing authority or a holding fund provides financial products to final recipients;</p>	<p>SI</p> <p>(Drafting suggestions):</p> <p>(37) ‘specific fund’ means a fund through which a managing authority or a holding fund provides financial <u>instruments</u> products to final recipients;</p>



<p>(38) ‘body implementing a financial instrument’ means a body, governed by public or private law, carrying out tasks of a holding fund or specific fund.</p>	
	<p>CZ (Drafting suggestions):</p> <p><u>(xx) ‘relocation’ means a transfer of the same or similar activity or part thereof within the meaning of point (61a) of Article 2 of Regulation (EU) No 651/2014;</u></p> <p>CZ (Comments):</p> <p>CZ requires defining the term relocation used in article 69.</p> <p>PL (Drafting suggestions):</p> <p><u>We propose adding the definitions of: ‘financial instrument’, ‘management fees’, ‘completed operation’):</u></p> <p><u>(38a) ‘financial instrument’ means a form of support delivered via a structure through which equity or quasi-equity investments, loans and guarantees are provided to final recipients;</u></p>

	<p><u>(38b) ‘management fees’ means a price for services rendered, as determined in the funding agreement between the managing authority and the body implementing a holding fund or a specific fund; and, where applicable, between the body implementing a holding fund and the body implementing a specific fund;</u></p> <p><u>(38c) ‘completed operation’ means an operation that has been physically completed or fully implemented and in respect of which all related payments have been made by beneficiaries and the corresponding public contribution has been paid to the beneficiaries;</u></p> <p>PL</p> <p>(Comments):</p> <p>We propose adding the definitions of ‘financial instrument’, ‘management fees’ and ‘completed operation’ in line with the definitions used in the CPR 2021–2027.</p>
<p>(39) [‘less developed regions’ means regions whose GDP per capita is less than 75 % of the average GDP per capita of the EU-27 (‘less developed regions’);]</p>	<p>DE</p> <p>(Comments):</p> <p>COM is requested to publish an updated list of MS regions counting as less developed region in 2028-2034.</p>

<p>(40) ¶‘transition regions’ means regions whose GDP per capita is between 75 % and 100 % of the average GDP per capita of the EU-27 (‘transition regions’).¶</p>	<p>DE</p> <p>(Comments):</p> <p>COM is requested to publish an updated list of MS regions counting as transition region in 2028-2034.</p> <p>RO</p> <p>(Comments):</p> <p>This article should address only definitions, not the classification of regions. This aspect should be treated separately.</p>
<p>(41) ¶‘more developed regions’ means regions whose GDP per capita is above 100 % of the average GDP per capita of the EU-27 (‘more developed regions’).¶</p>	<p>RO</p> <p>(Comments):</p> <p>Idem</p>
	<p>AT</p> <p>(Drafting suggestions):</p> <p><u>New 41a</u></p> <p><u>Home Affairs means areas covered by regulations:</u></p>

i) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;

ii) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

iii) Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034

New 41b) Grants provided by Member States to beneficiaries may also take the following form of simplified cost options pursuant to Article 78

(a) unit costs;

(b) lump sums;

(c) flat-rate financing;

(d) a combination of the forms referred to in points (a) to (c),

(e) financing not linked to costs.

AT

(Comments):

Inclusion of this definition would allow to use it throughout the text of the Regulation and help the readability of the text. Currently everywhere where the regulation needs to refer to home affairs it quotes the full names of the regulations.

o Requirements for the calculation of SCO and so-called ‘off-the-shelf’ options – such as a flat rate for overheads – are now also missing from the text of the regulation, with the exception of Article 77 (LEADER), which continues to explicitly refer to SCO.

o Therefore it is proposed to include a clear definition of the terms ‘financing not linked to costs’, ‘unit costs’, ‘lump sums’, ‘flat rate’, ‘off-the-shelf’ and ‘simplified cost options’ in Article 4. If not, supplementary clarifications in the form of secondary legislation will be required.

o It is also noted that Article 78(1) of the NRP Regulation stipulates that projects with a total cost of less than EUR 400,000 must, as a rule, use simplified cost options or financing independent of individual costs, while this threshold has been lowered to EUR 100,000 for CAP interventions.

CZ

(Drafting suggestions):

Financial year means the calendar year.

CZ

(Comments):

A definition of the financial year is needed as it is essential for the overall understanding of the financial management and corresponding obligations of the MS.

IT

(Drafting suggestions):

“Home Affairs” means areas covered by regulations:

i) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034

ii) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

	<p><u>iii) Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034</u></p> <p>IT</p> <p>(Comments):</p> <p>Inclusion of this definition would allow to use it throughout the text of the Regulation and help the readability of the text.</p>
<p>[The classification of regions under one of the three categories of region shall be determined on the basis of how the GDP <i>per capita</i> of each region, measured in purchasing power standards (PPS) and calculated on the basis of Union figures for the period 2021-2023, relates to the average GDP <i>per capita</i> of the EU-27 for the same reference period.]</p>	<p>RO</p> <p>(Comments):</p> <p>Idem</p>
	<p>MT</p> <p>(Drafting suggestions):</p> <p><u>(42) ‘Rural area’ means an area defined by the Member State to be used in the National Regional and Partnership Plan in relation to the specific objectives set out in article 3(d).</u></p> <p>Justification: The proposed definition is intended to ensure that the identification of rural areas remains proportionate and adaptable to</p>

national territorial realities. Allowing Member States to define rural areas at the level of the NRP Plan, provides the necessary flexibility to address diverse settlement patterns and functional rural characteristics. This approach supports effective targeting of interventions and avoids unintended exclusions, particularly in small island and densely populated Member States. It also reflects established practice under Article 110(c) of Regulation (EU) 2021/2115, which places responsibility on Member States to define rural areas.

PT

(Drafting suggestions):

In derogation of the above and taking into account the structural situation of the outermost regions referred to in Article 349 TFEU, these regions shall be considered as less developed regions for the purpose of this Regulation.

PT

(Comments):

PT: Considering the structural, permanent constraints and special characteristics of the Outermost Regions, as recognised in Article 349 of the TFUE, they require a joint and targeted treatment in this Regulation, equated to that of the less developed regions and regardless of their GDP

	per capita, in order to guarantee adequate support in the next MFF that is able to respond to these regions' aggravated challenges
<p>The Commission shall adopt a decision, by means of implementing act, setting out the list of regions fulfilling the criteria of one of the three categories of region set out in points 38 to 40 and of Member States fulfilling the criteria set out in paragraph 2(a) of Article 22. [That list shall be valid from 1 January 2028 to 31 December 2034.]</p>	<p>DE</p> <p>(Comments):</p> <p>DE: The implementing act must be announced at an early stage, as it is crucial for implementation in the Member States.</p> <p>COM is requested to publish an updated list of MS regions counting as transition region in 2028-2034.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>.... the three categories of regions set out in points 39 to 41</p> <p>RO</p> <p>(Comments):</p> <p>The points are wrongly indicated – please update</p>
	<p>CZ</p> <p>(Drafting suggestions):</p> <p><u>New (42) Home Affairs means areas covered by regulations:</u></p>

i) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;

ii) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

iii) Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034

CZ

(Comments):

CZ believes that inclusion of this definition would allow to use it throughout the text of the Regulation and help the readability of the text. Currently everywhere where the regulation needs to refer to home affairs it quotes the full names of the regulations.

DE

(Drafting suggestions):

(42) ‘financial year’ means the period from 1 January to 31 December, while the first financial year means the period from 1 January 2028 to

31 December 2028 and the final financial year the period from 1 January 2034 to 31 December 2034. The final annual assurance package for the final financial year will be submitted on [date].

DE

(Comments):

Clarification is needed to the definition of the financial year, while Art. 68,4 is referring to “accounting year”, which has to be corrected there or defined somewhere.

PL

(Drafting suggestions):

New definition: Home Affairs means areas covered by regulations:

i) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;

ii) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

iii) Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034

PL

(Comments):

Inclusion of this definition would allow to use it throughout the text of the Regulation and help the readability of the text. Currently everywhere where the regulation needs to refer to home affairs it quotes the full names of the regulations.

SK

(Drafting suggestions):

(42) Home Affairs means areas covered by regulations:

i) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;

ii) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;

iii) Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034

SK

(Comments):

inclusion of this definition would allow to use it throughout the text of the Regulation and help the readability of the text. Currently everywhere where the regulation needs to refer to home affairs it quotes the full names of the regulations.

Home Affairs encompasses several policies and for the sake of the legal text it would be very beneficial to include this “technical term” that is comprehensive and easy to use (it has been used during several programming periods in practice. It is commonly used by the EC, MAs, AAs and the beneficiaries in the member states.)