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MEETING DOCUMENT

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 5): MS comments and questions

Delegations will find attached MS comments and questions on Block 5 of the NRPP proposal.

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NRPP proposal (Block 5)*(st 11815/25)***MS comments and questions**

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

Commission proposal	MS comments and MS questions
<p style="text-align: center;">TITLE III</p> <p>NATIONAL AND REGIONAL PARTNERSHIP PLANS</p>	<p>FR</p> <p>(MS questions):</p> <p>Comment envisage-t-elle l'articulation entre les différents règlements, et notamment le règlement PAC ?</p> <p>PL</p> <p>(MS comments):</p> <p>The concept of NRP Plans should only be adopted once it can convincingly contribute to the achievement of the goals of treaty-based policies it integrates.</p>
<p style="text-align: center;">CHAPTER 1</p> <p>Preparation and adoption of the Plan</p>	<p>DE</p> <p>(MS comments):</p> <p>The different responsibilities in federal states need to be respected. Regions must have a central role for the design, implementation of the regional chapters and the selection of projects. A centralized policy would not be in line with that. In this regard, the regulation needs to be more precise.</p>

Commission proposal	MS comments and MS questions
	<p>RO</p> <p>(MS comments):</p> <p>Given that the CAP is addressed through a separate regulation, we consider that the provisions regulated under Articles 21, 22, 23, 24, and 25 should be included in the specific CAP regulation. Furthermore, the CAP should not be addressed jointly, taking into account the specific nature of the support that must be provided to farmers, namely direct payments and rural development. In our view, the Single Plan does not lead to simplification, as intended; on the contrary, a joint approach to the CAP will create difficulties both in developing the agricultural strategy and in its implementation.</p>

<p style="text-align: center;"><i>Article 21</i></p> <p style="text-align: center;"><i>Preparation and submission of the Plan</i></p>	<p>DE</p> <p>(MS comments):</p> <p>DE requests even stronger incentives for the implementation of domestic reforms. DE advocates that the NRPP Regulation must reflect the interlinkage between investments and reforms (“RRF-model”).</p> <p>The relevant documents for defining reform needs must be clearly and exhaustively set out in the Regulation. Anyhow, we reject a regionalization of the European Semester and the country specific recommendations.</p> <p>The regulation must establish criteria for the monetary value of reforms, especially those without budgetary costs.</p> <p>HU</p> <p>(MS comments):</p> <p>The text does not address the situation where a transitional period would be necessary. In addition, due to carry-over payments from the previous programming period, some investment measures will not start immediately in the first year of the new period. This is therefore not necessarily a realistic expectation for Member States.</p> <p>We foresee implementation difficulties, which will definitely require a transitional period. The commitment periods specified in Pillar II cover, in some cases, the year 2029. Transitional rules need to be established.</p>
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Commission proposal	MS comments and MS questions
	<p>We would like to learn the Commission’s position on this matter.</p> <p>HU</p> <p>(MS questions):</p> <p>How can the continuity of area- and animal-based income support in CAP be ensured if plans can only be submitted from June 2027?</p> <p>A prerequisite for farmers to submit their aid applications in spring 2028 is that the Member State has a plan that has been approved in time. This is the basis for national implementation rules, farmer training, and the development of IT systems.</p> <p>We see a great danger in the timing of the submission and approval of the plans from a CAP perspective.</p> <p>Furthermore, is it possible to partially approve the plan in order to ensure the continuity of area- and animal-based interventions?</p> <p>IE</p> <p>(MS comments):</p> <p>It is notable that the timeframe for submission of NRPPs is not stated in Art 21. Per the recital (29) it is referenced as January 2028. This seems overly ambitious given the significant scale of work to be completed in</p>

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	<p>preparing the NRPPs and the added layer of a national partnership framework in addition to sectoral partnerships</p> <p>IE</p> <p>(MS questions):</p> <p>How are annualised payments such as DABIS going to operate for farmers in 2028 if the approval date for the NRPP to be determined?</p> <p>IT</p> <p>(MS comments):</p> <p>As already highlighted in previous communications Article 21 of the proposed Regulation allows Member States to include specific “national, sectoral, and, where relevant, regional and territorial” chapters in their National Plan, following a partnership approach. A clear strategy to balance the “sectoral/thematic dimension” and the “regional dimension” is needed (this aspect is particularly relevant for the Ministry of Labour and Social Policies, considering the distribution of competences between the Ministry, regions, and individual Managing Authorities within the ESF+ framework).</p> <p>LV</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The CAP and CFP plan must be separate from the NRP plan</p> <p>SK</p> <p>(MS questions):</p> <p>We request the inclusion of a new paragraph 4, which would explicitly regulate and define the methodology for the preparation and drafting of the NRP, in a similar manner as set out in Article 17 of Regulation (EU) 2021/1060 of the European Parliament and of the Council. This request is made in order to ensure a clear and transparent procedure for the preparation of the Plan and to provide greater legal certainty for the overall approval process of the NRP, as well as for the approval of its amendments.</p> <p>Annex V of the Regulation demonstrates the need to establish a significant amount of numerical data, which cannot be communicated without a unified methodological document (such as justification of the choice of measurable indicators, reference sources, the retrospective or prospective methods applied, or the identification of factors influencing the achievement of the set objectives). Some objectives may be implemented by several providers, and without a methodological document the European Commission will not be able to identify clear addressees for communication, particularly in areas where competences are shared or overlap among several institutions.</p>

Commission proposal	MS comments and MS questions
<p>1. [Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package.] The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</p>	<p>AT</p> <p>(MS questions):</p> <p>Even though this part is in brackets, we would like to know what reforms and “other interventions” the European Commission expects from the Member States. Could the Commission give specific examples?</p> <p>BE</p> <p>(MS questions):</p> <p>What is understood with ‘agenda of reforms’? We need more clarity on this. Are their exceptions on the public availability of the plan for the parts related to border management and internal security? This can be sensitive information.</p> <p>Does this refer to a centralised portal or a nationally hosted website?</p> <p>BG</p> <p>(MS questions):</p> <p>As a general comment the fragmentation between EU funds and instruments targeting defined objectives, such as the European competitiveness, for example, has not been abandoned, but funds with similar/overlapping objectives and activities, such as the European</p>

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	<p>Competitiveness Fund and the new Single Fund for national and regional partnerships, are presented in different sections of the proposed MFF instead, although they are supposed to operate in complementarity and synergy. At the same time the instruments comprising the single Fund also have their own specificities. With this in mind, but also with a view to ensuring comprehensiveness and coherence of the NRP Plan, we have the following questions related to the programming of the resources towards concrete investment actions:</p> <ul style="list-style-type: none"> • How to avoid administrative complexity and competition between the MFF funds, given the declared simplification principle, with a view to facilitating Beneficiaries' access to EU support?; • What will be the clear and concrete division of responsibilities between the CION and the MS that will be ensured with a view to achieving complementarity, synergy, coherence and consistency between the different EU instruments? • Does the CION foresee any guidance to accompany the Regulation on the relation between investments and relevant reforms which should be in line with the objectives of cohesion policy and respect the MS priorities (in line with the Council Conclusions on cohesion and Cohesion Policy post-2027)?

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	<p>DE</p> <p>(MS questions):</p> <p>Are there any specific provisions on the relation of reforms and investments, i.e. is the requested ambition of reforms proportional to the volume of investments? Or is the assessment of adequacy of reforms fully at the discretion of the COM?</p> <p>EE</p> <p>(MS questions):</p> <p>Article 21 paragraph 1 establishes that Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64. According to the Article 64 paragraph 1 the website should be set up within 6 months after the Council decision to approve NRP Plan e.g. at the time of the submission the Plan to the Commission the website might not be operational. Is this incoherence intentional?</p> <p>1. Could you elaborate, what is meant under ‘other interventions’. E.g. under HAF operating costs are eligible in the current 2021-27 period. Would the operating costs still be eligible and where should they be categorized: as reforms, investments or other interventions?</p>

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	<p>2. In view of the requirement for NRP Plans to be made publicly available following the adoption of the implementing decision, it should be clarified whether Member States may apply exemptions to transparency obligations under the HAF on the basis of security or other justified grounds—particularly when the underlying documents prompting reforms, investments, or other interventions (such as Schengen evaluation reports or national implementation plans related to the EU Pact on Migration and Asylum) are not publicly accessible. Moreover, considering that internal security authorities are bound by specific restrictions on information disclosure, it is important to understand how reporting and performance indicator requirements take such confidentiality limitations into account, especially in the context of monitoring and reporting obligations?</p> <p>FR</p> <p>(MS questions):</p> <p>La Commission peut-elle préciser si les mesures sont à prendre au niveau du Plan ou des chapitres ? En effet, s’agissant des RUP pour lesquels la possibilité d’un chapitre dédié est prévue à l’article 46 (auquel le présent article ne renvoie pas), il est important de comprendre l’articulation entre</p>

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	<p>ce chapitre et le reste du Plan et de s'assurer que les mesures qui sont applicables aux RUP sont adaptées.</p> <p>IT</p> <p>(MS comments):</p> <p>Each Member State is required to prepare and submit to the Commission the National and Regional Partnership Plan (NRPP), structured as a coherent set of reforms, investments, and measures, and to make it accessible through the national portal.</p> <p>The experience gained with the RRF has demonstrated how crucial is to safeguard Member State's clear ownership of the Plan's content: although embedded within a common European framework, the Plan must stem from a medium-term strategy defined by the Member State itself, while taking into account the European priorities set out in the regulation.</p> <p>Such ownership by MS has contributed to the effective implementation of the Plan.</p> <p>IT</p> <p>(MS questions):</p>

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	<p>The text refers to <i>reforms, investments and other interventions</i>. Could you clarify what is meant by <i>other interventions</i> and, if possible, provide some examples?</p> <p>LT</p> <p>(MS comments):</p> <p>The CAP and CFP are based on multiannual, continuous programming with established management and control systems. Integrating them into a single NRP framework risks duplication, additional administrative costs, and undermining sectoral stability.</p> <p>LT</p> <p>(MS questions):</p> <p>How will the effective and consistent implementation of the CAP and CFP be ensured if they are integrated into the NRP framework, and will ongoing CAP measures also have to comply with additional NRP requirements beyond those already set in Regulation (EU) 2021/2115?</p> <p>RO</p> <p>(MS comments):</p>

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	<p>Even if this paragraph is bracketed, for transparency reasons and equal treatment, we consider relevant that EC establishes a set of criteria for assessment of the ‘comprehensive’ and ‘coherence’ of the NRP Plan, as well as for the assessment of ‘ambition’ of the reform agenda (as referred to in the Explanatory Memorandum).</p> <p>The references in the text of the entire paragraph should be to “NRP Plan”, not just “Plan”, to clarify that the provision does not cover Interreg.</p> <p>RO</p> <p>(MS questions):</p> <p>What does ‘comprehensive’ mean and how can it be assessed?</p> <p>We would appreciate a better clarification, in the text of the Regulation, wherever appropriate, on the scope and meaning of “<i>other interventions</i>” and correlation with similar reference in the text.</p> <p>Art 64 stipulates that the website should be set up within 6 months after the Council decision to approve NRP Plan. It should be clarified whether the submitted version Plan (before its approval) should be published on the available websites of the MS and then uploaded on the website mentioned in art. 64 since this website is expected to be available in 6 months after the approval of the Plan. If submitted versions (in particular before the</p>

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	<p>approval of the initial NRP Plan) are to be available only on the website mentioned in art. 64, how transparency objectives could be achieved for the initial first version submitted for approval to EC?</p> <p>SE</p> <p>(MS comments):</p> <p>Experiences from the current CAP period have shown that the need for amendments to the strategic plan has been significant. With the structure now proposed, it seems to be more challenging to amend the plans.</p> <p>SE</p> <p>(MS questions):</p> <p>How will the Commission ensure that the plans are truly strategic in nature and not more detailed than necessary, so that Member States have the flexibility to adjust for effective implementation?</p> <p>SI</p> <p>(MS questions):</p> <p>A lot of reforms have already been implemented under RRP.</p> <p>We believe that certain areas do not need further reforms, but rather that the system as it has been introduced in recent years needs to be</p>

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	<p>implemented and underpinned by investments. Isn't the EC worried that the reforms under the NRPP will be forced and will change the system again before the full effects of the reforms made under the RRP can be fully felt?</p> <p>(1) The preamble states that the NRPP must be prepared by June 2027 and must be submitted to the EC by January 31, 2028. Are there really any deadlines for preparing and submitting the NRP? Is the deadline of January 31, 2028, acceptable, given that the NRP will be implemented from January 1, 2028? Approval of the NRP takes several months, which means that it will practically not be implemented in 2028.</p> <p>Cohesion implements measures in the period 2023-2027 according to the N+3 rule, i.e. until 2030. The CAP implements measures according to the N+2 rule, which means until 2029.</p>
<p>1. Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.]</p>	<p>BE</p> <p>(MS questions):</p> <p>What is the difference between 'regional' and 'territorial'? Are there definitions for these terms?</p> <p>DE</p> <p>(MS comments):</p>

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	<p>It must be clarified in the regulation that direct negotiations between regional level and COM for regional chapters are possible.</p> <p>The central role of the regions for the design, implementation of the regional chapters and the selection of projects must be more firmly anchored in the Regulation text. For instance, it must be highlighted more clearly in Art. 21 that the Plans shall be prepared and implemented in partnership with regional authorities. In addition, other stakeholders listed in Art. 6 shall be involved.</p> <p>DE</p> <p>(MS questions):</p> <p>DE: Are there any requirements to document the participation of the partners?</p> <p>Would regional chapters be designed rather priority-based or funds-oriented? Would regional chapters allow MS and regions to maintain the current fund structure? Or would there only be one chapter per region setting overarching funding priorities?</p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>La Commission peut-elle préciser l'articulation des interventions en faveur des régions ultrapériphériques ? Les interventions doivent-elles être mentionnées dans les chapitres sectoriels et/ou dans le chapitre dédié aux RUP ?</p> <p>La Commission peut-elle indiquer pourquoi aucun renvoi aux RUP n'est prévu à l'article 21 ?</p> <p>HR</p> <p>(MS questions):</p> <p>Why has the Commission established partnership as a condition for drafting the Plan even though this creates an additional burden for Member States and seems inconsistent with the Commission's stated intention of simplification?</p> <p>Could you give a detailed elaboration on partner selection and manner of selecting them?</p> <p>IT</p> <p>(MS comments):</p> <p>The Plan must be developed and implemented in partnership with regional and local authorities, economic and social partners, civil society, and the research and innovation community, providing, where</p>

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	<p>appropriate, for sectoral, regional, and territorial chapters.</p> <p>This requirement is consistent with the nature of the new Fund, which integrates well-established areas of intervention that present specific governance needs, such as cohesion policy and the Common Agricultural Policy (CAP).</p> <p>It is appropriate to ensure that ownership is shared among the main institutional actors involved in the relevant policy areas.</p> <p>PL</p> <p>(MS comments):</p> <p>The number of this paragraph should be 2. We propose the following wording: Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. The Plan shall include national, sectoral and, where relevant, regional and territorial chapters”</p> <p>PL</p> <p>(MS questions):</p>

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	<p>Please explain whether various sectors can be separated from the national part, and whether this depends on the decision of the Member State concerned or is mandatory.</p> <p>PT</p> <p>(MS questions):</p> <p>The Outermost Regions (OR) are presently preparing a new OR Strategy, in close cooperation with the Commission. This long-term vision towards the OR has been essential in the sustainable development of these regions and in the presentation of concrete developments to better adapt European policies to the ORs and the challenges they face.</p> <p>Having this in mind, can the Commission please explain how the OR Strategy will be considered within the NRPP?</p> <p>RO</p> <p>(MS comments):</p> <p>This provision is without prejudice to the decision on the substance and structure of the Plan to be agreed at the appropriate level.</p> <p>RO</p> <p>(MS questions):</p>

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	<p>It should be clarified why [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.] is bracketed? This text is declarative and, in the context of traditional negotiation procedures, has less relevance in relation to the concrete elements and financial obligations contained in the Negotiating box.</p> <p>SK</p> <p>(MS comments):</p> <p>The correct wording should be paragraph 2 instead of 1.</p>
<p>2. Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p>	<p>AT</p> <p>(MS comments):</p> <p>The stated implementation date of January 1, 2028, is considered unrealistic.</p> <p>The phase-out period/possible transition years (CAP) will lead to the parallel existence of two systems. Clear, practicable, and resource-efficient transitional arrangements should be considered, where appropriate.</p> <p>BE</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Can the Commission provide a precise explanation of what it means by “Only measures whose implementation started from 1 January 2028”?</p> <p>CY</p> <p>(MS comments):</p> <p>Only Measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1</p> <p>CY</p> <p>(MS questions):</p> <p>Please confirm that the starting point of measures refers to expenditures, in order to be consistent with the provisions of article 79, regarding phased operations.</p> <p>CZ</p> <p>(MS questions):</p> <p>Does this arrangement include also supplementary income support of young farmers, which is currently provided to applicants on the basis of an annual application for five consecutive years? Can this payment be</p>

Commission proposal	MS comments and MS questions
	<p>continued after 1 January 2028, provided that it started before and lasts for the remaining period of five consecutive years, under the conditions applicable at the time of the first application for the payment?</p> <p>Could you please clarify whether it is possible to initiate the legislative process for reforms before 1 January 2028, provided that the legislation would enter into force only after that date? Or is it strictly required that the legislative process itself also begins no earlier than 1 January 2028?</p> <p>DE</p> <p>(MS comments):</p> <p>DE supports this.</p> <p>DE</p> <p>(MS questions):</p> <p>How can MS notify successful measures that are already implemented in the current MFF period and that MS would like to continue in the next MFF period?</p> <p>EE</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Recitals 30 and 31 of the proposal indicate that Member States are expected to design their NRP Plans in alignment with national, regional, and local strategies, ensuring coordinated implementation and integrated planning that takes into account specific territorial needs and established governance structures. In this context, could you clarify the rationale behind the requirement in Article 21(2) for additional consultation with partners, particularly in cases where the content of the NRP Plan has already been subject to consultation with the relevant stakeholders during the preparation of national strategies?</p> <p>ES</p> <p>(MS comments):</p> <p>It's necessary to provide for greater flexibility on the eligible measures. A possible drafting is:</p> <p><i>2. Only measures whose implementation is not fully finished as of 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</i></p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>La Commission peut-elle confirmer que toute dépense récurrente est exclue pour l'ensemble des chapitres du plan ? Peut-elle préciser si l'inclusion de mesures dont la mise en œuvre a débuté avant 2028 mais prenant la forme de scale-up (logique d'additionnalité) sera possible ?</p> <p>HU</p> <p>(MS questions):</p> <p>Measures started from 1 January 2028 will be eligible. It is necessary to clarify what exactly is meant by this and when the implementation of a measure begins.</p> <p>With regard to the issue of carry-over expenditure the derogation referred to in this point requires further clarification, particularly in light of the fact that the environmental and climate protection elements currently implemented in two separate pillars would be merged.</p> <p>IT</p> <p>(MS comments):</p> <p>This regulatory provision should be made less stringent and more flexible, as it appears—also in relation to the similar provision in article 63(2) of Regulation 2021/1060—overly restrictive, particularly in the case of measures in support of enterprises implemented through necessarily</p>

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	<p>multiannual interventions (such as, but not limited to, IPCEIs, which involve a lengthy phase of pre-notification and notification of State aid).</p> <p>This request is based on the following main considerations:</p> <ul style="list-style-type: none"> • NRPPs are configured as performance plans for which reimbursement requests under article 65 are submitted based on the achievement of Milestone & Target which, for the purposes of the decommitment provision under article 15, must be at least annual. • Target are measurable through the indicators set out in Annex I of the proposed regulation COM(2025) 545. • In the case of measures in support of enterprises (business support), the indicators generally refer to the number of supported enterprises, for which it is assumed (but confirmation is requested) that the projects are completed. • However, in the case of measures in support of enterprises, the related interventions may have multiannual durations, and their actual measurement—based on the aforementioned indicators—may occur long after the start. <p>For all the reasons described above, the opportunity for a revision of the regulatory provision in question is confirmed, aiming for greater and more</p>

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	<p>effective applicability also in the case of multiannual interventions in support of enterprises, possibly allowing for the eligibility of interventions whose start date precedes 1 January 2028, but whose actual implementation (or completion) occur after that date.</p> <p>Finally, there is a clerical error in the paragraph numbering: the present paragraph is number 3 and not number 2 as indicated (the previous one is marked as 1, but it is actually number 2).</p> <p>LU</p> <p>(MS comments):</p> <p>What about projects that could potentially span two programming periods? Currently, there is the possibility of phasing.</p> <p>LV</p> <p>(MS comments):</p> <p>Please include reference to Article 79 regarding phased projects from 2021-2027.</p> <p>NL</p> <p>(MS questions):</p>

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	<p>Are measures eligible if their implementation began on 1 January 2028, but their associated costs were incurred before that date?</p> <p>RO</p> <p>(MS questions):</p> <p>Taking into account that under the proposed Regulation, Member States may support the second phase of operations initiated under Regulation (EU) No 2021/1060 (Article 79), it should clarify how indicators for such phased operations will be treated within the new performance framework, define their relation to reforms and milestones</p> <p>SK</p> <p>(MS comments):</p> <p>The correct wording should be paragraph 3 instead of 2.</p>
<p>By way of derogation from the first subparagraph, expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115 may be eligible for contribution, provided such expenditure is provided in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation].</p>	<p>DE</p> <p>(MS questions):</p> <p>DE assumes that for those expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115, which are now mentioned under Art. 35 (1) a - k, o, p</p>

Commission proposal	MS comments and MS questions
	<p>and r, the contribution comes from the Ringfencing mentioned in Art. 10 (2) a ii?</p> <p>FI</p> <p>(MS questions):</p> <p>Possible transition periods always create administrative burden. How should the implementation start date “from 1 January 2028” be interpreted? Are the measures implemented after this date eligible? All measures included in the NRP Plan should be eligible from 1 January 2028 even though their implementation starts later. Flexibility is needed.</p> <p>FR</p> <p>(MS questions):</p> <p>Cette disposition peut-elle être explicitée ?</p> <p>La Commission peut-elle confirmer si cela s'appliquera à toutes les interventions et campagnes au cours de la période de programmation 2023-2027 (sans restriction) ?</p> <p>IE</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>How do schemes which are not aligned per calendar year or where approval was granted for investment in 2027 with a 12-month approval timeline comply with this?</p> <p>Will there be financial limits applied to the level of carryover?</p> <p>IT</p> <p>(MS comments):</p> <p>Given the lengthy amendment process for the National Plan (up to 16 months) and the short disengagement period (N+10 months), the transitions (carry-over) from the PSP to the National Plan will have to be included in the National Plan from its first official submission to the EC by January 2028. This means that the regional/provincial MAs will have to establish the transitions in the second half of 2027: which is unlikely given that the EC guidelines on the closure of the 2023-2027 programming period will not have been released by that date.</p> <p>IT</p> <p>(MS questions):</p> <p>In relation to this issue, we ask if it is possible to insert the sentence in red specifying that CAP transition expenditure may be included at any time by notification, even when it is a "new" measure:</p>

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	<p><u>"By way of derogation from the first paragraph, expenditure related to legal commitments to beneficiaries incurred under interventions financed under Regulation (EU) 2021/2115 may be eligible for funding, provided that such expenditure is provided for – at any time and always by notification – in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation]."</u></p> <p>SE</p> <p>(MS questions):</p> <p>SE interprets that this exemption for the CAP is the equivalent to Article 155 point 3(a) for IACS and 4(a) for non-IACS in 2021/2115, could the Commission confirm that. Could the Commission clarify what is meant by “provided” in this context.</p> <p>Is it possible, as today, to create a measure as a “placeholder” for an action with only carry-over, or must the measure exist as a formal action and be available for application even during the period after 2028?</p> <p>SI</p> <p>(MS questions):</p> <p>Please confirm that for interventions under the 2023-2027 plan (rural policy), it is possible to transfer commitments – overcommitment in the</p>

Commission proposal	MS comments and MS questions
	NRPP? Does this apply to all interventions, IACS and non-IACS? Are there any restrictions?

<p style="text-align: center;"><i>Article 22</i></p> <p style="text-align: center;"><i>Requirements for the NRP Plan</i></p>	<p>FI</p> <p>(MS questions):</p> <p>Can there be overlapping between different chapters in terms of their geographical coverage?</p> <p>For example, can a region be covered by both national chapter and territorial/regional chapter?</p> <p>What is meant by sectoral chapter? What can it cover?</p> <p>What is meant by plan's objective? Does it refer to specific objectives or is it defined by a Member State?</p> <p>What is meant by 'primary specific objective' and 'secondary specific objective'?</p> <p>What is meant by 'other intervention'? How does it differ from 'measure' and 'reform'?</p> <p>Specific question concerning Åland having self-governance status: Can Åland have their own regional chapter acting 'de facto' as Åland's 'national plan'?</p> <p>FR</p> <p>(MS comments):</p>
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Commission proposal	MS comments and MS questions
	<p>Dans sa redaction, l'article 22(2) comporte deux points a et b. Or, l'article 25 réalise des renvois à ces dispositions. La lisibilité de ces renvois se trouve donc affectée.</p> <p>IT</p> <p>(MS comments):</p> <p>Article 21 of the proposed Regulation allows Member States to include specific “national, sectoral, and, where relevant, regional and territorial” chapters in their National Plan, following a partnership approach.</p> <p>It is important to raise in the appropriate negotiation forums the need for a clear strategy to balance the “sectoral/thematic dimension” and the “regional dimension” (this aspect is particularly relevant for the Ministry of Labour and Social Policies (MLSP), considering the distribution of competences between the Ministry, regions, and individual Managing Authorities within the ESF+ framework).</p> <p>In particular, this aspect affects the balance between the general and specific objectives indicated in Article 22 (European Semester, fiscal plans, NECP, Digital Decade Roadmap, Single Market) and the specific needs of the regions within the individual national, sectoral, thematic, and regional chapters.</p>

Commission proposal	MS comments and MS questions
	<p>This balance is primarily reflected in the “introductory Chapter 1” of each Plan, which outlines the intervention strategy, the main challenges identified by each country, and the synergies; however, there remains a risk that the needs of territories and regions concerning specific themes may be sidelined.</p> <p>IT</p> <p>(MS questions):</p> <ol style="list-style-type: none"> 1) What will be the source used to draw lessons learned from the Recovery and Resilience Plan (RRP) and consequently plan the interventions: the European evaluation? National evaluations? 2) Will it be possible to integrate the methodology currently described in Annex VII to identify the regions requiring a higher intensity of intervention? <p>RO</p> <p>(MS comments):</p> <p>It is not sufficiently clear how the NRP Plan ensures the correlation between the various policies in the Treaty and specified in Article 2 of the proposed Regulation.</p>

Commission proposal	MS comments and MS questions
	<p>RO</p> <p>(MS comments):</p> <p>It is absolutely necessary to include in the NRPP a dedicated section describing how the CAP interventions with ring-fenced support, as well as the CAP-type interventions without ring-fenced support, are synergistic as a whole — how they act together in a complementary, efficient, and effective manner, and how they respond to the Country-Specific Recommendations.</p> <p>The absence of such a section could lead to the development of a deficient strategy, lacking medium- and long-term added value</p>
<p>1. Each NRP Plan shall be duly reasoned and substantiated and shall set out the elements referred to in paragraph 2 of this Article, in accordance with the template set out in Annex V.</p>	<p>AT</p> <p>(MS comments):</p> <p>The NRPPs should contain a strategic objective/vision and an analysis section. The objective/vision in particular would also be an important decision-making aid for the Council.</p> <p>BE</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Could the Commission specify exactly what is meant by the term 'duly reasoned and substantiated' in this context?</p> <p>FI</p> <p>(MS comments):</p> <p>There is a clear need to commit to the simplification objective also within the requirements for the NRP Plan.</p> <p>FR</p> <p>(MS comments):</p> <p>Les autorités françaises rappellent qu'elle avaient appelé à ce que la PAC soit préservée et fasse l'objet de dispositions dédiées.</p> <p>FR</p> <p>(MS questions):</p> <p>La Commission peut-elle préciser s'il est obligatoire d'inclure un chapitre sur la PAC dans le PPNR ? Si oui, la Commission peut-elle préciser, par exemple, comment le chapitre sur la PAC sera lié au chapitre sur les régions ultrapériphériques ? Plus précisément, les mesures de la PAC pour les régions ultrapériphériques doivent-elles être incluses dans le chapitre sur la PAC ? Cela aura-t-il une incidence sur les taux de cofinancement</p>

Commission proposal	MS comments and MS questions
	<p>applicables à ces mesures (taux spécifiques de la PAC pour les mesures figurant dans le chapitre sur la PAC) ?</p> <p>LT</p> <p>(MS comments):</p> <p>The requirements in Article 22(2) risk creating excessive administrative burden and raising subsidiarity concerns. Clarification is needed on how to calculate and justify financing needs, how to interpret the obligation to address “all or most challenges,” and how to ensure that Commission recommendations do not override national analyses, especially in CAP/CFP contexts. Further guidance is also required on the definition of “duly justified cases” for deviating from the common indicator set, and on the concrete funding sources for establishing and operating the Agricultural Knowledge and Innovation System (AKIS).</p> <p>LT</p> <p>(MS questions):</p> <p>How will the Commission provide methodological guidance and flexibility to Member States to (i) calculate and justify financing needs without disproportionate burden, (ii) respect subsidiarity when addressing challenges and recommendations, (iii) clarify conditions for justified</p>

Commission proposal	MS comments and MS questions
	<p>deviations from the indicator list, and (iv) specify funding sources for AKIS implementation?</p> <p>PL</p> <p>(MS comments):</p> <p>The proposed scope of the Plan makes it extremely complex, especially in case of bigger and decentralised Member States.</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain how exactly the proposed scope of the Plan simplifies the programming, implementation, monitoring and evaluation of EU funds from the perspective of Member States and beneficiaries.</p> <p>RO</p> <p>(MS questions):</p> <p>What does '<i>duly reasoned and substantiated</i>' mean?</p>
1. The NRP Plan shall:	<p>DE</p> <p>(MS comments):</p> <p>Wrong numeration.</p>

Commission proposal	MS comments and MS questions
	<p>The administrative burden in the context of drawing up the NRPPs and implementing the performance-based approach must be proportionate and deliver added value for the authorities involved (both national and sub-national). Overall, the bureaucratic requirements for programming must be reduced compared to the status quo.</p> <p>Germany has submitted a range of proposals for simplification in view of implementation of purely national law, audit and control.</p> <p>DE</p> <p>(MS questions):</p> <p>The reform ambition in each MS and at each level of government should be proportional to the volume of funds allocated to the respective MS / level of government. Are there any provisions in the regulation that ensure this relation or is it left to the discretionary assessment of the COM?]</p> <p>FI</p> <p>(MS questions):</p> <p>Is the funding allocated for Home Affairs intended to be used solely for the purpose of Home Affairs, or could it be used for other purposes under the NRPs? In other words, is it possible that a MS within the NRP decides</p>

Commission proposal	MS comments and MS questions
	<p>to use the funding allocated for Home Affairs for other purposes? Flexibility might be needed to address in a comprehensive manner the specific challenges in the EU regions bordering Russian and Belarus.</p> <p>Which parts listed here are relevant for Home affairs sector's/chapter's implementation and more specifically, are MS required to reflect the regional dimension under Home affairs funding, and if yes, can you explain the logic of regional dimension in Home affairs funding?</p> <p>HU</p> <p>(MS comments):</p> <p>The numeration seems odd. Under Article 2 there are two point (a), thus it cannot be complied with the citation on Article 22 in Annex V.</p> <p>One clear objective of the ongoing CAP simplification package negotiations is to reduce administrative burdens through simplification. The detailed list of NRPP requirements in this article goes against this effort.</p> <p>LU</p> <p>(MS comments):</p> <p>LU asks to replace “shall” by “may”. Especially for low budget Plans it would not be possible to address all specific objectives. For example, LU</p>

Commission proposal	MS comments and MS questions
	<p>does not have outstanding fishery activities. Forestry is rationally managed by national budget.</p> <p>PL</p> <p>(MS comments):</p> <p><u>In the this table this should be paragraph 2 (not 1).</u></p> <p>SK</p> <p>(MS comments):</p> <p>The correct wording should be paragraph 2 instead of 1.</p>
<p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p>	<p>AT</p> <p>(MS comments):</p> <p>In the absence of any specific “general objective” (Article 2) and “specific objective” (Article 3) in the areas of home affairs (migration, integration, border protection, security, etc.), it is unclear where the home affairs areas should be subsumed.</p> <p>AT</p> <p>(MS questions):</p> <p>By “<i>all the specific objectives laid down in Art. 3</i>”, only the main points/literas are meant and not the sub-points, correct? The reason for</p>

Commission proposal	MS comments and MS questions
	<p>this question is that MS with a small financial envelop cannot address all the sub-points.</p> <p>BE</p> <p>(MS questions):</p> <p>For countries with smaller allocations, and considering the multiple cross-cutting objectives (i.e., at least 43% for environment and climate, 14% for social inclusion), is it mandatory to contribute to all specific objectives?</p> <p>Does the obligation also apply to all sub-objectives within the six overarching specific objectives?</p> <p>What is the relationship to be established between the strategic objectives and the specific objectives?</p> <p>BG</p> <p>(MS comments):</p> <p>support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure</p>

Commission proposal	MS comments and MS questions
	<p>achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>BG</p> <p>(MS questions):</p> <p>From one side the Regulation explicitly states that all the specific objectives are obligatory for contribution by the plans. From the other side the CION has elaborated, in its Fiche № 15 on the policy reference framework for the programming of the NRPPs, that the required level of ambition of each Plan for each objective will depend on the challenges faced by the respective Member State and region, as identified in the policy reference framework. We see as well a contradiction between the word “all” and the “specific challenges of the Member State concerned” in the legal wording.</p> <p>How the approach of a pre-defined objectives, all of them obligatory for selection by a MS for spending reflects the various realities on the ground across Europe and how does it take into account the principles of partnership and multilevel governance of the Cohesion Policy and the</p>

Commission proposal	MS comments and MS questions
	<p>regional development decision-making, incl. the known bottom-up approach?</p> <p>Could the CION explain on what basis it has envisaged that the NRP Plan of a Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v)?</p> <p>CY</p> <p>(MS comments):</p> <p>Flexibility should be foreseen on the need to address all specific objectives. It will be particularly challenging for MS with a limited financial envelope to need to address all specific objectives in a substantial manner.</p> <p>The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>CY</p> <p>(MS questions):</p> <p>What is the rationale behind the last provision</p>

Commission proposal	MS comments and MS questions
	<p>«The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).»</p> <p>CZ</p> <p>(MS questions):</p> <p>What is meant by “to all specific objectives”? Is it (in art. 3) the level of a) to e) or is it the more specific level of i) to xii) per each of a) to e)? If the later one, why should all MS support for instance tourism under art. 3 (1)(a)(ix), regardless of whether it is relevant in given MS?</p> <p>Chapter 5 of Annex V sets out the format of the tables in which the link between measure and specific objectives is stated. We would like to ask for clarification concerning CAP support if the secondary specific objective could be outside the areas set out in Article 3 d)?</p> <p>DE</p> <p>(MS comments):</p> <p>NRPPs should also be required to be coherent, efficient and effective as whole and fulfil a certain level of ambition especially with regard to the</p>

Commission proposal	MS comments and MS questions
	<p>reforms (in relation to the size of the NRPP), thus such overarching criteria should be included.</p> <p>DE</p> <p>(MS questions):</p> <p>Could COM explain their system for the assessment of the NRPPs? Why did COM not include a system like Annex V of the RRF Regulation?</p> <p>DE: We see no relation between “less than 90 % of the Union average” and the obligation to “contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v)”</p> <p>Can the Commission give further explanations?</p> <p>In this regard, Article 3 (d) point III makes more sense.</p> <p>What does “contribute to all specific objectives” mean? Can it be sufficient to explain why a MS has not chosen to allocate funds to a specific objective?</p> <p>Why are the mentioned objectives in Art. 3 (tourism, housing...) especially relevant for MS with GNI<90%? Please provide reasoning.</p>

Commission proposal	MS comments and MS questions
	<p>EE</p> <p>(MS questions):</p> <p>Article 22 paragraph 2 point (a) second sentence. What are the justifications for selecting specifically Article 3(a), points (vii) and (ix), and Article 3(d), point (v)? There are other specific objectives that can be just as relevant (or moreso) for territorial cohesion of the MS with a per capita GNI of less than 90 % of the Union average.</p> <p>Why there is f.ex no reference to the specific objective in Article 3 (a) (i), (c) (ii) or (d) (iv)? Why the adequate contribution to objectives of CAP and CFP depend on the regional development level of a MS?</p> <p>EL</p> <p>(MS questions):</p> <p>Please clarify how the contribution ‘in an adequate manner’ should be demonstrated. Would this require an ex-ante evaluation for each of the three specific objectives mentioned? We consider it necessary that the Commission provides supporting explanatory documentation.</p> <p>FI</p> <p>(MS comments):</p>

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	<p>This requirement divides the plans of smaller Member States into inappropriately small parts. Member States should have the possibility to choose from the specific objectives set out in Article 3 those which respond to their specific challenges. As a general observation, the specific objectives should be broad in scope and the number should be as small as possible.</p> <p>FI</p> <p>(MS questions):</p> <p>NRP shall contribute in a comprehensive and adequate manner to <u>all the specific objectives</u> laid down in Article 3 : does specific objectives refer to points a-e of article 3 or subparagraphs in roman numerals under points a-e ? I.e. are there 5 or 28 mandatory specific objectives?</p> <p>HR</p> <p>(MS questions):</p> <p>How will this co-financing strategy apply to home affairs funds in practice?</p> <p>HU</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>According to this point, the Plan must reflect each specific objective, taking into account the challenges specific to each Member State. The first requirement calls into question the tailoring of the Plans to the needs of the Member States. If the challenges specific to each Member State must/can be taken into account, it is not clear how the Plan can be implemented in such a way that it responds to each specific objective. In general, we consider it unfavourable and risky if the Plan really should contribute to all specific objectives, especially in the broadly interpretable "comprehensive and adequate" manner.</p> <p>HU</p> <p>(MS questions):</p> <p>The Plan must present an intervention strategy, indicating the level of resources required in the Plan for the specific objectives. What does this requirement mean? Please also provide an interpretation in relation to the funds to be merged into the Single Fund.</p> <p>Why do the requirements apply specifically to Member States below the 90% average? How does this relate to GNI indicators? The Cohesion Fund, which will be merged into the Single Fund and does not appear in the allocation model, targets Member States below the 90% development level; does this mean that this part applies to the Cohesion Fund?</p>

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	<p>IE</p> <p>(MS questions):</p> <p>Will it be possible to address general objectives through a combination of measures within and outside of the NRPP? E.g. can we have no actions addressing a particular objective within the NRPP, and justify this through reference to national measures that are not EU co-funded?</p> <p>LT</p> <p>(MS comments):</p> <p>We take a critical view of the requirement that NRP plans must contribute to all general and specific objectives. We emphasize the importance of ensuring that Member States retain the discretion to prioritize investments according to their national needs and circumstances.</p> <p>LU</p> <p>(MS comments):</p> <p>LU: Please consider also that annex I has foreseen 5000 character (2 pages A4) for these explanations in SFC. From experience with CAP strategic plans COM should consider that explanations from MS should</p>

Commission proposal	MS comments and MS questions
	<p>be brief and perhaps incomplete. The COM services should be aware that not every detail can be addressed or provided under these conditions.</p> <p>LV</p> <p>(MS comments):</p> <p>LV is sceptical regarding requirement to include all specific objectives in the plan.</p> <p>LV</p> <p>(MS questions):</p> <p>Does the Commission truly envisage that all memberstates need investments or reforms in all policy areas listed in specific objectives?</p> <p>Does impact assessment support such approach?</p> <p>Could Commission verify that there is mistake in references in the article should refer to Cohesion fund objectives? If this is the case which specific objectives are relevant to this provision?</p> <p>MT</p> <p>(MS comments):</p>

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	<p>Point (a) + Annex V (section 1) – The reference to all specific objectives should be replaced by ‘relevant/applicable’ to allow for the required flexibility for Member States to address their specific challenges.</p> <p>PL</p> <p>(MS comments):</p> <p>The necessity to cover all general and specific objectives, taking into account the size of allocation, dilutes the potential impact of the intervention and leaves little space for country- and region-specific interventions. PL proposes that the list of objectives is an open catalogue from which Member States can choose interventions most suited to their situation.</p> <p>PL does not see a justification to specifically support affordable housing, tourism and sustainable agriculture and forestry management practices in Member States with a per capita GNI of less than 90 %, without taking into account their real characteristics and needs.</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain the reasoning behind the requirement to cover all general and specific objectives by each Member State.</p>

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	<p>Please provide the evidence-base for the selection of objectives for Member States with a per capita GNI of less than 90 %.</p> <p>Please explain what is the understanding of the specific objective – does it refer solely to the SO marked as letters or also respective sub-objectives (subpoints). In the annex there is a new concept of primary and secondary SO which should be better explained in the text.</p> <p>RO</p> <p>(MS comments):</p> <p>It is not clear what is meant by "<i>intervention strategy</i>", as this concept is invoked in letter a, paragraph 1, Art. 22. A brief explanation needs to be provided in a paragraph of Art. 22, either to be defined in the recital or in the content of Article 4. Also, in order to standardize the approach, it should be considered by EC services to design a methodological guide on the development and implementation of intervention strategies.</p> <p>RO</p> <p>(MS questions):</p> <p><i>Intervention strategy</i>: what is meant by this? Is it similar to the logic of intervention or the theory of change, concepts that were specific to previous financial periods?</p>

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	<p>Please clarify the syntagm” comprehensive and adequate” manner.</p> <p>In order to reflect the challenges and the needs of the MS, we do not see the relevance in selecting all the specific objectives. For the purpose of the flexibility, we consider that the MS should only select those specific objectives that respond to their needs/investment priorities in line with strategic documents.</p> <p>SE</p> <p>(MS questions):</p> <p>How does the Commission foresee that the NRP plan of Member States with smaller envelopes in an appropriate way can contribute to all specific objectives, especially as the proposed objectives are broader than in the current period?</p> <p>SI</p> <p>(MS comments):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3 <u>and are Member State’s priority</u>, ...</p>

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	<p>SI</p> <p>(MS questions):</p> <p>Please clarify the term "contributes in an adequate manner" and define the term adequacy in the regulation?</p> <p>Comment to the following part of point a): "NRP plan shall contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3"</p> <p>Maybe not all objectives can be addressed due to priorities of a MS and budget constraints, why should there be a contribution to all?</p> <p>What is the purpose of the following provision: "Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix)"?</p>
	<p>AT</p> <p>(MS comments):</p> <p>Article 22 needs to be worded in a consistent manner. It should be clarified which challenges, recommendations, plans, etc. are to be addressed by measures and which are merely to ensure consistency.</p>

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<p>(b) [effectively address all or a significant subset of challenges identified:</p>	<p>BE</p> <p>(MS questions):</p> <p>How does the Commission intend to assess whether a contribution is deemed significant?</p> <p>DE</p> <p>(MS questions):</p> <p>Why should not apply for the NRPP requirements also those challenges defined for the mid-term review under Art. 25 (1)? (see below)</p> <p>IT</p> <p>(MS comments):</p> <p>With regard to Article 22, paragraph 2, point (b), the Plan is required to address all or a significant subset of the challenges identified in the European Semester (Country-Specific Recommendations – CSRs), in the Union’s main policy documents (e.g. Common Agricultural Policy, Digital Decade, National Energy and Climate Plans – NECPs), and in sectoral strategies relating to internal security, border management, and migration.</p> <p>It should be clarified that the reference to the CSRs must not become an overly binding assessment criterion, as this could lead to inconsistent</p>

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	<p>interpretations.</p> <p>A more balanced approach would allow Member States to demonstrate alignment with a significant subset of challenges, while still preserving sufficient flexibility to define their own national priorities.</p> <p>It is important to maintain the possibility of focusing efforts on a significant subset of elements, without this necessarily implying full coverage of all aspects. In this framework, as in the context of the new European economic governance, it would be desirable to ensure the full involvement of Member States, with appropriate procedural safeguards, in the definition of the CSRs.</p> <p>PL</p> <p>(MS comments):</p> <p>In our opinion the list of recommendations to be implemented is too long and there are no objective procedures or criteria on how they are to be implemented in NRP Plans. This leaves room for one-sided decisions on behalf of the European Commission, weakens the position of the Member States in the process and, in combination with the long list of obligatory objectives in art. 2 and 3 and detailed fields of intervention with indicators from the performance framework, does not allow for the necessary flexibility in programming.</p>

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	<p>PL</p> <p>(MS questions):</p> <p>Please provide the legal basis for inclusion of the list of recommendations on the NRP plans and criteria on the basis of which the implementation of the recommendations will be assessed.</p> <p>SE</p> <p>(MS questions):</p> <p>Article 22 (b) states that the NRPP should effectively address all or a significant share of the challenges identified. Can the Commission clarify if challenges identified in the different contexts – (i), (ii) and (iii) will weigh differently. Could the Commission clarify the relationship between the country specific recommendations and the other documents.</p> <p>SI</p> <p>(MS comments):</p> <p>a significant subset of challenges identified – unclear wording</p> <p>SK</p> <p>(MS comments):</p>

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	We request that the text be edited “ effectively address a significant subset of identified challenges”.
<p>(i) in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;</p>	<p>BE</p> <p>(MS questions):</p> <p>The European Semester will serve as a framework for economic policy coordination to identify country-specific recommendations and reform priorities. COM had indicated that they will strengthen the territorial dimension of the European Semester. How exactly would this be done? This is important for drafting regional chapters within NRPs.</p> <p>BG</p> <p>(MS questions):</p> <ol style="list-style-type: none"> 1. The 2026 Semester cycle is to provide a comprehensive set of country-specific recommendations and analyses, „with a stronger territorial focus“ (as stated in the CION’s Fiche 15), which would be complemented by the 2027 cycle. We welcome the intention that “a stronger territorial focus” will be respected in the process and we would be grateful if the CION could elaborate more on how it intends to achieve it? 2. How the principle of subsidiarity is ensured with the transformation of recommendations into binding conditions for receiving

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	<p>of support from the Fund and also with the obligation that the national plans should contribute to all the specific objectives in art. 3 of the Plan?</p> <p>CZ</p> <p>(MS questions):</p> <p>To what extent will Member States have the flexibility to determine which CSRs are to be addressed within their NRPP?</p> <p>DE</p> <p>(MS comments):</p> <p>Annex VI speaks about “taking into account the specific national and regional needs and challenges identified, inter alia”, in addition to recommendations of the European Semester or in line with the European Pillar of Social Rights. This dimension is missing and should also be taken into account.]</p> <p>DE</p> <p>(MS questions):</p> <p>So far, the addressed policies are to a large extent regional policies (e.g. cohesion). How will regional reform and investment needs be derived at</p>

Commission proposal	MS comments and MS questions
	<p>the European level? Or will it be completely left to the MS and the COM to define how regional reforms and investments will address the CSR?</p> <p>EE</p> <p>(MS questions):</p> <p>Art 22 (j) Necessary explanation what this part of the sentence means: "and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant_measures supported under the NRP Plan"?</p> <p>HR</p> <p>(MS questions):</p> <p>Is this requirement possibly redundant, given that the NRPP should already align with the National medium-term fiscal-structural plan, which in turn is aligned with the European Semester and the country-specific recommendations (CSR)?</p> <p>IE</p> <p>(MS questions):</p>

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	<p>Country specific recommendations emerging from the European Semester are not binding on Member States – does this provision change that position?</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>PL</p> <p>(MS questions):</p> <p>As above</p> <p>RO</p> <p>(MS questions):</p> <p>In the context of the European Semester and the relevant Country-Specific Recommendations (CSRs) addressed to each Member State, clarification is needed on how measures under NRP Plan will address evolving CSR and how adaptation will possible.</p> <p>In particular, in the context of the European Semester and CSRs, how phased projects will demonstrate and maintain alignment with evolving</p>

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	<p>CSRs across programming periods, and how their contribution to the fulfilment of such recommendations will be assessed?</p> <p>SE</p> <p>(MS comments):</p> <p>SE is of the opinion that the NRP plans must address the need to strengthen the Union competitiveness more explicitly</p> <p>SE</p> <p>(MS questions):</p> <p>Could COM explain how <u>relevant</u> CSRs will be defined in this context?</p> <p>With COM's new CSR-approach from 2025 and onwards, we believe that <u>all</u> CSRs would be considered relevant, is that correct (i.e. consolidated set of CSRs)? Will CSRs linked to the Macroeconomic imbalance procedure (MIP), when relevant, be given more weight than other CSRs?</p> <p>Should we expect that future CSRs will be adapted to the cohesion policy, in fiche 15 it's mentioned that the European Semester will be given a stronger territorial focus?</p> <p>SI</p> <p>(MS comments):</p>

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	<p>in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;</p> <p>SI</p> <p>(MS questions):</p> <p>Why is the European Pillar of Social Rights exposed with “including”?</p>
<p>(ii) in other relevant documents officially adopted or assessed by the Commission related to the objectives laid down in Article 3 [specific objectives], including CAP national recommendations laid down in Article 2 of Regulation (EU) 202X/XXXX [CAP Regulation], Digital Decade recommendations based on Article 6 of the Decision establishing the Digital Decade Policy Programme, and National Energy and Climate Plans;</p>	<p>BE</p> <p>(MS questions):</p> <p>How will these guidance documents, which are nationally focused, be used in combination with regional chapters? ‘Other relevant documents’ – what is meant with this? Member States need to know in advance which guidance documents will be used.</p> <p>DE</p> <p>(MS comments):</p> <p>The relevant documents for defining reform needs must be clearly and exhaustively set out in the Regulation. We are critical regarding too much leeway for COM on administrative level to decide upon necessary reforms without the involvement of the Council. National level must not</p>

Commission proposal	MS comments and MS questions
	<p>be liable for regional level and vice versa. However, including regional needs must not lead to regionalization auf European Semester.</p> <p>Reform requirements must be proportional to the volume of funding.</p> <p>DE</p> <p>(MS questions):</p> <p>Which documents will serve as the basis for the plan and for the Commission's approval in areas not mentioned in the Regulation, such as the CFP?</p> <p>Will existing guidelines of the CAP be part of 'relevant documents'?</p> <p>Why are the nature restoration plans under Regulation 2024/1991 not mentioned, here? Which other examples of relevant documents, not mentioned after the word "including", can be given? Addition in order to streamline requirements, in line with Art. 22 para 2 sub-para 2 (a) NRPP Regulation.</p> <p>FI</p> <p>(MS questions):</p> <p>Concerning point (ii) we would like to know whether this makes it possible for DG Mare to carry out country-specific analyses of CFP?</p>

Commission proposal	MS comments and MS questions
	<p>HU</p> <p>(MS comments):</p> <p>According to Article 22(i)(ii), the operation of the AKIS system must continue to be ensured, but no dedicated resources are available to finance it. AKIS funding should be part of the CAP and not by reducing financial resources of income support.</p> <p>LU</p> <p>(MS comments):</p> <p>Only those CSRs that make a genuine contribution to the Union's strategic objectives should be taken into account..] .</p> <p>NL</p> <p>(MS questions):</p> <p>What will the Commission base the CAP national recommendations on? How will Member States be involved? What will be the consequences if they are not (fully) addressed?</p> <p>Has the Commission considered a role for the challenges identified in the country reports within the EU Environmental Implementation Review? This may be beneficial.</p>

Commission proposal	MS comments and MS questions
	<p>Has the Commission considered a role for the National Biodiversity Strategy and Action Plans?</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>PL</p> <p>(MS questions):</p> <p>As above</p> <p>RO</p> <p>(MS comments):</p> <p>We consider that there is a significant gap between the calendar for initiating the development of the NRP (i.e. 2026) and the documents/reports/recommendations/strategies/policies/processes that will guide its programming, although it is stated that the Commission will work to align the calendar of the different reference frameworks in order to facilitate the programming of the NRP Plan. This aspect will have negative repercussions on the programming and correlation process of the Plan, which may also affect its timely approval (31 January 2028) and</p>

Commission proposal	MS comments and MS questions
	<p>automatically the use of pre-financing from the first year of implementation.</p> <p>Consideration should be given so that the strategic frameworks not become prescriptive in the sense of explicitly and orderly specifying the reforms and investments that will be included in the NRP Plan. The experience of implementing the RRP (under RRF) shows the need for permanent adjustment of the implementation of reforms to revised EC Strategic frameworks.</p> <p>Regulation should also take into account that national strategic planning documents are periodically reviewed according to requirements derived from EU legislation, at least once every two years (as is the case with the Digital Decade Action Plan), which may result in a change in the hierarchy in implementation processes and/or implementation arrangements for reforms or investments included in the NRP Plan.</p> <p>RO</p> <p>(MS questions):</p> <p>Will other reforms than those identified in the context of the European Semester or those already included in the National Medium-Term Fiscal-Structural Plan be considered?</p>

Commission proposal	MS comments and MS questions
	<p>Will all reforms in the National Medium-Term Fiscal-Structural Plan revised in 2027/2028 be included in the NRP Plan or only those related to the investments proposed in the NRP Plan?</p> <p>It should be noted that some of the strategic documents (e.g. are updated periodically throughout the programming period, depending on the timetable and specific features of each policy. How will this periodic review influence the NRP Plan? Will the components, reforms, and measures in the NRP Plan also need to be updated? How will the consistency and predictability of strategic investments be ensured in this context?</p> <p>Shall the proposed wording give an indication to MS that the <i>only relevant documents</i> are limited to: the national medium-term fiscal structural plans, the national recovery plans, the national energy and climate plans and the national strategic roadmaps for the digital decade?</p> <p>Will the sectoral strategic reference frameworks (some of these imposed by European legislation) at national level to be adopted by 2030 be taken into account?</p> <p>More clarity should be provided in relation to “<i>a significant part of the challenges identified in the context of the European Semester</i>”.</p>

Commission proposal	MS comments and MS questions
	<p>SE</p> <p>(MS questions):</p> <p>Can the Commission clarify what is meant by “in other relevant documents” and the scope of these relevant documents?</p> <p>SK</p> <p>(MS comments):</p> <p>We request that the CAP national recommendations laid down in Article 2 of Regulation (EU) 202X/XXXX [CAP Regulation] have to be voluntary.</p> <p>Member States must be allowed a degree of flexibility. In the event of a reduction of financing resources under the CAP and the need to target all EU priorities, MS have a reduced degree of flexibility for national challenges specific to a given region/rural areas.</p> <p>SK</p> <p>(MS questions):</p> <p>Is the COM considering that CAP national recommendations under Article 2 of Regulation (EU) 202X/XXXX should remain voluntary, allowing Member States sufficient flexibility to address national or regional</p>

Commission proposal	MS comments and MS questions
	challenges, especially in rural areas, even when financing is reduced and all EU priorities must be targeted?
<p>(iii) in relevant documents and strategies adopted by the Council or the Commission in the field of internal security, European integrated border management, visa policy and asylum and migration, taking into account the Schengen IT architecture, the Schengen evaluation mechanism in accordance with Regulation (EU) 2022/922, vulnerability assessments in accordance with Regulation (EU) 2019/1896 and the European Union Agency for Asylum monitoring mechanism in accordance with Regulation (EU) 2021/2303.↓</p>	<p>AT (MS questions): Are there any exceptions to the preparation of the NRP plan for Home Affairs regulations? It is difficult to identify migration-related aspects in the text of the regulation. The only reference to Home Affairs is in Article 22(2)(b)(iii).</p> <p>DE (MS questions): Where do the specific priorities for less prosperous MS come from? Which specific relevant documents and strategies does the COM mean?</p> <p>EE (MS questions): Could you clarify the cut-off date for the EU documents and strategies that must be taken into account in the NRP Plan, particularly in light of recital 29, which states that the NRP Plan should be submitted by 31</p>

Commission proposal	MS comments and MS questions
	<p>January 2028, and article 20, which requires prior consultations with partners?</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>PL</p> <p>(MS questions):</p> <p>As above</p>
<p>The Member State shall provide an explanation on how the challenges and country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p>	<p>BG</p> <p>(MS questions):</p> <p>With reference to the numerous reference documents at EU level, but also to Fiche 15 from the CION and the stated need to start preparing the Plans already in 2026 and submitted by January 2028 the latest, we see inconsistencies in the timing, but also the treatment by the CION of the separate reference documents with regard to the programming of the Plans, for example:</p> <ul style="list-style-type: none"> - “CAP national recommendations will be adopted by the Commission sufficiently ahead of the submission of the NRP Plans by

Commission proposal	MS comments and MS questions
	<p>Member States (in the course of 2026)”, while “the Employment Guidelines pursuing from art. 184 of the TFEU” should be adopted by the Council by 1 January 2027. Also the new National Medium-Term Fiscal Structural plans should be submitted in the general case by April 2028 as a draft and the Draft NECPs for the 2031-2040 period are due to be submitted by 1 January 2028. How the CION would estimate these discrepancies from the perspective of the declared intention of the regulation to provide for a more integrated and coherent programming?</p> <p>- “MS are expected to review and adjust their National Digital decade strategic roadmaps before December 2026”, however “the State of the Digital 2026 and 2027 Reports (to be adopted, respectively, around June 2026 and 2027) will provide recommendations, along with country reports. Could the CION clarify how would it be possible to have a robust informative base for the relevant programming?</p> <p>CY</p> <p>(MS comments):</p> <p>What is the rationale of the absence of Home Affairs related requirements/challenges mentioned in the requirements of the Plan.</p>

Commission proposal	MS comments and MS questions
	<p>CY</p> <p>(MS questions):</p> <p>As regards the contribution to particular objectives do the Home Affairs Funds also need to contribute accordingly in the context of the NRPP?</p> <p>DE</p> <p>(MS questions):</p> <p>Why do the explanations on how the recommendations have been addressed need to be provided in the NRP plan itself and not outside the NRP plan?</p> <p>FR</p> <p>(MS questions):</p> <p>Comment la Commission entend-elle garantir la correcte application de l'article 349 du TFUE s'agissant des défis auxquels sont confrontés les régions ultrapériphériques (au titre de leurs caractéristiques spécifiques telles que l'éloignement, l'insularité, la dépendance économique et la vulnérabilité climatique) ?</p> <p>HR</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The obligation to elaborate all of this in detail represents additional burden for MS and is not in line with the simplification intention emphasised by the Commission.</p> <p>HU</p> <p>(MS comments):</p> <p>How can the annual country reports and country-specific recommendations be adequately taken into account in a seven-year plan, and how do they relate to the objectives listed in Articles 2 and 3?</p> <p>Member States must explain how the Plan took country-specific recommendations into account. Given the expectations, the obligation (“shall”) seems excessive and unfeasible, making it extremely difficult to maintain planning flexibility.</p> <p>HU</p> <p>(MS questions):</p> <p>We ask for clarification on the wording of this paragraph: is this a requirement to specify the amount of funding addressed to country-specific recommendations or is that a drafting error?</p>

Commission proposal	MS comments and MS questions
	<p>IE</p> <p>(MS questions):</p> <p>What will be included in the Commission’s interpretation of a Member State’s “challenges and country specific recommendations”?</p> <p>What data will be used by the Commission to assess contribution towards the specific objectives?</p> <p>LT</p> <p>(MS comments):</p> <p>Clarification is needed on whether methodological requirements will apply to the “explanation”</p> <p>LT</p> <p>(MS questions):</p> <p>Is it necessary for the plan to cover all CSRs? If not, how many CSRs should be addressed, and according to which criteria should their selection be determined?</p> <p>Whether “explanation” should be based on situation and needs analysis, statistical assessment, expert consultations, cost-benefit and financial</p>

Commission proposal	MS comments and MS questions
	<p>analysis, participatory surveys, and impact monitoring? As well, will it be applied to justify rural and agricultural policy needs?</p> <p>LU</p> <p>(MS comments):</p> <p>Proposal: ... are addressed in a proportionate manner ...</p> <p>It would be useful to include a proportionality clause for small envelopes or plans, in order to avoid having a partnership that is overrepresented in relation to the financial stakes.</p> <p>Proportionality operates by ensuring that any legal measures adopted are not excessively burdensome when weighed against the legal or social interests they aim to achieve.</p> <p>The principle of proportionality acts as a crucial tool for achieving equilibrium between overall Unions interests and Member States interests, ensuring that legal determinations in the NRP Plan are both reasonable and just. The relevance of proportionality highlights the indispensable role it plays in upholding fairness and accountability within the NRP Plan.</p> <p>LU</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Does that mean all reforms included in the Plan need to be linked to CSRs?</p> <p>The principle of proportionality is a vital concept within the realm of the NRP Plan. Thus we would ask the Commission if it is possible to include it in the body of the text (horizontal principles)?</p> <p>Would the Commission be willing to engage in a proportionality analysis, for example for the envelopes (or NRP plans) in relation to the envisaged achievement of the country-specific recommendations)?</p> <p>NL</p> <p>(MS questions):</p> <p>It seems as if, from now, this upcoming listing ‘a’ up to ‘r’ does not align with the references in Annex V (table 1.1 up to table 1.11).</p> <p>It seems as if ‘(a)’ (under these lines) should have been ‘(c)’ (compare to reference in Annex V, table 1.3, also referring to 22.2.c, regarding national medium-term fiscal structural plans). The same holds to the following letters (e.g., table 1.7 refers to i-ii, not g-ii). Hence, for consistency the following upcoming letters should be altered (a→c; b→d; and so on, at least all the way to h becoming j). This is probably caused because 22.2 seems to have two 22.2.a items.</p>

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	<p>Can you please confirm? Another option is to alter the references in Annex V (table 1.1 ~ table 1.11).</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>A new paragraph should start here in order for it to be more clear.</p> <p>PL</p> <p>(MS questions):</p> <p>As above</p> <p>RO</p> <p>(MS comments):</p> <p>The article seems not to be correlated with the Annex V. According to the Template for the NRPP – (Annex V), the level of envisaged financing is not requested at measure level, being at chapter level.</p>
<p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and</p>	<p>BE</p> <p>(MS questions):</p>

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<p>of the Council¹, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council²; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council³;</p>	<p>How will these guidance documents, which are nationally focused, be used in combination with regional chapters?</p> <p>DE</p> <p>(MS questions):</p> <p>Where do the specific priorities for less prosperous MS come from?</p> <p>EL</p> <p>(MS questions):</p> <p>Will it be possible to use specific types of indicators?</p> <p>HU</p> <p>(MS questions):</p>

¹ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

² Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

³ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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	<p>What is the specific expectation regarding the national medium-term fiscal structure plans?</p> <p>IE</p> <p>(MS questions):</p> <p>Further clarity is needed on what provisions are foreseen, are they binding in terms of Commission seeking specific levels of finance to ensure ‘consistency with national restoration plans (Reg 2024/1991’ as part of approval of National Plans.</p> <p>NL</p> <p>(MS questions):</p> <p>How will the Commission assess consistency with the National Restoration Plans under the Nature Restoration Regulation that are to be produced in draft by 1 September 2026 and in final form by 1 September 2027? Coherence here is key.</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>PL</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>As above</p> <p>RO</p> <p>(MS comments):</p> <p>The first draft of the national restoration plans should be sent to the Commission by 1.09.2026, followed by a negotiation with the Commission and approval by the MS in maximum 6 months from the date of receiving comments from the Commission. We are afraid that this plan might not be ready in time for the purpose of developing the NRP plan.</p> <p>RO</p> <p>(MS questions):</p> <p>How will the correlation with the national nature restoration plans that are being prepared in parallel with the MFF negotiations be achieved?</p> <p>It should be noted that some of the strategic documents are periodically updated throughout the entire programming period, depending on the calendar and specifics of each policy. How will this periodic review influence the NRP Plan? Will the components, reforms and measures in the NRP Plan also need to be updated at the same time? How will the</p>

Commission proposal	MS comments and MS questions
	coherence and predictability of strategic investments be ensured in this context?
<p>(b) contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council⁴ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council⁵, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p>	<p>AT</p> <p>(MS questions):</p> <p>For a better understanding: Important Projects of Common European Interest (IPCEIs) are mentioned here. Can these be supported directly with funds from the plans and/or with funds from the “EU Facility”?</p> <p>BE</p> <p>(MS questions):</p> <p>Should this aspect not rather fall under Interreg and therefore be excluded from the NRP plan?</p> <p>If not, does this imply that transnational coordination must also be undertaken upstream during the drafting of the plan?</p>

⁴ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

⁵ Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

Commission proposal	MS comments and MS questions
	<p>Could the Commission explain how it intends to reconcile the differing timelines between the NRP, which is a multiannual plan, and the STEP labels/Competitiveness Seals, which are issued on a more regular basis?</p> <p>BG</p> <p>(MS questions):</p> <ol style="list-style-type: none"> 1. Could the CION clarify, with regard to the obligation to include measures in the Plan related to the IPCEIs, how demarcation and complementarity would be sought and achieved between the NRPs and the ECF on these projects? 2. Could the CION clarify what will be the scope of the measures aimed at the Savings and Investment Union, their obligatory nature for every MS and possibly give examples for measures? <p>CY</p> <p>(MS questions):</p> <p>Notably is binding? consists an option to choose not include such measures?</p> <p>HU</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Does the Commission expect Member States to conduct bilateral/multilateral negotiations on joint projects in parallel with the programming of the Plan, which will then be included in the Plans of all countries concerned? In addition, what is the difference between the concepts used here and the Interreg strand? If there is a difference, what is the distinction?</p> <p>PL</p> <p>(MS comments):</p> <p>As above</p> <p>PL</p> <p>(MS questions):</p> <p>As above</p> <p>RO</p> <p>(MS comments):</p> <p>Contribution to single market is a strategic objective but in a manner in which it also contributes to cohesion. Particularly, it should be better explained how the implementation of measures underpinning the Savings</p>

Commission proposal	MS comments and MS questions
	<p>and Investments Union might have a direct link or impact on cohesion objectives.</p> <p>The NRP Plan is aimed first and foremost to respond to the real needs of Member States and reflect the direct and/or indirect link with funding managed directly or indirectly at European level. From this perspective, transnational measures should be complementary, without creating an obligation to use a disproportionate amount of NRP resources to provide additional support for strategic interventions already undertaken at European level.</p> <p>RO</p> <p>(MS questions):</p> <p>Why a Competitiveness Seal is mentioned here? A project that receives Competitiveness Seal should be financed under the Pillar 2, European Competitiveness Fund.</p> <p>At the same time, it is necessary to clarify how the Competitiveness Seal works in practice—whether this status confers automatic or priority access to other funding lines. It is necessary to analyse the extent to which the use of Competitiveness Seals would diminish the resources allocated to</p>

Commission proposal	MS comments and MS questions
	<p>investments with a major impact at national and regional level and what such a mechanism would look like.</p> <p>SE</p> <p>(MS questions):</p> <p>How should Member States with smaller national envelopes support IPCEIs? And why should it be compulsory to support operations with a Competitiveness Seal?</p> <p>How does the Cion. see the balance of funding for IPCEIs between ECF, NRPP, the proposed EU Facility and national private- and public co-financing respectively?</p>
<p>(c) [provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The</p>	<p>BE</p> <p>(MS questions):</p> <p>The Commission has orally explained that there are three types of measures:</p> <ul style="list-style-type: none"> ○ Investments ○ Reforms ○ Interventions based on the outputs: mostly CAP interventions

Commission proposal	MS comments and MS questions
<p>indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified;</p>	<p>What is the legal basis for interventions based on the outputs ?</p> <p>In the 2023-2027 period, the CAP direct payments are based on unit amounts and planned outputs. Article 102 of the current CAP Regulation (Regulation 2021/2115) gives a legal basis for planned outputs, as well as for the following types of unit amounts: minimal / planned / average / maximal unit amount.</p> <p>In the NRP proposal, Annex V, Title II, includes two tables under “5. Milestones, targets and timeline” (pp 28-30 of the Annexes). The indicated reference is Article 22(2), point (e). We think that Article 22(2) would be a more appropriate reference.</p> <p>The 2nd Table appears to give the MS the possibility to determine uniform or average, minimal and maximal unit values, which appears a good thing. We think that this Table should have a clear legal basis, like the current Article 102 of Regulation 2021/2115.</p> <p>DE</p> <p>(MS questions):</p> <p>DE wonders what the Commission expects when the regulation stipulates that there must be a “description of measures”? In the sense of a</p>

Commission proposal	MS comments and MS questions
	<p>performance-oriented approach, the information here should be limited to a “need to know”.</p> <p>What is meant by “the list of envisaged milestones and targets, with their indicative completion date”? Will they be part of the CID?</p> <p>EL</p> <p>(MS comments):</p> <p>We consider it necessary to have separate accompanying detailed methodological guidance. This could be combined with, or form part of, the compulsory back-up justification referred to in point (d) (on total estimated cost of measures). As this represents a major change of modus operandi, the approach to assessing the achievement of milestones and targets must be clearly defined, including the appropriate level of detail. A complete list of measures to be financed may not be mature at the programming stage; therefore, either a higher-level generic approach should be allowed, or excessive detail will risk repeated amendments later.</p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>La Commission peut-elle fournir des précisions sur les recommandations nationales qui seront transmises aux États membres, et notamment sur les bases à partir desquelles elles seront élaborées et leur champ d'application, ainsi que le degré de contrainte qu'elles emportent ?</p> <p>Quelle procédure les États membres devront-ils suivre pour proposer des indicateurs supplémentaires ou alternatifs, conformément à l'article 22(2)(c) ? Cette démarche fera-t-elle l'objet d'un examen par la Commission lors de l'évaluation du PPNR soumis ?</p> <p>De quelle manière les États membres pourront-ils communiquer ces indicateurs à la Commission, la trame de PPNR figurant en annexe V ne prévoyant pas de champ spécifique à cet effet ?</p> <p>IE</p> <p>(MS questions):</p> <p>Could CION clarify to how theses measures will be funded under the Facility and to what degree?</p> <p>IT</p> <p>(MS comments):</p> <p>The Plan must organize its measures into chapters, each accompanied by objectives, milestones, and targets, built on the basis of common output</p>

Commission proposal	MS comments and MS questions
	<p>indicators.</p> <p>It is important to draw lessons from the experience gained through the implementation of the Recovery and Resilience Plan (RRP). The approach based on the achievement of milestone and target has encouraged a results-oriented mindset within the administrations involved. For this model to succeed, outputs must be clearly linked to the final objectives while also being formulated in a simple and straightforward manner, with transparent and, to the extent possible, standardized milestone and target, comparable with those of other Member States.</p> <p>The verification of achievement should rely on clear and consistent documentary evidences, such as administrative acts, signed contracts, acceptance reports, or data extracted from information systems.</p> <p>Conversely, the use of outcome indicators—or, more generally, indicators that are not fully within the control of public policy and are overly influenced by macroeconomic or exogenous factors—should be avoided.</p> <p>In relation to the provision stating that <i>“the indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation], except where duly justified”</i>, it would be useful to clarify how the financial valuation of output and result indicators is to be determined for the purpose of defining</p>

Commission proposal	MS comments and MS questions
	<p>the amount of payments. Indeed, it is not specified whether such valuation will follow a logic similar to that applied in the 2021–2027 period, where in the case of grants it was carried out ex post, at project closure, while for financial instruments it was linked to the first payment.</p> <p>IT</p> <p>(MS questions):</p> <p>According to Article 22, paragraph 2, point (c), the Plan must structure the measures into chapters accompanied by objectives, milestones and targets, built on the basis of common <i>output indicators</i>. Annex I refers to a list of <i>output indicators</i>, each of which is associated with specific <i>result indicators</i>. One issue that has emerged during the implementation of the RRP is the importance of ensuring that targets are linked to variables under the direct control of public policy and not overly affected by exogenous factors. In this perspective, the Commission is invited to clarify the function of <i>output indicators</i> in relation to <i>result indicators</i></p> <p>PL</p> <p>(MS comments):</p> <p>We propose specifying that measures can be national or regional.</p>

Commission proposal	MS comments and MS questions
	<p>The existing lists of common indicators have had very limited application in simplified cost options or financing not linked to costs. Such a provision will significantly restrict development of milestones or results that are linked to the core of the support. This will be particularly evident in ESF operations.</p> <p>PL proposes the following wording: “The indicators proposed for the targets may be based on the output indicators listed”</p> <p>It should be clearly stated in the regulation how to define milestones and targets and to indicate that this concepts are measured by means of indicators listed in the annex to the regulation on PF. The MS can only guess now, on the basis of the scope of Annex V, what is the intention of the EC proposal in this regard.</p> <p>PL</p> <p>(MS questions):</p> <p><u>Please explain when (for what type of measures) it is necessary to set a milestone and when it is necessary to set a target, as well as which indicators from the Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] should be used for setting milestones and which for setting targets. We would like to know as well whether the EC</u></p>

Commission proposal	MS comments and MS questions
	<p>is planning to prepare binding definitions of the indicators listed in Annex I.</p> <p>RO</p> <p>(MS comments):</p> <p>Even if the paragraph is bracketed, we underline that according to Annex V – template of the Plan, at the level of measure description is requested only the objective of the measure, and not the general and specific objective. The correlation is needed.</p> <p>RO</p> <p>(MS questions):</p> <p>Why is bracketed? This text is declarative and, in the context of traditional negotiation procedures, has less relevance in relation to the concrete elements and financial obligations contained in the Negotiating box.</p> <p>The indicators proposed for the targets might need in reality to be based on other output indicators than those listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation]. More flexibility should be allowed than the exception “where duly justified”.</p>

Commission proposal	MS comments and MS questions
	<p>SE</p> <p>(MS comments):</p> <p>It is difficult to understand how the different concepts are related (milestones, targets, indicators) and what constitutes payment.</p> <p>SI</p> <p>(MS questions):</p> <p>Please explain if system of the milestones and targets is the same as it was implemented within RRF? The system within RRF brought us additional administrative burden that small countries find it hard to cope with it. There is a concern that combining systems of European Cohesion Policy, RRF and also CAP will not simplify this burden but instead it will be doubled or even tripled. We strongly suggest to simplify the whole system. Milestones and targets should take into account proportionality for smaller actors, including social economy organisations.</p>
<p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union</p>	<p>AT</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
<p>financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</p>	<p>Are more specific guidelines planned for the method used by the EC to estimate the total costs? How will reforms be assessed financially? Will the EC make any proposals in this regard?</p> <p>CZ</p> <p>(MS questions):</p> <p>What does it mean, that “<i>non-programmed flexibility amount shall be considered as part of the total estimated costs of the measures</i>”? In oral replies of EC in the Ad hoc group it was explained, that draft of NRPP shall be submitted without planned 25 % of flexibility amount, it therefore cannot be included in estimated costs of the measures.</p> <p>DE</p> <p>(MS questions):</p> <p>DE wonders how the Commission expects the MS to estimate/calculate the flexibility amount already when handing in the plan?</p> <p>ES</p> <p>(MS comments):</p> <p>It should be specified that spending from 1 January 2028 will be eligible, even if the PNR Regulation is not yet adopted by then.</p>

Commission proposal	MS comments and MS questions
	<p>FR</p> <p>(MS questions):</p> <p>Les montants non programmés ne sont-ils intégrés au total des coûts estimés des mesures que pour atteindre la somme de la contribution de l'Union et des cofinancements nationaux ? Autrement dit, la Commission peut-elle confirmer que les autorités nationales n'auront pas à évaluer les coûts estimés liés à des mesures financées en cours de programmation par des fonds mis en réserve ?</p> <p>HR</p> <p>(MS questions):</p> <p>Does this imply that co-financing rates will have to be justified for every measure?</p> <p>How does the Commission define the “plausible and reasonable” explanation of the costs of the measures?</p> <p>IT</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The Plan must include a cost estimate for the various measures, accompanied by a justification highlighting their efficiency and expected impact.</p> <p>Therefore, it is useful to clarify the relationship between the concept of “estimated total costs” referred to in article 22(3)(d) and Annex V, points 7 and 9, and the concept of “Milestones & Targets”, which form the basis for submitting payment requests referred to in article 65.</p> <p>It is necessary to define the common ex-ante estimation methods already at the adoption stage, in order to ensure legal certainty and minimize the risk of discrepancies between national assessments and European-level controls.</p> <p>IT</p> <p>(MS questions):</p> <p>Whether, at what stages, and at which level of governance the “estimated total costs” become expenditure subject to verification?</p> <p>Could the Commission clarify whether it intends to define common ex-ante costing methodologies, in order to ensure legal certainty and avoid different interpretation at national and EU level?</p> <p>LV</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p><i>“The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;”</i></p> <p>Could COM verify that milestones and targets are set using 75% of allocation when submitting the plan?</p> <p>PL</p> <p>(MS questions):</p> <p>The rule that “The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures” is not logical. If a Member State is programming expenditure in the Plan, but 25% of the allocation (flexibility amount) is not to be used, why is the flexibility amount included in the total costs of the measures? It seems that the flexibility amount should not be programmed, not included in indicators and not divided into measures, so that it can be effectively and freely used later.</p> <p>RO</p> <p>(MS comments):</p> <p>Taking into consideration the non-allocated flexibility proposed amount of 25% of the total allocation and that is subject to some disclaimers in case</p>

Commission proposal	MS comments and MS questions
	<p>of crisis, before MTR, establishing the costs by taking into account the total allocation will not reflect the reality.</p> <p>Moreover, according to the Template for the NRPP – (Annex V), the total estimated costs and Union contribution are requested at chapter level and not at measure level.</p> <p>RO</p> <p>(MS questions):</p> <p>According to the Template for the NRPP – (Annex V – Title II – heading 5.), under the table containing milestones, targets and timeline for the chapters, the information is provided at measures level, including Amount for managing authorities and Pay-out value (relevant for COM payments to the Member States). Which of the two values could be associated with the Total estimated costs of the measure?</p> <p>SI</p> <p>(MS questions):</p> <p>Please explain if system of setting out the estimated costs for each measure is the same as it was within RRF? This will bring us additional administrative burden that small countries find it hard to cope with it. The system will also be more rigid – all measures will have to be planned in</p>

Commission proposal	MS comments and MS questions
	<p>detail years before they will be implemented. This is hard to understand in current constantly changing circumstances. In addition, the nature of some measures is such, that they cannot be planned in such detail in advance. For example, IPCEI – we only know details about projects and budget, when we carry out quite a lot of steps in the IPCEI creation procedure (call for expression of interest, creation of project portfolios, matchmaking events).</p> <p>What does it mean “The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures.”?</p> <p>How will the social impact be measured?</p> <p>SK</p> <p>(MS comments):</p> <p>The last sentence reads “ The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures ”.</p> <p>SK</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	We request further clarification of this provision, as the flexibility amount is to be programmed in accordance with Article 14.
<p>(e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p>	<p>BE</p> <p>(MS questions):</p> <p>What is meant by “clear arrangements”? To what extent will this need to be detailed?</p> <p>To what extent could the European Commission withhold adoption on the basis of internal arrangements within Member States?</p> <p>CZ</p> <p>(MS questions):</p> <p>CZ – should this part of NRPP include information on National CAP Network? Or should it be described under AKIS chapter?</p> <p>What does term “technical support” mean?</p> <p>DE</p> <p>(MS comments):</p> <p>Lengthy descriptions of existing national management and control structures, which have been examined by the Commission for years, must be reduced to a minimum.</p>

Commission proposal	MS comments and MS questions
	<p>The description of the Governance and Control System of the NRPP should serve as an assurance for MS in order to avoid potential serious deficiencies that lead to exclusions from the funds and flat-rate financial corrections.</p> <p>Germany has submitted a range of proposals for simplification in view of implementation of purely national law, audit and control.</p> <p>HR</p> <p>(MS comments):</p> <p>HR advocates for the continuation of the existing national structure within home affairs funds, i.e. one managing (responsible) authority along with a monitoring committee, an audit authority and coordination authority etc. without the introduction of an additional level of authorities, which would further complicate communication and implementation of activities under the NRPP.</p> <p>IT</p> <p>(MS comments):</p> <p>[amendment proposed] Set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring</p>

Commission proposal	MS comments and MS questions
	<p>committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and vsibility, an identification of potential technical support needs <u>and substitute mechanisms to prevent critical issues</u>, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State.</p> <p>The issue of governance of the National Plans, which is also addressed in other parts of the proposed regulation, is crucial: it is essential to ensure effective multi-level governance.</p> <p>Among the requirements that proved fundamental in the experience with the Recovery and Resilience Plan (RRP) was the establishment of an effective national coordination system, entrusted with the responsibility of synthesising negotiations with the Commission, while also ensuring the coordination of reporting and an integrated control system.</p> <p>IT</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Further clarifications are requested regarding the division of responsibilities and roles between Member States and Regions with respect to Article 22(2)(e) and 22(2)(f), and the modalities for indicating Milestones & Targets (M&T) and estimating the costs associated with each measure (the RRF tabular model is referenced, but it remains to be clarified how to adapt it for the division between central and regional levels).</p> <p>Furthermore, it is necessary to include a provision—currently contained in the RRF guidelines—that establishes a flexibility margin allowing the result to be considered achieved nonetheless (the RRF percentage is set at 5%). It would be appropriate for this provision to be included also in the Plan template (Annex V).</p> <p>PL</p> <p>(MS comments):</p> <p>It is necessary to streamline the provisions concerning Managing Authorities, the Coordinating Authority, Monitoring Committees, and the Coordinating Committee in order to make the best possible use of the existing institutional potential and to maintain administrative and institutional capacity at both governmental and local levels. In the current draft of the NRPP regulation, there are concerns regarding the provisions related to the tasks of these institutions, the role of Intermediate Bodies</p>

Commission proposal	MS comments and MS questions
	and paying agencies, as well as the duplication of tasks between the Monitoring Committees and the Coordinating Committee.
(f) reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:	<p>AT</p> <p>(MS comments):</p> <p>Additional points could be included, e.g. “regions particularly affected by transformation.” And “addressing territorial challenges and the needs and potential of all regions”</p> <p>DE</p> <p>(MS questions):</p> <p>How and why should MS focus on cross-border regions, islands or similar areas in individual CAP interventions if they do not see a greater need for support there compared to other regions?]</p> <p>EL</p> <p>(MS comments):</p> <p>We fail to see how Annex VII constitutes a methodology.</p> <p>EL</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Will there be measures without a specific target or milestone, but with some form of output?</p> <p>Specifically for the SO on the rule of law, what kind of indicators will be used – older types like ESF+ ?</p> <p>How this Annex helps planning? What we need is a breakdown tree of processes: from Chapters to M&Ts to Activities and Projects and the level of detail of each one.</p> <p>(Do all points need to be taken into account? If not, point (f)(i) is related to (a), (b) and (c) of Annex VII. Is point (f)(iii) related to the rest points (d-j) of Annex VII?)</p> <p>LU</p> <p>(MS questions):</p> <p>LU: How should a regional approached be considered: LU in defined as NUTS 3 region. How should we consider inside LU different regions for the agricultural sector and again different regions for social or employment policy?</p> <p>Should this be part of the Plan to prove that the objectives are addressed. In that case are these interventions covered by the rules of the NRPP?</p>

Commission proposal	MS comments and MS questions
	NL (MS questions): Does this also include environmental disparities?
	SE (MS comments): SE is of the opinion that a new first para should be added with the meaning that resources should target competitiveness, innovation and the green and digital transition. With such an approach, cohesion policy can help increase growth and employment in all Member States and reduce regional disparities in the EU, in accordance with cohesion policy's objective of strengthening economic, social and territorial cohesion in the EU.
(i) allocating resources to less developed, transition and more developed regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII;	BE (MS questions): Why is reference made to transition and more developed regions, given that no dedicated funding is allocated to them? DE (MS comments):

Commission proposal	MS comments and MS questions
	<p>A clarification is needed that not all of the listed categories of regions must necessarily be allocated funds.</p> <p>EL</p> <p>(MS comments):</p> <p>We fail to see how Annex VII constitutes a methodology. What we need is a breakdown tree of processes: from Chapters to M&Ts to Activities and Projects</p> <p>and the level of detail of each one.</p> <p>EL</p> <p>(MS questions):</p> <p>How this Annex helps planning? Do all points need to be taken into account? If not, point (f)(i) is related to (a), (b) and (c) of Annex VII. Is point (f)(iii) related to the rest points (d-j) of Annex VII?)</p> <p>HU</p> <p>(MS questions):</p> <p>According to the regulation, resources should be concentrated only related to less developed regions. Questions arise, whether</p>

Commission proposal	MS comments and MS questions
	<p>a) if there is no earmarking envisaged for the transnational and developed regions, is it up to the Member States to set allocations and</p> <p>b) the allocation earmarked for less developed regions can be used only in these regions or can be used wherever the Member State sees fit as long as the amounts contribute to the development of these regions?</p> <p>Article 20 (2) ('where for a given measure, it is not possible to determine the proportion of implementation of less developed regions (...)') suggests the latter.</p> <p>NL</p> <p>(MS questions):</p> <p>Are MS required to allocate resources to all categories of regions as set out in Annex VII (when applicable)?</p> <p>RO</p> <p>(MS questions):</p> <p>The methodology set in Annex VII is based on NUTS3. How to report on NUTS 2, according to the Annex V?</p> <p>SE</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>How will the Commission ensure that resources are allocated to the overall objective in Article 2 to reduce regional imbalances in the Union in accordance with the TFEU and contribute to the overall objective of cohesion policy?</p>
<p>(ii) concentrate resources on less developed regions by establishing minimum amounts per Member State based on methodology set out in Annex II;</p>	<p>FR</p> <p>(MS questions) :</p> <p>La Commission peut-elle préciser pourquoi aucune ressource n'est spécifiquement dédiée aux RUP et pourquoi le dispositif d'allocation spécifique RUP ne figure pas dans le présent règlement ?</p> <p>HU</p> <p>(MS questions):</p> <p>Considering the establishment of minimum amounts what is the precise task of Member States? To whom should the Member State drafting the Plan establish minimum allocations?</p>
<p>(i) focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</p>	<p>DE</p> <p>(MS comments):</p> <p>A clarification is needed that not all of the listed categories of regions must necessarily be allocated funds.</p>

Commission proposal	MS comments and MS questions
	<p>Regarding e.g. Article 174 TFEU and Article 4 “Support for disadvantaged areas” of ERDF proposal (COM(2025) 552 final), we suggest a streamlining of categories and definitions, and would welcome an extension.</p> <p>DE</p> <p>(MS questions):</p> <p>DE thinks that the current CAP provisions on off-farm investments in rural areas (basis services, rural infrastructure etc., art. 69 (d) and (e), do not have any equivalent in the July 2025 proposals, while EAFRD rules on urban development etc. are still in place. How (on which legal basis) does COM expect MS to improve living standards in rural areas with EU funding from 2028 onwards?</p> <p>PL</p> <p>(MS comments):</p> <p>In the case of PL and its external EU border with three non-EU countries, it is essential to allocate appropriate funds for activities in these areas, independently of the allocation to NRPP. Moreover, special solutions (e.g. higher co-financing rates, additional pre-financing) are needed for</p>

Commission proposal	MS comments and MS questions
	<p>regions bordering Russia, Belarus or Ukraine due to the challenges they have faced since the onset of Russian aggression against Ukraine.</p> <p>RO</p> <p>(MS comments):</p> <p>We would like to underline that are differences between provisions/terminology in the recitals, articles and the provisions in the annexes regarding "eastern border regions" being necessary to harmonize in order to reflect that are those NUTS2 regions of the Union that have a land or maritime border with the Russian Federation, Belarus or Ukraine.</p>
<p>(ii) strengthening the economic and social development of outermost regions; to be set out in dedicated measures for the territories concerned in accordance with Article 46;</p>	<p>FR</p> <p>(MS questions) :</p> <p>La Commission peut-elle préciser le type et la portée des mesures qui devraient être incluses par les Etats membres dans leur chapitre consacré aux régions ultrapériphériques ? Est-ce que seul le chapitre RUP leur sera applicable ou bien l'ensemble des mesures du Plan avec des mesures spécifiques additionnelles RUP ?</p> <p>HU</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The situation of outermost regions does not concern every Member State.</p>
	<p>MT</p> <p>(MS comments):</p> <p><i>(iii) strengthening economic and social development and addressing the specific needs of Island Member States</i></p> <p>The text should better reflect the realities of Member States with only one category of region, and which are also Island Member States.</p>
<p>(g) concentrate resources on:</p>	<p>DE</p> <p>(MS comments):</p> <p>DE rejects the obligation that plans must “concentrate resources” as it contradicts the principle of the NRP that MS themselves define the objectives. MS shall have more flexibility here.]</p> <p>FI</p> <p>(MS questions):</p> <p>Article 22(2)(g), (h) and (i):</p> <p>What is the purpose of the different verbs used (concentrate – contribute – promote)? Should these points should be reflected differently in the NPR</p>

Commission proposal	MS comments and MS questions
	<p>Plan? Does the proposed text indicate their importance? The terms seem inconsistent with the obligations set for Member States.</p> <p>For example, Article 22(2)(h)(i): How does the wording support the requirement for Member States to support LEADER? Why is this not under point (g)?</p> <p>Is the minimum environmental and climate funding requirement in conflict with the wording of point h(iii)?</p> <p>LT</p> <p>(MS questions):</p> <p>Member States must concentrate resources on specified priority areas (e.g. generational renewal in agriculture, social measures, fisheries and aquaculture). How should this requirement be understood in practice – will additional methodological guidance be provided, and does it imply fixed minimum funding shares for these areas, or rather a broader strategic focus linked to targets and indicators?</p>
	<p>SI</p> <p>(MS comments):</p> <p><u>(i) supporting RDI and competitiveness of the economy in EU and Member States;</u></p>

Commission proposal	MS comments and MS questions
	<p>SI</p> <p>(MS questions):</p> <p>The resources cannot be concentrated only on (i) agricultural sector, fishery, aquaculture, (ii) social measures and (iii) fishery, aquaculture and maritime activities.</p>
<p>(i) supporting generational renewal in the agricultural sector, in accordance with Article 8 of Regulation XX [CAP, generational renewal], as well as in the fisheries and aquaculture sector;</p>	<p>AT</p> <p>(MS questions):</p> <p>It is unclear what is meant by the term “concentrate resources on generational renewal in agriculture and in the fisheries and aquaculture sector”?</p> <p>FI</p> <p>(MS comments):</p> <p>Unlike CAP, fisheries do not have a dedicated section for generational renewal in Annex V.</p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Comment ce soutien doit être mis en œuvre pour le secteur de la pêche et de l'aquaculture, notamment car le soutien au renouvellement des générations n'est pas repris dans la réglementation sectorielle ?</p> <p>La Commission pourrait-elle préciser comment le « soutien au renouvellement générationnel dans le secteur agricole » sera mis en œuvre dans la pratique ? Quel est le lien avec la contribution aux objectifs sociaux mentionnés à l'annexe VI du règlement ?</p>
(ii) social measures in accordance with Annex VI [social allocations].	<p>AT</p> <p>(MS questions):</p> <p>What is the significance of the measures in Annex VI compared to the specific objectives in Article 3 of the NRPP Regulation and the ESF Regulation? What practical significance will this have in the evaluation of the plans?</p> <p>DE</p> <p>(MS comments):</p> <p>Wording: Annex VI talks about “contribution to social objectives”, maybe better than “social allocations”.]</p> <p>FR</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions) :</p> <p>Quelle est l'articulation de cette disposition avec le point (q) du même article qui dispose qu'au moins 14% de la contribution totale de l'Union et des prêts sont consacrés à la réalisation des objectifs sociaux, calculés à l'aide des coefficients prévus à l'annexe 1 du règlement relatif à la performance ?</p> <p>HU</p> <p>(MS comments):</p> <p>Annex VI lists the areas for which Member States must provide funding. However, social interventions go beyond this, and if we understand correctly, a wider range of measures is counted in the 14% social target.</p> <p>IT</p> <p>(MS questions):</p> <p>Could EC clarify the connection with the broader list in the Annex I of the Performance Regulation?</p> <p>LV</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Please explain why the social objectives listed in the Annex VI do not cover all the sub-objectives of the general objective set out in Article 3(1)(c) “to strengthen social cohesion by supporting people and strengthening the Union’s societies and the Union’s social model,” as they are also in line with the principles of the European Pillar of Social Rights.</p>
<p>(iii) supporting fisheries, aquaculture and maritime activities, including small scale fishing, the implementation of the CFP as set out in Regulation EU XX [CFP] as well as the European Ocean Pact in accordance with Annex V [Plan’s template].</p>	<p>FI (MS questions): Should fisheries, blue economy, and the Ocean Pact be programmed as one chapter, as the Article text bundles these topics together?</p> <p>NL (MS questions): Why is small scale fishing, similar to the CFP/Oceans pact regulation, being specifically highlighted here? Small scale fisheries is undeniably part of fisheries, so we see no reason to draw special attention to this particular type of fisheries.</p>
<p>(h) effectively contribute to:</p>	<p>DE (MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>DE: Is the scope of this provision, Article 22 3 (h), aligned with Annex VII? Especially the scope of Annex VII lit. (g) seems wider than the scope of the regulation itself.</p> <p>DE: In which other part of the regulation should be the structural problems written down in Annex VII lit. (g) addressed, if it is not within Article 74?</p> <p>FI</p> <p>(MS questions):</p> <p>Is contributing less than concentrate (g) and more than promote (i)?</p> <p>SI</p> <p>(MS questions):</p> <p>The same comment: it cannot contribute only to territorial investments, farms, environmental and climate, agricultural products, but also economic development and competitiveness.</p>
	<p>SI</p> <p>(MS comments):</p> <p><u>(i) promoting RDI and competitiveness in EU and Member States;</u></p>

Commission proposal	MS comments and MS questions
<p>(i) promoting the use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER];</p>	<p>BE (MS questions): Integrated territorial investments are mentioned here, although they are not identified elsewhere in the Regulation. Does this constitute an obligation?</p> <p>DE (MS questions): DE: To what extent are MS obliged to implement Integrated Territorial (e.g. Rural) Development as “cooperation interventions” (apart from CLLD, including LEADER)? How does COM define a cooperation requirement here? Will funding for non-cooperative rural development not be available anymore? (See also art. 74 (1): “cooperation in the following areas...”, while art. 75 on integrated territorial development does not mention cooperation.)</p> <p>FI (MS questions): Concerning the point (i) we would like to know whether this does not oblige the Member State to implement the Leader approach? It's just an obligation to promote it. Or at least there is no obligation here to allocate a</p>

Commission proposal	MS comments and MS questions
	<p>certain amount of funding to leader, which means that a Member State could also implement it on a very small scale, if deemed justified. To this conclusion refers also Table 1.9 of Annex V, which would not have to describe the funds allocated to this item but only describe the measure.</p> <p>LU</p> <p>(MS comments):</p> <p>While important to address prevention of conflict of interest, it is important not to disproportionately increase administrative burden.</p> <p>PL</p> <p>(MS comments):</p> <p>Territorial approach should be mainstreamed in the regulation and not treated as an optional menu for choice. The specificity of different territorial instruments should be respected.</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain which implementation rules concern each of the cooperation interventions mentioned in this point.</p>

Commission proposal	MS comments and MS questions
	<p>Please confirm that smart specialisation strategies stop being an obligatory instrument.</p> <p>RO</p> <p>(MS comments):</p> <p>Unlike this para, art 74 refers to '<i>integrated territorial and urban development</i>' but not particularly to '<i>integrated territorial investments</i>'. Also, in the Annex II –of the proposed <i>Regulation for budget expenditure and performance framework - Lists of codes for the territorial dimension, part 3- Codes for territorial initiative and local cooperation dimension</i>, there is no code for <i>integrated territorial investment</i> and is replaced by the code 01. <i>Integrated territorial and urban development</i>.</p> <p>The <i>integrated territorial instrument</i> doesn't take into account where it is developed and it might cover cities, urban, rural and coastal areas, which might require consideration to the specific indication to 'cities, urban, rural and coastal areas(..)' cited under this alineate.</p> <p>Moreover, according to the previous point (f) and Annex V - Template for the NRPP, the Plan should provide also information on reducing disparities by highlighting the measures/chapters contributing on each type of territory, including less developed, transition and more developed regions,</p>

Commission proposal	MS comments and MS questions
	<p>Eastern border regions, rural areas, urban areas, areas affected by industrial transition etc.</p> <p>RO</p> <p>(MS questions):</p> <p>Taking into consideration that the <i>integrated territorial investment</i> has no longer intervention code for the territorial initiative and local cooperation dimension, please provide the rationale for approaching together, under the same code, the <i>integrated and territorial urban development</i>, based on integrated and urban development strategies.</p> <p>SE</p> <p>(MS questions):</p> <p>It is important that the cooperation interventions in Article correspond to national conditions and that it is possible to use existing national, regional or territorial strategies if they exist. Can existing tools in MS be used?</p>
(ii) improving farm resilience and management of risks at farm level and supporting the digital and data-driven transition of agriculture and rural areas to enhance their competitiveness, sustainability and resilience;	<p>NL</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	Do farm resilience and sustainability also encompass climate and environmental resilience/sustainability?
(iii) the environmental and climate priority areas set out in Article 4 of Regulation (EU) 202X/XXXX [CAP - Environment and climate priority areas].	<p>DE</p> <p>(MS questions):</p> <p>DE: How are modalities to be set out if they are determined at the level of the competent federal states? Presumably by having separate explanations (sub-chapters) according to the number of federal states?</p> <p>What standard will the COM apply to assess whether the criterion “effectively” (see point h, chapeau: “effectively contribute”) is met, in this regard?</p> <p>NL</p> <p>(MS comments):</p> <p>retain</p>
(i) promote partnership, knowledge exchange and as relevant distribution of agricultural products by setting out:	<p>DE</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.</p> <p>LV</p> <p>(MS questions):</p> <p>How to apply the requirement “as relevant” in this subparagraph? Does it mean that for the school scheme only point iii) is relevant, where the school scheme is genuinely mentioned, or all points i), ii) and iii) are applicable and relevant to the EU school scheme?</p>
<p>(i) which stakeholders have been consulted, how these were selected, how their representativeness and prevention of conflict of interest has been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership⁶, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter;</p>	<p>HR</p> <p>(MS comments):</p> <p>This section further defines partnership obligations – MS has to elaborate the process of selecting and justifying cooperation with partners for each chapter, which does not reflect the intended simplification. See comment under Art. 21(1).</p>

⁶ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

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	<p>PL</p> <p>(MS comments):</p> <p>Investigating conflicts of interest seems nearly unfeasible or excessively administratively burdensome in the context of public consultations on the Plan.</p> <p>PL</p> <p>(MS questions):</p> <p>What specific recommendations does the European Commission provide regarding stakeholder consultation for the preparation of the Plan, to ensure stakeholder representativeness and preventing conflicts of interest? Given the administrative burden and practical difficulties in investigating conflicts of interest during wide public consultations, how should it be defined and handled in this context to align with the <i>Code of conduct on partnership</i> and ensure transparency and fair input of stakeholders?</p>
<p>(ii) an Agricultural Knowledge and Innovation System including its organisation set-up in accordance with Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation – Agricultural knowledge and innovation systems and farm advisory services];</p>	<p>HU</p> <p>(MS comments):</p> <p>AKIS funding should be part of the CAP and not by reducing financial resources of income support.</p>

Commission proposal	MS comments and MS questions
	<p>LT</p> <p>(MS comments):</p> <p>In order to guarantee the provisions of Article 20 of the CAP Regulation, adequate financing is essential. We are concerned that this will not be achieved unless Article 35(3) of this Regulation is supplemented by a part (m), and Article 10(2)(a)(II) is supplemented — i.e. unless financing is provided for support for knowledge sharing and innovation in agriculture, forestry and rural areas.</p> <p>LT</p> <p>(MS questions):</p> <p>How can we ensure the implementation of AKIS requirements without allocation of adequate funding?</p>
(iii) the modalities for the EU school scheme in accordance with Title I, Part II, Chapter IIa of Regulation (EU) No 1308/2013.	
(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective	<p>DE</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
<p>practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p>	<p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.</p> <p>EE</p> <p>(MS questions):</p> <p>Necessary explanation what this part of the sentence means: "and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan"?</p> <p>LV</p> <p>(MS questions):</p> <p>What information will need to be included in the NRP Plan in relation to the complementarity between the protective practices set out in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation] and the relevant measures laid down in Article 10 of Regulation (EU) 202X/XXXX [CAP Regulation]? We kindly ask the Commission to provide examples with the required descriptions.</p>

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<p>(k) explain how the Member State's system and arrangements are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies;</p>	<p>BE</p> <p>(MS questions):</p> <p>The plan must provide detailed explanations, including about authorities that have been operating for a long time. Self-assessments are needed for (m) on security issues, (o) compliance charter horizontal condition, (p) respect for the rule of law, and European Semester recommendations. Will COM assess in advance whether what is stated is sufficient?</p> <p>DE</p> <p>(MS comments):</p> <p>The description of the Governance and Control System of the NRPP should serve as an assurance for MS in order to avoid potential serious deficiencies that lead to exclusions from the funds and flat-rate financial corrections.]</p> <p>FR</p> <p>(MS questions):</p> <p>La Commission peut-elle confirmer que ces éléments doivent être fournis pour l'ensemble du plan par l'autorité de coordination, et non dans chaque</p>

Commission proposal	MS comments and MS questions
	<p>chapitre individuel, y compris lorsque ces chapitres sont gérés par des autorités de gestion différentes ?</p> <p>SK</p> <p>(MS questions):</p> <p>How will the Member State ensure the efficient use of EU resources in the submitted NRP Plan, given that it does not apply a real-cost approach?</p>
<p>(l) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p>	<p>AT</p> <p>(MS comments):</p> <p>The proposal stipulates that final recipients and contractual partners should be guaranteed to receive their funds. However, the body responsible for the plan has no contractual relationship with bodies other than the beneficiaries. Therefore, in our view, the last part of the sentence should be deleted in any case.</p> <p>AT</p> <p>(MS questions):</p> <p>Where does such an obligation of the MS stem from/are laid down (“MS will comply with their obligation”)?</p>

Commission proposal	MS comments and MS questions
	<p>BE</p> <p>(MS questions):</p> <p>The only way of dealing with such financial liquidity-risk on the level of Member States, will be to apply the same logic for the payment from Member States to beneficiaries, thus: interruption of payments as long as their output has not been delivered. Is the Commission aware of the risk-aversive effect and liquidity-risk this creates for potential beneficiaries, and thus the possibility of disuse of European funding in practice?]</p> <p>CZ</p> <p>(MS comments):</p> <p>CZ is of the opinion that this obligation should be limited to cases where the entities concerned are not responsible for the measures taken by the EC.</p> <p>We do not agree that in the event of an interruption of payments by the Union, the Member State should be obliged to continue payments to beneficiaries if the reason for the interruption of payments was, for example, the discovery of a breach of legal regulations by the beneficiary.</p> <p>CZ</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Why is this provision stipulated in such an extensive way, i. e. to continue the payments to the beneficiaries, recipients, final recipients, contractors and participants, even if the application of these measures was caused by these entities? Or should we read the text in such a way that in this case there is no such obligation?</p> <p>DE</p> <p>(MS questions):</p> <p>How can the responsibilities of different government levels be considered when setting up and describing these arrangements? Punishing one level of government for the other's failure to comply with milestones and targets should be avoided.</p> <p>How does the Commission effectively ensure subsequently that MS continue the payments to beneficiaries in case of Art. 8 and 9 suspensions of payments?</p> <p>EL</p> <p>(MS questions):</p> <p>Why does that need to be specified? Is there anything similar in the current PP 2021-2027 when this is the case when an enabling condition fails being fulfilled?</p>

Commission proposal	MS comments and MS questions
	<p>FR</p> <p>(MS questions):</p> <p>Est-il possible de préciser la nature des mesures prévues afin de garantir que les États membres continuent de verser les paiements aux bénéficiaires malgré une suspension de la contribution du budget de l'UE ? Quelles seraient les conséquences en cas de non-respect de ces obligations?</p> <p>HR</p> <p>(MS comments):</p> <p>This raises the issue of ensuring sufficient funds under the national budget, specifically in the context of projects with high value. The experience from a parallel crisis of COVID-19 pandemic and earthquakes that hit Croatia in 2020 showed that in cases of force majeure national budget funding may be insufficient.</p> <p>HR</p> <p>(MS questions):</p> <p>Would it be possible to add a provision that in certain cases payments could be fully suspended?</p>

Commission proposal	MS comments and MS questions
	<p>IT</p> <p>(MS comments):</p> <p>The experience with the Recovery and Resilience Plan (RRP) highlights how national pre-financing instruments and cash advances are crucial to protect beneficiaries, particularly local authorities and small implementers, from liquidity risks.</p> <p>Therefore, it is appropriate for the Regulation to provide broad margins and simplified procedures in this regard.</p> <p>IT</p> <p>(MS questions):</p> <p>The provision rightly requires Member States to ensure the continuity of payments to beneficiaries even in the event of a suspension of Union funds. Could the Commission clarify whether, for this purpose, the Regulation is intended to allow Member States broad use of and simplified procedures for instruments such as pre-financing and national advances, in order to protect in particular local authorities and small implementers from potential liquidity risks?</p> <p>LU</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>This seems very restrictive to and implies significant cash flow reserves.</p> <p>LU</p> <p>(MS questions):</p> <p>How can be assured that in case of an interruption of payment, MS are still able to comply with their obligation to continue the payments to beneficiaries?</p> <p>Furthermore, if the Commission is unable to pay (e.g. at the end of the year due to a lack of budget), Member States must still proceed with reimbursements?</p> <p>PL</p> <p>(MS comments):</p> <p>This clause causes a financial risk to Member States allowing for payments to be stopped based on unilateral Commission assessment and making Member States carry the burden of such a solution.</p> <p>Moreover, there are doubts concerning financial corrections and other measures that Commission can use during the implementation of the Plans. They can cause a necessity of modifications of the system during the</p>

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	financial perspective, negatively impacting predictability and stability of implementation.
<p>(m) where appropriate, provide a security self-assessment based on common objective criteria identifying any security issues, and detailing how those issues will be addressed in order to comply with relevant applicable law.</p>	<p>CY (MS questions): Please clarify what is meant by “security self-assessment”?</p> <p>DE (MS questions): DE wonders what is to be understood by a “security self-assessment”?</p> <p>FI (MS questions): What is meant by security self-assessment?</p> <p>HR (MS questions): What type of security does this imply? Internal, budgetary or otherwise? Could you please clarify how will Commission verify claims from MS self-assessment?</p>

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	<p>LU</p> <p>(MS questions):</p> <p>What does “where appropriate” mean?</p> <p>LV</p> <p>(MS questions):</p> <p>Could Commission provide examples when such assessment should be carried out? How the sensitive information will be protected given that plans need to published? Does this requirement relates only to investments under specific objectives of art.3.1(b)?</p>
<p>(n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p>	<p>AT</p> <p>(MS comments):</p> <p>The required description of the coherence of the plan entailed a high administrative burden without added value in the previous planning period and should therefore be deleted.</p> <p>BG</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>What is expected to be presented as “arrangements in place in a MS to capitalise on synergies”?</p> <p>DE</p> <p>(MS comments):</p> <p>Doubling the content of the thematic chapters should be avoided.</p> <p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.</p> <p>FI</p> <p>(MS questions):</p> <p>Concerning the following we would like to know what is sought with the requirement to describe how the needs of more than one target group are taken into account? Are agricultural and fishery entrepreneurs one target group?</p> <p>FR</p> <p>(MS questions):</p>

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	<p>A quoi correspondent les « groupes cibles » mentionnés, qui ne sont pas mentionnés dans les articles 2 et 3 ? Pourquoi l'accent est-il mis sur les communautés rurales et côtières en particulier ?</p> <p>HU</p> <p>(MS comments):</p> <p>We find it inconsistent that Member States are required to prepare the NRP Plan with the objective of simplification through the merger of numerous policy areas, and then it is the responsibility of Member States to prove that synergies, complementarity and simplification have actually been achieved.</p> <p>PL</p> <p>(MS questions):</p> <p>Please clarify what exactly is expected from this description.</p> <p>Furthermore, since the plan is to cover all the general and specific objectives listed by the EC, what is the point of the Member State demonstrating that there is complementarity between the actions? The EC should ensure this complementarity by establishing a list of objectives.</p>

Commission proposal	MS comments and MS questions
<p>(o) provide a self-assessment of the compliance with the Charter horizontal condition referred to in Article 8 [Charter Article];</p>	<p>DE (MS questions): Will there be a guidance for this self-assessment? How, in particular, are the principles contained in the Charter to be addressed in this self-assessment?</p> <p>EL (MS questions): Will there be a template for the assessment? Under the current CPR Annex II, Horizontal Enabling Condition 3 was fulfilled based on Commission Notice C/2016/4384 (“Guidance on ensuring respect for the Charter of Fundamental Rights when implementing ESI Funds”), without a common template for Member States. Is this 2016 Notice still valid, or will there be an updated approach, and by when?</p> <p>There is no specific type described for an assessment. Will there be a specific pattern, common for all MS?</p> <p>Is there a common format for the plan?</p> <p>HR (MS questions):</p>

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	<p>Could you please clarify how will Commission verify claims from MS self-assessment?</p> <p>HU</p> <p>(MS comments):</p> <p>These articles and their corresponding recitals, as well as the further provisions related to the new conditionality mechanism, should not be negotiated in this forum but in the horizontal MFF AHWP, since they concern decisions falling under the negotiating box.</p> <p>The Commission has proposed a new regime of conditionality whose elements cannot be separated. This is a key issue if we wish to give substantive matters to our leaders for decision-making.</p> <p>Therefore, as we have already indicated in the MFF AHWP, we ask the Presidency to place in brackets Articles 8 and 9, as well as Article 22 (2), points (o) and (p), Article 24 (8) and (9), Article 25(1)(g), and Article 80(2).</p> <p>We consider that the proposal is not merely an initiative to maintain already existing mechanisms but goes far beyond that. The proposal introduces several new elements, such as:</p> <ul style="list-style-type: none"> • the link with the Rule of Law Report,

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	<ul style="list-style-type: none"> • the further weakening of the link between conditionality and actual budgetary/financial risks, • the duplication of rule of law conditionality, without retaining even the few safeguards that had prevented the Conditionality Regulation from being declared invalid by the Court of Justice, • and the shortening of the timeframe leading to the definitive loss of Union funds. <p>These new elements are currently not placed in brackets, which we consider an unacceptable starting point for further negotiations.</p> <p>IT</p> <p>(MS comments):</p> <p>The Commission considers that the Plan should demonstrate compliance with the horizontal conditions related to the Charter of Fundamental Rights and the rule of law.</p> <p>In this regard, it is important to emphasise the need for verification procedures of these conditionalities to be proportionate and protective of the Member State, so as to avoid excessive interpretative margins that could delay implementation or create legal uncertainty.</p> <p>LU</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Is this self-assessment required at the set-up of the NRPP or is a self-assessment required annually or is it also linked to the submission of payment requests?</p> <p>PL</p> <p>(MS comments):</p> <p>Including the CFR self-assessment in the Plan as an integral part of the entire document may result in delays in the approval of the document (due to the need to undergo a lengthy legislative process) and in the start of the implementation of funds.</p>
<p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.</p>	<p>ES</p> <p>(MS comments):</p> <p>ES proposes the following drafting:</p> <p>“specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], <i>including the follow-up given to the</i></p>

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	<p><i>latest Rule of Law Report</i> and European Semester, together with measures to address those identified country specific challenges.”</p> <p>Thus, we propose to delete the reference to the recommendations, to avoid having a direct relation between the acknowledgement of the non-fulfilment of the RoL condition and the country-specific recommendations of the annual RoL report.</p> <p>Furthermore, this would be coherent with art. 9, which does not refer explicitly to the recommendations.</p> <p>FR</p> <p>(MS questions):</p> <p>En quoi l’analyse attendue diffère du “self-assessment” prévu au point (o)? Comment les suivis des rapports sur l’État de droit et les recommandations spécifiques par pays dans le cadre du Semestre européen seront-ils pris en compte et avec quelle portée (indicative ou contraignante) ?</p> <p>HR</p> <p>(MS comments):</p> <p>This also has to be further elaborated – NRPP should be based on regulations and established procedures anyway.</p>

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	<p>HU</p> <p>(MS comments):</p> <p>See our comments above at point o).</p> <p>IT</p> <p>(MS questions):</p> <p>The Rule of Law Report was not conceived as a binding instrument, and to date its conclusions and recommendations do not carry mandatory legal force. On what legal basis are Member States required to demonstrate compliance with the Rule of Law horizontal condition on the grounds of non-binding reports? How does the Commission justify, from a legal standpoint, that documents without binding effect can nonetheless produce binding consequences and become a prerequisite for the approval of the NRPPs?</p> <p>PL</p> <p>(MS comments):</p> <p>The rule of law report goes far beyond the scope of intervention undertaken within the NRP Plan. The assessment of the Rule of Law horizontal condition should be done based on specific criteria indicated in</p>

Commission proposal	MS comments and MS questions
	<p>regulation on the NRP Plan and directly related to the scope of intervention under NRP Plan.</p> <p>Poland, generally, does not oppose linking the rule of law with budgetary matters and even recognizes the purpose of such an approach. Nevertheless, we insist that any assessments and subsequent decisions in this area should be based on objective indicators that are specific, unambiguous, and easily verifiable by each Member State as well as by the relevant EU institutions (such as milestones, for example).</p> <p>The recommendations contained in the European Commission's rule of law reports may only serve as an additional element in the assessment of the rule of law situation in a Member State when considering the possibility of disbursing funds from the EU budget.</p> <p>The proposed provisions (including Articles 8(4) and (6), and Article 9) grant the European Commission the authority to assess, determine, and repeal decisions in the context of applying the Charter of Fundamental Rights and the rule of law principle. There is a concern that these proposed solutions may, in practice, lead to an expansion of the Commission's powers beyond the treaty framework and allow for discretionary application of general clauses.</p>

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	<p>The pace of implementing changes aimed at addressing the recommendations set out in the annual rule of law reports depends on many factors, often including the legislative process, which — due to the subject matter and the negotiation climate — may involve complex, multi-layered, and challenging issues requiring broad and, therefore, time-consuming analyses or consultations, as well as political agreement. In this context, it is important to note that achieving a specific outcome — i.e., the implementation of a given recommendation — may prove unattainable within the defined assessment cycle, despite the exercise of due diligence. Moreover, the process of change itself may be overlooked, regardless of how advanced it is.</p> <p>There is a need to define horizontal rule of law conditions, ensure clarity of definitions, establish rules for the suspension of payments, set out appeal procedures, and clarify the impact on the settlement of regional plans.</p>
<p>(q) ensure that the NRP Plan contributes to the Union’s social objectives. At least 14% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a)</p>	<p>BE</p> <p>(MS questions):</p> <p>What are the consequences if the thresholds (social or climate) are not met, based on the challenges identified by the Member State in the submitted plan and during implementation?</p>

Commission proposal	MS comments and MS questions
<p>(ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p>	<p>Why is it necessary to justify the achievement of the targets? Annex 1 of the Performance Regulation specifies, for each type of intervention, the contribution to the various objectives set by the Commission (climate, social, etc.). This calculation could be automated within the SFC system, without requiring additional justification in the NRPP.</p> <p>BG</p> <p>(MS questions):</p> <p>What is the base for calculation of the result of at least 14% concentration of the resources under the respective Plan under art. 22. q to Social objectives? Why the resources under Article 10(2), point (a) (ii), as well as (the externally assigned revenue) from the Social Climate Fund are excluded from this concentration, given that some of them also relate to social expenditure? If our understanding is correct, “the external assigned revenue” means the one under art. 10.1 of Regulation (EU) 2023/955.</p> <p>CY</p> <p>(MS questions):</p> <p>Please clarify that this does not apply to Interreg Plan.</p> <p>DE</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Where and how, on which basis the Union’s social objectives are defined?</p> <p>Must they not be underpinned by official EU objectives like the EU2030 goals related to employment, education and social inclusion/anti-poverty, or the 20 principles of the European Pillar of Social Rights, to be “the Union’s social objectives”?</p> <p>Are they maybe related to Annex VI?</p> <p>EE</p> <p>(MS questions):</p> <p>Could you please explain how the proposed minimum allocation of 14% for social objectives would help to achieve the Union’s ambitions in the social domain, particularly in light of the broad scope of general and specific objectives outlined in Articles 2 and 3?</p> <p>ES</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>ES advocates that the contribution to the social objectives is specifically made and that the minimum amount to be dedicated to the Union's social objectives does not include the amounts dedicated to social infrastructure.</p> <p>A possible drafting would be:</p> <p><i>(q) ensure that the NRP Plan contributes to the Union's social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation] <u>excluding amounts dedicated to social infrastructure</u>. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</i></p> <p>FR</p> <p>(MS questions):</p> <p>Quelle est l'articulation de cette disposition avec le point (g) (ii) du même article, qui dispose que les ressources des PPNR doivent être concentrées sur 4 objectifs sociaux définis à l'annexe VI ?</p> <p>Les instruments financiers JAI devront-ils contribuer à cet objectif de 14% ?</p>

Commission proposal	MS comments and MS questions
	<p>HU</p> <p>(MS questions):</p> <p>With regard to the level of the minimum allocation of the Plan’s social and climate contribution, it should be clarified whether non-compliance would trigger sanctions, whether there would be a risk of payment suspension, and also, how the rule should be interpreted in the context of Interreg.</p> <p>IE</p> <p>(MS questions):</p> <p>How will the contribution to the Union’s social objectives be measured?</p> <p>Will the objectives be chapter specific or do they refer to the overall plan?</p> <p>IT</p> <p>(MS comments):</p> <p>“ensure that the NRP Plan contributes to the Union’s social objectives. At least <u>14</u>% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... , <u>in accordance with Annex VI [social allocations]</u>. [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the</p>

Commission proposal	MS comments and MS questions
	<p>Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation”</p> <p>NL</p> <p>(MS questions):</p> <p>What interplay does the Commission envision for the vision for rural areas play and these social objectives?</p> <p>PL</p> <p>(MS comments):</p> <p>The coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation] need to be analysed and reviewed in terms of contributing to social objectives. Detailed comments will be submitted to the Performance Regulation proposal.</p> <p>RO</p> <p>(MS comments):</p> <p>The Home Affairs funds should be excepted from the climate and environmental objectives, taking into account their specificity.</p> <p>SK</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>Request minimum thematic shares for health within the social objectives (at least indicative), or explicitly state that health investments (including workforce and prevention) count toward the social quota.</p> <p>SK</p> <p>(MS questions):</p> <p>Can COM consider earmarking a share for health?</p>
<p>(r) ensure that the NRP Plan contributes to the Union's climate and environmental objectives. A minimum percentage of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in [Annex III of Regulation (EU) .../... [Performance Regulation]].</p>	<p>AT</p> <p>(MS questions):</p> <p>How are national funds included in the percentage rate? (Annex III Performance Regulation)?</p> <p>The proposal to link the percentage to the achievement of the NECP and Nature Restoration Law targets seems to be very complex. Could the EC please provide an example of how the percentage is to be determined?</p> <p>DE</p> <p>(MS comments):</p> <p>DE supports the spending target especially in the context of the discontinuation of the former environmental earmarking.</p> <p>FR</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions) :</p> <p>La Commission peut-elle confirmer que dans les PPNR ce pourcentage sera apprécié sur l'ensemble du plan et décliné par mesure (coefficients fixés dans le cadre du dialogue avec la Commission comme pour la FRR) ?</p> <p>Dans la mesure où la Commission pourrait demander une contribution plus ou moins importante de chaque Etat Membre à l'objectif général de financement environnement/climat (art 22.2.r), en se basant entre autres sur les ambitions énergétiques, climatiques et de restauration de la nature des Etats Membres, la Commission pourrait-elle préciser si elle dispose déjà d'une clé de décision et si oui pourrait-elle en préciser les critères ?</p> <p>HU</p> <p>(MS questions):</p> <p>See question at point (q).</p> <p>IE</p> <p>(MS questions):</p> <p>What happens if these targets are not on track during the period of met at the end?</p>

Commission proposal	MS comments and MS questions
	<p>How will the burden be shared among MS?</p> <p>LT</p> <p>(MS comments):</p> <p>LT is cautious about the proposal on contributing to climate and environmental objectives, we believe that the requirement for the NRP Plan to allocate 43% of funds to climate and environmental objectives is too ambitious and cannot be (fully) applied to support in the field of home affairs.</p> <p>LT</p> <p>(MS questions):</p> <p>clarification is needed on how the percentages of contribution to environmental and climate objectives will be calculated.</p> <p>LU</p> <p>(MS comments):</p> <p>We are critical about the possibility for COM to request higher contribution in the middle of a planning period.</p> <p>LU</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>LU: will there be a ventilation by Member State or sector of the 43%? Why is this minimum not specified? Without value, this does not make sense.</p> <p>NL</p> <p>(MS questions):</p> <p>How will the Commission ensure sufficient contributions to biodiversity in country's NRP Plans in the context of the climate and environment spending target?</p> <p>PL</p> <p>(MS comments):</p> <p>In our opinion the proposed level of contribution to climate and environmental objectives is too high and will be difficult to achieve.</p> <p>PL</p> <p>(MS questions):</p> <p>Please provide evidence and justification on why a higher level of contribution to climate and environmental objectives in NRP (as compared to the overall budget) is necessary.</p> <p>SK</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Please specify in which part of the NRPP (in accordance with the template in Annex V) this information should be declared.</p>
<p>¶By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.¶</p>	<p>AT</p> <p>(MS questions):</p> <p>Why and under what conditions could or should the EC propose a lower percentage for climate and environmental targets?</p> <p>Why does the Commission intend to prevent a Member States from showing a higher ambition on climate and environmental objectives?</p> <p>BE</p> <p>(MS questions):</p> <p>On which objective criteria will COM establish these percentages? Can this percentage change throughout the implementation period?</p> <p>CY</p> <p>(MS comments):</p> <p>The current text lacks certainty and transparency for MS to design appropriately the NRP Plans. Further clarification on the legislative text</p>

Commission proposal	MS comments and MS questions
	<p>should be provided, outlining the methodology/approach to be used by the EC to calculate the specific percentage for each MS.</p> <p>CY</p> <p>(MS questions):</p> <p>Please clarify that this does not apply to Interreg Plan.</p> <p>CZ</p> <p>(MS comments):</p> <p>The Commission is given the opportunity to increase or decrease the environmental ambitions of the plan, but it is not specified on what this will be assessed and what the Commission will base its decisions on.</p> <p>DE</p> <p>(MS comments):</p> <p>Climate and environmental objectives should be set mandatory for all member states at Union level and not be subject to unilateral requests by the Commission.</p> <p>DE</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Why should the Commission may request MS to contribute a LOWER minimum percentage of the total allocation of the plan for climate and environmental objectives?</p> <p>EL</p> <p>(MS comments):</p> <p>It is proposed to set a range between 30%-40% as an acceptable contribution for climate and environmental objectives.</p> <p>(This paragraph must be incorporated in point (r) in order to make sense)</p> <p>IE</p> <p>(MS questions):</p> <p>Practically, can a MS refuse this request?</p> <p>LV</p> <p>(MS comments):</p> <p>We are rather sceptical to the provision granting the COM the unilateral right to request an increase in the funding allocated to environment and climate.</p>

Commission proposal	MS comments and MS questions
	<p>We propose to consider linking this to Annex III of the performance regulation, which stipulates that 43% of the VRP must be planned for climate and environmental objectives.</p> <p>NL</p> <p>(MS questions):</p> <p>Does the Commission foresee to ask MS to increase the general spending target of 43% in their NRPP, or can it ask to increase percentages on specific environmental subgoals such as biodiversity or water? Will the Environmental Implementation Review Country Reports play a role here?</p> <p>PL</p> <p>(MS comments):</p> <p>There should be no scope for such one-sided decision-making concerning the content of the NRP plans. We propose removing this clause.</p> <p>RO</p> <p>(MS questions):</p> <p>How will the European Commission ensure that it will guarantee fair treatment for all member states and ensure the effective contribution to</p>

Commission proposal	MS comments and MS questions
	<p>achieving the objectives set at European level if a lower percentage is set for some member states?</p> <p>SE</p> <p>(MS comments):</p> <p>The Commission is given the possibility to request that Member States ensure the NRP plan contributes to climate and environmental measures to varying degrees. According to this para the percentage is to be determined by the Commission at the time of the plan’s approval. This appears to be too late and risks creating unpredictability for the Member States.</p> <p>SK</p> <p>(MS questions):</p> <p>The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan. - Does this mean that the Commission will set the minimum percentage in the preparatory phase of the NRP Plan or only during the official approval of the NRP Plan? We are concerned that if the proposed minimum percentage is adjusted (upwards or downwards) in the NRP Plan only during the approval process, it may cause a prolongation of the approval process.</p>

Commission proposal	MS comments and MS questions
<p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p>	<p>EL</p> <p>(MS comments):</p> <p>(This paragraph must be incorporated in point (r) in order to make sense)</p> <p>EL</p> <p>(MS questions):</p> <p>The determination of the percentage takes into account ONLY the Regs mentioned here?</p> <ul style="list-style-type: none"> - Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment - targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans. <p>Are there any other acts or regulations that will be taken into account?</p> <p>FI</p> <p>(MS comments):</p> <p>We are concerned that this might lead to unpredictability for the NRP measures planned. Equal treatment between Member States should be ensured.</p>

Commission proposal	MS comments and MS questions
	PL (MS comments): As above
2. The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.	AT (MS questions): Since measures are subject to a DNSH assessment, an SEA is no longer required, correct? DE (MS comments): The empowerment of the Commission in paragraph 3 to amend and possibly expand the template in Annex V via delegated acts should be limited. FI (MS comments): The empowerment to adopt delegated acts on Annex V template should be restricted to cover only technical matters, such as character limits. Member States must be informed in time about what is required for program and system development. In the current period, we had to

Commission proposal	MS comments and MS questions
	<p>accommodate to several unexpected new requirements due to updates of the SFC system.</p> <p>This empowerment must be limited only to clerical amendments. Is is very burdensome for MSs recourses and IT-systems to keep on track on all changes.</p> <p>PL</p> <p>(MS comments):</p> <p>There is too much scope for delegated acts throughout the proposal. It needs to be considered where the delegated acts are indeed necessary – in other cases there should be an amendment of the regulation.</p> <p>The scope of the Plan is set out in Annex V. The Commission may not, during the implementation of the Plan, arbitrarily change its scope by means of a delegated act. The scope of that Annex may only be changed by means of a regulation of the European Parliament and of the Council.</p> <p>RO</p> <p>(MS comments):</p> <p>The amendment of the Plan template during implementation process could determine a lot of dysfunctionalities in the management of the funds, taking</p>

Commission proposal	MS comments and MS questions
	<p>into consideration the need to correlate all the involved systems (Information Management System, MA procedures etc.)</p> <p>SK</p> <p>(MS comments):</p> <p>The correct wording should be paragraph 3 instead of 2.</p>

<p style="text-align: center;"><i>Article 23</i></p> <p style="text-align: center;"><i>Commission proposal and Council implementing decision</i></p>	<p>LV</p> <p>(MS comments):</p> <p>This process should be simplified. The plans and their amendments should be approved by the Commission. The involvement of the Council creates unnecessary administrative burden and significantly prolongs the procedures without adding value.</p> <p>RO</p> <p>(MS comments):</p> <p>It would be important that EC explains the need for a double layer decision process. The Plan is proposed to be implemented in a hybrid mode: RRF model in terms of milestones and targets, but in shared management. So far, the known models are: (i) the RRF model in direct management with Council decision; (ii) the Social Climate Fund with Commission decision in direct management, and now the Plan, under shared management, but with two decisions – both Commission and Council.</p> <p>There are concerns regarding the impact of this new model on the proven flexibility of Cohesion Policy, on its adaptability and on the possibility to propose adjustment to the programmes in order to adapt to the reality on the ground. Bringing all policies together and making the decision process more complex will definitely affect this flexibility.</p>
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Commission proposal	MS comments and MS questions
	<p>RO</p> <p>(MS questions):</p> <p>How does the Commission consider that this approach will ensure flexibility and speed in the implementation?</p>
<p>1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p>	<p>AT</p> <p>(MS questions):</p> <p>Why will an implementing decision by the Council be required in future to adopt the plan, rather than an implementing decision by the Commission?</p> <p>BE</p> <p>(MS questions):</p> <p>What happens if the Council rejects the NRP or requests amendments? How many weeks do the Managing Authorities have to revise the plan if modifications are required?</p> <p>CY</p> <p>(MS comments):</p> <p>The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four</p>

Commission proposal	MS comments and MS questions
	<p>three months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22</p> <p>CY</p> <p>(MS questions):</p> <p>4 months is such a long time.</p> <p>CZ</p> <p>(MS questions):</p> <p>How detailed information should be provided for the list of measure, examined by the Council? Shall it be only names and IDs of each of the measure?</p> <p>DE</p> <p>(MS questions):</p> <p>DE: What is the reason for a four-month period? This long duration makes it difficult to carry out the appropriate follow-up of the plan, if necessary.</p> <p>IE</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>The timeframe for the process set out is highly ambitious. Of note are the provisions of Article 17 where the first tranche of pre-financing will not be available if there is no Council decision on the NRPP by 31 July 2028.</p> <p>The timeframe for the process set out in Article 23 needs to be re-considered, or the provisions of Article 17 need to be considered in light of the practicalities of the Commission assessing NRPs from every MS in such a short time frame.</p> <p>IT</p> <p>(MS comments):</p> <p>it is noted that the Commission is required to assess the Plan, or the amended Plan, within four months of submission, verifying its compliance with the Regulation and, in particular, with the requirements set out in Article 22.</p> <p>IT</p> <p>(MS questions):</p> <p>Would it be technically possible to have a partial approval of the NRP Plan?</p>

Commission proposal	MS comments and MS questions
	<p>If some plan components other than the CAP are not available by the submission deadline, it should be possible to proceed with the approval of CAP measures, avoid interruptions in farmers' income support.</p> <p>Aa similar provision is contained in Regulation 2021/2115, which provided for partial approval of CAP Strategic Plan for direct payments, to allow its implementation from January 1 to 2023, even if the Plan has not been fully approved</p> <p>LU</p> <p>(MS questions):</p> <p>Why is the assessment by the Commission done within four month and not within 2 months as for RRF?</p> <p>PL</p> <p>(MS comments):</p> <p>The adoption of the Plan and amended Plan at the Council level prolongs and unnecessarily complicates the procedure, which is against the proposed flexibility of Plans. PL proposes to use the adoption procedures similar to those used in Cohesion Policy in the present programming period.</p>

Commission proposal	MS comments and MS questions
	<p>PL</p> <p>(MS questions):</p> <p>Please provide clear criteria for the assessment of the Plan as the whole and for the self-assessment of the compliance with the Charter horizontal condition.</p> <p>SE</p> <p>(MS questions):</p> <p>It should be clarified whether all parts of Article 22 are to be included in the approval process. Under the current CAP regulation, there are exceptions where, for example, information on control systems, needs assessment, and the intervention strategy are not included in the approval (Article 118 in 2021/2115 for reference) .</p> <p>SI</p> <p>(MS questions):</p> <p>(1) The deadline for comments to the EC has passed. In particular, in Article 22 – what other elements will the EC still review?</p> <p>SK</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>Art. 23 and 24 (programming/amendments):</p> <p>We are not in favour of the proposal for a procedural setting and a timeframe for the approval of the National and Regional Partnership Plans (NRP plan) and their amendments at the level of the EU Council. This procedure is contrary to subsidiarity and the effort to reduce the administrative burden. Multi-level approval will cause delays in the reprogramming and implementation of the plans, which may jeopardise the absorption of resources, including in cases of force majeure. Furthermore, it will weaken the importance of the Council's recommendations on economic and social policy, as each amendment would be approved in two stages with a significant time lag. We therefore continue to support the single-level approval of the NRP plan exclusively at the level of the European Commission, as has been the case so far.</p> <p>For the sake of greater precision, we propose that the four-month period for assessing the Plan or amendments to the Plan should also include an obligation on the Commission to submit a draft implementing decision to the Council.</p> <p>SK</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>We request clarification as to why the Council has the competence to adopt decisions on the approval/amendment of the NRP Plan, given that shared management, under Regulation (EU, Euratom) 2024/2509, is based on a relationship between the Member State and the Commission. The involvement of the Council prolongs the process, does not simplify it and creates the space for politization.</p>
<p>2. The Commission may make observations to Member States and request additional information.</p>	<p>BE</p> <p>(MS questions):</p> <p>On what would COM base these requests? Are Member States obligated to take these into account?</p> <p>DE</p> <p>(MS comments):</p> <p>The Council's steering competence for key decisions must be safeguarded, and the provisions cannot be determined solely by the Commission. They must be laid down in the Regulation itself and cannot be left to bilateral negotiations between the Commission and MS on the NRPPs or to secondary legislation.</p>

Commission proposal	MS comments and MS questions
	<p>DE</p> <p>(MS questions):</p> <p>Could COM explain their system for the assessment of the NRPPs? Why did COM not include a system like Annex V of the RRF Regulation?</p> <p>DE: By what deadline does the Commission make such observations/request additional information?]</p> <p>IT</p> <p>(MS comments):</p> <p>paragraph 2 allows the Commission to make observations and request additional information, suspending the deadline until the Member State responds, while paragraph 4 provides that the draft Council Implementing Decision (CID) establishes the overall contribution, any loan component, and the list of eligible measures.</p>
<p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p>	<p>BE</p> <p>(MS questions):</p> <p>What does it mean by “in duly justified cases”?</p> <p>CY</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>In duly justified cases, the Commission may request suggest the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>DE</p> <p>(MS comments):</p> <p>The requirements for additional measures must be laid down in the Regulation itself and cannot be left to bilateral negotiations between the Commission and MS on the NRPPs.</p> <p>DE sees too much leeway for the COM as there is no clear definition of the relation between reforms and investments with regard to the MS allocation/GDP, see first comment on Art. 21.</p> <p>FI</p> <p>(MS questions):</p> <p>What is meant by ‘in duly justified cases’?</p> <p>HR</p> <p>(MS questions):</p> <p>Could you clarify what is meant by “duly justified cases” in order to avoid subjective interpretations.</p>

Commission proposal	MS comments and MS questions
	<p>HU</p> <p>(MS comments):</p> <p>The incorporation of new, unplanned measures into the plan after its submission could significantly disrupt the structure and financial logic of the plan, so adding completely new measures is not realistic. The Commission should only examine whether the interventions included in the plan are in line with EU legislation, but the selection of interventions is the responsibility of the Member States.</p> <p>HU</p> <p>(MS questions):</p> <p>According to the Commission's intentions what may be considered as such duly justified cases. What could be the consequences if a Member State does not adopt the proposed amendments?</p> <p>LU</p> <p>(MS comments):</p> <p>LU is of the opinion that "in duly justified cases" is not precise enough. There needs to be a precise reason for asking a MS to include additional measures.</p>

Commission proposal	MS comments and MS questions
	<p>LU</p> <p>(MS questions):</p> <p>Could COM explain what “duly justified” means?</p> <p>LV</p> <p>(MS questions):</p> <p>To ensure maximum predictability and efficiency in the NRP Plan amendment process, particularly concerning the interruption of the four-month assessment deadline under Article 23 (2), could the EC provide clarification on the specific, objective criteria that define a 'duly justified case' for requesting additional information or revised documents? We would be grateful if the EC could illustrate this threshold by providing examples of both the nature of issues that would necessitate an interruption (e.g., fundamental legal or strategic non-compliance) and those that would be addressed through standard, non-interrupting communication (e.g., minor technical inconsistencies). This guidance would greatly assist Member States in preparing robust submissions.</p> <p>PL</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>There should be no scope for such one-sided decision-making concerning the content of the NRP plans. We propose removing this clause.</p> <p>RO</p> <p>(MS questions):</p> <p>What it is considered to be "<i>in duly justified cases</i>"?</p> <p>SI</p> <p>(MS questions):</p> <p>In duly justified cases - What does this mean, specific cases? We suggest that this be defined specifically.</p> <p>Request additional information – how detailed will this additional information and these requirements be?</p> <p>Is the Stop the clock mechanism used in every case, or is it only used when a proposal needs to be supplemented or clarified?</p>
<p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission. The deadline set out in paragraph 1 shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised</p>	<p>CY</p> <p>(MS comments):</p> <p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests suggestions made by the Commission. The deadline set out in paragraph 1</p>

Commission proposal	MS comments and MS questions
<p>documents to the Member State and until the Member State responds to the Commission.</p>	<p>shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.</p> <p>FR</p> <p>(MS questions):</p> <p>Les délais de validation du PPNR, notamment en raison d'échanges avec les Etats membres, peuvent-ils avoir un impact sur le calendrier de versement des fonds ?</p> <p>IT</p> <p>(MS comments):</p> <p>The expression <i>if needed</i> reflects the scope for assessment left to the Member State in relation to the Commission's proposal.</p> <p>LV</p> <p>(MS comments):</p> <p>Article 23 (2) also states that the four-month assessment deadline can be 'interrupted' when the Commission requests additional information. This provision introduces significant uncertainty and the potential for</p>

Commission proposal	MS comments and MS questions
	<p>prolonged delays, which could hinder timely project implementation for Member States like</p> <p>LV</p> <p>(MS questions):</p> <p>Latvia, therefore we would like to inquire about - <i>what specific measures will the Commission put in place to ensure that this process remains efficient, transparent, and does not become a tool for undue delays, so that we can maintain momentum in our strategic investments and avoid potential bottlenecks?</i></p>
<p>3. Where the Plan does not comply with the requirements referred to in paragraph 1, the Commission shall communicate a duly justified reasoning to the Member State concerned within the deadline set out in paragraph 1.</p>	<p>DE</p> <p>(MS questions):</p> <p>Will this reasoning also be sent to other MS for transparency/multilateral surveillance?</p> <p>SK</p> <p>(MS comments):</p> <p>This provision violates the principle of national subsidiarity. Therefore, we request the deletion of this paragraph. The Commission may propose</p>

Commission proposal	MS comments and MS questions
	changes to the Member State, but the Member State should have the right to accept or decline the proposed changes.
<p>4. Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, the Commission proposal for a Council implementing decision shall lay down:</p>	<p>CY (MS questions): Within the Council implementing decision, where pre-financing and union contributions are to be stated, will there be separate reference to the HOME Affairs Funds, (either all three of them in total, or each one of them separately) having different rules and percentages from the other components of the NRPP, or will there be a uniform decision applying the same percentages and criteria to all objectives of the NRPP?</p> <p>DE (MS questions): Will there be an Annex to the CID comprising the list of milestones and targets? If yes, only envisaged M&T and indicative planning or binding M&T and planning?]</p> <p>ES (MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>A partial approval from the Commission of some of the chapters of a Plan would help a swift start of the plans.</p> <p>PL</p> <p>(MS comments):</p> <p>As above – the Plan should not be adopted at the Council level.</p> <p>SK</p> <p>(MS comments):</p> <p>The Commission may make observations within 3 months of the submission of the amended NRP plan. The principle of reciprocity should apply here.</p>
(a) the total Union contribution.	
(b) the amount of the loan support where the Member State concerned makes such a request; and the related amount of pre-financing, as well as the availability period of the loan;	<p>DE</p> <p>(MS comments):</p> <p>We strictly object the loan instrument.</p>
(c) the list of measures covered by the Union contribution and loans contained in the NRP Plan;	<p>CY</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>the list of measures covered by the Union contribution and loans contained in the NRP Plan;</p> <p>CY</p> <p>(MS questions):</p> <p>The proposal to include the list of measures in the Council implementing decision limits flexibility and creates additional and unnecessary administrative burden for Member States, Council and the European Commission.</p>
<p>5. In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures.</p>	<p>BE</p> <p>(MS questions):</p> <p>What does COM mean with ‘deficiencies’?</p> <p>LU</p> <p>(MS questions):</p> <p>LU: If MS do not respond in a satisfactory manner to COM requests for modifications, does COM exclude the concerned measures/interventions from the Council implementing decision?</p>

Commission proposal	MS comments and MS questions
	<p>Why is a Council decision necessary and will it not be burdensome and slow to go through the Council? We did not need a Council implementing decision for the CAP strategic plans approval.</p>
<p>6. The Council shall adopt the implementing decisions referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p>	<p>AT</p> <p>(MS questions):</p> <p>Which Council formation would discuss and adopt the CID?</p> <p>CZ</p> <p>(MS questions):</p> <p>CZ would like to ask the Commission which Council configurations will be primarily responsible for adopting the CIDs. Will it be ECOFIN, as in the case of the RRF, or GAC, or another configuration? Furthermore, will the NRP plans be discussed to the same extent as the RRFs within the preparatory bodies of ECOFIN, namely the EPC and EFC?</p> <p>DE</p> <p>(MS comments):</p> <p>We are critical of the fact that the Council is to have only four weeks to adopt the implementing decisions on the approval of the NRPPs.</p>

Commission proposal	MS comments and MS questions
	<p>DE</p> <p>(MS questions):</p> <p>Does the implementing decision of the Council include the National Plan of the Member State? Does the implementing decision constitute the final approval which is needed to implement the Plan at national level?]</p> <p>EL</p> <p>(MS comments):</p> <p>We suggest a maximum of months to be included:</p> <p><i>6. The Council shall adopt the implementing decisions referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal and not later than XX months after the date of first submission by the Member State.</i></p> <p>FR</p> <p>(MS questions):</p> <p>La Commission pourrait-elle préciser quel sera le rôle du Conseil, notamment en ce qui concerne l'évaluation par la Commission de la conformité du PPNR ?</p>

Commission proposal	MS comments and MS questions
	<p>Les retards dans la validation du PPNR, dus notamment aux échanges avec les États membres, peuvent-ils avoir une incidence sur le calendrier des versements des fonds ?</p> <p>LV</p> <p>(MS comments):</p> <p>This process should be simplified. The plans and their amendments should be approved by the Commission. The involvement of the Council creates unnecessary administrative burden and significantly prolongs the procedures without adding value.</p> <p>NL</p> <p>(MS questions):</p> <p>This provision does not allow the Council to amend the Commission proposal. Does that imply that – in case the council does not adopt the implementing decision – the Commission will come up with a new proposal?</p> <p>Considering that the Council adopts the decision on the basis of the Commission proposal, is it correct to assume that the Council will vote with QMV?</p>

Commission proposal	MS comments and MS questions
	<p>PL</p> <p>(MS comments):</p> <p>The time for the Council decision is too short compared to the time given to the Commission.</p>
<p>7. Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall adopt a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p>	<p>AT</p> <p>(MS questions):</p> <p>After adoption of the CID, the Commission would adopt a financing decision including the “pay-out value” of each milestone and target. We welcome this shift from the RRF approach, but wonder how the Commission arrives at the “pay-out value”? In particular: how will zero-cost measures (e.g. reforms) be treated in terms of value? How will the value of investment milestones and targets be defined? Will the cost estimation of the investment be reflected in the value of the corresponding milestones/targets</p> <p>BE</p> <p>(MS questions):</p> <p>Will these financing decisions be made publicly available?</p> <p>FI</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>The Commission should also be subject to a deadline for making the financing decision of the plan.</p> <p>The Council has a deadline for its decision. The CION has to have same kind of deadline.</p> <p>FR</p> <p>(MS questions) :</p> <p>Quel est le calendrier d'adoption de la décision de financement?</p> <p>HU</p> <p>(MS questions):</p> <p>We consider it important to clarify whether the Member State will calculate/plan the costs of milestones and targets, particularly in the case of reforms, and the amount for which it can submit a payment claim, or whether will be calculated on the basis of the mechanism established by the Commission.</p> <p>LT</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>On what basis will the indicator amounts be assigned? Will this be determined by the Member State, based on justifications, or by the European Commission?</p> <p>NL</p> <p>(MS comments):</p> <p>The Netherlands would like to see a role for the MS/Council in the steps after the Council implementing decision.</p> <p>NL</p> <p>(MS questions):</p> <p>This financing decision does not seem to be qualified as an implementing decision. What is the reasoning for this?</p> <p>Furthermore, what is the reasoning for the adoption of a separate financing decision on the milestones and targets in relation to the measures, could these not be included in the Council implementing decision (as was the case in RRF)?</p> <p>SE</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>Sweden believes that the timeframe for the adoption of the financing decision needs to be clarified in order to get a complete picture of the total time required.</p> <p>SE</p> <p>(MS questions):</p> <p>Why is there no time limit for the financing decision?</p> <p>SI</p> <p>(MS questions):</p> <p>No deadline for financing decision—We propose that a deadline be set.</p>
<p>(a) the milestones and targets in relation to the implementation of measures contained in the NRP Plan, and for each of them, the corresponding pay-out value;</p>	<p>AT</p> <p>(MS questions):</p> <p>Are payments only made if milestones are 100% achieved (all or nothing principle)? For example: Milestone: 100 persons are reached by a certain measure, but by the set date only 99 are reached</p> <p>CZ</p> <p>(MS questions):</p> <p>Who will decide the corresponding pay out value - MS or the COM?</p>

Commission proposal	MS comments and MS questions
	<p>DE</p> <p>(MS comments):</p> <p>Clear ex ante guidelines are needed for determining the amount of funding (pay-out value) linked to a reform milestone.</p> <p>Those criteria are also needed for the determination of the suspension amounts.</p> <p>DE</p> <p>(MS questions):</p> <p>Question related to the question above Art. 23 (4). If there is a Annex to the CID comprising the M&T, what is their legal status in relation to the list in the financing decision?</p> <p>Will the Verification Mechanism (VM) of each milestone and target not be included in the financing decision? It is important that the VM is binding. Otherwise, MS face significant insecurities with regard to payment requests and audits.</p> <p>LU</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Does the pay-out value equals the amount not received when a M/T is not reached?</p> <p>PL</p> <p>(MS comments):</p> <p>There needs to be a clear determination of the pay-out value based on clear and objective criteria and appropriate guidance.</p> <p>SI</p> <p>(MS questions):</p> <p>Please, explain how the system will work and will be simplified based on the experiences of RRF. Please see earlier question/comment on milestones and targets.</p>
(b) the Union contribution per year, based on the percentages set out in Article 14(1) [commitments];	
The notification of that Commission decision to the Member State concerned shall constitute a legal commitment.	<p>DE</p> <p>(MS questions):</p> <p>What is the relationship of the financing decision to the CID? According to our understanding, a CID is also legally binding.</p>

Commission proposal	MS comments and MS questions
<p>[Where Article 4(2), point (b), of the MFF Regulation applies, that financing decision may be amended in accordance with the outcome of the annual budgetary procedure.]</p>	
<p>8. Payment applications for the specific measures affected by deficiencies identified in the implementing decisions adopted by the Council may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been remedied.</p>	<p>EE</p> <p>(MS questions):</p> <p>With regard to this provision, we would appreciate clarification on the scope of its impact: does it pertain to the entire MS's NRPP or is it limited to a specific objective or target of the NRPP associated with the identified deficiency?</p> <p>HR</p> <p>(MS comments):</p> <p>See comment under Art. 22(2)(1).</p> <p>HU</p> <p>(MS questions):</p> <p>Could a payment request be submitted without the prior approval of the Plan? Could the Council approve the Plan despite the identified deficiencies?</p> <p>LU</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Does the assessment period by COM start the day of the submission of the payment request, even if a modification procedure is ongoing?</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain how the measures affected by deficiencies identified in the implementing decisions will work in practice, e.g. whether the amounts associated with them will be included in earmarkings and whether the amounts allocated to them are considered a commitment subject to decommitment rule?</p>

Commission proposal	MS comments and MS questions
CHAPTER 3 Revision of the NRP Plan	HR (MS comments): This should be corrected to Chapter 2.

<p style="text-align: center;"><i>Article 24</i></p> <p style="text-align: center;"><i>Amendment of the NRP Plan</i></p>	<p>HU</p> <p>(MS comments):</p> <p>If only one amendment can be in progress, it may cause problems (e.g. if an amendment to one chapter is still ongoing, but a need for amending another chapter arises, the latter request would have to await the completion of the pending procedure).</p> <p>We believe it would be highly important to provide Member States with the possibility of reallocations up to a certain threshold without the need for a programme amendment. Pursuant to Article 24, a programme amendment in practice entails that such flexibility is not available, as the procedure described requires at least six months to complete, and in most cases even longer due to the consultations between the Commission and the Member State.</p> <p>HU</p> <p>(MS questions):</p> <p>Please confirm that multiple amendments can be initiated at the same time from one Member State.</p> <p>If no limitation is set, does it mean that reallocations within the Plan may be made without any ceiling?</p>
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Commission proposal	MS comments and MS questions
	<p>Moreover, how will the Commission ensure that the results of the current simplification package (Omnibus III) regarding CAP can be preserved and carried forward after 2027? The distinction between strategic and other amendments is a significant step forward.</p> <p>IE</p> <p>(MS comments):</p> <p>While the preparation of the Plan requires the involvement of an extensive range of partners, this Article is silent on the matter of the national process to amend the Plan other than the references in Article 56 to Monitoring Committees approving proposed amendments. It is important to note that any amendments will require an amendment of the full NRP – however the Articles on the Coordinating Authority (49) and Managing Authorities (50) make no reference to programme amendments so it is unclear who can initiate same.</p> <p>IE</p> <p>(MS questions):</p> <p>What is the effective date of NRPP amendments?</p>

Commission proposal	MS comments and MS questions
	<p>IT</p> <p>(MS comments):</p> <p>The experience with the Recovery and Resilience Plan (RRP) shows that Plan revisions constitute a natural phase, linked to external factors such as inflation, energy shocks, or geopolitical crises, but also to the possibility that administrations identify more effective ways to achieve public policy objectives during implementation.</p> <p>Overall, it is positive that the Regulation distinguishes between procedures for substantial and minor amendments, overcoming the RRF approach that applied the same process to changes of varying significance. However, the procedures for amending the Plan appear to be rather complex and involve the participation of numerous actors, with the risk of prolonging the time necessary for submit the amended proposal.</p> <p>It will be necessary to discuss the 5% threshold and, in particular, the rule allowing only one adjustment per target over the duration of the Multiannual Financial Framework (MFF), which appear excessively formalistic.</p> <p>It would be advisable to establish more flexible and proportionate criteria, permitting multiple adjustments when justified, so as to avoid rigidities that could hinder implementation.</p>

Commission proposal	MS comments and MS questions
	<p>It is not specified how many amendments can be made (per year or during the programming period) for each category of amendment.</p> <p>Furthermore, it should be clarified whether the various types of amendments can be submitted in parallel or whether, once an amendment has been submitted, it is necessary to wait for the approval process to be completed before submitting another.</p> <p>Finally, it should be clarified at what point expenses can be considered eligible, e.g., from the date of submission of the amendment (as has always been the case for the EAFRD) or from the date of the approval decision of the amendment itself.</p> <p>Since the procedure for amendments of the NRP is quite long, it is deemed appropriate to identify “non-strategic” changes for which a simplified procedure is permitted such as notification without decisions and with reduced procedural time.</p> <p>SK</p> <p>(MS comments):</p> <p>Within the framework of this article, we request the addition of a provision authorizing Member States to apply elements of the NRPP that are subject to change in the implementation of the NRPP from the date of submission of this change for assessment by the EC, similarly to what was permitted</p>

Commission proposal	MS comments and MS questions
	<p>by paragraph 3 of Article 63 of Regulation (EU) No. 1060/2021 of the European Parliament and of the Council.</p> <p>We propose adding the following text: <i>„Where a time limit is set for an action by the Commission, that time limit shall start when a plan amendment in accordance with the requirements laid down in this Regulation or in Fund-specific Regulations has been submitted by the Member State.</i></p> <p><i>That time limit shall be suspended from the day following the date on which the Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.“</i></p>
<p>1. A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p>	<p>DE</p> <p>(MS questions):</p> <p>What is the definition of a reasoned request? ‘Are there any objective criteria for accepted reasons (such as objective circumstances) to amend a plan, especially if the level of ambition might be lowered.</p> <p>ES</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The possibility of submitting several amendments simultaneously, but which could be adopted separately, would be welcomed</p> <p>FR</p> <p>(MS questions) :</p> <p>La Commission peut-elle préciser ce qu'elle entend par « demande motivée » mentionnée au premier paragraphe ? La Commission peut-elle énumérer les cas dans lesquels un État membre est tenu de présenter une modification de son PPNR?</p> <p>Une approche chapitre par chapitre peut-elle être envisagée pour les modifications du PPNR? En d'autres termes, une modification d'un chapitre peut-elle être soumise alors qu'une modification d'un autre chapitre est en cours?</p> <p>Quel est le calendrier imposé à la Commission dans le cas où celle-ci modifie directement la décision de financement (sans modifier le montant total de la contribution de l'Union)?</p> <p>HU</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>In the case of an amendment, what is the time limit for the use of the funds in question (should it be considered as new commitment)?</p> <p>IT</p> <p>(MS comments):</p> <p>A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3. <u>Such amendments shall comply with all requirements of the NRP Plan, including percentage of contributes to the Union’s social objectives the revision of costing information;</u></p> <p>The article provides different kind of amendments that imply from 16 month to 10 months for their finalization.</p> <p>These timeframes must be reduced by allowing the amendment/notification mechanism to be "per chapter (e.g., CAP)" rather than "per National Plan.</p> <p><u>Regarding notifications, the requirement that notification can only be given once per target (multiple targets can be associated with a measure) is difficult to understand, given that agriculture has always been</u></p>

Commission proposal	MS comments and MS questions
	<p><u>unpredictable. Therefore, it would be appropriate to exclude the CAP from this restriction.</u></p> <p>The eligibility date for expenditure should be clarified, making it retroactive to the date of the first submission of the amendment request to the SFC by the Member State. The same applies to the date from which an amendment can be applied.</p> <p>IT</p> <p>(MS questions):</p> <p>Would it be possible to rewrite the articles of association as indicated below?</p> <p>a) Each MA responsible for a chapter can submit a request to amend its own chapter, meaning that multiple amendments to different chapters can be submitted simultaneously, so that amendments to NRP chapters are unrelated.</p> <p>b) Reduction of the EC's timeframe for submitting observations from 3 to 2 months (considering prior informal consultations) and reduction of the Commission's timeframe for submitting a decision proposal to the Council from 4 to 1 month.</p>

Commission proposal	MS comments and MS questions
	<p>c) Establishment of a 15-day period for the EC to make a financing decision, following the Council's decision.</p> <p>d) Streamlining of procedures by expanding the possibility of submitting notifications, for example, in the case of CAP transitions, even in the case of "new" measures.</p> <p>e) provide for the possibility of the notification being applicable multiple times per target (thus eliminating the arbitrary delimitation described above) and for a non-reviewable decision on acceptability by the EC to be made within one month.</p> <p>f) specify a specific date for the eligibility of expenditure and the applicability of the amendment, starting from the Member State's submission of the amendment to the SFC.</p> <p>g) alternatively, delete paragraph 3; it would be appropriate for the Member State to have the option of deferring the introduction of the new measure requested directly by the EC to a subsequent amendment procedure. Furthermore, in the case of a new measure "at the EC's request," it seems appropriate for the Commission to approve it promptly, which is estimated to be appropriate within 15 days.</p>

Commission proposal	MS comments and MS questions
	<p>LT</p> <p>(MS comments):</p> <p>The requirement to indicate the “impact” of NRP plan amendments is unclear, as the term may be interpreted narrowly (direct effect on targets/indicators) or broadly (indirect, legal, long- or short-term effects). Greater clarity is needed to avoid disproportionate reporting.</p> <p>LT</p> <p>(MS questions):</p> <p>How will it be ensured that NRP revision procedures remain flexible and proportionate over a long implementation period, and will Member States be allowed to amend specific sections (e.g. sectoral or thematic parts) without reopening the entire plan?</p> <p>LU</p> <p>(MS questions):</p> <p>LU: Will it be possible to submit modifications to individual chapters of the plan? Do modifications need to be timed together with the other related sectoral chapters? If so, quick action in response to urgent events (e.g. modifications in view of crisis) becomes impossible. How many</p>

Commission proposal	MS comments and MS questions
	<p>amendments are possible per year? Can multiple modification be conducted in parallel?</p> <p>Do we understand correctly that in a modification procedure, a modification is accepted or rejected as a whole? In that case, why can't the COM services not adopt a modification partially in order to ensure the implementation of the NRPP at least in the policy files which are coherent with the regulation.</p> <p>NL</p> <p>(MS questions):</p> <p>Could the Commission elaborate what would entail a reasoned request?</p> <p>RO</p> <p>(MS comments):</p> <p>From an administrative perspective, managing a single amendment for all programmes represents a major challenge.</p> <p>The need to adjust intervention fiches arises in most cases after the launch of calls for proposals, as beneficiaries face diverse situations requiring adaptation. A relevant example is represented by the Pillar I interventions for the 2023–2027 period. In such cases, when a Member State identifies the need for an adjustment, the modification procedure is excessively</p>

Commission proposal	MS comments and MS questions
	<p>lengthy and rigid. This highlights the difficulty of applying a single framework — such as that provided for in Article 24 of the Regulation — to policies with distinct specificities and implementation cycles, such as the CAP.</p> <p>Support under the NRPP must primarily take into account market needs and those of private stakeholders, while EU and Member State administrative regulations should be less restrictive. At present, the new architecture does not lead to the intended simplification. Simplification should also be viewed from the perspective of both fund beneficiaries and administrations.</p> <p>RO</p> <p>(MS questions):</p> <p>Taking into account the wording of art. 24(1), should MS understand there will be a single, common amendment for all chapters of the Plan? If so, <i>reason request</i> should be better explained. This mechanism, similar to RRF model should be accommodated to the higher flexibility specific to the cohesion programs.</p>
<p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make</p>	<p>AT</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
<p>observations within three months of the submission of the amended NRP Plan.</p>	<p>The deadline for the EC to respond to proposed plan amendments should be reduced (e.g from 3 months to 30 days).</p> <p>CZ</p> <p>(MS comments):</p> <p>Long deadlines for Commission assessment will make the process of Plan changes cumbersome and reduce flexibility. The deadlines should not be longer than in current programming period, i.e. 2 months.</p> <p>CZ</p> <p>(MS questions):</p> <p>To ensure flexibility and prevent the process for amending NRP Plans from becoming cumbersome, would the Commission consider shortening its assessment deadline from three months to the two-month timeframe established in the current programming period?</p> <p>DE</p> <p>(MS comments):</p> <p>Since the plan will encompass many different, currently separate programmes, we expect amendments to be necessary rather frequently. In order to act swiftly, the amendment procedure needs to be lean and quick.</p>

Commission proposal	MS comments and MS questions
	<p>We doubt that the procedure laid down in Art. 23 meets those requirements.</p> <p>IT</p> <p>(MS comments):</p> <p>See previous comment (paragraph 1 art.24)</p> <p>IT</p> <p>(MS questions):</p> <p>See previous set of questions (paragraph 1 art.24)</p> <p>LU</p> <p>(MS comments):</p> <p>LU: The period of three months is too long and needs to be shortened to increase speediness and flexibility.</p> <p>SK</p> <p>(MS comments):</p> <p>The deadlines set out in paragraphs 2 and 4 are, in our opinion, disproportionate, where the Commission has 3 months to assess the changes to the NRP Plan and make comments and the Member States have</p>

Commission proposal	MS comments and MS questions
	<p>1 month to react and incorporate the comments. We ask for the harmonisation of these deadlines.</p> <p>SK</p> <p>(MS questions):</p> <p>Does the COM consider harmonizing these deadlines?</p>
<p>3. [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p>	<p>AT</p> <p>(MS questions):</p> <p>How should this para be interpreted? Are the amendments of plan proposed by the EC mandatory?</p> <p>BE</p> <p>(MS questions):</p> <p>On what will these proposed amendments be based? This might cause instability in programming/implementation</p> <p>CY</p> <p>(MS comments):</p> <p>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph</p>

Commission proposal	MS comments and MS questions
	<p>1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones</p> <p>DE</p> <p>(MS comments):</p> <p>This element of independent entitlement to demand amendments for the Commission seem to be new. The Commission shall take into consideration, that some amendments have consequences for co-financing and therefore national budget law.</p> <p>COM competence for requesting additional measures must be limited. The requirements for additional measures must be laid down in the Regulation itself and cannot be left to bilateral negotiations between COM and MS on the NRPPs.</p> <p>DE</p> <p>(MS questions):</p> <p>What are the triggering circumstances for the Commission to propose such an amendment?</p> <p>What are the consequences if MS to not follow?</p>

Commission proposal	MS comments and MS questions
	<p>ES</p> <p>(MS comments):</p> <p>Initiative for amendments should only come from the Member State, which is the best placed to assess changes in circumstances that would justify an amendment.</p> <p>FI</p> <p>(MS comments):</p> <p>This point has to be deleted or it has to be limited to the recommendations given earlier by the CION.</p> <p>FR</p> <p>(MS questions):</p> <p>Est-il possible de fournir des exemples de cas qui conduiraient la Commission à demander des modifications aux PPNR ? S'agira-t-il de demandes de révision adressées à tous les États membres en raison d'un contexte particulier, ou la Commission pourra-t-elle demander la révision d'un PPNR particulier ?</p> <p>HR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>We would appreciate the Commission's clarification regarding Article 24 paragraph 3 — could you please clarify which are the exceptional and justified cases when the EC proposes the MS to introduce new measures by amending the NRP. In the implementation of the CAP, the introduction of measures has been exclusively at the request and proposal of the MS.</p> <p>IE</p> <p>(MS comments):</p> <p>This is not aligned with the Common Provisions Regulation (CPR), and represents a change in approach. No process is set out in relation to how/when such proposals will be made or the process that will apply following the making of any such proposals, and clarification is needed as to what it being proposed here.</p> <p>LU</p> <p>(MS questions):</p> <p>Does that mean the COM has the right to introduce at any moment new measures, including reforms into the Plan? What would those “duly justified” cases be?</p>

Commission proposal	MS comments and MS questions
	<p>PL</p> <p>(MS comments):</p> <p>There should be no scope for such one-sided decision-making concerning the content of the NRP plans. We propose removing this clause.</p> <p>PT</p> <p>(MS questions):</p> <p>Why is the Commission given the possibility to request the Member State to introduce new measures, possibly outside the scope of the amendment to the Plan proposed by the Member State?</p> <p>RO</p> <p>(MS questions):</p> <p>What do the "<i>duly justified cases</i>" mean?</p> <p>SI</p> <p>(MS questions):</p> <p>(3) In duly justified cases - What are these cases? Is it mandatory to include the EC proposal in the NRPP?</p>

Commission proposal	MS comments and MS questions
<p>4. The Member State shall review the amended NRP Plan within one month from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p>	<p>BE</p> <p>(MS questions):</p> <p>Why do Member States only get 1 month to review the amended plan? This will require a great deal of coordination within the Member State, given the scope of the plans</p> <p>CY</p> <p>(MS comments):</p> <p>The Member State shall review the amended NRP Plan within one two months from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>IT</p> <p>(MS comments):</p> <p>See previous comment (paragraph 1 art.24)</p> <p>IT</p> <p>(MS questions):</p> <p>See previous set of questions (paragraph 1 art.24)</p>

Commission proposal	MS comments and MS questions
	<p>LU</p> <p>(MS questions):</p> <p>LU: What justifies that deadlines for the COM are very long (3 months, 4 months) and the deadlines provided for the MS are very short (1 month)?</p> <p>MT</p> <p>(MS comments):</p> <p>4. <i>The Member State shall review the amended NRP Plan within one <u>two</u> months from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</i></p> <p>Considering the longer timeframes for the Commission, the possibility of holiday periods falling within such time periods as well as internal reviews and validations required at local and national level within MSs, the timeframe should be increased to at least 2 months.</p> <p>PL</p> <p>(MS comments):</p> <p>There should be no scope for such one-sided decision-making concerning the content of the NRP plans. We propose removing this clause.</p>

Commission proposal	MS comments and MS questions
	<p>Moreover, the time given to Member States and Commission for assessment of proposals should be the same.</p> <p>RO</p> <p>(MS comments):</p> <p>The one-month deadline for submitting responses to the COM's observations is too short, given the complexity of the intervention typologies and the large number of entities involved — aspects that require extensive coordination.</p> <p>RO</p> <p>(MS questions):</p> <p>Could deadlines be extended?</p> <p>SI</p> <p>(MS questions):</p> <p>The deadline for the MS should be longer. The NRPP covers a wide range of content that is expected to require considerable coordination at the national level.</p> <p>Is it only a response or a new version of the NRPP that is prepared within one month? One month is too short.</p>

Commission proposal	MS comments and MS questions
<p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p>	<p>CY</p> <p>(MS comments):</p> <p>Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall issue a Commission Decision. make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>CY</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>The approval of the Plan amendments by the Council will create unnecessary administrative burden and delays. Amendments could be approved by the European Commission.</p> <p>CZ</p> <p>(MS comments):</p> <p>We do not consider Council Implementing Decision (CID) necessary and request the maximum use of changes under the notification procedure to the Commission. The involvement of the Council (and its approval) should remain only in cases where the amended/updated NRPP would newly include Member State loans.</p> <p>Long deadlines for Commission assessment and proposal and CID will make the process of Plan changes cumbersome and reduce flexibility. The deadlines should not be longer than in current programming period, i.e. 3 months in total for the whole process.</p> <p>CZ</p> <p>(MS questions):</p> <p>What exactly is meant by the term “list of measures” in the context of NRP amendments? Which information should be included?</p>

Commission proposal	MS comments and MS questions
	<p>DE</p> <p>(MS comments):</p> <p>We are critical of the fact that the Council is to have only four weeks to adopt the implementing decisions on the approval of the NRPPs.</p> <p>DE</p> <p>(MS questions):</p> <p>How can there be a modification in the total Union contribution when the total amount per MS is defined ex-ante (Annex 1)?</p> <p>ES</p> <p>(MS comments):</p> <p>The procedure for amending the plans should not be exposed to possible delays or blocking situations.</p> <p>HU</p> <p>(MS comments):</p> <p>Based on CAP experience, one month is typically not sufficient to fully address the Commission's comments.</p>

Commission proposal	MS comments and MS questions
	<p>IT</p> <p>(MS comments):</p> <p>See previous comment (paragraph 1 art.24)</p> <p>IT</p> <p>(MS questions):</p> <p>See previous set of questions (paragraph 1 art.24)</p> <p>LU</p> <p>(MS comments):</p> <p>LU: The point 5 (a) should apply in any case for a small amendment. Minor adjustments, representing increase or decrease of less than X% or XX % should be possible at any time without adoption procedure of the Commission.</p> <p>PL</p> <p>(MS comments):</p> <p>As mentioned above, we do not see a justification for adopting Plans and their amendments at Council level. It prolongs and overly complicates the procedure, not leaving room for necessary flexibility.</p>

Commission proposal	MS comments and MS questions
	<p>Moreover, the time given to Member States and Commission for assessment of proposals should be the same.</p> <p>PT</p> <p>(MS questions):</p> <p>Can the Commission confirm that any introduction of a new measure will lead to a Council Implementing Decision procedure? Is this provision in line with the simplification and speed required for the efficient implementation of the Plans?</p> <p>SE</p> <p>(MS questions):</p> <p>Concerning point 5, the following wording is unclear: "...or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1)...". Since Article 23(1) refers to Article 22, the wording is not a simplification but rather opens up the entire content of the plan. It would be helpful if the Commission could provide examples of what this wording entails.</p> <p>This can be interpreted as MS being able to amend plans and get them approved even though they are not in compliance with art 23.1 and hence</p>

Commission proposal	MS comments and MS questions
	<p>art 22, is that correct? If a MS switch one measure with another, similar one, would that result in a new CID being adopted by the Council?</p> <p>SI</p> <p>(MS questions):</p> <p>EC confirms within 4 months - from the first version or from the last amendment sent?</p> <p>Can you confirm that in the event of an amendment to the NRPP, there is no Stop the clock instrument (as the MS has 1 month).</p> <p>Timeline:</p> <ul style="list-style-type: none"> • 3 months EC for comments. • 1 month for MS to respond to comments • 4 months for Council decision (after sending the first draft or last amendment) • 4 weeks for Council decision after receiving the EC proposal • EC decision - no deadline <p>SK</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>Art. 23 and 24 (programming/amendments):</p> <p>We are not in favour of the proposal for a procedural setting and a timeframe for the approval of the National and Regional Partnership Plans (NRP plan) and their amendments at the level of the EU Council. This procedure is contrary to subsidiarity and the effort to reduce the administrative burden. Multi-level approval will cause delays in the reprogramming and implementation of the plans, which may jeopardise the absorption of resources, including in cases of force majeure. Furthermore, it will weaken the importance of the Council's recommendations on economic and social policy, as each amendment would be approved in two stages with a significant time lag. We therefore continue to support the single-level approval of the NRP plan exclusively at the level of the European Commission, as has been the case so far.</p> <p>SK</p> <p>(MS questions):</p> <p>Is there any way to simplify the process of approval of the NRP Plan?</p>
<p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the</p>	<p>IT</p> <p>(MS comments):</p> <p>See previous comment (paragraph 1 art.24)</p>

Commission proposal	MS comments and MS questions
financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.	IT (MS questions): See previous set of questions (paragraph 1 art.24).
6. The adoption of the decisions referred to in paragraph 5 shall not be required:	IE (MS comments): Ireland supports the tolerances set out in Article 24(6) for minor amendments to the plan and suggest that these should be even more flexible. The design of the plans must be a high level. We should avoid prescriptive details that become long and complex documents that require many amendments. (Currently it is proposed that we could make a 5% adjustment to a target without the full adoption process for an amendment. We could look for more to be included in the list of possible amendments without adoption of decisions). Allowing a minor amendment only once per target appears overly inflexible. RO (MS questions): As mentioned in paragraph 6, the Member States apply these rules only once for each target. Suppose that, under the CAP, a modification is made to a target that is shared with another programme, and subsequently the

Commission proposal	MS comments and MS questions
	<p>need arises to amend the same target again, but under a different programme — what would happen in this situation, given that this type of modification can be carried out only once (see also comment for para 1.)?</p> <p>SI</p> <p>(MS questions):</p> <p>6) The EC is only notified once per target per programming period if the change is less than 5%. At what level are these indicators?</p> <p>Can the program or changes be implemented once they have been sent to the EC for approval (at the country's risk)?</p> <p>Can proposals for changes be sent for individual policies/chapters (if, for example, a change has already been submitted for one of the policies/chapters)? Given that approval is possible by chapter, is it necessary to approve the proposed amendment before submitting a new amendment proposal (currently, the SFC does not allow more than one amendment at a time)?</p>
<p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the</p>	<p>AT</p> <p>(MS questions):</p> <p>What constitutes a “minor adjustment”? What do the 5% refer to?</p>

Commission proposal	MS comments and MS questions
<p>Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p>	<p>BE</p> <p>(MS questions):</p> <p>Why was ‘5%’ chosen? If a measure is successful, and the target is exceeded by 6%, does this mean an adjustment of the plan is necessary</p> <p>CY</p> <p>(MS comments):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5% 20% of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>CY</p> <p>(MS questions):</p> <p>The proposal to increase the threshold for amendments is in line with the simplification and flexibility of the proposed Regulation and the efforts for less administrative burden.</p>

Commission proposal	MS comments and MS questions
	<p>Projections for milestones / targets made at the programming phase of the Plans, are impossible to be correctly estimated at 95% more than 7 years in advance.</p> <p>In addition, according to Paragraph 5 of the closure guidelines of operational programmes 2014-2025 ((2021/C 417/01), “Member States should explain (where necessary) the year 2023 achievement values, especially in cases where they are significantly different from the set targets (i.e. a deviation of more than 20 %)”.</p> <p>CZ</p> <p>(MS comments):</p> <p>The 5% threshold for a possible change of a target without prior approval from the Commission is insufficient, and it should also be possible to make such a change more than once per period and per target.</p> <p>Based on the experience with the limited possibilities for changes during the implementation of the Recovery and Resilience Facility and the complex approval and administrative procedures, there is a need to increase flexibility for potential changes. Any restrictive conditions for changes should be set realistically.</p>

Commission proposal	MS comments and MS questions
	<p>CZ</p> <p>(MS questions):</p> <p>Why is it not allowed to change a target multiple times within a period, in cases where it would make sense? Does this refer to once in addition to MTR, or once including the MTR?</p> <p>DE</p> <p>(MS comments):</p> <p>The threshold for plan corrections should be higher to avoid administrative burden for minor changes of the plan.]</p> <p>DE</p> <p>(MS questions):</p> <p>How does COM define “correction of editorial nature”?</p> <p>EE</p> <p>(MS questions):</p> <p>Article 24 paragraph 6 point (a). Does “costing information” mean “financial allocation”?</p>

Commission proposal	MS comments and MS questions
	<p>1. Could the meaning of 'target' be clarified in this context? Specifically, does correction also encompass modifications to the metrics or measurement unit (a quantitative achievement) used to assess the target on the progress towards the achievement of a measure?</p> <p>Does the provision allow for a one-time adjustment per individual target over the entire programming period, or is it permissible to make one adjustment to each target per year?</p> <p>EL</p> <p>(MS questions):</p> <p>Why MS can apply only once per target the simplified rules?</p> <p>ES</p> <p>(MS comments):</p> <p>The procedure for “minor” amendments should be streamlined and also referred to the estimated costs of the measures potentially affected. A possible wording for this is:</p> <p><i>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan or of the estimated cost</i></p>

Commission proposal	MS comments and MS questions
	<p><i>of one or several measures. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information.</i></p> <p>In addition, these “minor” amendments should be considered in force from the moment they are notified to the Commission.</p> <p>FI</p> <p>(MS comments):</p> <p>Concerning the following we would like to know what “costing information” mean? Does it mean the conditions under which the Commission pays a Member State or something else?</p> <p>“for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information”</p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>La Commission peut-elle confirmer que cette proposition a pour référence la cible et non pas le montant de la mesure (comme actuellement dans le cadre de la Facilité pour la relance et la résilience) ?</p> <p>L'article 24(6) point a ne fait référence qu'aux cibles. Est-ce que les jalons sont également concernés par cette disposition ?</p> <p>HR</p> <p>(MS comments):</p> <p>HR advocates for greater flexibility and a broader scope of minor adjustments to the NRPP, as the proposed amendment procedure is more elaborate than the current one and includes more stakeholders.</p> <p>HU</p> <p>(MS questions):</p> <p>It should be clarified on what basis can be decided that an amendment is minor.</p> <p>IE</p> <p>(MS comments):</p> <p>Allowing a minor amendment only once per target appears overly inflexible.</p>

Commission proposal	MS comments and MS questions
	<p>IT</p> <p>(MS comments):</p> <p><i>[Proposed amendment]</i> <i>For corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and <u>during the implementation</u> shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including <u>percentage of contributes to the Union’s social objectives</u> the revision of costing information;</i></p> <p>In general, it is positive that the regulation distinguishes between procedures for substantial and marginal modifications, thus overcoming the RRF approach which applied the same procedure to changes of different magnitude. However, the provision allowing only one adjustment per target over the entire MFF period is excessively restrictive, as shown by the RRF experience, which highlighted the need for small adjustments during implementation. For these reasons, the deletion of the “<i>only once per target</i>” clause is proposed, as it does not appear justified nor conducive to the effective management of the Plans.</p> <p>LT</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Can minor changes to the plan be made before informing the EC? Are such changes appropriate?</p> <p>LU</p> <p>(MS comments):</p> <p>We would be in favour of deleting this part. “shall apply those rules only once per target and”</p> <p>LU</p> <p>(MS questions):</p> <p>Why only apply it once per target? Why only 5%?</p> <p>LV</p> <p>(MS questions):</p> <p>Does the 5% specified in 6 a) also apply to financial target?</p> <p>MT</p> <p>(MS comments):</p> <p><i>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or</i></p>

Commission proposal	MS comments and MS questions
	<p><i>decrease of less than <u>15</u> % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</i></p> <p>Considering the current international dynamics and the volatility of variations from what is originally forecasted at programming stage, a 5% variation allowance is insignificant. This should be increased to 15%, allowing flexibility to address changes within reasonable risk and adjustment parameters (typically between 10-20%) without overburdening administrations with plan changes. Furthermore, only once per target does not allow for flexibility to adapt to emerging circumstances which might be difficult to project at initial programming stage.</p> <p>NL</p> <p>(MS questions):</p> <p>What is meant with corrections of a clerical or editorial nature? Who decides whether corrections fit these specifications?</p>

Commission proposal	MS comments and MS questions
	<p>Is this 5% related to the target value or the cost of the target value? And if it's the target value, should the corresponding cost be increased/decreased proportionately?</p> <p>PL</p> <p>(MS comments):</p> <p>This point allows less flexibility for minor modifications than in the current perspective. We propose using the thresholds from Cohesion Policy 2021-2027. Only one change per target is also not flexible enough.</p> <p>PL</p> <p>(MS questions):</p> <p>Please provide a justification for adopting such a low threshold and frequency for adjustments.</p> <p>In view of ensuring the effectiveness and practicality of the implementation process, it would be important to clarify whether strictly clerical and editorial amendments should indeed be limited to a single occurrence during the entire financial perspective?</p>

Commission proposal	MS comments and MS questions
	<p>Please explain how to understand this provision: <i>Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information</i> in the context of costing information.</p> <p>SE</p> <p>(MS comments):</p> <p>Compared to the current CAP and SPR – and especially after the simplification proposals – the scope of what can be notified is significantly more limited under this regulation.</p> <p>SE</p> <p>(MS questions):</p> <p>Can the Commission explain what considerations have been made in proposing adjustments that correspond to an increase or decrease of less than 5 % of a target set out in the National Reform Plan? Why not a lower or higher percentage?</p> <p>SI</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>A 5% flexibility for each individual target has been introduced, which will not require the approval of the Commission for the amended NRP Plan.</p> <p>MDP</p> <p>SI</p> <p>(MS questions):</p> <p>Why would a Member State want to correct the NRPP for the sake of exceeding the target? Is it prohibited to exceed targets?</p> <p>SK</p> <p>(MS comments):</p> <p>We propose the following amendment to the text: "(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5% 10% of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments.</p> <p>Justification:</p> <p>For example, the area of home affairs is subject to constant change and unpredictable international events (crises, wars, new threats, waves of</p>

Commission proposal	MS comments and MS questions
	<p>migration and related visa applications, reintegration in the country of origin, etc.). Based on accurate statistics, we can thoroughly set indicators in advance and determine the “expected development,” e.g. <i>„Number of people accommodated in EU funded reception centres – by the following characteristics: unaccompanied minors, families, total – and by gender; Number of participants supported – by type of assistance (legal counselling, legal assistance, others), by vulnerability status (vulnerable/others) and by gender ; Number of participants receiving information or assistance for legal migration including for family reunification; Number of participants in pre-departure measures with EU funding – by gender; Number of people accommodated in EU funded reception centres – by the following characteristics: unaccompanied minors, families, total – and by gender “...and similarly, but migration statistics are constantly changing and a large wave of migration may subside and significantly change the ratio of necessary support for migrants (integration in the Slovak Republic vs. reintegration in the country of origin). Member States should also have the option, in view of other rules in the draft regulation (e.g. N+1), to flexibly change the plan as needed in response to changing statistics. In addition to efforts to speed up payments and drawdown, the draft regulation should take into account the needs of Member States to respond to unpredictable geopolitical changes.</i></p>

Commission proposal	MS comments and MS questions
	<p>The text states that the adoption of the decisions (plural) referred to in point (5) is not required for adjustments under points (a) and (b). We propose to specify exactly what decisions are involved, since, for example, in point (5), if the change to the Plan does not lead to a change in the total Union contribution or the amount of the loan or the list of measures, the Commission shall amend the financing decision, i.e. adopt a new financing decision.</p> <p>There is no provision for the process of amending the Plan in the case of amendments to the Plan that do not change the objectives of the Plan at all (or by less than 5%). For the sake of clarity, we propose adding the relevant provisions. We request a clear definition of what constitutes ‘minor adjustments’ – Article 24(6)(a) – in order to avoid different interpretations when assessing changes to individual program parameters.</p>
(b) for amendments in accordance with Article 31(7).	
<p>7. Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p>	<p>DE</p> <p>(MS comments):</p> <p>Ensuring that the estimated total costs remain reasonable and plausible and amending the plans accordingly is contrary to the performance-based approach. This adds a cost-based component.</p>

Commission proposal	MS comments and MS questions
	<p>DE</p> <p>(MS questions):</p> <p>How should this be done in practice? Will there be more guidance from the Commission? When the costs increase / decrease considerably due to external factors, the plan has to be amended?</p> <p>EE</p> <p>(MS questions):</p> <p>Article 24 paragraph 7, does “estimated total cost“ mean „total public expenditure“?</p> <p>FI</p> <p>(MS comments):</p> <p>Concerning the following we would like to know what is meant by “total costs”? Is it the public costs of the programme (total public expenditure) for the programme's measures or something else, e.g. the costs of managing the programme?</p> <p>“Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial</p>

Commission proposal	MS comments and MS questions
	<p>management, and request an amendment of their Plan where necessary in accordance with paragraph 1.”</p> <p>HU</p> <p>(MS comments):</p> <p>This is an unrealistic expectation and a significant administrative burden for a document of this scale.</p> <p>LU</p> <p>(MS comments):</p> <p>We do not understand this sentence, as the plan has a pre-allocated budget.</p> <p>PL</p> <p>(MS comments):</p> <p>The provision is very broad and gives the EC enormous scope for discretion and interpretation, which could lead to financial corrections on its part. The European Commission accepts the value of actions under the Plan during the Plan's approval procedure, and then obliges Member States to update the cost values of a given investment. This leaves Member States with enormous, unacceptable uncertainty.</p>

Commission proposal	MS comments and MS questions
	<p>PL</p> <p>(MS questions):</p> <p>How should a Member State fulfil this obligation?</p> <p>RO</p> <p>(MS questions):</p> <p>Clarification is needed on how the Commission will ensure that the estimated total costs under the NRP Plan remain reasonable and plausible throughout implementation, whether it will accept or provide a common methodology or adjustment mechanism for cost updates within the framework of the Plan, and within what limits the targets initially assumed may be adjusted in relation to cost variations, so as to avoid additional pressure on national budgets. These elements should be clarified for a sound programming and financial management of the allocated resources</p> <p>SE</p> <p>(MS questions):</p> <p>How should this be ensured, should MS make regular new estimates of total costs?</p>

Commission proposal	MS comments and MS questions
<p>8. The specific measures identified in the implementing decision referred to in Article 9(4) or subject to a decision imposing measures for the protection of the budget under Regulation (EU, Euratom) 2020/2092 shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to the fulfilment of the Rule of Law horizontal condition or to addressing the situation that led to the adoption of the aforementioned decisions.</p>	<p>HU (MS comments): See our comments above at Article 22 point o).</p>
<p>9. The specific measures identified in the implementing decision referred to in Article 8(4) [Charter conditions] shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to:</p>	<p>HU (MS comments): See our comments above at Article 22 point o).</p>
<p>(a) the fulfilment of the Charter horizontal condition;</p>	
<p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p>	<p>NL (MS questions): What does subsection (b) of article 24(9) mean exactly? When does the CION consider that there are “significant changes in the priorities of the Union”? RO (MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Clarification is needed on the interpretation of what constitutes “<i>significant changes in the priorities of the Union</i>” and on the rationale and the methodology for calculating the 30% limit of the amounts concerned, in order to ensure a transparent and consistent application of this provision across Member States</p> <p>SE</p> <p>(MS questions):</p> <p>What is the rationale for including point (b), the possibility to make amendments in order to “address significant changes in the priorities of the union”. Especially given that such a possibility doesn’t exist under article 24(8) in the case of rule of law breaches. And what made the Commission propose the precise number of 30%?</p> <p>- Could the Commission clarify what “significant changes in the priorities of the Union” might mean in practice?</p>
<p>10. Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State.</p>	<p>HR</p> <p>(MS questions):</p> <p>Who determines if amendments directly affect parts of the NRPP? EC or MS? Does it have to be justified?</p>

Commission proposal	MS comments and MS questions
	<p>HU</p> <p>(MS comments):</p> <p>This should be specified further with paragraph (3) of this Article, interpretations could be contradictory.</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain the provision– what is its purpose and what it refers to?</p>

<p style="text-align: center;"><i>Article 25</i></p> <p style="text-align: center;"><i>Mid-term review</i></p>	<p>ES</p> <p>(MS comments):</p> <p>Based on recent experience regarding CFP, during both the EMFF and the EMFAF periods, we believe it is too premature to establish a mid-term review in 2031 based on the evaluation of the Plan. It must be taken into account that, in 2025 and within the framework of the EMFAF, we have only just begun the in-depth implementation of the programme. Although ideally the start of implementation in the new period should proceed more swiftly, the EMFAF will not be concluded until 2030, and therefore we will almost certainly face potential delays in the start of execution.</p> <p>For this reason, our proposal would be to postpone the mid-term review to 2032.</p> <p>ES</p> <p>(MS questions):</p> <p>Possibility of postponing the mid-term review to 2032</p> <p>IE</p> <p>(MS comments):</p> <p>Ireland would welcome more information on how the mid-term review might interact with the interim evaluation set out in the Performance Framework Regulation. It would be practical to leverage the outcome of</p>
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Commission proposal	MS comments and MS questions
	<p>the interim evaluation to better inform the mid-term review, and this might be accounted for and acknowledged in Article 25. We should also return to this article in the case of a delayed implementation. Currently in CAP a mid-term evaluation is required in a plan that is only 3 years old.</p> <p>IE</p> <p>(MS questions):</p> <p>How might the mid-term review interact with the interim evaluation set out in the Performance Framework Regulation?</p> <p>Does this include direct income support or funding outside of the ring-fenced amount?</p> <p>IT</p> <p>(MS questions):</p> <p>Targeted revisions are envisaged, as in the RRF, but also a <i>mid-term review</i>, in line with cohesion policy. It would be useful to hear from the Commission a reflection on the complementarity between the two instruments. At first sight, the <i>mid-term review</i>, compared to individual revisions, would appear particularly functional to taking stock at European level, taking into account the experiences of the different Member States.</p>

Commission proposal	MS comments and MS questions
	<p>SE</p> <p>(MS questions):</p> <p>We understand that there will be no mid-term review for the Interreg plan. Is that correct?</p>
<p>1. The Member State shall review their NRP Plans, taking into account the following elements:</p>	<p>AT</p> <p>(MS comments):</p> <p>With a view to significantly simplifying administration, the mid-term review should also be abolished; the achievement of objectives is determined by performance reviews and can be taken into account by making changes to the plan if necessary.</p> <p>CY</p> <p>(MS questions):</p> <p>Please clarify if this article applies to Interreg Plan.</p> <p>DE</p> <p>(MS comments):</p> <p>Some of these following elements like the socio-economic situation of the Member State or region concerned, with special emphasis on regional and</p>

Commission proposal	MS comments and MS questions
	<p>territorial needs, or main results from evaluations or SWOT analysis, should also apply for the programming of the NRPP under Art. 22 (1) b.</p> <p>EL</p> <p>(MS comments):</p> <p><i>1. The Member State shall review their NRP Plans, taking into account the following elements:</i></p> <p><i>(a) the challenges identified in accordance with Article 22(2), points (a), (b) and (c) [Requirements of the Plan];</i></p> <p><i>(b) the socio-economic situation of the Member State or region concerned, with special emphasis on territorial needs, taking into account any major negative financial, economic or social development;</i></p> <p><i>(c) the main results of relevant interim assessment reports;</i></p> <p>FR</p> <p>(MS questions):</p> <p>La révision à mi-parcours s'applique-t-elle à l'ensemble des chapitres ou sera-t-elle facultative pour certains chapitres ?</p> <p>Pourquoi l'exception prévue sur 2021-2027 pour les fonds JAI n'est-elle pas maintenue ?</p>

Commission proposal	MS comments and MS questions
	<p>IT</p> <p>(MS comments):</p> <p>The laborious amendment procedure appears sufficient, and we don't see the added value of this review. Furthermore, this revision would block SFC for a period of at least six months, as multiple Community decisions are required.</p> <p>For this reason, we suggest exploring making such revision <u>optional</u>.</p> <p>PL</p> <p>(MS comments):</p> <p>According to paragraph 2 of this article, the amendment of the NRP as a result of the mid-term review appears to be mandatory. Please confirm our understanding. In the current perspective, changes to the Partnership Agreement as a result of the mid-term review were optional. In the case of programmes, there were two options: either to amend the programme or to allocate the flexibility amount to the same activities as before, without amending the programme.</p> <p>PL</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Please explain if changing the Plan during the mid-term review is obligatory or is it enough to only program the flexibility amount.</p> <p>In addition, please clarify whether the flexibility amount must be allocated to new, additional, or different measures than those before the mid-term review, or if it can be allocated to the same measures as previously.</p>
(a) the challenges identified in accordance with Article 22(2), points (a), (b) and (c) [Requirements of the Plan];	
(b) the socio-economic situation of the Member State or region concerned, with special emphasis on territorial needs, taking into account any major negative financial, economic or social development;	<p>NL</p> <p>(MS questions):</p> <p>Has the Commission considered also taking into account the environmental situation and needs?</p> <p>RO</p> <p>(MS questions):</p> <p>Clarification is needed on how “<i>any major negative financial, economic or social development</i>” will be identified and assessed in evaluating the socio-economic situation of the Member State or region, and how such</p>

Commission proposal	MS comments and MS questions
	<p>developments will be reflected in adjusting priorities or measures to address specific territorial needs</p>
<p>(c) the main results of relevant interim assessment reports;</p>	<p>CZ</p> <p>(MS comments):</p> <p>For the midterm review, only those evaluations that are available in due time can be used, whether or not an interim evaluation is among them.</p> <p>Due to the potential timing mismatch between the MTR deadline (31 March 2031) and the results of required interim evaluation (within three years from the start of implementation), it is desirable to keep the wording used from 22021-2027 general regulation for the midterm review, which states: “the main results of relevant evaluations.”</p> <p>CZ</p> <p>(MS questions):</p> <p>Is it expected that the MTR will be based on the completed midterm evaluation (according the Performance Framework regulation), which is to be carried out within 3 years from the start of implementation and cover “the entirety of the Plan”?</p> <p>FI</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>Concerning the following we would like to know what is meant with this? “the main results of relevant interim assessment reports”</p> <p>PL</p> <p>(MS questions):</p> <p>Please explain what is the scope of such interim assessment report and which side is responsible for its elaboration (EC or MS ?) ? The regulation does not mention anything in this point.</p> <p>SI</p> <p>(MS questions):</p> <p>Which reports are these? Is it required that the evaluation referred to in Article 11(2) of the PF Regulation (at least one interim evaluation of the entire NRPP within three years of the start of implementation) be completed and taken into account in the amendment submitted by March 31, 2031?</p>
<p>(d) the progress towards the achievement of measures, taking into account major difficulties encountered in the implementation of the NRP Plan;</p>	

Commission proposal	MS comments and MS questions
(e) Important Projects of Common European Interest (IPCEI) and projects that have been awarded a Seal;	RO (MS questions): See the question in art 22
(f) occurrence of any crisis;	FR (MS questions): A quels types de crise fait référence cette disposition (catastrophe naturelle, crise économique, migration, sécurité, agricole...)? RO (MS questions): Clarification is needed on the definition and scope of the term “ <i>crisis</i> ,” including whether it refers exclusively to EU-wide or global crises formally recognized by the Union, or also to national or regional emergencies with significant economic or social impact
(g) the need to ensure continuous compliance of the Rule of Law and the Charter horizontal conditions in the implementation of the Plan, taking into consideration in particular the country-specific challenges	PL (MS comments):

Commission proposal	MS comments and MS questions
<p>identified in the context of the Rule of Law Report and the European Semester.</p>	<p>The rule of law report goes far beyond the scope of intervention undertaken within the NRP Plan. The assessment the Rule of Law horizontal condition should be done based on specific criteria indicated in regulation on the NRP Plan and directly related to the scope of intervention under NRP Plan.</p> <p>Please see our earlier comment on this topic.</p>
<p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031.</p>	<p>BE</p> <p>(MS questions):</p> <p>Why has the European Commission shortened the deadline for submitting the mid-term revision? How can performance and potential reorientation needs be properly assessed without allowing sufficient time to implement the measures set out in the plan?</p> <p>Can the Commission confirm that the mid-term revision does not automatically entail the introduction of new measures?</p> <p>CZ</p> <p>(MS comments):</p> <p>Based on experience with the mid-term review in the 2021–2027 period, it is necessary to shift submission deadline from 31 March 2031 to at least 30 June 2031. The main reason is the short time available to process the</p>

Commission proposal	MS comments and MS questions
	<p>midterm review using the most recent data, which the review relies on. The data are always available by 15 February of the relevant year (see Article 59). If the deadline is March it will again be necessary to draft the review on predicted values and will make the MTR process more complex and demanding.</p> <p>CZ</p> <p>(MS questions):</p> <p>What are the valid reasons for setting the MTR deadline again on 31 March?</p> <p>EE</p> <p>(MS questions):</p> <p>Article 25(1) requires MSs to review their NRPPs, taking into account several specified elements. In order to submit an amended Plan, it must first undergo informal discussion with the Commission and consultation with the monitoring committee. This implies that MSs would need to complete the relevant evaluations by the end of 2029, analyse the findings, and prepare a draft amended plan by mid-2030, allowing time for informal negotiations with the Commission in the second half of 2030 and consultation with monitoring committees by late 2030 or early 2031,</p>

Commission proposal	MS comments and MS questions
	<p>to ensure timely submission. Given this timeline, evaluations would rely primarily on data from 2028 and the first half of 2029, providing a relatively brief 1.5-year period as the analytical basis for determining substantial changes to the NRP. Given the limited timeframe available for conducting evaluations, and to ensure that the mid-term review of the NRP Plan is based on robust and comprehensive data, would it be appropriate to consider extending the deadline for the submission of the amended NRP Plan by 1.5 years?</p> <p>ES</p> <p>(MS comments):</p> <p>We propose to modify the date for the submission of the amended NRP Plan, as well as to include the possibility that the NRP Plan does not have to be revised in the MT review (except for the flexibility amount).</p> <p>We propose the following drafting:</p> <p><i>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including, where relevant, a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 203<u>2</u>1.</i></p>

Commission proposal	MS comments and MS questions
	<p>ES</p> <p>(MS questions):</p> <p>Experience in Home Affairs funds has shown that this deadline of three years from the start of the MFF may not be enough to properly and comprehensively review the program and thus present the outcome of such a mid-term review.</p> <p>Also, for ESF, by 2032 there would be a much more robust ground for assessment.</p> <p>HR</p> <p>(MS comments):</p> <p>.MUP:</p> <p>HR expresses concern about the earlier date of the mid-term review comparing to the current MFF, as it is possible that milestones and targets will not be achieved by that time, consequently delaying the payment of financial support.</p> <p>HR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>There appears to be a potential misalignment between the deadline for submitting the amended NRP Plan by 31 March 2031 and Article 10(2) of the Performance Framework Regulation, which requires the Commission to publish implementation reports no later than four years after the start of implementation. Clarification is needed as to whether the Commission's implementation reports under Article 10(2) are intended to inform the mid-term review under Article 25 or are separate reporting requirements.</p> <p>LT</p> <p>(MS questions):</p> <p>Can the flexibility amount only be used for new measures? If the additional measure is consistent with an existing one, is it necessary to create another one?</p> <p>LU</p> <p>(MS comments):</p> <p>It would be appropriate to postpone this date. In the past, it has been found that the date for the mid-term review was too early and that, for many programmes, the data available at that time was not necessarily representative.</p>

Commission proposal	MS comments and MS questions
	<p>LU: not every mid-time review will lead to an amended NRPP. (2) should be adopted and “Shall” replaced by “may”.</p> <p>MS need to modify their NRP Plan based on the mid-term review outcomes. If mid-term review automatically induces a plan amendment, mid-term review will be done more carefully by MS. Therefore, LU calls upon the COM to delete the automatic link between evaluation and update. It shall be upon the decisionmakers in each MS on whether or not updating a plan, not on the evaluator implementing evaluations.</p> <p>According to art. 11 §3, this evaluation should be carried out not later than 3 years after the start of the implementation of the plan. LU would like to keep the status quo for CAP regulation where the moment for midterm evaluation is upon the decision of Member States.</p> <p>LU</p> <p>(MS questions):</p> <p>This means in case of no crisis; the flexibility amount will be used to fund new measures which need to be added to the Plan in the mid-term review? Does the mid-term review entail automatically a modification of the Plan?</p>

Commission proposal	MS comments and MS questions
	<p>PL</p> <p>(MS comments):</p> <p>Taking into account the experience gained during the current financial perspective, as well as the potentially very long process of developing and adopting plans, PL suggest not setting a fixed date, but making it dependent on the date of adoption of the first version of the plan.</p> <p>SI</p> <p>(MS questions):</p> <p>(2) a review of the estimated total costs of the measures - What does it mean?</p>
<p>3. The amended NRP Plan shall include the following:</p>	
<p>(a) revised or new measures;</p>	
<p>(b) the updated estimated total costs of the Plan and the flexibility amount requested;</p>	
<p>(c) revised or new milestones and targets.</p>	<p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Est-ce que les indicateurs associés à ces cibles et jalons pourraient être modifiés ?</p> <p>SI</p> <p>(MS questions):</p> <p>Please explain how this would contribute to simplification and reduction of administrative burden.</p>
<p>4. The revised Plan shall be approved in accordance with Article 24 [on amendment].</p>	<p>ES</p> <p>(MS comments):</p> <p>It should be clarified that the cost of new or revised measures will be eligible from the day when the Member State presents the proposal for amending the NRP.</p>
<p><u>ANNEXES</u></p>	
<p>ANNEX V</p>	<p>AT</p> <p>(MS comments):</p> <p>An overview of the planned contributions of the measures to the objectives under Article 22(q, r), climate and environmental objectives,</p>

Commission proposal	MS comments and MS questions
	<p>and social spending objectives would be useful. This should also be evident in the respective descriptions of the measures.</p> <p>Table containing outputs and timeline for interventions:</p> <p>This (data like ‘uniform or average’, ‘min./max’ ‘value per unit for output’ per output indicator) sounds very much like the system of “planned unit amounts” that we had in the CAP 21-27. For the CAP 21-27 the EC proposes to abolish the system of planned unit amounts and the performance clearance after having experienced 2 years of administrative burden and no added value. Therefore, we seriously question the proposed requirements (data points).</p> <p>A proposal was submitted to the Council Working Party (CAP Regulation) as regards phrasing of priority areas under Art. 4 in a more consistent and concise manner. This structure should be reflected here.</p> <p>AT</p> <p>(MS questions):</p> <p>Where in the table on p. 32 (Title II 7.) “Financing and costs and social target” is the social target shown? Why are climate and environmental targets not addressed?</p>

Commission proposal	MS comments and MS questions
	<p>The “Summary of all Chapters” (Title II 9.) should also include contributions to the above-mentioned targets.</p> <p>What do the Home Affairs Regulations cover here?</p> <p>Where should the allocations for the instruments "local development driven by the local population / LEADER" be specified? There are currently no provisions for this in Chapter 1.9.</p> <p>CY</p> <p>(MS comments):</p> <p>Within the template there is no separate chapter for the HOME Affairs Funds. As the HOME Affairs have their own dedicated Regulations, Part 1 – 1.1 and 1.2 of the Annex V, where the specific objectives are mentioned and reference to article 22(2) is made, we consider that there should be provisions for the clean-cut reference to the HOME Affairs within the template of the NRPP.</p> <p>Point 18 1.8. Comprehensive overview of the Plan’s support to thriving fisheries and aquaculture production [2000] Reference: Article 22(2), point (i)(g)(iii)</p> <p>The table should include a row for other type of measures ensuring synergies with other parts of the NRP Plan</p>

Commission proposal	MS comments and MS questions
	<p>CZ</p> <p>(MS comments):</p> <p>Annex V – general comment: It does not correspond to the requirements defined in Article 22 in terms of its structure and cross-references. We need more detailed guidelines, ideally linked to the SFC testing environment.</p> <p>Moreover, the level of information required on individual CAP measures in the plan is very detailed and goes against the principle of simplification. We do not agree, for example, with the provision of a schedule for the implementation of milestones/objectives by quarter, we do not agree with the provision of min. and max. unit values of output, etc. The details provided will necessarily lead to frequent changes of the plan, which, however, will be very difficult, given that this is a document at the national level.</p> <p>CZ</p> <p>(MS questions):</p> <p>On behalf of the Czech Republic, we would like to request that the Commission organize a technical seminar for Member States on completing Annex V. Is the EC planning such a seminar?</p>

Commission proposal	MS comments and MS questions
	<p>Table 1.1. : Specific objectives</p> <p>In this table, shall we introduce Specific objectives on the level of a)-e), that is exactly 5 lines, or shall there be listed all 29 specific objectives?</p> <p>Table 1.2: Description of the specific challenges</p> <p>Level of financing envisaged - What does this column mean?</p> <p>How to understand column „National or regional level? Is it an indication of whether the challenge is regional/national or whether the solution to (or capacity to solve) the challenge will be on regional/national level?</p> <p>Table 1.5: Comprehensive overview of the Plan’s support to the territories</p> <p>Are all the lines and rows in the table mandatory to fill, or can some of them be left blank?</p> <p>Table 5: Milestones, targets and timeline</p> <p>Shall each of the measures be on exactly one line of the table or (in case there are more targets per measure) could it occur repeatedly on more lines with different content in some of columns?</p> <p>What is the relation between „measure“ and „intervention“? What is their relation to „Policy areas“ and „activities“, referred to in Performance framework regulation draft?</p>

Commission proposal	MS comments and MS questions
	<p>Table 5: Table containing milestones, targets and timeline</p> <p>What specific data should be included in the "Amount for managing authorities" column?</p> <p>Do we understand correctly that each measure should be divided into categories of regions and monitored separately per each category as the categories of region are mentioned in column „Geographical coverage, territorial dimension“? Is this column relevant to all measures or only to those implemented under territorial dimension?</p> <p>Table 5: Table containing outputs and timeline for interventions</p> <p>Is this table only for the common agricultural policy or also for other parts of the plan?</p> <p>Table 7: Financing and costs and social target</p> <p>How to count 14 % for social target? Does it count 14 % of NRPP or is it 14 % of broader amount, specified in art. 10(5)?</p> <p>Which specific tables or items from this annex should be used as a source for reporting on the plan in Annex IX?</p> <p>Structured information on the CAP:</p>

Commission proposal	MS comments and MS questions
	<p>For a number of items of information, there is a choice from a list. When will these lists be available and in what form?</p> <p>Must all CAP measures be linked to a priority in the field of the environment and climate?</p> <p>In the Annex V, point 1.4, the areas listed in the table do not correspond to the list of areas in Article 22(2).</p> <p>Annex V, point 3.4 – what is meant by the term "technical support"? The same term is also used in Article 22(2)(e).</p> <p>In the Annex V, we find that a passage describing the use of technical assistance and the establishment of the National CAP Network is missing</p> <p>DE</p> <p>(MS comments):</p> <p>DE assumes that information from the thematic chapters is automatically transferred to the upstream strategic chapters in the SFC system.</p> <p>However, duplications in the plan must be avoided in principle.</p> <p>In the sense of a performance-oriented approach, the information here should be limited to a “need to know”.</p>

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	<p>A further streamlining of the reporting requirements is needed to a reporting minimum to reduce administrative burden and to have concise NRPPs.</p> <p>The Commission’s proposal only obliges Member States to demonstrate “consistency” between their restoration plans and their NRPPs, with the explanation capped at 1000 words under Annex V of the regulation. Such a requirement is clearly inadequate to guarantee that national allocations are effectively aligned with nature restoration.</p> <p>DE</p> <p>(MS questions):</p> <p>What is meant by “Primary and Secondary Specific objective”, p. 29? Do they refer to policy fields from the Annex I of the Performance Regulation?</p> <p>When only one output can be defined, what can trigger more than one payment during the implementation of reforms?</p> <p>EE</p> <p>(MS questions):</p> <p>According to Annex V to NRP (Template for the National and Regional Partnership Plan) – Each measure may have a Primary specific Objective</p>

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	<p>and Secondary specific objective. May different specific objectives also be combined at the intervention level? May more than two specific objectives be combined (either measure or intervention level)? May specific objectives under different General Objectives be combined at the measure and intervention level? As an example – may there be a CLLD/LEADER measure/intervention developed that involves 3-4 General Objectives (sustainable prosperity, security across all regions, social cohesion, CAP).</p> <p>EL</p> <p>(MS comments):</p> <p><u>In the Title 1, we propose to include the Scheval Recommendations in 1.2. according to article 22 par.2 (b), (iii). The challenges in Home Affairs should be in line with the findings in each Scheval Recommendations in the field of Return, External Border Management and Police Cooperation. Based on the Annex I of the columns: Geographical coverage, Primary and Secondary specific objective are not compatible within the scope of HOME Funds. Are these obligatory to be filled?</u></p> <p>EL</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>1.1. Plan’s contribution to all specific objectives referred to in Article 3, taking into account the specific challenges of the Member State concerned. Please clarify whether it is mandatory for each NRP Plan to address not only all five specific objectives of Article 3, but also the entire list of sub-objectives set out under each of them.</p> <p>(If this is not the case, we propose the following change: 1.1. Plan’s contribution to all the selected specific objectives referred to in Article 3, taking into account the specific challenges of the Member State concerned)</p> <p>1.5. Comprehensive overview of the Plan’s support to the territories listed in Annex VII, taking into account their specific needs and challenges [2000] Reference: Article 22(2), point (h)(i) and Article 45 [measures for the outermost regions. Is the reference correct? Points (f) and (g) seem relevant to the table under 1.5.</p> <p><u>At the template in point 5, there are two (02) tables, one for Milestones and Targets and one for Interventions.</u></p> <p><u>Which is the difference between the two tables as the “interventions” are part of measures based on the definitions in article 2 (3) in the Regulation establishing a budget expenditure tracking and performance framework. It is very important to have a clear link</u></p>

Commission proposal	MS comments and MS questions
	<p><u>between the measures in table 1 of point 5 (Annex V) and the specific list of interventions fields and indicators in Annex I of performance framework regulation.</u></p> <p><u>Based on Annex I of performance framework regulation, which lines are corresponded to the three thematic regulations , e.g.to the Policy area (level 1) “Migration and border (322-333) and “Resilience, defence industry and space” (398-401)?</u></p> <p><u>Which is the corelation among</u></p> <ul style="list-style-type: none"> a) <u>the specific objectives (article 3),</u> b) <u>specific objectives within each thematic Regulation of AMIF, ISF, BMVI, and</u> c) <u>the Policy areas in the Regulation establishing a budget expenditure tracking and performance framework?</u> <p>ES</p> <p>(MS comments):</p> <p>Regarding the heading 1.8. Comprehensive overview of the Plan’s support to thriving fisheries and aquaculture production:</p>

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	<p>Reference: Article 22(2), point(i)(iii) is mistaken as it is referred to point g(iii).</p> <p>Point (d) of heading 1.8, refers to activities set out in the European Ocean Pact concerning the conservation of marine biological resources, the restoration of marine biodiversity, the management and innovation in sustainable fisheries and aquaculture activities, maritime safety, and the development of a competitive and sustainable blue economy. It also includes maritime spatial planning and regional maritime cooperation at the sea basin level.</p> <p>We understand that point (d) should not be covered within the minimum allocation of 2 billion euros, which, according to the explanations provided by the Commission to date, this amount would be directed towards essential aspects of the Common Fisheries Policy. It would not include the activities covered by the European Ocean Pact, maritime safety, or maritime spatial planning and regional cooperation at sea basin level, which we trust will be supported by an additional source of funding.</p> <p>FI</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>In addition to the need for consistent terminology across regulations, also this annex should use terms consistently. The annex should be revisited in working groups once Member States have a clearer understanding of the plan's requirements.</p> <p>FI</p> <p>(MS questions):</p> <p>Can all the different types of territories be supported by more than one chapter of the Plan (starting from point e there is only one row for a Chapter in the table) in point 1.5 Comprehensive overview of the Plan's support to the territories listed in Annex VII?</p> <p>Can only one NUT2 region be assigned to a measure in the table for 2.7. Territorial dimension of the measure? Does this mean that if a measure is implemented in all the regions of a Member State (i.e. national measure), this needs to be divided in the plan into as many measures as there are NUTS2-regions? Question relates also to Article 14(4) of the Performance Regulation</p> <p>Which parts of the annex are relevant for Home Affairs sector?</p> <p>FR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>Comment la condition horizontale liée à l'égalité de genre et au DNSH sera prise en compte dans le PPNR ?</p> <p>La partie 1.1 pourrait-elle faire référence également aux objectifs spécifiques des trois règlements sectoriels sur les instruments financiers JAI, afin de garantir leur intégration dans le PPNR, si ceux-ci ne sont pas inclus dans les objectifs spécifiques mentionnés à l'article 3 du règlement PPNR ?</p> <p>Comment devront être complétés les points 1.3 et 7 par les États membres?</p> <p>Les informations à renseigner dans les tableaux ne sont pas suffisamment claires pour ce qui concerne les indicateurs. Dans quel cas s'agit-il des indicateurs de réalisation et dans quel cas d'indicateurs de résultat ?</p> <p>Les références au sein de l'annexe sont erronées et ne permettent pas de vérifier aisément que tous les items prévus par l'article 22 sont bien présents dans la trame. La Commission pourrait-elle préciser les bonnes références ?</p> <p>Au titre II.5, les tableaux concernent-ils tous les fonds ou uniquement la PAC ?</p> <p>L'article 22(2) point q indique que les PPNR devront rendre compte de la manière dont il contribue aux objectifs sociaux de l'UE (minimum de 14%</p>

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	<p>du Fonds dédié à cet objectif), en utilisant la méthode définie à l'article 6(1) du règlement cadre de performance. Cet article indique que le suivi de la contribution du budget de l'UE aux objectifs sociaux doit mobiliser le cadre de performance prévu à l'article 8 de ce même règlement. Celui-ci précise l'utilisation d'indicateurs de réalisation (output) et de résultats (result). Or, dans l'annexe V, au titre II, point 7, le tableau dédié à la mesure de la contribution des PPNR aux objectifs sociaux de l'UE requiert uniquement de mentionner les indicateurs de résultats quand cela est pertinent. La Commission confirme-t-elle qu'il ne sera pas attendu des États membres qu'ils précisent dans leurs plans les réalisations contribuant aux objectifs sociaux ?</p> <p>HR</p> <p>(MS comments):</p> <p>On the one hand, the proposed template is too complex and requires MS to submit a lot of different data and detailed explanations and on the other, the number of characters used is in some cases very restricted.</p> <p>HR</p> <p>(MS questions):</p>

Commission proposal	MS comments and MS questions
	<p>With regard to the part of the Annex 'Chapters', point 1.2., we would appreciate an explanation as to how the measures address the identified challenges and relevant policy objectives - namely, which policy objectives does this refer to?</p> <p>HU</p> <p>(MS comments):</p> <p>(Title II 2.6, 2.7) The interpretation of both points is difficult in relation to the Home Affairs funds, particularly where projects are implemented in the territory of third countries, such as Pakistan, Kenya, Vietnam, etc. This needs to be clarified.</p> <p>HU</p> <p>(MS questions):</p> <p>(I.1) Information must be provided in tables following "List of measure ID and titles", but it is not clear where this data can be found.</p> <p>Please clarify the definition of 'Level of financing envisaged' in table 1.2.</p> <p>3.2. "Description of the organization and structure of the monitoring committee(s) and coordinating committee; the arrangements envisaged to</p>

Commission proposal	MS comments and MS questions
	<p>ensure the monitoring of the Plan is in line with Article [Monitoring Committee and coordinating committee]."</p> <p>If there are changes during implementation, does this constitute an amendment to the Plan? Based on experience in the current period, there are always numerous operational and technical changes in the Monitoring Committees, and it would hinder effective implementation if these changes were dependent on amendments to the Plan.</p> <p>The references to Article 22 in the completion guide are not consistent with the numbering of the points in Article 22.</p> <p>(Title II: Chapters, 2.1) "The nature, type and size of the measure, indicating whether it is new or an existing measure intended to be extended with the support from the Plan"</p> <p>What is meant by the nature, type and size of the measure? Where can information in this regard be found?</p> <p>4. Gender - What does "activity level" mean in the second row of the second column of the table?</p> <p>The reference to the legislation is inaccurate; paragraph 7.2 of the Performance Regulation is correct.</p>

Commission proposal	MS comments and MS questions
	<p>5. How should “the primary and secondary specific objectives” be interpreted?</p> <p>IE</p> <p>(MS comments):</p> <p>The template for the NRP Plan, we welcome getting this technical information so early in the process. We will have detailed comments on this annex in due course, however, it is important to reiterate our previous points – the information that goes into the NRP Plan should be at a sufficiently strategic level to allow for minor changes without amendment. Detailed rules can be set out in terms and conditions at a national level.</p> <p>IE</p> <p>(MS questions):</p> <p>We note that in the table in section 1.8 the first category of activity is not provided for in the NRPP, but under the EU Facility, and may be implemented by direct, indirect or shared management. It is not yet clear if, how or what extent funding for these measures will be implemented under the Facility.</p> <p>LT</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>LT proposes to develop dedicated and tailor-made templates for the programming of the Home Affairs Funds. This approach would ensure thematic coherence and simplify programming for Member States.</p> <ol style="list-style-type: none"> 1. Descriptions of the compatibility, synergies, and distinctions between measures should be concise and optimal, to avoid unnecessary administrative burden. 1.2. Technical note: When preparing the NRP, the list and names of LEADER and other bottom-up measures will not yet be clear (they will only become clear once the local development strategies have been approved). At the NRP preparation stage, the contribution of LEADER and other bottom-up measures can be classified as probable. 2. 1.5. (j) "Specific needs and challenges identified in the planning of <...> community-led local development <...>": In the case of LEADER, this information will overlap with point (g), as LEADER contributes a priori to the objectives of social inclusion and economic development in rural areas.

Commission proposal	MS comments and MS questions
	<p>3. (1.6 p.) Detailed overview of generational renewal. It is not possible to precisely plan in advance the uptake of higher-intensity support for generational renewal, the use of financial instruments, or the popularity of farm naming measures. This depends on applicant behaviour, which increases the risk of errors when setting targets and indicators.</p> <p>4. 1.9. Technical note: When preparing the NRP, the list and names of LEADER and other bottom-up measures will not yet be clear (they will only become clear once the local development strategies have been approved).</p> <p>5. (3.1) The eligibility criteria for financing in the strategic document should remain at a strategic level, without delving into implementation details such as specific dates, agricultural operation deadlines, or similar aspects.</p> <p>LT</p> <p>(MS questions):</p> <ol style="list-style-type: none"> 1. Are there any specifications for the Home Affairs in ANNEX V as there is not mention of the funds there?

Commission proposal	MS comments and MS questions
	<p>2. Will the Commission set a maximum number of characters for the description of synergies and complementarities?</p> <p>3. Will the generational renewal overview table be streamlined by removing elements that depend on applicant behavior?</p> <p>4. 1.5. (g) "Specific characteristics of rural areas": it is unclear whether this section refers to "young people" and "generational change" in agriculture, or to the rural population as a whole?</p> <p>5. (1.9) Could LEADER remain exclusively focused on rural areas, without integration with urban CLLD, while ensuring policy coherence?</p> <p>LV</p> <p>(MS comments):</p> <p>Correction needed in point 1.6. “Comprehensive overview of the Plan’s support to generational renewal in accordance with Article 15” point “c”. Reference in the table to the breakdown of funding by measure in points “c”; d (regarding investments); “e” to “i” should be delete.</p> <p>Correction needed in point 3.6 “Distribution of Agricultural products”: reference to Article 22(2), point (k)(ii) should instead be referenced to Article 22(2), point (j)(ii)</p>

Commission proposal	MS comments and MS questions
	<p data-bbox="1137 260 2089 347">Annex V point 1.2. column “Relevant country-specific recommendation / national CAP recommendation and/or challenge” –</p> <p data-bbox="1137 387 2089 587">Please note that only name of CSR or CAP recommendation will require more than 300 characters, not to mention name of official document or strategy. Please increase characters available in template for Plan (Annex V of CPR).</p> <p data-bbox="1137 627 1187 659">LV</p> <p data-bbox="1137 699 1350 730">(MS questions):</p> <p data-bbox="1137 770 2089 970">The condition regarding the reflection of the start-up package in the funding breakdown by measure is too detailed, which may significantly hamper the implementation of measures, especially those providing for increased aid intensity or priority in project selection.</p> <p data-bbox="1137 1010 2089 1145">Does the Commission envisage elaboration of more detailed and specific guidance or template on how the modalities of the EU School scheme should be described in its NRP by the Member State? 1.8.</p> <p data-bbox="1137 1185 2089 1337">It is unclear how the CFP interventions referred to in Article 35(11) of this Regulation integrate with the Category of activities referred to in point 1.8 of Annex V. In order to prepare detailed comments or proposals, it is</p>

Commission proposal	MS comments and MS questions
	<p>necessary to obtain clarification on how to fill in the table included in point 1.8 - what is meant by Contributing Chapter, List of supporting reforms</p> <p>Annex V point 1.3. row “National Plans and roadmaps: National Energy and Climate Plan under Regulation (EU) 2018/1999” -</p> <p>Does it is required that new National Energy and Climate Plan covering 2028-2034 is adopted prior to creation of Plan (Annex V of NRP) or information regarding existing National Energy and Climate Plan can be included in Plan template section 1.3. “Description of how the Plan is consistent with the national medium-term fiscal structural plans, national restoration plan”.</p> <p>MT</p> <p>(MS comments):</p> <p>By way of general comment, MT welcomes a more streamlined template structure. Nevertheless, we feel there is a mismatch between the level of detail required at programming stage and the timeframes Member States are expected to deliver within.</p> <p>The template does not evidence the extensive detail and work associated with FNLC that will now be required for all funds upfront, most of which will be unprecedented work for most Member States.</p>

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	<p>Whilst welcoming the inclusion of character limits, we ask the Presidency to clearly explain which other documents will be required to be submitted alongside the plan. For the sake of transparency, we would appreciate detailed guidance on the level of detail, format needed for financial and costing assessments across all chapters of the plan. Whilst the template, at face value seems simplified, the additional documentation requested by the Commission in the negotiations leading up to the plan submission is usually much more extensive. For the new programming period, we feel it is time to truly move towards simplified processes.</p> <p>Furthermore, the detailed tables on territories, gender, climate/environment not only do not provide further simplification, but they rescind the simplification achieved in the 21-27 period over the previous 14-20 period.</p> <p>Here there needs to be some serious reflection on what is really needed at initial programming stage and what can be left for reporting/evaluation purposes. We either want all the detail or the timeliness of plan adoption. As the proposal stands both aspects are in direct conflict.</p> <p><i>1.1. Plan's contribution to all specific objectives referred to in Article 3, taking into account the specific challenges of the Member State concerned.</i></p>

Commission proposal	MS comments and MS questions
	<p>As per earlier comment on Article 22(2)(a) above, the obligation on Member States to select all Specific Objectives does not allow for the required flexibility nor does it take into account plans with small budgets whereby it would be unrealistic to target all SOs and achieve an adequate impact.</p> <p><i>7. Financing and costs and social target</i></p> <p>In the table which is required to be filled in for every measure, there is a column 'Result indicator (where relevant)' – MT requests a confirmation that, should the MS decide to include result indicators, this would only be used for reporting/evaluation purposes and that there is no link between indicators and payment claims.</p> <p>PL</p> <p>(MS comments):</p> <p>The proposed template of the Plan is overly complicated – in case of Poland, assuming the introduction of regional and sectoral chapters with a limited number of measures and corresponding indicators, the Plan prepared according to the template would have more than 3000 pages.</p> <p>The self-assessment of horizontal conditions should be excluded from the Plans as it will additionally complicate their preparation and adoption.</p>

Commission proposal	MS comments and MS questions
	<p>The annex in many places contains incorrect references to Article 22 of the NRP Regulation_ (example: Title II, point 2 measures; Reference: Article 22.2.(e) – letter (e) refers to monitoring and implementation of the Plan. This should be corrected.</p> <p>Annex V introduces a significant number of concepts, which are not indicated in the regulation, e.g. primary and secondary specific objectives – in PL opinion this should be defined at least in the annex.</p> <p>PL</p> <p>(MS questions):</p> <p><u>It should be better explained in the annex what is the purpose of the two tables presented under point 5 <i>Milestones, targets and timelines</i>. Both tables present similar set of data and could be potentially combined with removal of some unnecessary colons.</u></p> <p>RO</p> <p>(MS comments):</p> <p>Title 1, Table 1.5, last column</p> <p>In the case of many MS reforms are not appropriate at regional level.</p>

Commission proposal	MS comments and MS questions
	<p>Under Title II – Chapters, for each measure is requested only the objective, while under Art 22 – point c- are mentioned both general and specific objectives at measure level.</p> <p>It should be clarified if the total estimated costs and Union contribution should be provided at measure level (the tables in the template mention only the chapter for the headings related to estimated costs.)</p> <p>5. Milestones, targets and timeline – the mark *: as indicated in SFC is not transparent.</p> <p>Table containing outputs and timeline for interventions - Output unit value</p> <p>Table containing outputs and timeline for interventions - Unit value of commitment in the calculation of the average output value of agricultural actions</p> <p>Table Financing and costs and social target – Result indicator (where relevant)</p> <p>RO</p> <p>(MS questions):</p> <p>Title 1, Table 1.5 point e).</p>

Commission proposal	MS comments and MS questions
	<p>Why Eastern border regions do not include Ukraine but are limited to NUTS 2 regions that have borders with Russia and Belarus?</p> <p>Within Annex V (Part 2: Horizontal conditions and principles - 2.2. <i>Compliance with the principle of ‘do no significant harm’</i>) it is mentioned that:</p> <p><i>Description of the mechanisms in place</i> to ensure compliance with the principle of ‘do no significant harm’ in the implementation of the Plan, <i>including a description of the protective practices</i> as per Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation].</p> <p>Clarifications are needed regarding the information concerning <i>description of the mechanisms in place, including a description of the protective</i>. What are the expectations from the perspective of interventions financed under Cohesion Policy?</p> <p>Title II, Table 5, 8th column - milestones are defined as qualitative indicators. In fact, milestones can be expressed as partial achievement of the target (hence of the output indicator) Why should milestones refer strictly to qualitative indicators?</p> <p>According to Title II Chapters, point 5. Milestones, targets and timeline, under the table containing milestones, targets and timeline for the chapters,</p>

Commission proposal	MS comments and MS questions
	<p>the information are provided at measures level, including Amount for managing authorities and Pay-out value (relevant for COM payments to the Member States). Which of the two values could be associated with the Total estimated costs of the measure?</p> <p>Taking into consideration the provision of the Art 74 – the support for integrated territorial development strategies and urban development strategies could be associated to a ”<i>measure</i>”?</p> <p>Could the COM reveal what granular information MS should expect to provide in SFC? What is the meaning of the term Amount for managing authorities?</p> <p>Could the COM explain the terms “uniform or average”, “Type – lump sum, or top-up or other”, “Min-Max”?</p> <p>Is the Table to be filled in for agriculture actions?</p> <p>Is the COM expecting that the Methodology used and description of cost be linked to result indicator? However, this is somehow not in line with table containing outputs and timeline for interventions, which requires unit costs per output.</p> <p>When to consider that result indicator is not relevant?</p> <p>SE</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>We need to study the template further, but we have some initial questions.</p> <p>SE</p> <p>(MS questions):</p> <p>Annex V have very few references to the specific objectives. It should be further clarified how the specific objectives are to be handled in the plan.</p> <p>In the table containing milestones, targets and timeline there are 2 separate columns for primary specific Objective and Secondary specific objective. Is it a limit of 2 specific objectives in the same measure?</p> <p>In the same table there is a column for qualitative indicators. Can the Commission explain the concept of qualitative indicators? There is no reference of qualitative indicators in the performance framework.</p> <p>SI</p> <p>(MS comments):</p> <p>The content of the strategic document must be strategic. Detailed content such as that currently included in the CAP is not appropriate and does not ensure flexibility in implementation. The plan must be truly strategic, including and especially in the area of the CAP, which will allow sufficient</p>

Commission proposal	MS comments and MS questions
	<p>flexibility to adapt to changing circumstances while taking into account the specifics of agricultural policy and bringing about a real reduction in administrative requirements.</p> <p>The required data should not be repeated in individual chapters.</p> <p>SI</p> <p>(MS questions):</p> <p>There is no clear distinction between chapters 2 and 3. Chapter 2 refers to "measures," while chapter 3 refers to "interventions." It is also unclear where CAP measures/interventions are actually taken into account. There is no clear distinction between measures and interventions.</p> <p>What does data sharing mean for the CAP?</p> <p>5: Milestones, targets and timeline</p> <p>What this means in the case of the CAP: Pay-out value [relevant for COM payments to the Member State]*</p> <p>It is unclear whether the milestones and targets are annual or otherwise. The text suggests that the milestones are qualitative in nature. It is unclear what kind of text (content) is expected here.</p>

Commission proposal	MS comments and MS questions
	<p>We believe that this field is superfluous. There are no secondary targets in the SN, but there were in the 2014-2020 RDP. Their purpose was solely for evaluation purposes. We estimate that there was no added value, but it was quite difficult to calculate.</p> <p>Indicative timeline for achievement – Does this relate to the target or milestone?</p> <p>What does it mean in the case of the CAP: Amount for managing authorities*</p> <p>Baseline – this is new – it was in the 2007-2013 RDP. The baseline will be difficult to determine in some cases.</p> <p>What does it mean in the case of the CAP: Unit value of commitment in the calculation of the average output value of agricultural actions</p> <p>Year – It is not clear whether this refers to the calendar year or the financial year. Can the year be defined as the year of the end of the programming period?</p> <p>Can you confirm that a description of technical assistance is not necessary? Only the finances should be entered in the table.</p> <p>SK</p>

Commission proposal	MS comments and MS questions
	<p>(MS comments):</p> <p>We recommend aligning the references in this annex with the relevant articles in the draft regulation (i.e., the relevant paragraph and letter).</p> <p>According to Article 22(q) and (r) (according to the English version), the Plan shall include the allocation of a minimum amount to contribute to social, climate, and environmental objectives.</p> <p>We propose to amend Table 7 by adding columns so that the SFC automatically calculates the Plan's contribution to these objectives.</p> <p>We recommend that regional characteristics be listed in the table in section 1.5 of the annex in a uniform format, i.e. in abbreviated form or in full, in accordance with Annex VII of the draft regulation.</p> <p>We request that, in addition to BY and RU, UA be added to Annexes V(e) and VII(e) in the context of border regions.</p> <p>SK</p> <p>(MS questions):</p> <p>In point 1.3 of Part 1 of Title I, the table requires describe how the measures included in the Plan are consistent with the objectives set out in “Other</p>

Commission proposal	MS comments and MS questions
	relevant national plans". Could you please specify which documents you are referring to?
ANNEX VI	<p>AT</p> <p>(MS questions):</p> <p>Reference to Art. 22 (2), point (i), letter (ii) does not appear to be comprehensible in this context. Clarification is requested.</p> <p>CZ</p> <p>(MS comments):</p> <p>The regulation does not clearly link the requirement to quantify contributions to the areas listed in Annex VI with the requirement to allocate at least 14% of NRPP resources to EU social objectives. In the Commission's proposal, interventions outside the specific objectives under Article 3(c) also count toward the 14% threshold, whereas Annex VI quantifies only ESF interventions under Article 3(c), and only in the four areas <u>of social inclusion, material assistance to the most deprived, child guarantees and youth guarantees</u> specified above.</p> <p>Annex VI is not fully aligned with the ESF Regulation. For example, regarding material assistance to the <u>most deprived</u> poorest persons, Article 6 of the ESF Regulation states that Member States may provide support,</p>

Commission proposal	MS comments and MS questions
	<p>while Annex VI of this regulation states that they must. Similarly, for the Child Guarantee and Youth Guarantee, the ESF Regulation mentions in its preamble that Member States should support them, whereas Annex VI assumes that support is mandatory.</p> <p>CZ</p> <p>(MS questions):</p> <p>Can the EC clarify, why exactly the 4 areas in Annex VI were chosen, and not any others, such as e.g. employment or skills?</p> <p>Does that mean, that although no precise allocation is set, all these 4 areas must be supported in at least one NRPP chapter?</p> <p>Do these areas have prescribed intervention field codes, or will Member States have some freedom to choose the most suitable intervention fields, e.g. for child guarantees or youth guarantees?</p> <p>DE</p> <p>(MS questions):</p> <p>DE believes that the reference to letter (ii) is a mistake. If not, could the Commission explain the idea behind it?</p>

Commission proposal	MS comments and MS questions
	<p>How is the term “deprived persons” to be understood? Why is the minimal national contribution not listed? Is it left to the MS to decide what a “region” is?</p> <p>FI</p> <p>(MS comments):</p> <p>there should be no overly detailed list of reforms and measures that should be targeted without taking into account the identified needs of Member States and regions. In addition, the Member States' capacity to support the above-mentioned measures at the national level should be taken into account.</p> <p>FR</p> <p>(MS questions) :</p> <p>Les instruments financiers JAI sont-ils concernés par l'annexe VI ? Ou s'agit-il de mesures d'intégration avec un impact de long terme, qui relèveraient ainsi plutôt d'autres instruments financiers selon le considérant n°6 du règlement sectoriel FAMI, celui-ci se concentrant sur les premières phases d'installation (article 3.1.d) ?</p> <p>Chaque mesure doit-elle être rattachée à des objectifs généraux et spécifiques, comme mentionné à l'article 22.2.c) ? Le point 5) de l'annexe</p>

Commission proposal	MS comments and MS questions
	<p>VI ne permet le rattachement des mesures qu'à des objectifs spécifiques et non des objectifs généraux.</p> <p>Est-ce que la Commission considère que tous les objectifs généraux et spécifiques plus sociaux sont compatibles avec les 4 mesures listées en annexe VI ?</p> <p>HU</p> <p>(MS comments):</p> <p>The references to Article 22 (2) point (i) letter (ii) are incorrect (the correct reference is point (g) (ii)).</p> <p>IE</p> <p>(MS comments):</p> <p>For countries that have a very high percentage of their allocation ringfenced for CAP, it will be a challenge to enact all of the objectives. Based on the Commission's outlines, we are expecting an effective cut to the CAP budget of approximately 20%. For Member States like Ireland, who receive the majority of their EU support as CAP funding, there will be very limited funding available to achieve the broad variety of measures listed in these annexes.</p> <p>NL</p>

Commission proposal	MS comments and MS questions
	<p>(MS questions):</p> <p>Why is the listing of topics in this Annex (to be used in table 1.7 (Annex V) limited to only four? Article 3.1.c (page 34) has a richer listing. The same holds for article 22.2.b.i (page 52).</p> <p>RO</p> <p>(MS questions):</p> <p>Why youth support is not included in ESF regulation as material deprivation support is ?</p> <p>SE</p> <p>(MS questions):</p> <p>How does this annex relate to the specific targets in art. 3.c and to the provisions in the ESF regulation?</p> <p>SI</p> <p>(MS questions):</p> <p>Reference to the content of the plan as set out in Annex V. The methodology is not apparent from the annex.</p> <p>Where and when are the indicative amounts allocated to the above categories of measures determined?</p>

Commission proposal	MS comments and MS questions
	<p>SK</p> <p>(MS comments):</p> <p>Explicit recognition of health under category (a) social inclusion: “Supported measures also include health interventions aimed at access to primary care, prevention, mental health, long-term care and strengthening the health workforce, where they demonstrably reduce social exclusion and barriers to accessing services.”</p> <p>Linking the Child/Youth Guarantees with specific health services: “Under letters (c) and (d), school- and community-based prevention programmes, child/youth mental health, vaccination, dental screening, etc., qualify as targeted actions.”</p> <p>SK</p> <p>(MS questions):</p> <p>Does COM consider explicit recognition of health under category (a), (c) and (d)?</p>
ANNEX VII	<p>AT</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The categories of regions should be consistent with the categories of regions in Annex II of the Performance Framework. (e.g., Annex VII(d) islands/Annex II islands and coastal areas).</p> <p>AT</p> <p>(MS questions):</p> <p>Could the Commission give an overview of which regions in the EU constitute more developed, transition and less developed regions according to the methodology described in Annex VII</p> <p>DE</p> <p>(MS comments):</p> <p>The reference in Annex VII to Art. 22 (2) point (h) is wrong. In our view, the Annex should be linked to Art. 22 (2) point (f).</p> <p>A clarification is needed that not to all of the listed categories of regions must necessarily be allocated resources.</p> <p>DE</p> <p>(MS questions):</p> <p>Does this Methodology for territorial contribution really only refer to Art. 22 (2) (h) and the CAP?</p>

Commission proposal	MS comments and MS questions
	<p>EL</p> <p>(MS comments):</p> <p>We fail to see how Annex VII constitutes a methodology. How this Annex helps planning? What we need is a breakdown tree of processes: from Chapters to M&Ts to Activities and Projects and the level of detail of each one.</p> <p>EL</p> <p>(MS questions):</p> <p><i>“For the purpose of Article 22(2), point (h), Member States shall allocate resources to the below categories of regions, taking into account:”</i></p> <p>For the purpose of Article 22(2), point (h), Member States shall allocate resources to the below categories of regions, taking into account:</p> <p>Will horizontal principles (complementarity, DNSH, equality/non-discrimination, environment) also apply to the selection of measures and the flow of payments?</p> <p>ES</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>For several programming periods, the EU fisheries fund has not been subject to different EU co-financing rates based on regional classification. Under the EMFF (2014–2020), co-financing was linked to the type of measures, and under the EMFAF (2021–2027), there is a single co-financing rate, always regardless of the region in which the support is granted.</p> <p>Fisheries is a non-territorialized activity with a single national plan since the beginning of the implementation of fisheries funds. Therefore, EU co-financing in this area should not be subject to regional classification. Currently, there is a single co-financing rate of 70% for all measures, with broad support from both the Council and the Parliament, clearly demonstrating the suitability of maintaining the co-financing system as it stands.</p> <p>FI</p> <p>(MS comments):</p> <p>The text of Article 22(2)(g), (i), and (h) and Annex V should correspond with each other.</p> <p>HU</p> <p>(MS comments):</p>

Commission proposal	MS comments and MS questions
	<p>The terminology used is not consistent and does not reflect the Single Plan Regulation. In relation to integrated territorial and urban development, it needs to be aligned with Article 22(h) and Articles 74–77.</p> <p>Ukraine is not mentioned in point (e), which is odd (in contrast, the country is mentioned in the ERDF Regulation, e.g. in Article 4.)</p> <p>IE</p> <p>(MS comments):</p> <p>For countries that have a very high percentage of their allocation ringfenced for CAP, it will be a challenge to enact all of the objectives. Based on the Commission’s outlines, we are expecting an effective cut to the CAP budget of approximately 20%. For Member States like Ireland, who receive the majority of their EU support as CAP funding, there will be very limited funding available to achieve the broad variety of measures listed in these annexes.</p> <p>PL</p> <p>(MS comments):</p> <p>The territorial aspect of NRP Plan is not sufficiently covered by Annex VII, which provides rather an accounting exercise after the Plan is prepared. Apart from less developed regions, other types of territories</p>

Commission proposal	MS comments and MS questions
	<p>compete for limited funding among one another and against a high number of obligatory objectives and recommendations.</p> <p>RO</p> <p>(MS comments):</p> <p>Consideration should be given for the harmonization of the provisions in the regulations so that "<i>eastern border regions</i>" to be defined as those NUTS2 regions of the Union that have a land or sea border with the Russian Federation, Belarus, or <i>Ukraine</i>, so that to adequately reflect the challenges they face</p> <p>RO</p> <p>(MS questions):</p> <p>e). Why Eastern border regions do not include Ukraine but are limited to NUTS 2 regions that have borders with Russia and Belarus? What is the rationale for such a limitation?</p> <p>SI</p> <p>(MS questions):</p> <p>Where and when are the indicative amounts allocated to territories determined?</p>

Commission proposal	MS comments and MS questions
	<p>SK</p> <p>(MS comments):</p> <p>We request that, in addition to BY and RU, UA be added to Annexes V(e) and VII(e) in the context of border regions.</p>