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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 1): MS comments and questions

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

NRPP proposal (Block 1)*(st 11815/25)***MS comments and questions**

Commission proposal	MS comments and questions
Proposal for a	
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	HU (MS comments): General comment regarding CAP: Hungary has already taken a firm stance on the CAP reform legislation for the period after 2027. We insist on maintaining an independent, two-pillar CAP, which must remain outside the Single Fund; we are fundamentally committed to a two-pillar CAP with its own budget, which must remain outside the NRP Fund. Based on the experience of previous programming periods, a mature, well-functioning CAP system has been established, which, with targeted simplifications, is an excellent and in many respects

	more advantageous alternative to the CAP under the NRP plan outlined in the Commission's proposal. A significant part of agricultural regulation is currently included in the draft NRP Regulation. We are convinced, that all CAP related rules, including the ones on its implementation and performance, should be regulated in the CAP regulation. Therefore, I call upon the Presidency to present a structured analysis of which articles from the NRPP Regulation and the Performance Regulation should be assigned to the CAP regulation in terms of content, in particular those that directly concern agricultural measures and instruments. Putting these articles to the CAP regulation would not prejudice the heads of states decision on the single plan. General comment on the Home Affairs funds: We consider it essential that the common rules respect the specific characteristics of the Home Affairs policy areas, either by defining these rules on the basis of general principles that apply not only to cohesion and agriculture, or by clearly incorporating the specific characteristics of these policy areas into the provisions. General comment regarding Interreg:
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	In the Single Fund regulation it should be indicated clearly which provisions shall not apply to the Interreg Plan and its chapters, similarly to Article 1(5) of the CPR (Regulation (EU)2021/1060). HU (MS questions): The draft legislation is much vaguer than the current CPR. Can we expect the Commission to lay down further detailed rules in other, subsequent legislation?
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	DE (MS comments): DE: In terms of simplification and of reducing administrative burden, the proposals are insufficient and contradict the Commission's announcements. The level of ambition of reducing administrative burden while safeguarding policy objectives and high standards must be raised significantly.] FR

	(MS questions): La Commission pourrait-elle préciser le titre du fonds et la raison pour laquelle ne sont pas reflétés les enjeux des affaires intérieures, comme la migration, la gestion des frontières et les politiques des visas ?
	RO (MS comments): We understand the overall objective to have a more strategic alignment and synergy among the different instruments, facilitating a more comprehensive and integrated approach to achieving EU policy objectives. Still, regrouping different sectors and policies can lead to a more general legislative framework that does not properly address sector/policies specificities and is likely to reduce effectiveness of the interventions. Strict and simultaneous alignment of the specific rules and objectives can be difficult, reducing the targeted impact on each area (cohesion, agriculture and rural development and fishery, internal affairs). In addition, centralisation of funds can have an impact on the application of the subsidiarity principle and the capacity of Member States to adapt measures to the local context, which gives a rigid character to the process of programming and implementing funds.

	RO (MS questions): It is important to clarify how the proposed architecture of the Fund / NRP Plans provides Member States and regions with the possibility to be flexible across policy areas, in order to address their specific needs while contributing to the EU priorities. If the logic is to step away from the current approach of ‘one <i>sectoral</i> Fund’ = one allocation’, it is important to explain to the MS how synergies and flexibility of EU funding could make available sufficient funds for all specific objectives, taking into consideration the specific provisions for programming and revision of NRP Plan (as presented in articles under block. 5). EC is invited to present how these issues could be effectively addressed at the level of the MS and subsequent risks could be tackled.
TITLE I GENERAL PROVISIONS	
<i>↓Article 1</i> <i>Subject matter</i>	FI

	(MS questions): Concerning the HOME activities, do this regulation set other rules than the financial rules for Union support (besides article 6 para 5, article 10 para 2 (a) (iii) and article 22 para 2 (b) (iii))? HU (MS questions): Without disputing the bracketed text, we ask the Presidency to clarify exactly what specific decisions we expect from the Heads of State and Government in the future regarding the bracketed text of Article 1. IE (MS comments): We support calls from other MS for Agri & Fisheries specific definitions to be moved to sectoral CAP and fisheries regs. IE (MS questions): Can the Commission prepare a comparison table that sets out which elements of which fund have been retained and now take precedence, vis-à-vis the payment deadlines, claim frequency, conditionality, etc?
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1. This Regulation establishes the ‘European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ Fund (the Fund). It lays down rules on:	BE (MS questions): Can the Commission list all the instruments/programmes that are now grouped under the NRPP? EL (MS comments): This Regulation establishes the ‘European Fund for Economic, Territorial, and Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security’ Fund (the Fund). It lays down rules on: (the word and is missing) EL (MS questions): How will the Region be represented within the NRPP? How exactly are the concepts of "prosperity" and "security" defined in the context of the proposed Fund, and what are the limits of their application, to avoid overlapping with other Union financial instruments, particularly in issues related to national defence or internal security?

	ES (MS comments): Observation regarding the relationship between Articles 1 and 2 of the Regulation and Title V. We think that support for the Common Fisheries Policy (CFP) should have its own dedicated title and not be subordinated to (CAP), as seems to be implied by the wording of Title V, particularly Article 35.11 and subsequent articles. However, within Title I on general provisions, support for the CFP is clearly identified as a priority objective, both in Article 1.1(a)(iii) and Article 1.2(d), as well as in Article 2.1(d), which identifies support for CFP as one of the general objectives of this fund, and Article 3.1(d)(iv), which establishes as a specific objective the need to ensure the sustainability, competitiveness, and resilience of fisheries and aquaculture. Therefore, we agree with how support for fisheries is addressed in Arts. 1 to 3, but we believe that these objectives have not been consistently reflected throughout the rest of the proposed Regulation, failing to provide fisheries and aquaculture with the distinct recognition they require—recognition that was indeed granted in previous Financial Frameworks. FI
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	(MS questions): Is Union support for asylum migration and integration, integrated border management and European visa policy and internal security for the period from 2028 to 2034 part of the ‘Fund’, i.e. does rules in reference to the ‘Fund’ apply also to DG HOME support? FR (MS comments): Les autorités françaises tiennent à rappeler qu'elles seront très vigilantes à ce que l'Union européenne continue à adopter une politique agricole commune robuste afin de garantir la souveraineté alimentaire européenne. Cela nécessite un budget à la hauteur de cette ambition, permettant de préserver les revenus des agriculteurs européens et de lutter contre toutes les formes de concurrence déloyale. Les autorités françaises avaient demandé, avant la publication des textes, que la PAC, y compris le POSEI, et la PCP restent des politiques communes à part entière, soumises à des dispositions spécifiques distinctes d'un éventuel fonds unique. L'architecture adoptée et l'articulation entre le règlement général et les règlements sectoriels nécessitent de multiples renvois entre les textes, ce qui constitue une source importante de
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	complexité réglementaire, contraire à l'objectif de simplification mené par la France et au niveau européen. FR (MS questions): Quelle sera la marge de manœuvre des Etats membres dans l'allocation entre les fonds ? Un Etat membre pourrait-il choisir d'allouer l'intégralité de ses fonds à un seul fonds ? IE (MS questions): What is the total per Member State allocated to the funds that now fall under the NRPP Regulation, both for the current MFF period and the previous one, including special allocations under EURI, etc. LV (MS comments): Latvia does not support the integration of the CAP and CFP into a single fund together with other policies. CAP and CFP must remain separate policies with specific regulations, appropriate and substantial funding firmly earmarked for all activities under each policy.
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	PL (MS comments): Before the new Fund can be accepted, there needs to be a certainty that it can deliver on the objectives on treaty-based policies it covers and that it follows Cohesion Policy rules: shared management, multilevel governance, partnership and place-based approach. PL (MS questions): Please explain how the NRP Fund will deliver on the objectives on treaty-based policies it covers. RO (MS comments): As a general comment for the funds from Home Affairs field, we would like to continue to sustain our concern that the new proposal of programming and managing of Home Affairs funds, respectively within NRPP and the new Horizontal Regulation is expected to produce more bureaucracy and difficulties in the accessing and managing of these funds. A separated Horizontal Regulation with general rules of programming,
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	implementation and reporting for Home Affairs funds will be welcomed by all Member States and also by the beneficiaries, taking into consideration the specificity of the funds. The fund's title is not suggestive and proportional to its funding areas, RO proposes the following title of the fund: <i>'European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity, <u>Migration, Borders</u> and Security'</i>
(a) tasks, priority objectives, organisation and grouping under the Fund of:	EE (MS questions): Article 3 paragraph 1 of the proposal establishes specific objectives. Will the intervention logic be pre-defined by the Commission? E.g. will it up to the MS-s to decide to which SO the fisheries related interventions contribute or all fisheries related interventions should go under paragraph 1 (d) (iv)? FR (MS questions):

	Une mention des fonds financiers justice et affaires intérieures pourrait-elle être ajoutée, plus précisément le fonds asile migration et integration, le fonds stratégique d'investissement et le soutien financier à la gestion des frontières et à la politique des visas (IGVF) ?
(i) the Structural Funds and Cohesion Fund;	
(ii) instruments for the common agriculture policy (the CAP);	CZ (MS comments): We propose that specific conditions related to the CAP should be moved from this Regulation to the CAP regulation. CZ (MS questions): To ensure legislative coherence, would the Commission consider moving the specific conditions related to the Common Agricultural Policy from this Regulation directly into the dedicated CAP regulation? RO

	(MS comments): As reiterated with several occasions, it should be carefully assessed the inclusion of CAP, under the Fund and NRP Plan. We still consider that CAP must remain a stand-alone policy, governed by its own specific regulation and supported by an ambitious and independent budget; direct payments and rural development should continue to function as two independent pillars, each with its own structure, objectives, and implementation logic. Furthermore, the exclusion of key areas such as the LEADER program, the European Innovation Partnership, advisory and training services, and EU schemes in schools jeopardizes the vitality of rural areas. All CAP rules, including those on implementation and performance, should be regulated in a single CAP Regulation; the current proposal creates fragmentation and additional bureaucracy. The CAP should be simplified and made more transparent.
(iii) instruments for the common fisheries policy;	RO (MS comments): Same considerations, as in section ii) above for CFP that should remain separately, as in the current programming period

(iv) instruments funded from the auctioning of allowances in the framework of the emission trading systems set up under Directive 2003/87/EC to address the social impacts of the introduction of an emission trading system for buildings and road transport on vulnerable households, vulnerable micro-enterprises and vulnerable transport users;	BE (MS questions): Can the Commission list the instruments concerned?
	RO (MS comments): New reference needed to elements which are specific to the Home Affairs Funds, specifically internal security, migration and border management and visa. RO proposal for amending the text: <i>(vi) support for internal security, for asylum, migration and Integration, for the Schengen area, for European integrated border management and for the common policy on visas.</i>
(v) support to security and defence capabilities.	AT (MS questions):

	Do the areas of “security and defense” referred to in this Article include the sectoral proposals AMI, IS, and BMV as well, as these are specifically mentioned in paragraph 2(e)-(g)? BE (MS questions): Can the Commission list the instruments concerned? EL (MS comments): There is no any subject related to HOME Funds. The defence and security capabilities are also covered within the ECF. Thus, we propose to add the following sub-paragraph “(vi) instruments for migration, integrated border management and internal security”. RO (MS questions): There is a need to clarify what remains eligible for funding under HE (strictly civilian) and what falls under the remit of the ECF and NRP Plan (including dual-use activities).
	ES

	(MS comments): <u>(vi) support to the area of freedom, security and justice without internal borders</u> ES (MS questions): Without prejudice to the fact of having proposed three separate legal instruments which lay down specific rules in the area of Home Affairs, the NRPP encompasses measures under this policy field and thus the area of freedom, security and justice without internal borders should be explicitly integrated in the subject matter of the regulation.
(b) the financial rules for Union support to be implemented by means of the National and Regional Partnership Plans (the ‘NRP Plans’), the Interreg Plan as set out in the Regulation XX [Regional development, Chapter II on the Interreg Plan] (the ‘Interreg Plan’) and the EU Facility (the ‘Facility’);	CY (MS questions): EU Facility will have any connection with Interreg Plan? Will I3 be included under EU Facility? CZ (MS comments): CZ proposes to set aside a separate plan for the CAP outside the National Partnership Plans.

	CZ (MS questions): Given the specific nature of the Common Agricultural Policy, would the EC consider establishing a separate, dedicated plan for the CAP outside the framework of the National and Regional Partnership Plans? RO (MS questions): NRP is implemented according to shared management principle. Clarification is needed in art 62(2) of the Financial Regulation in relation with the fact that for shared management purposes, the budgetary execution instruments are those provided in the sectoral rules. Can you please provide a mapping on the rules applied and the elements that still need to be regulated at the national level?
(c) the financial resources for the period from 1 January 2028 to 31 December 2034.	

2. The Regulations listed below may set out specific conditions to complement this Regulation which shall not be in contradiction with this Regulation:	AT (MS questions): It is unclear when a measure or specific objective pursuant to Article 3(1) falls or must fall under the provisions of one of the specific regulations listed under this para. We kindly ask for examples for the various funds? Related to this, the relationship between Article 22 and the provisions on the NRPP in the specific regulations is also unclear. For example, Article 22(2)(f) and Article 4 of the ERDF Regulation (Support for disadvantaged areas). CY (MS comments): There are certain provisions for which there will be a need to apply a derogation for certain provision. CY (MS questions): Any derogations from the general rules and provisions of the NRP, are they to be discussed only at the NRP ad hoc working group? How are the sectoral WG on the different auxiliary WGs pass on these needs for
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	derogation. Would derogations be stated in the auxiliary NRP regulations? And if so paragraph 2 should ne amended accordingly to allow for explicit derogations. FR (MS questions): Pour quelles raison ces fonds sont-ils séparés de ceux listés au point 1 ? RO (MS questions): If specific regulations establish that natural persons are not eligible, is such a provision complementary to or in contradiction with this regulation?
(a) Regulation XX [establishing the European Fund for Regional development including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034]	CY (MS comments): Regulation XX [establishing the European Fund for Regional development European Regional Developemnt Fund including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU EL

	(MS comments): (a) Regulation XX [establishing the European Fund for Regional Development Fund including for European Territorial Cooperation (Interreg) and Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034 NL (MS questions): Given that specific funds are named, why is LIFE not listed here? What role will LIFE activities for biodiversity play in the NRRPs? PL (MS comments): EFRD can be included in the NRP Fund provided that it can deliver on its goals in the new architecture. We assess positively a separate Plan for Interreg.
(b) Regulation XX [establishing the European Social Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing	LU

conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034]	(MS questions): Why is there no reference to “education”, cf. art. 2.1.b hereafter ☐ ...to support quality employment, education and skills and social inclusion PL (MS comments): ESF can be included in the NRP Fund provided that it can deliver on its goals in the new architecture.
(c) Regulation XX [establishing the Common Agriculture Policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to support the implementation of the Common Agricultural Policy (CAP) of the Union in accordance with Title III of Part III of the TFEU, ensuring a fair standard of living for the agricultural community and the availability of food, increasing agricultural productivity, stabilising markets, and supporting long-term food security from 2028 to 2034]	PL (MS comments): PL points out that the preferred solution in terms of the architecture of the Common Agricultural Policy is to maintain a two-pillar structure and a separate budget for the CAP. RO (MS comments): All CAP rules, including those on implementation and performance, should be regulated in a single CAP Regulation; the current proposal creates

	fragmentation and additional bureaucracy. The CAP should be simplified and made more transparent See also comments for art. 1(1)
(d) Regulation XX [establishing Common Fisheries Policy and Union's maritime policy as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of from 2028 to 2034]	PL (MS comments): CFP can be included in the NRP Fund provided that it can deliver on its goals in the new architecture. RO (MS comments): See comments for art. 1(1)
(e) Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 2028 to 2034	EL (MS comments): There is no any reference to the third aspect of existing AMIF, the return. We propose the new title “ Regulation (EU) [...] establishing the Union

	support for asylum migration, integration <u>and return</u> for the period from 2028 to 2034 “ FR (MS questions): Pourquoi n’y a-t-il pas de référence au NRP dans le nom du règlement, alors que la référence est présente pour les règlements (a) à (d) ci-dessus ? Est-ce que les fonds justice et affaires intérieures seront intégrés aux NRP ou fonctionneront-ils différemment ? NL (MS comments): Retain PL (MS comments): Union support for asylum migration and integration can be included in the NRP Fund provided that it can deliver on its goals in the new architecture. RO
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	(MS comments): See first comment related to the management of Home Affairs funds within a separated Horizontal Regulation, as it has been since the SOLID Programme.
(f) Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 2028 to 2034	NL (MS comments): Retain PL (MS comments): Union support for European integrated border management and European visa policy can be included in the NRP Fund provided that it can deliver on its goals in the new architecture.
(g) Regulation (EU) [...] establishing the Union support for internal security for the period from 2028 to 2034	NL (MS comments): Retain

	PL (MS comments): Union support for European internal security can be included in the NRP Fund provided that it can deliver on its goals in the new architecture.
(h) Regulation (EU) 202X/XXXX amending Regulation (EU) No 1308/2013 of the European Parliament and of the Council¹ as regards the school fruit, vegetables and milk scheme ('EU school scheme'), interventions in certain sectors, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties and rules on the availability of supplies in time of emergencies and severe crisis, to the extent relevant to the support under this Regulation.	DE (MS questions): DE: In MS in which federal states are responsible for implementing the scheme, does the EU school scheme have to be implemented as a mandatory CAP intervention in every federal state?]

¹ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671, ELI: <http://data.europa.eu/eli/reg/2013/1308/oj>).

In case of doubt about the application between this Regulation and the policy-specific regulations referred to in the first subparagraph, this Regulation shall prevail.↓

FR

(MS questions):

La régularité du point 2) de l'article 1er du règlement, qui établit la primauté systématique de la réglementation du Fonds sur les réglementations sectorielles en cas de contradiction, pourrait-elle être démontrée par la Commission ?.

RO

(MS questions):

The principle "lex specialis derogat legi generali" dictates that specific regulations take precedence over general ones, as they are tailored to particular contexts and needs. Please provide the rationale on this legislative option taking into consideration that the general regulation prevails over specific ones

SE

(MS questions):

Can the Commission provide more details on which articles apply to the Interreg Plan? It is unclear as the Regulation sometimes explicitly states

	that the Interreg Plan is covered, sometimes explicitly states that it is not covered but, in most cases there is no information.
<i>Article 2</i> <i>General objectives of the Fund</i>	AT (MS questions): It is unclear under which general objective the respective specific objectives (Art. 3) are placed. How do these objectives relate to each other? ... DE (MS questions): In the COM proposal, transition is addressed as follows: digital transition, clean industrial transition and green transition for a thriving agri-food sector. According to COM is transition a cross-cutting policy objective going beyond the mentioned text references in the proposal, that encompasses different sectors (i.e. to adapt to regional structural change as well as to strengthen sustainable development and resilience in the sense of Art. 3 Para 1 lit a (x))?) FI

	(MS questions): Why Home affairs sector is not included in the list of general objectives? HU (MS questions): It is extremely important to clarify the definitions and ensure consistent use of the terms applied in the regulations. For example, "measure" can mean reform, investment, or other intervention at the Member State-level or below. We also consider it necessary to address cases where the Single Fund Regulation and, for example, the Financial Regulation provide different definitions for a term. PL (MS comments): The requirement to implement all the general and specific objectives of the Fund is excessive and does not allow for flexibility in programming. The objectives should be treated as an open catalogue for Member States to choose interventions most suited to their specific situation, also at regional level. PL
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	(MS questions): Please explain whether the intention is that Member States are required to implement all of the Fund's general and specific objectives, or is there some flexibility in their application? Having in mind flexibility the wording should be adjusted accordingly.
	EL (MS comments): There is a lack of matching/association between the general objectives of Article 2 and the specific objectives of Article 3. It is considered appropriate to establish a correlation between the general and specific objectives. EL (MS questions): Indicate how general and specific objectives are correlated. To which general objective corresponds each specific objective? PT (MS comments):

	A reference to Defence is lacking in Article 2 (General objectives). Given that the NRPPs will complement and reinforce the European defence strategy outlined in the White Paper on European Defence, acting as a platform for national and regional cooperation to mobilise resources, foster innovation and ensure the allocation of defence funding, the absence of an explicit reference to “defence” in article 2 seems inconsistent, especially as Recital 16 and Article 3 do explicitly mention it.
1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives:	AT (MS questions): For example, there is uncertainty regarding the allocation of the general objective of economic and territorial cohesion (Art. 2 (a)). Are climate and environment horizontal objectives in all of these policy areas? Where would this be stipulated? In the proposal it is not ensured that funds will be allocated to the environment and climate in all policy areas. How does the EC intend to ensure that environment and climate are addressed in each policy area? DE (MS comments):

	Fostering competitiveness is a main field of cohesion policy. With the second pillar of the MFF, the competitiveness fund, it must be clarified in both regulations, that competitiveness can be supported in both pillars. Reinforce the general objective of potential growth increase in line with the CSRs that have to be addressed in the NRPPs by inserting ‘potential growth’ as an additional objective.] DE (MS questions): Do the general objectives cover all specific objectives of Art. 3?] ES (MS comments): ES considers it important that the general objective more explicitly reflects the goal of environmental protection, biodiversity conservation and nature restoration. This is particularly relevant given the disappearance of the LIFE Programme, which, despite its limited resources, had been the only programme dedicated exclusively to the environment and nature until now FR (MS comments):
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	L'inclusion des objectifs plus spécifiquement concernés par la PAC sous la rubrique « Maintenir la qualité de vie dans l'Union » ne semble pas refléter l'ensemble des objectifs, en particulier les objectifs économiques de la PAC. FR (MS questions): Pourquoi la Commission n'a-t-elle pas inséré un objectif général lié aux affaires intérieures et à la gestion des frontières dans ce paragraphe ? La PAC est-elle concernée par tous les objectifs spécifiques du fonds ? Comment ces objectifs devraient-ils être traités dans le chapitre consacré à la PAC du PPNR ? HR (MS questions): Is a “measure” an equivalent to a specific objective (as in the 2021–2027 period), a priority, or another planning unit entirely? What is the definition of a measure? As currently formulated, it appears that a measure is situated above activities but below the chapter level. A clearer definition is necessary to
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	ensure consistent interpretation and implementation across Member States. IT (MS comments): Proposed amendment: <i>With the overall aim of promoting economic, social and territorial cohesion, higher standards of living for European citizens, the sustainable development and competitiveness of the Union and its security, the Fund shall support the following general objectives</i> LT (MS comments): Separate new general objectives: - to increase resilience in the Union - to cover fully the Home Affairs area LT (MS questions):
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	Given that the security and defence area is becoming increasingly relevant on the EU agenda, we believe that it is of utmost importance to establish these aspects in the legal basis of the new MFF, therefore we propose to name increasing resilience as one of the general objectives of the fund in Article 2 of the NRPP Regulation NL (MS questions): Has the Commission considered adding environmental cohesion here? This would be an important objective also PL (MS comments): The goal on asylum, migration, integration, internal security and Schengen should be included here as per TFUE. Combining cohesion and security is however doubtful. RO (MS comments): The Home Affairs funds (HA) are not part of the general objectives, at least not specific if the COM has considered that the general objective from
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	point (e) is referring to these domains and our proposal, considering the importance of HA funds (from many perspectives) to a secure Europe, is to be included in the general objectives. RO proposed text: With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its internal security policies and its preparedness, the Fund shall support the following general objectives: SE (MS questions): Is resilience included in the wording "its security and its preparedness"? Would it be good to express this explicitly, i.e. "its security, its resilience and its preparedness"? Furthermore, we are not sure we have understood correctly what the Cion. has said in Council working group meetings. Is there a link between the five general objectives in Article 2 and certain of the specific objectives in Article 3? If so, it would be helpful if the Cion. could clarify which specific objectives that relates to each general objective. For
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	example, which specific objectives are linked to the general objective 1. (a) in Article 2? SK (MS comments): We request that a new "general objective" be added, as the general objectives do not include the content of Title V of the Treaty on the Functioning of the EU (it only mentions reducing regional disparities, employment, fisheries policy, democracy, etc.). The agenda of border protection and visas, internal security, migration, and asylum is not covered. SK (MS questions): Why are home funds absent from the general objective? Does the COM consider adding home funds to the general objective to comply with Title V of TFEU?
(a) to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial	DE (MS comments):

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

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

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

DE

(MS questions):

How does the Commission proposal address the challenges facing transition regions?

How does the Commission proposal intend to ensure that funding is directed towards structurally weak areas at a fine-grained level?

How is this general objective (convergence/regional focus) translated into the specific objectives of Art. 3 where many objectives address Union goals and are directed towards "all regions"?]

	FR (MS comments): Pour une meilleure compréhension de l'objectif général, il serait opportun de compléter l'article en reprenant exhaustivement l'article 174 du TFUE de façon explicite. Proposition de complément : « Parmi les régions concernées, une attention particulière est accordée aux zones rurales, aux zones où s'opère une transition industrielle et aux régions qui souffrent de handicaps naturels ou démographiques graves et permanents telles que les régions les plus septentrionales à très faible densité de population et les régions insulaires, transfrontalières et de montagne. » FR (MS questions): La Commission pourrait-elle apporter des précisions sur les infrastructures éligibles à ces financements ? En particulier, concernant les RUP et territoires insulaires, quelle articulation est prévue avec le MIE-T pour renforcer leur connectivité et intégration?
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	Comment ce règlement, et plus particulièrement les articles 2 et 3 s'articulent avec les autres textes du paquet, notamment le fonds de compétitivité ? Comment s'articule cet objectif avec l'article 176 du TFUE relatif au FEDER qui stipule que le FEDER est destiné à contribuer à la correction des principaux déséquilibres régionaux dans l'Union par une participation au développement et à l'ajustement structurel des régions en retard de développement et à la reconversion des régions industrielles en déclin ? NL (MS comments): Retain PL (MS comments): We support including Ten-T networks in this objective. However, other national, regional and local infrastructure should also be supported. PL (MS questions):
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	Please explain if national, regional and local infrastructure can also be supported under this objective. Please explain if infrastructure located in border areas (the eastern border of the EU) in the transport sector could also be supported under this objective. RO (MS comments): It would be important for this paragraph to highlight more explicitly that transport infrastructure is an important element in reducing regional disparities. The reference to trans-European networks in the field of transport should be emphasized, as the development of a coherent transport network directly supports economic cohesion, mobility, and territorial integration within the Union. RO (MS questions): It could be considered to improve wording to deliver a more comprehensive formula possible for environment, energy and transport infrastructure objectives among the objectives related to the Plan/Fund, so as to ensure complementarity with the objectives of the Competitiveness
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	Fund and CEF and to enable the objectives of economic and social convergence to be pursued appropriately through financing actions SE (MS questions): We cannot find this general objective in the performance framework. What policy areas in the performance framework are meant to deal with this objective? SI (MS comments): a) to reduce regional <u>and development</u> imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation SI (MS questions): Why is it written “including supporting projects in the area of the environment and trans-European networks in the area of transport infrastructure”?

(b) to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;	NL (MS questions): Has the Commission considered referencing the wider transition including to a nature-positive and circular economy and society, besides climate neutrality?
(c) to support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU;	CY (MS comments): To support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU; CY (MS questions): Typo LU (MS questions):

	LU: We understand that on farm investments for transformation are still eligible for CAP support, what about transformed annex I products for cooperatives or other organisations? PL (MS questions): Please explain if it is possible to support bioeconomy, food manufacturing, ecosystem services, forestry and forest economy, public infrastructure in rural areas, rural tourism as well as eco-education under CAP support. RO (MS comments): See comments in Article 1
(d) to support the implementation of the common fisheries policy of the Union in accordance with Part Three, Title III of the TFEU;	CY (MS comments): In Part Three, Title III of the TFEU the term ‘agricultural’, shall be understood as also referring to fisheries, having regard to the specific characteristics of this sector. It is therefore unclear based on the NRP

	new approach what articles and which provisions apply to fisheries and what provisions apply to agriculture. Therefore, there is a need to specify in all sections and have separate chapters and or articles for legal certainty and clarity. This included also provisions related to bracketed financial resources FR (MS questions): Comment s’articule cet objectif avec le règlement sectoriel établissant le soutien à la politique communes des pêches le pacte Océan et la politique maritime et aquacole de l’Union ? RO (MS comments): See comments in Article 1
(e) to protect and strengthen democracy in the Union and uphold Union values in accordance with Article 2 TEU.	AT (MS comments): Security (home funds) should be included in lit. e AT

	(MS questions): Why are policy areas of home funds not mentioned here? Security should be included. CZ (MS questions): Is there any link between this objective and the horizontal principles in Art. 8 and 9? If so, which one? FR (MS questions): Cet objectif est-il lié au respect des conditionnalités ? Quelle articulation est prévue avec le règlement AgoraEU?
	ES (MS comments): <u>(f) to support the area of freedom, security and justice without internal borders in accordance with Article 3 (2) TEU and Title V of the TFEU;</u> ES

	(MS questions): In line with the suggestion made on Article 1, the general objective in the Home Affairs area should also be incorporated in this article. IT (MS comments): No general objective is included to address the sustainability aspects mentioned in the aim. It could be useful to include an additional objective, e.g.: “ (f) to contribute to the shift towards a sustainable, circular, resource-efficient, net-zero, and resilient economy, in order to protect, restore, and improve the quality of the environment - including air, water, and soil - and to halt and reverse biodiversity loss and tackle the degradation of ecosystems, including by supporting the implementation and management of the Natura 2000 network, in accordance with the principles of environmental protection and sustainable development enshrined in TFEU”. This will add consistency to the text in relation to the specific objective (x) of Article 3(1).
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<i>Article 3</i> <i>Specific objectives of the Fund</i>	DE (MS questions): The funding objectives outlined here are not differentiated based on region categories as in the current funding period of cohesion policy. Why does the Commission proposal not adopt a differentiated approach to the cohesion funding schemes?] FI (MS comments): The list should be indicative and much shorter with broad policy scope; The list should be more like policy-areas instead of specific objectives; EU rural areas cover 80 % of its territory. Thus, they could be emphasized even more. Overall, the article 3 should more clearly address the needs of both rural and urban areas. FI (MS questions):
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	Should all chapters of the plan contribute to all specific objectives including all sub-points (i.e. for example being applied also for possible territorial and regional chapters)? Can a plan include also other objectives than those in article 3? This would be crucial for taking into account the specific national, regional and territorial challenges. HU (MS questions): Can one policy area belong to two specific objectives? For example, regarding asylum, migration, and integration, the social integration of third-country nationals legally residing in a country could fall under both SO2 and SO3 (Article 3(1)(b) and (c)). IE (MS questions): 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?
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	Will funding for supports under this article be separate from the CAP eg. 1.(a)(x) water quality and if yes, is there a risk of double funding? LV (MS questions): Draft Regulation "Proposal for a Regulation of the European Parliament and of the Council establishing the European Economic, Social and Territorial Cohesion, Agriculture and Rural, Fisheries and Maritime Affairs, Welfare and Security Fund for the period 2028 to 2034" specifies the following support for transport and communications in Article 3(1): - improving EU transport infrastructure and promoting the completion of TEN-T, in particular the TEN-T core network and the extended core network, supporting the green and digital transition of transport; - strengthening EU military mobility, in particular by developing dual-use TEN-T infrastructure; - strengthening critical energy and transport infrastructure and cybersecurity. Please provide more details on the planned support, given that similar support for transport is also planned under the Connecting Europe Facility (CEF) instrument as well as in the European Competitiveness
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	Fund in the EU's multiannual budget for 2028-2034 in accordance with the published proposals for regulations (Proposal for a Regulation of the European Parliament and of the Council establishing the Connecting Europe Facility for the period 2028-2034, amending Regulation (EU) 2024/1679 and repealing Regulation (EU) 2021/1153; Proposal for a Regulation of the European Parliament and of the Council establishing the European Competitiveness Fund (ECF)). We would like to understand in more detail what support will be provided by each of the financial instruments for transport and communications, avoiding duplication of support measures and ensuring synergy. RO (MS comments): We expect a clearer/better correlation between <i>the general objectives outlined in Article 2</i> (which is anchoring the regulation within the framework of the Treaties on European Union (TEU) and the Functioning of the European Union (TFEU)), and <i>the specific objectives detailed in Article 3</i> which concentrate more on the operational agenda of the EU. For instance, for the specific objective on defence (art. 3(1)e), it is difficult to link it to one of the general objectives indicated in art. 2, even if “defence” specific objective is addressing the “readiness/preparedness”
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	embedded under the overall aim of the Fund/NRP. Similar consideration could be given to the fishery policy defined as general objective (art. 2(1)d), but elements related to fishery and aquaculture or coastal areas and blue economy are reflected as a sub-objective under the “quality of life” specific objective under art. 3(d)iv); if fishery and blue economy are sufficiently important to be defined as a general objective, clearer delimitations/emphasis could be made under the specific objectives. If the general objectives serve as the foundational principles/goals for the Fund, we understand that the specific objectives are translating the current challenges and the strategic agenda of the Union, but they need to be intercorrelated. In sum, the general objectives in Article 2 could provide the general compass for the Fund, while the specific objectives in Article 3 chart the operational course, creating a structured and consistent framework for EU policy delivery. RO (MS questions): There must be a material hierarchy/link and clearer correlation between the general objectives as they were constructed in Art. 2, which aims to ensure
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	the link with the TFEU/TEU, and the specific objectives in art. 3, this one being more focused on EU agenda. Thus, establishing this material hierarchy/link between general and specific objectives is likely to ensure legal coherence and clarity in Fund/NRP Plan implementation; therefore, there is a need for clarification if the specific objectives could be addressed through one or more funding chapters of the Plan. While correlating art. 22(2)a and art. 3, <i>should NRP Plan contribute to all specific objectives and to all specific sub-objectives, or the obligation is limited to all specific objectives (as listed in art. 3 (a)-(e)) and to some/most relevant sub-objectives of each specific objective?</i>
	EL (MS comments): There is a lack of matching/association between the general objectives of Article 2 and the specific objectives of Article 3. It is considered appropriate to establish a correlation between the general and specific objectives.

	Culture has been interpreted as a value and has been decoupled from the sustainable prosperity of the Union and the attractiveness of regions. This should be re-examined. Confusion is created when one looks into the table with the intervention fields, where culture seems to be also seen as part of specific objective (a) and not as part of specific objective (e). Please clarify and make the necessary adjustments in article 3, where necessary. EL (MS questions): A healthcare infrastructure can be funded under specific objective 2(iv)? If not, are we to understand that each specific objective corresponds to a specific Fund (i.e. 2a-ERDF/CF, 2c-ESF)? In such a case from which specific objective a healthcare infrastructure will be funded? RO (MS comments): Despite the fact that there are provisions referring to technical assistance (TA) (art. 12-13), there is difficult to link TA to any specific objective,
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	which might generate difficulties in complying with the requirement that NRP Plan (understood as all measures, TA support included) to address all specific objectives RO (MS questions): Should it be considered that TA to be reflected under each specific objective or reference under a specific objective? Should be understood that accessing TA is conditional upon reforms aiming at strengthening the administrative capacity for each sector/policy area?
1. The general objectives referred to in Article 2 shall be pursued across all regions through the following specific objectives:	AT (MS comments): Some of the specific objectives formulated are not sufficiently clear. For example: lit. (a)(i) What are “territorial services,” particularly in contrast to “services of general interest”?

- There are overlaps between the specific objectives in Art. 3) (1) (a) (x) and Art. 3) (1) (d) (v). How can these be distinguished/separated from one another?
- The Fund should also support the development of regions based on their conditions and development potential.
- Consistent use and application of CAP definitions across all regulations (NRP Regulation, CAP Regulation, Performance Regulation) should be ensured in order to avoid contradictory or parallel definitions in different legal acts. We recommend that all terms and definitions be reviewed and standardized

AT

(MS questions):

In the AHWP NRP on 11 September the Commission representative explained that all specific objectives have to be met at national planning level. Can the Commission further explain what this means in practice?

BE

(MS questions):

	Do all these specific objectives (and sub-specific objectives) have to be addressed in ‘all regions’? Not all of the sub-specific objectives seem relevant for all regions or member states. This might pose a risk to the aim to remain focus on region-specific needs and objectives (link with article 22). What is the link between the general objectives and the specific objectives? How can the investment priorities (the specific objectives) be connected to the various general objectives? CY (MS questions): The Objectives concerning Interreg Plan are only the Art.31.a and c without any minimum allocation? DE (MS comments): In principle, Germany agrees with the general and specific objectives of the proposed regulation and welcomes the fact that the various areas of support are adequately reflected therein. However, the list of funding objectives in Art. 3 should be strategically focused in terms of European added value.
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	MS should focus on their primary investment and reform needs (national or regional level) based on development concepts. Primary investment and reform needs of MS must be in line with the European policy objectives focused on EU added value.] DE (MS questions): When the regulation states “across all regions” does this include the national/central level as well? Are there maybe inconsistencies in the text?] FI (MS questions): How should the objectives set in the proposals for regulations in the Home Affairs sector be seen in relation to the objectives set in the NRP Regulation, are the objectives and funding in the Home Affairs sector a separate entity implemented in synergy and in line with the objectives of the NRP Regulation proposal, but otherwise as a separate entity? FR (MS questions):
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	Les objectifs spécifiques liés aux affaires intérieures pourraient-il être insérés dans ce paragraphe, au-delà de la cohérence mentionnée entre le renforcement de la sécurité de l'Union et les objectifs définis par les trois règlements sectoriels portant sur les affaires intérieures ? En effet, les affaires intérieures couvrent un champ plus large que la sécurité de l'Union : asile, integration, politique des visas... De plus, l'annexe V (Titre 1, 1.1) ne renvoie qu'aux objectifs spécifiques de l'article 3 du règlement PPNR. L'ensemble des objectifs spécifiques et généraux doivent-ils être soutenus dans toutes les régions (notamment en ce qui concerne les régions non côtières pour la pêche) ? La Commission pourrait-elle décrire le lien entre ces objectifs spécifiques, les indicateurs de performance et les corrections financières appliquées par la Commission au regard du principe de « cohérence des paiements avec les indicateurs transmis » ? HR (MS questions): What is the meaning of 'primary' and 'secondary' specific objectives stated in the Plan template?
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	The Regulation does not clarify what is their meaning. IE (MS comments): There are 5 very broad objectives set out in article 3. However, the financial allocation for each Member State, and the funds available to meet these objectives will vary widely. The CAP, in the current period, have common, specific objectives, that help to ensure a level playing field between Member States. It is difficult to see how NRP Plans will adopt this approach, given the breadth of the objectives listed. Greater clarity is needed regarding the calculation of respective PO, MS and EU contributions to funding Eligible Expenditure under PO schemes' [and source of finance for non-ringfenced funds such as Leader) PL (MS comments): The requirement to implement all the general and specific objectives of the Fund is excessive and does not allow for flexibility in programming. The objectives should be treated as an open catalogue for Member States
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	to choose interventions most suited to their specific situation, also at regional level. PL (MS questions): Please explain whether the intention is that Member States are required to implement all of the Fund's general and specific objectives, or is there some flexibility in their application? Having in mind flexibility the wording should be adjusted accordingly. Please confirm that the term "across all regions" does not mean that support of every general and specific objective of the Fund should concern each and every region. Which general or specific objective should be understood as territorially concentrated with the focus on territorial tools? Is it only the specific objective (a)(i) or others as well?
(a) to support the Union's sustainable prosperity across all regions by:	AT (MS questions):

	Many areas, particularly under lit.a (cohesion objective), could just as easily be purely sectoral objectives (e.g., strengthening the Union's industrial base, support for tourism, the Union's defense capacity). Multiple allocations would also be possible. On what basis, therefore, can measures be assigned to and programmed under the cohesion objective or the objectives of the ERDF in accordance with Article 2(a)? BE (MS questions): Is the general objective of reducing disparities between regions (2.1.a) pursued through the specific objective (3.1.a)? Does the ERDF support anything other than the investment priorities identified under points (i) to (x) of Article 3.1.a? DE (MS comments): It should be clarified that the support for the Union's sustainable prosperity should be based on regional development strategies. Art. 3 (1) (ii) does not exclude big companies from the NRPP support. We request a clarification on the relationship between NRPP and ECF funding. This accounts in particular for the possibility to support big
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	companies under NRPPs and the new ECF (second pillar). NRPPs should be focussed on funding competitiveness of SMEs like beforehand under Cohesion Policy.] DE (MS questions): See above, sustainable development is a matter of the national / central level rather than a matter across all regions, are there maybe inconsistencies in the text?] PL (MS comments): The Treaty objective of Cohesion Policy should be clearly emphasised in this article as part of the specific objectives (the EC draft_only includes social cohesion in point c) of Art. 3.1). Reducing the objectives of cohesion policy in the field of economic and territorial cohesion solely to ‘sustaining prosperity’ seems inadequate and diminishes the importance of Cohesion Policy. PL (MS questions):
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	Please explain if the subpoints to this specific objective are examples of actions to be taken or are they sub-objectives that also have to be fully implemented. RO (MS questions): Sustainable prosperity is a general objective, and it needs to be contextualized for the clarity of the provision and to avoid overlap SE (MS comments): We note that SMEs are generally missing from the points under a). SMEs, regardless of industry, should be covered. SE (MS questions): Are those objectives listed under (a) linked only to the general objective 1 (a) in Article 2? See also the question under Article 2. Has the importance of interventions in SMEs decreased compared to the current programming period?
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(i) fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and rural areas, including support for territorial services and infrastructure;	AT (MS comments): proposed wording: ...for territorial services and <i>sustainable</i> infrastructure CY (MS comments): fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban, <u>coastal</u> and rural areas, including support for territorial services and infrastructure; DE (MS comments): DE believes that Cohesion Policy should be a central instrument that provides 'reasons to stay' in a region also in structurally weak regions rather than postulating a 'right to stay'.] EE (MS questions):

Article 3 paragraph 1 point (a) (i) establishes that fostering the attractiveness of territories to support the right to stay may be supported including by supporting strategies for the integrated development of urban and rural areas. Is it solely up to the managing authority to decide, when to use regional strategies as the basis for this specific objectives and when not? Are there any additional requirements to consider when implementing this specific objectives not based on territorial strategies

LV

(MS questions):

The text of Article 3 (1) (i) states ‘supporting strategies for the integrated development of urban and rural areas’, and this legally mandates an integrated approach, but we would like to ask for the EC’s interpretation on whether ‘integrated development of urban and rural areas’ allow funding for urban-only or rural-only strategies, or must support be strictly integrated for both.

NL

(MS questions):

	Has the Commission considered including objectives like ‘territorial development’ and ‘well-being’, marked as objectives in the vision for rural areas, within this proposal, either as general or specific objectives? PL (MS comments): The provision concerning the "right to stay" appears to lack clarity and would benefit from further specification to ensure legal certainty and consistent interpretation across Member States. PL (MS questions): How should we understand “the right to stay” in this subpoint and what are implications for implementing the strategies in practice? Please explain if this priority allows for the inclusion of regional health strategies as part of efforts to foster territorial attractiveness, and whether territorial services may include healthcare-related services and infrastructure. Taking into account the role of culture in fostering the attractiveness of territories and reducing disparities in territorial development, please
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	explain whether investments in cultural infrastructure (historical and non-historical) are possible also outside integrated development strategies - as long as they pursue this goal. PT (MS comments): Fisheries communities should be mentioned: (i) fostering the attractiveness of territories to support the right to stay including by supporting strategies for the integrated development of urban and , rural <u>and fisheries and aquaculture</u> areas, including support for territorial services and infrastructure; RO (MS questions): In this context, the strategies for the integrated development of urban and rural areas could refer also to the "integrated territorial development and urban development strategies" in the meaning of Art. 75, as base for the integrated territorial development? SE (MS comments):
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	The objective should be formulated so that it is about promoting regional competitiveness in territories to offer attractive environments for businesses and residents to live and work in. SE (MS questions): - SE do not understand this specific objective. The attractiveness of territories is very much dependent on pursuing other proposed specific objectives. We do not see how strategies for integrated development can be an objective in itself. - The EU Regional Competitiveness Index measures the ability of a region to offer an attractive environment for firms and residents to live and work. Can the Commission explain how “the right to stay” capture the importance of regional attractiveness for competitiveness?
(ii) strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises,	AT (MS comments): • The enhancement of sustainable manufacturing while safeguarding and boosting competitiveness in the pharmaceutical sector is crucial for

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

achieving a clean industrial transition and should therefore be highlighted, e.g.: “[...] in particular in the areas of net zero and critical raw materials technologies *as well as pharmaceuticals* [...]”

- “supporting the competitiveness and growth of SMEs” should be added - either as an own sub-para or included in (ii)

AT

(MS questions):

It is unclear if and how this sub-point relates to (v) research, innovation... Could EC please explain this?

Would focusing on industrial base mean that not all businesses would be eligible for support?

DE

(MS questions):

How is the “full integration of environmental and climate ambitions” to be ensured?

How to avoid double funding or the duplication of support structures for big companies under NRPPs and the ECF? How to maintain the former focus of Cohesion policy on the funding of competitiveness of SMEs?]

	FI (MS questions): Is this the only specific objective to support SMEs? FR (MS comments): Afin de mieux prendre en compte les spécificités des RUP, l'ajout d'une référence aux "très petites entreprises" serait opportun. FR (MS questions): Quelle articulation avec le FEC et le fonds Horizon sur le financement de projets, notamment pour les secteurs à haute intensité énergétique, comme les carburants durables ? HU (MS comments): We generally agree with the goals set out, i.e. the strengthening of the industrial base, building resilient supply chains, boosting manufacturing,
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	but it has to be a general approach across all sectors, especially in the case of supporting SMEs. HU (MS questions): It is important to clarify whether the wording “strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing” applies only to “net zero and critical raw materials technologies” and to “clean industries”, or to any other important industrial and service sectors of the Union as well. Therefore, we ask for the clarification of the potentially restrictive meaning of the “special attention” part of the sentence. Additionally, it is not clear what is the purpose of underlining the end of the paragraph (“by fully integrating environmental and climate ambitions to accelerate a clean industrial transition”). IT (MS comments): The current wording should be made clearer and broader, in order to explicitly include support for SMEs among the objectives, also in line with what is set out in COM (2025) 555, taking into account the role that SMEs
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	play in the composition of the EU's productive system, and the importance of cohesion policy resources in supporting their development. Wording proposal: (ii) <i>strengthening the Union's industrial base and small and medium-sized enterprises competitiveness, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small and medium-sized enterprises, <u>also by fully integrating environmental and climate ambitions to accelerate a clean industrial transition</u>;</i> Alternatively, a specific objective in support of SMEs could be introduced, similar to what is provided for in COM(2025) 555. <i>(ii. bis)</i> <i>enhancing competitiveness of SMEs, addressing market failures and suboptimal investment situations, including by productive investments and by facilitating access to credit, in order to deliver targeted financial support to companies throughout their entire life cycle;</i> LV (MS comments):
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	Article 3 (1) (a) (ii) mentions the strengthening of Union's industrial base (including critical raw materials technologies) as one of the specific objectives. In order to fully integrate sustainability ambitions, it should be stated that circular critical raw materials technologies are included in the specific objectives. LV (MS questions): Do we understand correctly that this SO covers also circular economy? NL (MS comments): Retain strengthening the Union's industrial base, resilient supply chains and boosting sustainable and, competitive and circular manufacturing, in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean industrial transition; NL
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	(MS questions): Suggestion to insert. Preference for second “circularity”; first one is more optional. What does the Commission consider raw materials? Does it also include ecosystem services? A wide scope would be beneficial. PL (MS comments): We suggest adding here areas of support resulting from Critical Medicines Act. PL (MS questions): Please explain if this priority allows for supporting the development of pharmaceutical supply chains and sustainable manufacturing, including the production of pharmaceutical products and active pharmaceutical ingredients (APIs) at the national or regional level. RO (MS questions):
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	How does this specific objective correlate with the one in (b), point (i) from the perspective of investments in industry? Additionally, the ongoing mechanism for inter-relation is unclear when Competitiveness Seal projects are involved, especially in relation to the associated budgetary allocations, the limits and sources tied to them, and how the already committed reforms and targets will be handled. SE (MS comments): It is important to mobilise and focus actions on regional and national areas of strength. The wording could be aligned with the EU Competitiveness compass. SE (MS questions): 1. Does “industrial” cover all industries, also services? It is not evident in the context, especially as tourism has its own proposed specific objective. 2. Would it not be better to start off the sentence with the objective to strengthen the Union’s competitiveness by building on its strengths instead of “industrial base”?
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	3. How does the proposal relate to current provisions for the Regional Development Fund when it comes to the size of the enterprises that can be supported? Differences, similarities? 4. How does the proposed objective capture the importance of competitiveness put forward in the EU Competitiveness compass: closing the innovation gap, decarbonising the economy and reducing dependencies? Which investments do the Commission foresee under “strengthening the industrial base”: funding to the industry for its transition or rather investments in an enabling infrastructure? SI (MS comments): (ii) strengthening the Union’s industrial base, resilient supply chains and boosting sustainable and competitive manufacturing, in particular in the areas of net zero and critical raw materials technologies, <u>digital and deep technologies and biotechnologies, enhancing sustainable growth and competitiveness of enterprises, job creation and productive investments</u>, with special attention to the competitiveness of small- and medium-sized enterprises, by fully integrating environmental and climate ambitions to accelerate a clean industrial transition;
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	The part: "...in particular in the areas of net zero and critical raw materials technologies, with special attention to the competitiveness of small- and medium-sized enterprises..." is contradictory as the mentioned technologies are mainly in hands of big enterprises. SI (MS questions): We propose to add also: enhancing sustainable growth and competitiveness of SMEs including social economy organisations and job creation in SMEs and social economy organisations, including by productive investments; Question for EC: Provision "by fully integrating environmental and climate ambitions to accelerate a clean industrial transition is unclear. We would like the EC to clarify what is meant by "fully integrating environmental and climate ambitions" and spell out the provision more clearly.
(iii) supporting a just transition towards the Union's 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy	FI (MS comments):

efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition;	The objectives of the fund should address the rural areas in a clear and comprehensive manner, under the point 1(a)(iii) should explicitly mention rural SME's. IT (MS comments): Proposed amendment: <i>“supporting a just transition towards the Union’s 2030, 2040 and 2050 targets for energy and climate, ensuring that all territories and everyone can contribute and benefit from the clean transition; in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids, also taking into account the Trans-European Network (TEN-E), and promoting a circular economy.”</i> In this way, the clause <i>“ensuring that all territories and everyone can contribute and benefit from the clean transition”</i> is placed immediately after the general objective (<i>supporting a just transition...</i>), so as not to risk diluting or weakening the message. A further remark concerns the
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	reference to “<i>technology</i>”, which appears unclear and would benefit from further specification or more precise framing. NL (MS comments): Retain The relevance of biodiversity for climate seems to be overlooked. Climate targets as such have less relevance if biodiversity loss and nature restoration are not addressed at the same time. NL (MS questions): Has the Commission considered adding biodiversity objectives and nature-based solutions here? The Convention on Biological Diversity and European Biodiversity Strategy for 2030 include relevant targets for 2030 (EBS/CBD: bend the curve of biodiversity loss towards recovery) and 2050 (CBD: live in harmony with nature). Their achievement brings essential leverage to the clean transition. PL (MS comments):
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	The concept of ‘just transition’ presented here mainly covers the scope of energy transition and does not correspond to the approach used so far within the Just Transition Fund, the main objective of which was to alleviate the social, economic and environmental impacts of the energy transition. A change in the concept of the types of activities that fall under the definition of ‘just transition’ is crucial for the development of regions that are currently undergoing transition or are about to begin transition in the near future. This is also important in relation to the provisions of Article 22(2)(f) and (h) of the Regulation. Just transition should include also "clean transport" as an area eligible for support under the future framework. A significant number of such projects are being implemented during the 2021–2027 programming period within Integrated Territorial Investments (ITI), co-financed by the Just Transition Fund (JTF). The scope of the Just Transition should be broadened beyond the energy sector, so that it is not limited solely to investments in clean and renewable energy, energy efficiency, or network infrastructure, as currently emphasised in Article 3(a)(iii) of the draft Regulation
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	establishing the European Fund for Economic, Social and Territorial Cohesion (...) PL (MS questions): What is the current definition of the term ‘just transition’? Based on the provisions of Article 3, will regions currently benefiting from the Just Transition Fund, the main objective of which was to alleviate the negative effects of the energy transition, be able to continue their wide range of just transition activities also in the 2028-2034 period, or will their future activities be limited to the energy transition only? Does the European Commission still consider regions undergoing a major energy transition to be crucial to the sustainable development of the European Union? Please explain if this priority allows for investment in healthcare infrastructure, including hospital buildings and other medical facilities. RO (MS comments): The specific objective of the fund, respectively related to the energy sector need some topic adjustments/reformulation or clarifications in order to
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cover as well the interconnectivity and sustainable energy infrastructure for enhancing green transitions and energy security.

Also, related to promoting energy efficiency and decarbonisation, storage and technology, we consider for **clarity and consistency** there is a need for adjustments in order to cover clean technologies, respectively clean technology are those technological solutions that reduce pollution and greenhouse gas emissions, use resources more efficiently, and support the transition to a green and circular economy.

RO

(MS questions):

Given that the targets for 2040 in energy and climate have not yet been agreed upon and the necessary flexibilities have not been fully considered, it is advisable to remove the 2040 targets until a clearer framework and more comprehensive agreements are in place.

What is the difference, if any, between promoting a circular economy under the specific objective iii) and promoting circularity under the specific objective x)?

SI

(MS comments):

	We miss economic-social- educational dimension of just transition, not only technological.
(iv) supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally sovereign, secure, and inclusive Union, and promoting the development and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity, while addressing the digital divide;	CZ (MS questions): We would like to make sure, that “ICT connectivity” in this article is understood as including support of broadband network construction? FI (MS comments): In order to better balance the need of digital connectivity also in rural areas under the (1(a)(iv) a wording of ‘in urban and rural areas’ should be added. IT (MS comments): It would be more appropriate to specify “<i>services of general interest</i>”, in order to better clarify the scope. NL

	(MS comments): Retain PL (MS comments): There should be greater flexibility within the digital transformation objective, given that the Digital Decade targets and objectives do not cover the entire implementation period of the Fund. The objective should allow for adjustments as technological and policy contexts evolve. PL (MS questions): In order to effectively support digital transformation, would it be possible to allow support not only for advanced, but also for basic digital technologies, particularly for enterprises in less developed regions? RO (MS questions): How does this specific objective correlate with the one in (b), point (iii) from the perspective of investments in detection capabilities or cybersecurity, taking into account that detection capabilities are an integral
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	part of AI applications that provide intelligent, adaptive, and proactive functionalities across various sectors, including cybersecurity? SE (MS questions): Why is the Digital Decade Policy Programme mentioned? Does it not fit better in Article 22? SI (MS comments): supporting the digital transformation towards the Digital Decade targets and objectives set out in the Digital Decade Policy Programme 2030, thereby contributing to the achievement of a digitally sovereign, secure, <u>ethical</u> and inclusive Union, <u>bringing its benefits to citizens and society, public administrations and businesses across the Union</u>, and promoting <u>research</u>, development, <u>production</u> and use of advanced technologies, including AI secure and trusted digital infrastructure and services, basic and advanced digital skills, digital public services, and ICT connectivity, while addressing the digital divide;

(v) supporting research, development and innovation, including the diffusion of innovation across all regions;	LT (MS comments): Adequate funding should be ensured for the support for knowledge sharing and innovation in agriculture, forestry and rural areas LT (MS questions): This horizontal objective is relevant to different sectors, including Agriculture. Therefore, how can we ensure the implementation of this objective if Article 35(3) of this Regulation is not supplemented by a part (m), and also Article 10(2)(a)(II) is not supplemented — by ensuring financing for support for knowledge sharing and innovation in agriculture, forestry and rural areas? RO (MS questions): The “diffusion of innovation across all regions” should be understood in a national or in an European context (“across all national regions” or “across all European regions”)? A clarification is needed in this context SE
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	(MS questions): Why is the focus not on research, development and innovation capabilities as in the current provisions? We need a clear demarcation towards Horizon.
(vi) supporting measures, including reforms to further the Saving and investments Union and foster the development of market-based funding options;	AT (MS comments): Sentence appears to be incomplete: To further <i>strengthen</i> ... or to further <i>foster</i> ... AT (MS questions): Could the EC please give an example of what kind of measures these might be? And how does this differ from the ECF (2 heading)? What overlaps are to be expected and what risks are involved? DE (MS comments):

	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”).] DE (MS questions): What is the methodology to determine the pay-out value of reforms? See above, Savings and investment Union is a matter of the national / central level rather than a matter across all regions, are there maybe inconsistencies in the text?] FR (MS questions): Quels sont exactement les types d’actions ou d’opérations visées par ce paragraphe ? RO (MS comments): The relevance of this specific sub-objective in relation to cohesion objectives should be better clarified, considering that art 22(2)a requires to NRP Plan to contribute to all specific objectives
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	RO (MS questions): While correlating art. 22(2)a and art. 3, should NRP Plan contribute to all specific objectives and to all specific sub-objectives, or the obligation is limited to all specific objectives (as listed in art. 3 (a)-(e)) and to some/most relevant sub-objectives of each specific objective? SE (MS questions): Why are reforms mentioned especially in this specific objective?
	IT (MS comments): <i>vi. supporting adaptation to industrial change and transformations in production systems brought about by Artificial Intelligence</i>
(vii) supporting social and affordable housing;	PL (MS comments): New European Bauhaus should be included here instead of in point x – water management

	PL (MS questions): Please confirm if projects concerning improving energy efficiency of buildings can be supported under this specific objective. Please confirm if support of the social and affordable housing can be implemented directly as a separate instrument, not only as an accompanying or complementary element of support. RO (MS comments): As regards housing, it would be useful to explain how the two policy areas, Housing and infrastructure and Housing complement each other, clarify their objectives and indicators (disaggregate indicators to separately quantify investments in social vs. affordable housing) and address terminology and definitions (harmonize and formalize definitions throughout the Regulations and mandate national specificity with EU coordination for "affordable housing"), explicitly exclude social housing from social infrastructure under c) (iii) or clarify boundaries to avoid confusion and double financing. We would appreciate receiving the fiche on social and affordable housing.
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	RO (MS questions): How are the 2 specific objectives (a)(vii) <i>supporting social and affordable housing; (c) (iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure;</i> complementing each other in financing social infrastructure? Should it not be appropriate to mention that social infrastructure in under c)(iii) is excluding social housing? The list of definitions is incomplete and not harmonized among different Regulations. The following definitions are missing: "affordable housing", "social and affordable housing", "subregional area" (art76) <i>What is the definition of" affordable housing"? If a definition cannot be available at European level, it would be important to specify in the Regulation that Member States will make their own definitions, but the Commission should present some guidelines on this topic, in order to have a coherent approach at European level.</i> SE (MS comments):
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	SE does not support this objective. We do not have a common policy in the area and housing should not, as a rule, be publicly funded SI (MS comments): We propose to add: supporting social and affordable housing, including the possibility of social housing cooperatives and social enterprises in construction and renovation
(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport;	AT (MS comments): Support should focus on improving the Union's <i>sustainable</i> transport infrastructure BE (MS questions): Which general objective in article 2 has to be pursued with this specific objective? Is it art. 2.1.a (regional development, which means a territorial

	focus), b (socially fair transition towards climate neutrality, which means a focus on sustainability) or e (housing as a right under the European pillar of social rights, which has a more broader focus). FR (MS questions): En lien avec la question précédente relative à l’articulation avec le MIE, la Commission pourrait-elle apporter des précisions sur les actions éligibles dans l’objectif de soutien à une connectivité décarbonées, notamment au regard de l’article 33 du règlement FEC concernant le soutien à la production et la distribution de carburants alternatifs à travers l’UE afin de faciliter la décarbonation des transports ? NL (MS comments): Retain NL (MS questions): Has the Commission considered including a reference to considering ecological connectivity when enhancing transport infrastructure?
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	PL (MS comments): We support including the core and extended core network here. We see the lack of a clear definition of the terms "<i>remote, peripheral and less connected areas</i>", as referred to in the specific objective on security and accessibility, may lead to ambiguous interpretation. This could, in particular, affect the eligibility of support for isolated transport links in border regions and mountainous areas. PL (MS questions): Please explain if marine and river transport can be supported under this specific objective. Please explain if including railway and road rolling stock in the detailed description of the specific objective is possible? RO (MS comments): Urban nodes should be explicitly emphasised when referring to connectivity in addition to peripheral and less connected areas.
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	The specific objective should also include a reference about <i>improving the connections to the TEN-T network</i> .
(ix) support for tourism, including sustainability;	DE (MS comments): It should be qualified that that tourism should be funded in view of enhancing regional development.] DE (MS questions): What is the justification for EU funding, in particular in view of EU added value?] IT (MS questions): Clarifications are needed regarding the introduction of a specific objective for tourism, in terms of scope and potentially eligible activities. PL (MS comments):

	In order to align with the intervention category 93 <i>Protection, development and promotion of cultural heritage and tourism services (excluding infrastructures)</i> we request explicit inclusion of culture and cultural heritage in this objective: (ix) <i>support for tourism, including culture, cultural heritage and sustainability</i> Culture and cultural heritage supports the attractiveness of territories, not only in the context of tourism development, but also as liveable places, which has an impact on demographic policy and internal migration. PL (MS questions): Please clarify if the support for health resorts/ health resort municipalities can be supported here. SE (MS questions): We do not understand why tourism has its own objective. Why is it not integrated in para 1. (a) ii?

(x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity and natural resources, as well as promoting the New European Bauhaus solutions in the built environment.	AT (MS comments): It would make sense to use only one umbrella term for soil condition in all legal acts: either soil quality, soil fertility, or soil health. The term « soil potential » should not be used in the legal acts AT (MS questions): Do NEB solutions include renovations? DE (MS comments): Drafting suggestion: (x) supporting efficient water management, quality and resilience, environmental protection, climate adaptation, climate resilience and enhancing biodiversity, soil quality and natural resources, promoting circularity, sustainable and environmentally friendly bioeconomy and wider resource efficiency, strengthening pollution prevention, control and remediation, preserving and restoring nature and enhancing biodiversity
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	and natural resources, as well as promoting the New European Bauhaus solutions in the built environment. Comment: Re “sustainable and environmentally friendly”: Taking account of environmental impacts and a sustainable use of natural resources should be an essential aspect of the development of the bioeconomy sector. We request clarification which sub-programmes and project types of the LIFE programme are covered. If not all sub-programmes and project types of the LIFE programme are covered, we ask for an explanation why not, or whether they are included elsewhere in the MFF proposal.] DE (MS questions): According to COM is the funding scope in Art. 3 para 1 lit. a) (x) equivalent to the notion of “green transition”?] FR (MS questions):
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	Pourquoi la préservation de l'environnement et de la qualité font partie des objectifs spécifiques et non généraux des PPNR à l'article 2, alors qu'elle conditionne la cohésion, la sécurité et la prospérité de l'Union ? LT (MS questions): More clarity is needed on what it means to contribute to the goals of the New European Bauhaus. As well, more clarity is needed on the objective criteria for determining how projects contribute. Is this contribution mandatory or voluntary? NL (MS comments): Retain NL (MS questions): How will expenses related to these objectives, including biodiversity, be tracked? PL
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	(MS comments): New European Bauhaus should be included in point vii – affordable housing. Investments in water and wastewater infrastructure should be prioritised to implement the goals of Directive (EU) 2024/3019. Funding is necessary for projects introducing Quaternary treatment (removal of micropollutants) and achieving energy neutrality for treatment plants > 10,000 PE. Green-blue infrastructure for the reduction of storm overflow discharges should also be explicitly supported. PL (MS questions): Please explain if this point covers also support for the construction/adaptation of flood defences and drought prevention” How will the Fund’s indicator system measure and reward projects that actively lead to the water sector’s climate and energy neutrality, in line with the objectives of Directive 2024/3019? RO (MS questions):
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	How does this specific objective correlate with the one in (b), point (ii) from the perspective of investments in climate adaptation, climate resilience and preparedness to crises and disasters? SE (MS questions): Why should a specific solution as “the new European Bauhaus solutions” be mentioned in an objective?
(b) to support the Union’s defence capabilities and security across all regions by:	BG (MS questions): With reference to the CION’s presentation for the meeting of the AHWP on NRPs on 11 September on Block 5, showing an intention for a greater flexibility for Member States and regions in the allocation of resources and design of their Plan (page 9), we kindly ask the CION to clarify how that flexibility should be applied, if the use of the various political instruments comprising the Single Fund should be based in principle on the objectives of these instruments, as enshrined in the Treaties and sectoral regulations (obviously, it would not be possible to spend funds for HOME affairs for just transition for example). If it is so, where should

	the resources for investments in defense capabilities can come from and how the specific objective of art. 3.b. relates to the general objectives of art. 2 in the draft Regulation (as it shown in the slide on p. 10)? DE (MS questions): What is the rationale for including “Security and Defence” as a separate objective in the NRPP regulation, given that these aspects are addressed by the ECF, the CEF (military mobility), the UCPM? In order to ensure European added value, shouldn’t there be a reference to the ECF regulation (i.a. definition of defence capability priorities and eligibility criteria for security and defence projects)? See above, defence is a matter of the national / central level rather than a matter across all regions, are there maybe inconsistencies in the text?] EL (MS comments): This paragraph (b) does not describe the thematics within the three bellow Regulations. We propose as in the article 1 par.1 (v) to add another sub
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	paragraph in order to have a strong link among the “subject” , ”general objective” and specific objective”. FI (MS questions): Why the points (i)-(iii) do not mention all Home Affairs sectors (migration, internal security, border management, visa policy)? LT (MS comments): LT requests adding new separate specific objective under Article 3 covering fully the Home Affairs area PL (MS questions): Please explain if the subpoints to this specific objective are examples of actions to be taken or are they sub-objectives that also have to be fully implemented RO (MS questions):
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	A separate chapter on defence will be necessary in the Plan, or defence investments can be in the same chapter as the rest of the investments (for example, if we had a chapter on transportation, it should also cover the specific objective a)(viii) and b)(i))? SE (MS questions): Is resilience included in security? Should it perhaps be mentioned explicitly? SI (MS questions): We suggest to align/ to add goals of the JHA financial instruments. SK (MS comments): We propose adding the phrase "as relevant": "to support the Union's defence capabilities and security across all regions as relevant, through:..." Justification: ensuring the protection of land borders, airports, etc., does not copy regional aspects across the board and evenly. Crisis preparedness,
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	prevention, etc. is possible in all regions equally. We recommend adding the above phrase. SK (MS questions): Does the COM consider to add reference "as relevant" to this point. Please clarify in relation to which general objective of the fund (Article 2) this specific objective is to be pursued.
	RO (MS comments): See comment above with respect to the need to specify objectives related to home affairs funds.
(i) reinforcing the Union's defence industrial base and military mobility, in particular by developing dual-use TEN-T infrastructure;	DE (MS questions): Where is the connection to the regulations establishing the Union support for asylum migration and integration and establishing the Union support for European integrated border management and European visa policy? It is not clear why and how these regulations should contribute to this.]

	EL (MS questions): Is this thematic eligible under the three Regulations (Home Funds)? NL (MS comments): Retain PL (MS comments): We support including military mobility here. We propose to extend the provision to include the development of infrastructure beyond the TEN-T network. Some roads of strategic military importance lie outside the TEN-T network and constitute a crucial element in the movement of armed forces. RO (MS questions): Is there any rationale for which the NRP Plan does not include a dedicated section on investments in dual-use infrastructure deriving from this specific
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	objective. Such a section would ensure a coherent approach to enhancing both civilian and military mobility, in line with the Union's strategic priorities. By explicitly targeting the dual-use transport infrastructure, the Plan can strengthen the synergies between defence needs and broader connectivity goals, while promoting efficiency and resilience across the TEN-T network. SK (MS questions): We are not clear about the link to the objectives set out in the DG Home regulations (listed in subparagraph of point b)). Please clarify.
(ii) strengthening the Union's preparedness to crises and disasters by mainstreaming the principle of 'preparedness by design';	CY (MS questions): What does in practice "preparedness by design" mean, how is this principle applied and what kind of crises are we referring to (man-made linked to Home Funds)? DE (MS questions):

	Where is the connection to the regulations establishing the Union support for asylum migration and integration and establishing the Union support for European integrated border management and European visa policy? It is not clear why and how these regulations should contribute to this.] EE (MS questions): HAF (home affairs funds) scope is very limited in a sense of listed defence and security objectives of Article 3. Specific objectives set out in Article 3(b) are not in line with the objectives of the proposals of AMI, BMVI and ISF regulations. Although security approach involves both internal and external dimensions, security and defence is predominantly a competence of MS. At the same time, a common policy on asylum, immigration and external border control is shared competence between the EU and its MS. Please elaborate what can be financed for example from AMIF, ISF or BMVI regarding the dual-use TEN-T infrastructure? We are in need of clarification why only security threat detection, prevention and response threat detection capabilities are in focus of specific objective and not investigation capabilities despite due to the
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	regulations and directives that are applicable to the area of security and foresee the investigation? Namely, the directive 2016/681 on the use of passenger name record (PNR) data for the prevention, detection, investigation and prosecution of terrorist offences and serious crime, and the regulation 2025/13 on the collection and transfer of advance passenger information for the prevention, detection, investigation and prosecution of terrorist offences and serious crime. Taken into account the competences of the EU, please elaborate which specific objectives are specifically related to the area of freedom, security and justice and the financial mechanisms proposed by the COM to finance this area? EL (MS questions): Is this thematic eligible under the three Regulations (Home Funds)? NL (MS comments): Retain PL
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	(MS questions): Please explain if this specific objective includes also investments in civil preparedness (the scope of intervention under specific objective 3.3 and 5.4 in perspective 2021-2027). Will it be possible to provide support to hospitals and medical facilities in adapting to preparedness for potential threats? Please explain, if security of cultural heritage can be supported under this goal. RO (MS questions): We request further information on the meaning of the principle “preparedness-by-design” in connection with financing.
(iii) strengthening the Union’s security by improving threat detection, prevention and response threat detection capabilities, including by strengthening energy and transport critical infrastructure and cybersecurity;	AT (MS comments): The relationship between “overall aim”, “general objectives” (Art. 2) and “specific objective” is unclear for “Home Funds”. A reference to the the

	objectives of the Home Funds under this provision could help to clarify this CY (MS comments): The specific objectives for the Home Affairs Regulations is more relevant to be stand-alone objectives based on the specificities and particularities of the correspondent Funds and not be referred to under the specific objective (b) “strengthening the Union’s defence capabilities and security” and restricted to subparagraph (iii) under “Union’s security”. This does not reflect the extent of the Home Affairs Funds activities that go beyond security and deal with border management and matters linked to asylum, migration and inclusion. DE (MS comments): This has the character of a horizontal rule rather than a specific objective and would thus be better anchored in an article settling horizontal requirements, such as Art. 7, or in the Performance Regulation.] DE
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	(MS questions): Where is the connection to the regulations establishing the Union support for asylum migration and integration and establishing the Union support for European integrated border management and European visa policy? It is not clear why and how these regulations should contribute to this.] EL (MS comments): We propose to be “cybercrime” against “cybersecurity”. In the current ISF 2021-2027 and next, cybersecurity is out of the scope of the ISF. EL (MS questions): Is the cybersecurity eligible under the three Regulations (Home Funds)? FI (MS questions): Why point (iii) mentions only certain aspects of security? FR (MS questions):
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	Au regard des objectifs en matière de sécurité et de résilience, la Commission peut-elle apporter des précisions sur la définition des infrastructures critiques de transport et son périmètre ? Les infrastructures aéroportuaires peuvent-elles s'inscrire dans ces objectifs, notamment celles situées dans des zones d'intérêt stratégique pour l'UE définies dans le cadre de Global Europe ? HU (MS comments): The Fund's objectives only marginally mention objectives relating to the field of home affairs, with the wording specifically referring to internal security objectives, but making no reference to border management and visas (integrated border management and visas) or migration (asylum, migration, and integration). If the field of home affairs remains under the scope of the NRP Regulation, including the three areas of home affairs as three separate specific objectives should be considered in a way that gives Member States greater leeway in identifying their own migration, border protection and internal security priorities and in formulating action measures.
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	NL (MS comments): Retain NL (MS questions): Has the Commission envisaged the opportunities of using nature restoration in the context of defence mechanism such as wetlands? https://landscape.ut.ee/aveliina-helm-on-bbc-world-news-restoring-wetlands-helps-strengthen-national-defense/?lang=en PL (MS questions): Please explain if this priority allows support the development of health threat monitoring systems, including spatial planning tools and targeted programs for vulnerable or high-risk areas?
	EL (MS comments):

	Taking into account the above-mentioned comments, we propose to add a new paragraph (c) with the following title “(c) to support the efficient management of migration, external borders and internal security by: (i) supporting for asylum, migration, integration and return interventions. (ii) strengthening the Union’s external border management and visa policy. strengthening the Union’s internal security. RO (MS comments): The description of this specific objectives must be completed with references to internal security, asylum and migration and border management and visas, at least, to reflect the HA funds general objectives.
in a manner fully consistent with the objectives set out:	AT (MS comments): Proposed wording: “(iv) <i>Strengthening the Unions over all security by improving internal security, migration- and border management in a manner fully consistent with the objectives set out</i>”

	BE (MS questions): Can the Commission explain the articulation between this regulation and the three listed below? DE (MS questions): Would it not also be appropriate here to add the UCPM Regulation alongside the Home Affairs Funds Regulations?] FR (MS comments): Les objectifs de contrôle de l'immigration et de lutte contre la criminalité ne sont pas clairement énoncés ; il y est juste renvoyé par référence aux fonds dédiés. FR (MS questions): Pourquoi seuls ces règlements sont-ils cités et non les autres règlements sectoriels ?
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	NL (MS comments): Retain RO (MS comments): RO proposed text, new paragraph letter (b¹): <i><u>(b¹) supporting efficient and effective management of migration flows, of European integrated border management, of Schengen area and visa policy and to ensure a high level of internal security, in a manner fully consistent with the objectives set out:</u></i>
• in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034;	NL (MS comments): Retain

• in Regulation (EU) [...] establishing the Union support for European integrated border management and European visa policy for the period from 1 January 2028 to 31 December 2034;	NL (MS comments): Retain
• in Regulation (EU) [...] establishing the Union support for internal security for the period from 1 January 2028 to 31 December 2034.	NL (MS comments): Retain
(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by:	BE (MS questions): By broadening the thematic scope for the Social Union, how will the European Commission ensure that the issues and target groups traditionally supported by the ESF+ remain an investment priority? DE (MS comments):

	In order that the ESF as main instrument to support quality employment, education and skills and social inclusion reached its goals within the NRPP, it is essential that it covers all eligible regions in each MS.] FI (MS comments): This objective should not be extended to cover investments in long-term care and hospital infrastructure and the development of health and care services without links to combating social exclusion and poverty. HU (MS comments): The areas listed under Article 3(1)(c) of the social pillar and in Annex VI do not fully correspond to each other, which poses a problem in terms of definition and consistency. According to what was explained in the working party, the approaches of Article 3, Article 22 and Annex VI intentionally differ. The draft regulations use the term "social" inconsistently, defining it sometimes narrowly and sometimes broadly:
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- it refers to employment, education, training, addressing labour shortages, equal opportunities, fighting poverty, addressing demographic change, certain objectives of the Social Climate Fund,
- Annex VI defines social objectives differently and much more narrowly, i.e. only some of the specific objectives listed under Article 3(1)(c) would be included in the allocation expected from Member States (due to the different wording, it may be unclear exactly what is meant by this),
- The annex to the draft regulation defining the performance framework and monitoring contains yet another set of categories: here, employment falls under the social category (policy area level 1), while education and training are classified in a separate category.

In our opinion, this does not serve the purpose of simplification. It would be advisable to consistently follow the objectives defined under "specific objectives" in terms of both earmarking requirements and the names of policy areas and levels used for intervention categories.

	LV (MS comments): Please consider including explicit support for education under Art.3(c) LV (MS questions): Please clarify whether we understand correctly that both infrastructure and “soft” investments can be included under this SO? PL (MS questions): Please explain if the subpoints to this specific objective are examples of actions to be taken or are they sub-objectives that also have to be fully implemented. Please confirm if persons with disabilities are treated as a target group requiring special support. Please explain if the former ESF objective: supporting actions against material deprivation will be continued under this specific objective. RO
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	(MS comments): Taking into consideration the demographic challenges that EU is facing – including low rate of birth and ageing population – it is important to give proper support to women employment by paying attention to life-work balance and this issues should be also highlighted in the formulation of the specific objective/sub-objectives wherever relevant. In the same time, in the context of Youth Guarantee, and according to the <i>Annex VI – Methodology for the contribution to social objective</i>, youth employment, education and vocational training should be better highlighted by the specific objectives/sub-objectives or formulation of specific sub-objective(s) to reveal the importance of these issues should be considered SE (MS questions): How are the disability and gender equality perspectives included in these objectives? SK (MS comments):
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The Council's recommendations for Slovakia (art. 22, 2b)(i) NRPP shall effectively address all or significant subset of challenges identified in the context of European Semester, in particular in the relevant CSR) repeatedly emphasize the need to support the teaching of basic skills, including for children from disadvantaged backgrounds, especially in marginalized Roma communities, as well as equal and inclusive access to quality education at all levels. It is also recommended to intensify efforts in relevant policy areas focused on the provision and acquisition of skills and competences, not only in relation to adult education (upskilling and reskilling), but also investing in teacher training and supporting education in the STEM field. From the current wording of the draft NRPP, it is not clear under which specific objective such types of operations could be included.

SK

(MS questions):

Under which specific objective in the area of social cohesion will it be possible to support the area of education outside the support of adult education (upskilling and reskilling), such as strengthening the teaching of children's skills, including children from socially disadvantaged backgrounds and marginalized communities?

	IT (MS comments): <i>i. better employment opportunities for young people and women</i>
(i) supporting employment, equal access to the labour market, fair and quality working conditions and labour mobility;	ES (MS comments): Youth employment should be mentioned specifically] PL (MS questions): Please confirm that the objective regarding fair and quality working conditions also covers preventive healthcare for employees. If not, we suggest including it.
(ii) enhancing labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling;	BE (MS questions): Can the Commission explain the difference between the ECF and the NRPP on this specific issue? EE

	(MS questions): Are investments in education-related infrastructure eligible under the specific objectives listed in Article 3, in particular under points (c)(ii), (c)(iii), and (c)(iv)? If so, would it be possible to clarify or explicitly reflect this eligibility more clearly in the relevant guidance or documentation? IT (MS comments): <i>enhancing labour supply and improving education and training, work-based learning and lifelong acquisition of skills, in particular by promoting upskilling and reskilling;</i> LU (MS comments): Would it not be reasonable to include a dedicated point on education, as its importance does not appear to be sufficiently reflected at present? PL (MS questions):
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	Please confirm that this specific objective also includes support for enterprises in developing the skills of their employees and adapting to changes in the economy (the former ESF+ objective on the adaptability of enterprises). Please explain why the regulation does not include a separate objective for education and lifelong learning. Please confirm that support for these areas does not always have to be strictly linked to enhancing labour supply. RO (MS comments): In terms of quality education, the intervention cannot be limited only to services it has to be correlated with proper infrastructure. SI (MS comments): enhancing labour supply and improving education and lifelong acquisition of skills, also digital skills in particular by promoting
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	upskilling and reskilling (specially for profiles where there is a shortage, for example ICT experts);
	IT (MS comments): <i>iii. enhancing equal and timely access to high-quality, sustainable and affordable services, including services that promote the access to housing and person-centred care; modernizing social protection systems including promoting access to social protection, with a particular focus on children and disadvantaged group.</i>
(iii) promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure;	AT (MS comments): The improvement of health equity is crucial to the achievement of this specific objective and should be referred to in its wording, e.g.: “[...] fostering social inclusion, <i>combating health inequities</i> and fighting poverty [...]” BE (MS questions):

	Can the Commission explain the concept of “ supporting strong social safety nets”? ES (MS comments): The support to investment in social infrastructure should be placed in a separated strategic objective, so that the minimum amount to be dedicated to the Union’s social objectives, as per art. 10.5 of the proposed NRP Regulation, is not cannibalised by this investment in infrastructures. In addition, a specific mention to gender equality, in line with current framework would be welcomed. PL (MS comments): We suggest adding cultural infrastructure in addition to social infrastructure. We suggest adding support related to improving accessibility for people with special needs, including disabilities. PL (MS questions):
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	Would investments in social infrastructure under this priority also include healthcare-related projects, and how should we interpret “equal opportunities” in the context of access to health services? Will it be possible to provide support to establishing accessibility standards and support hospitals and medical facilities in improving accessibility for persons with disabilities (e.g. investments in medical transport, architectural accessibility)? SE (MS questions): Why is not gender equality included?] SI (MS comments): iii) promoting equal opportunities for all, <u>including to sports activities</u>, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure and social economy; SI (MS questions):
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	We propose to add reference to sport: promoting equal opportunities for all, also to sports activities, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure and social economy.
(iv) facilitating access to services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services;	AT (MS comments): Further specification through the addition of examples of crucial actions areas is proposed, e.g. <i>through the strengthening of primary care and improvement of patient pathways</i> EE (MS questions): Please elaborate how child care services are interpreted in the context of this article? Is it only child care and early childhood education? We would like to remind that in order to increase children's well-being, it is necessary to keep in mind that children are very different and their needs are also different. In addition to providing classic childcare and early childhood education services, it is also necessary to deal with children with disabilities, children with high needs of assistance, children with mental

	health issues, and offer them broad variety of services that don't fit under this narrow interpretation of child care services. LV (MS questions): Could you please elaborate what type of support could be provided under long-term care? Does this include institutional care? PL (MS comments): We suggest adding here: to ensure medicines security and production of medicines/critical medicines and active pharmaceutical ingredients. PL (MS questions): Please explain if this priority improving access to services may include support for medical transport systems or digital tools for monitoring spatial accessibility between healthcare facilities and the populations they serve. Please confirm that the target groups for social and health service support will not be narrowed down at the level of the regulation, but that they
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	may be determined on the basis of the problems and challenges identified in the Member State. SI (MS comments): facilitating access to services and associated infrastructure, including modernization, digitalization and strengthening the quality and resilience of healthcare systems, child and long-term care services and empowerment of social economy organisations active on this fields; SI: We propose to add social economy organisations, since they can contribute greatly to the development of this fields.
(v) addressing the challenges of demographic change across the EU, which include labour shortages and disparities between generations and regions;	AT (MS comments): Explicit reference to addressing the health systems challenges and pressing need for health system reforms that result from demographic change is proposed, e.g. by adding: “[...] which include labour shortages, <i>increased demand for healthcare</i> and disparities between generations and regions.”

	DE (MS questions): Can the COM explain how this specific objective (v) will interact and be complementary without overlap with specific objective on Demographic change from Art. 5 of the proposal of ESF regulation? And what is the added value to have both?] PL (MS questions): Please clarify the scope of this objective, e.g. by providing examples of activities that should be implemented under this objective rather than under other social objectives.
	CY (MS comments): in a manner fully consistent with the objectives set out: in Regulation (EU) [...] establishing the Union support for asylum migration and integration for the period from 1 January 2028 to 31 December 2034; CY (MS questions):

	In a similar approach to Article 3 (1) (b), issues related to asylum, migration and integration are linked with Article 3 (1) (c) social cohesion.
(vi) addressing the social impacts of the inclusion of greenhouse gas emissions from buildings and road transport within the scope of Directive 2003/87/EC.	EE (MS questions): Please elaborate and open the background – what kind of interventions should be supported here? Is it necessary to target people with low incomes or people with vulnerable backgrounds? ES (MS comments): This point should be placed in a different strategic objective, not under the ESF strategic objective, as it is clearly related to the Social Climate Fund.
(d) to sustain the quality of life in the Union by:	BE (MS questions): Is the general objective of supporting the implementation of the CAP (2.1.c) pursued through the specific objective (3.1.d)? CZ

	(MS comments): Simplifying the CAP objectives to merely improving the quality of life is not representative and does not align with the goals set out in the TFEU. CZ (MS questions): Given that the Treaty on the Functioning of the European Union establishes specific and multifaceted objectives for the CAP, would the Commission consider reformulating this overarching goal to be more representative and aligned with the TFEU, rather than simplifying it to merely "sustaining the quality of life"? HR (MS questions): Why does the specific objective „sustain the quality of life in the Union“ lists only activities related to agriculture, fisheries, activities in rural areas, long-term food security. For example, do activities under point <i>(a) (vii) supporting social and affordable housing</i> also contribute to this specific objective? If not, we propose to rename it.
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	PL (MS comments): The quality of life shall not be limited to farmers and fisher, but to extend to other areas in disadvantaged position, like depredated urban areas requiring revitalisation. A new separate sub-objective shall be added. While CAP Regulation refers to this provision it should better reflect the scope of CAP and its objectives as provided in the Treaty. PL (MS questions): Please explain if the subpoints to this specific objective are examples of actions to be taken or are they sub-objectives that also have to be fully implemented SE (MS questions): We do not fully understand this heading. Much of the focus in other parts of Article 3 is also very relevant for the quality of life.

(i) supporting fairer and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain;	DE (MS comments): DE: The general objective is, among other things, to promote decent incomes for farmers, including the improvement of farmers' position in the value chain. The value chain consists of several links; the position of farmers can be viewed and improved on the supply and demand side. To improve the position of farmers in the value chain with improved bargaining opportunities to achieve better incomes, it would be one-sided to consider only the supply-side support opportunities in the CAP.] DE (MS questions): DE: In the context of Article 35, in which investments in processing and marketing structures "off-farm" are no longer defined as CAP intervention, it is read as meaning that this support should no longer be the content of the draft - is this interpretation correct? If yes: Why is the importance of promoting the demand side of agricultural products in the context of the outermost regions and the Aegean islands
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	still addressed, but not universally maintained for promoting the position of farmers? If not: Which support instrument covers the support of the processing and marketing of agricultural products? To what general objective (Article 2) and specific objective (Article 3) is this support allocated?]
(ii) contributing to long-term food security;	
(iii) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;	AT (MS comments): In connection with the implementation and achievement of the specific objective to improve attractiveness and living standards in rural areas rural development plays an essential role. This should be reflected in the proposed regulations. CZ (MS comments): If each measure is to be linked to a specific objective (see the table in Annex III chapter 5), it would be more efficient to have the different

	objectives separated into multiple paragraphs, e.g. generational renewal separately and risk management separately. CZ (MS questions): To ensure a more efficient and clear linkage of measures to specific objectives as required in Annex III, would the Commission consider separating the distinct objectives currently grouped together in point (iii), such as generational renewal and risk management, into individual subparagraphs? DE (MS comments): DE recommends a linguistic revision of this paragraph.] DE (MS questions): DE: There seems to be a partial overlapping to (v) in context of green transition, what is in this context the difference (iii) to (v)? DE: The current CAP provisions on off-farm investments in rural areas (basis services, rural infrastructure etc., art. 69 (d) and (e), do not have
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	any equivalent in the July 2025 proposals, while EAFRD rules on urban development etc. are still in place. How does COM expect MS to improve living standards in rural areas with EU funding from 2028 onwards?] EE (MS questions): Please elaborate and open the background - what kind of interventions are kept in mind in the context of “access to healthcare in rural areas”? Is it investments? Digital solutions? Support measures for increasing mobility of doctors or people? FI (MS questions): Why in 1(d)(3) ‘the improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers’ preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;’ explicitly mentions ‘healthcare’ and not other aspects of attractiveness? IE
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	(MS comments): An amendment of 'farmers' to 'primary food producers' should be considered. LT (MS comments): Adequate funding should be ensured for the support for knowledge sharing and innovation and accelerating the digital and green transition for a thriving agri-food sector. LT (MS questions): How can we ensure the implementation of this objective if Article 35(3) of this Regulation is not supplemented by a part (m), and Article 10(2)(a)(II) is not supplemented — i.e. by ensuring financing for support for knowledge sharing and innovation in agriculture, forestry and rural areas?” NL (MS questions):
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	What is the Commission's vision to incorporate the objectives for the attractiveness and living standards of rural areas in NRPP and the performance framework? Can the Commission explain how a balanced approach between urban and rural areas looks like? Does the Commission link the Longterm Vision for Rural Areas with the objective related to the attractiveness and living standards rural areas? PL (MS comments): In light of the derogation from Regulation (EU) 2020/741, the Fund should support enabling investments to remove barriers for future implementation of the Regulation. This includes funding for pilot projects, construction of dedicated retention and distribution infrastructure for reclaimed water, and technical support for operators in preparing mandatory Water Reuse Risk Management Plans. PL (MS questions): Please explain if enhancing access to sport and physical activity as one of the measures to improve the resilience of healthcare system can be included here.
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	Please explain if this priority includes strengthening access to healthcare, and whether this refers primarily to basic healthcare or could also involve innovative health security solutions tailored to rural needs? Does the Fund foresee higher co-financing rates for farmers and investments that introduce solutions going beyond the minimum requirements of the Nitrates Directive (91/676/EEC), especially in Nitrate Vulnerable Zones (NVZ)?
(iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean governance in all dimensions, with safe, secure, clean and sustainably managed ocean;	CY (MS comments): This paragraph should be broken up in two and a third should be included as below in order to have more clarity on the specific objectives i.e. 1. The fisheries sector, 2. blue economy and coastal communities and 3. Common fisheries policy. (iv) ensuring sustainability, competitiveness and resilience of the Union fisheries and aquaculture sector, (ivBis)boosting the sustainable and competitive blue economy in coastal, island and inland areas, enhancing the socio-economic opportunities and the resilience of the local communities and ensuring strong ocean

	governance in all dimensions, with safe, secure, clean and sustainably managed ocean; (iv Ter) support the implementation of the Common Fisheries Policy, inter alia, develop and improve fisheries control, provide scientific advice, data collection and knowledge for the purposes of promoting sound and efficient fisheries management decisions; DE (MS comments): For reasons of systematic coherence, sublights (iv) and (v) should be swapped.]
(v) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.	CZ (MS comments): CZ proposes to add explicitly "eliminate antimicrobial resistance". DE (MS questions): DE: There seems to be a partial overlapping to (iii) in context of green transition. What is in this context the difference between (iii) and (v)?

	What is meant by “resilient climate action”? Is this about the resilience of the climate or about the resilience of actions? Are the aspects of mitigation and adaptation both adequately addressed by this wording? What does the word “quality” relate to? (It is not self-explanatory what “supporting efficient water [...] quality” would imply, if that is the point of reference, here.)]
(e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values by:	CZ (MS questions): Is there any link between this objective and the horizontal condition in Art. 8 and 9? If so, can the funds allocated to this objective be used in the fulfilment of these horizontal conditions? DE (MS questions): Why is there an allocation funding for this objective? Upholding democracy and Union values is more of a prerequisite (and therefore a matter of conditionality) than a measure eligible for financial support. Which existing programmes are to be covered under this objective?]

	FI (MS comments): It should be indicated clearly that the point1(e) ‘to protect and strengthen fundamental rights, democracy, the rule of law and to uphold Union values by:’ covers also rural areas. NL (MS comments): Retain NL (MS questions): What is meant by the specific objectives mentioned in article 3(e)(iii) and (iv)? How should these goals be read in light of the overarching goal of protecting and strengthening fundamental rights, democracy, the rule of law and upholding Union values? PL (MS comments):
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	We suggest adding good governance to the scope of objective, as follows: “to protect and strengthen fundamental rights, democracy, equality, good governance, the rule of law and to uphold Union values by (...)”. Goals referred to in subpoint (iii) - enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders – should not be limited to protecting and strengthening fundamental rights, democracy, equality, the rule of law and to uphold Union values. It is crucial to also support improvements in functioning of public institutions and services in order to create legal and organizational environment supporting growth of enterprises and competitiveness, green and digital transitions, security and preparedness as well as social reforms and security. PL (MS questions): Please explain if the subpoints to this specific objective are examples of actions to be taken or are they sub-objectives that also have to be fully implemented.
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	Please explain also the link between specific objectives and subpoints assigned to them. Is the support under subpoints is limited in terms of their scope to the given specific objective? In the current perspective, a condition regarding the implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) was in force. In both regulations - NRPP and the MFF, Convention was mentioned only in the introduction to the regulations as a document that must be taken into account in programs. No detailed requirements regarding compliance with the CRPD were formulated. Therefore, it would be appropriate for the European Commission to clarify how the CRPD should be treated in the 2028-2034 perspective. Are additional expectations regarding the implementation of the CRPD in EU funds planned for the next perspective? And if so, in which document(s)?
(i) sustaining and further developing open, rights-based, democratic, equal and inclusive societies, including by building civil society and social partners' capacities to uphold Union values, citizenship education and youth participation;	CZ (MS comments): The Czech Republic requests that in Article 3(1)(e) the word participation, or alternatively the phrase democratic participation, be added. The current wording, which explicitly refers only to youth

	participation, is considered by the Czech Republic to be insufficient and too narrow. Participation is a key element for maintaining and developing an open, democratic and inclusive society, and it significantly contributes to the resilience of European democracy. CZ (MS questions): Why were these objectives, including the tasks of civil society and social partners, specifically selected and not others (e.g. the protection of fundamental rights and values in general)? Why is participation in Article 3(1)(e) limited only to youth participation? PL (MS comments): In terms of aging of the European society it is important to ensure adequate participation level of the senior citizens as well
(ii) promoting and upholding the rule of law through strengthening justice systems, anti-corruption frameworks, media pluralism, information integrity, media literacy, and effective checks and balances;	NL (MS comments): Retain

	RO (MS comments): We are aware that media pluralism and media literacy create an informed public which is essential for upholding the rule of law, supporting democratic governance, and safeguarding human rights in society, but currently those areas have other funding sources at EU level (ex. Media Pluralism Fund, Journalism Partnerships - Pluralism (2025) etc.)
(iii) enhancing the efficiency of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level;	DE (MS questions): See above, in the context of fundamental rights the fact that this is a matter of the national / central level rather than a matter across all regions, is recognised. Are there maybe inconsistencies in the text?] PL (MS comments): The scope of support in this point should go wider than indicated in specific objective e and include improvements in functioning of public

	institutions and services as well as creating legal and organizational environment supporting growth of enterprises and competitiveness. RO (MS comments): It would be beneficial to clarify if technical assistance for the authorities in the management and control systems is covered by this specific sub-objective. Subject to certain prerequisites, such support mechanisms would enable the relevant entities to fulfil their roles efficiently and in compliance with regulatory requirements. RO (MS questions): So, are the aspects related to administrative capacity and technical assistance for managing authorities and beneficiaries covered by this sub-objective, so as to enhance the effective management and implementation of EU funds? SI
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	(MS comments): Suggestion SI: enhancing the efficiency, <u>accessibility and quality of service</u> of public administration and the institutional capacity of public authorities and stakeholders at national, regional and local level;
(iv) promoting culture as a catalyst for European values and supporting a vibrant and diverse cultural sector.	PL (MS comments): In our opinion culture should be supported in general, not only as a catalyst for European values. PL (MS questions): Please explain if cultural infrastructure (both landmarked/historical and modern), as well as cultural tourism, cultural heritage and security of cultural heritage can be supported under this objective). SI (MS comments):

	Suggestion SI: promoting culture <u>and creativity</u> as a catalyst for European values and supporting a vibrant and diverse cultural <u>and creativity sectors</u>
	ES (MS comments): <u>(v) to support the area of freedom, security and justice without internal borders by:</u> <u>(a) ensuring an efficient management of migration flows in line with the objectives set out in Regulation (EU) [asylum, migration and integration];</u> <u>(b) safeguarding a high level of internal security in the Union in line with the objectives set out in Regulation (EU) [internal security];</u> <u>(c) ensuring strong and effective European integrated border management at the external borders, a well-functioning Schengen area and an efficient visa policy in line with the objectives set out in Regulation (EU) [border management].</u> ES

	(MS questions): Following the reasoning under Articles 1 and 2, the specific objectives to pursue in the Home Affairs area within the NRPP should be mentioned in this regulation.
<i>Article 4</i> <i>Definitions</i>	BE (MS questions): The specific definitions (Article 4) relating to the CAP are directly linked to the conditions for CAP interventions set out in the draft CAP Regulation and cannot be viewed in isolation from each other. We request that the clarifications and exceptions to general definitions for the CAP be discussed in the Working Party Horizontal Agricultural Questions, where the sectoral regulation on the CAP is discussed. We also request that other CAP and CFP (fisheries) specific provisions be discussed in the sectoral Council working groups. CY (MS comments): Scrutiny on the definitions as some may need to be revised or include additional ones based on the discussions in the sectoral regulations

	CZ (MS comments): CZ proposes to move some definitions connected with CAP into the regulation for the CAP (3(c), 9(c), 14, 15, 22, 23, 24, and 25. FI (MS comments): Consistency of terminology across different regulations must be ensured. It seems that some terms used are not defined, and some are defined but not used in the regulation (e.g. in points 31-34). Only essential terms should be defined. CAP performance progress should be monitored using output-based indicators FI (MS questions): Do all the definitions also apply to Home Affairs sector? Why (1) is missing from the article? FR
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	(MS comments): La dissémination des définitions dans le règlement PPNR et dans les règlements sectoriels le cas échéant complique la lisibilité et ne participe pas à la compréhension globale des propositions. FR (MS questions): Pour quelles raisons les définitions spécifiques au secteur de la pêche et de l'aquaculture ont été intégré au règlement PPNR et non dans le règlement PCP ? Quelle articulation y a-t-il entre ces deux règlements ? De même, de nombreuses questions se posent concernant les définitions relatives à la PAC, dont certaines ont été modifiées par rapport à la programmation actuelle de la PAC (et d'autres semblent avoir disparu). Ces définitions faisant partie intégrante et essentielle de la PAC, et lui étant spécifiques, pourquoi ces définitions ont-elles été incluses dans le règlement PPNR et non dans le règlement PAC ? Pourquoi toutes les définitions des règlements sectoriels n'ont pas été reprises dans cet article, en particulier les définitions du FSE+ ne figurant pas dans le nouveau projet de règlement FSE ? HU
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	(MS comments): We recommend clarifying the definition of reform and the methodology for calculating the costs of reforms (including zero-cost reforms). The definition of the accounting year is missing. The definitions of financial product and financial instrument are missing. IE (MS comments): That there are two areas that require their own definitions as they are not included currently. These are definitions for ‘aquaculture’ as defined in the CFP regulation (EU) 1380/2013 and ‘producer organisations’ which are defined under the CMO Regulation (EU) 1379/2013. In defining producer organisations, there has to be a clear distinction between producer organisations that operate in agriculture sector and those that operate in the fisheries and aquaculture sector as both types of producer organisations are bound by two different CMO regulations. IE (MS questions):
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	• What is the definition for permanent pasture and crops or is that left to the Member State • What is the definition of a ‘family farm’ or is that left to the Member State IT (MS comments): It would be preferable to include some missing definitions to ensure a better synergy with the other articles provided by the regulation, such as the definitions of <i>Financial Instrument</i>, <i>Management Costs</i>, <i>Management Fees</i>, <i>Relocation</i> (art. 69, <i>Accounting Period</i> (art. 68.4) and <i>Small mid-cap company</i> and <i>Small and medium-sized enterprise</i> or <i>SME</i>, as set out in the art. 2 of the regulation establishing the European Competitiveness Fund (‘ECF’). LV (MS comments): Definitions related to the CAP, i.e., farmer, holding, agricultural activity, agricultural area, eligible hectare, young farmer, new farmer, must be included in the CAP regulation, as is the case in this period. This would also ensure that these issues are examined in the F3 group,
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	where CAP matters are addressed. Meanwhile, the horizontal regulation should only contain definitions related to the protection of EU financial resources and reporting. To supplement the definitions with – financial year – The Regulation refers to the financial year, but it does not specify the period when the financial year starts and ends. We kindly request that a precise definition be set out in the Regulation LV (MS questions): Where will the other definitions be laid down, for example, for permanent grassland, arable land, etc. – in delegated acts, in the NRP Plan, or will they remain at the discretion of the Member States? PL (MS comments): Some definitions differ between the NRP Regulation and the Performance Framework (e.g. operation) – they should be harmonised. It is proposed to add the definition: Eastern border regions as regions negatively impacted by the Russian aggression on Ukraine: NUTS II regions bordering Russia, Belarus or Ukraine – the definition corresponds
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	to the proposal to introduce this category of regions in Article 7 of the draft regulation on the ERDF and Interreg. RO (MS comments): There is a need to correlate definitions between all regulations. (there are some differences in definitions at the level of the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 ... {SWD(2025) 565 final} and those in the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities {SWD(2025) 590-591 final. Harmonization of definitions in the CAP -Differences in terminology might occur between the definitions related to CAP introduced in the COM proposal or defined by the NRPP (article 4(22)) and the state aid regulations. These differences can lead to legal and operational misunderstandings during implementation of the CAP chapter within the
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	plan. It is recommended to adopt unified and detailed definitions within the plans to comply with state aid. compatibility requirements. Regarding state aid rules, it must be clearly stipulated which rules prevail in case of discrepancies with the COM proposal. For example, the draft Regulation 565 final/16.07.2025 explicitly states the precedence of the Single Fund Regulation over other specific regulations of funds. For clarity and common understanding, definitions are needed for the following concepts: mining tools in the context of preventing irregularities, fraud, corruption (article 58, para 2c), serious non-compliance (art. 6, (3)a), intentional non-compliance (art. 62, 5) para 4). The Regulation explicitly excludes PPPs and single enterprises from the definition of beneficiaries for de minimis schemes, which could impact funding opportunities. The reasons for removing these elements from the definition must be analysed and clarified. SK (MS comments): We request the inclusion of the term financial year, as the term accounting year, previously applied to the periods 2014–2020 and 2021–2027, is being discontinued.
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	SK (MS questions): Can the COM include the term financial year, as was previously applied in the 2014-2020 and 2021-2027 periods?
For the purposes of this Regulation, the following definitions apply:	AT (MS comments): General remarks: • Consistent use and application of CAP definitions across all regulations (NRP Regulation, CAP Regulation, Performance Regulation) should be ensured in order to avoid contradictory or parallel definitions in different legal acts. Some relevant terms are not defined, which carries the risk of differing interpretations. • Terms for the 2021-2027 period are now used differently (e.g., “operation” – see also below for details). Important terms are missing, e.g., “eligibility conditions” “national contribution” or “public expenditure” (for the moment a definition for “public expenditure” is only provided in the context of CAP).

- Furthermore, terminology relating to simplified cost options is missing:
 - o In contrast to the previous Regulation 2021/2115, the term ‘simplified cost options’ (SCO) is no longer used and there is no clear definition of what is specifically meant by the terms ‘financing not linked to costs’, ‘unit costs’, ‘lump sums’ and ‘flat rate’.
 - o Requirements for the calculation of SCO and so-called ‘off-the-shelf’ options – such as a flat rate for overheads – are now also missing from the text of the regulation, with the exception of Article 77 (LEADER), which continues to explicitly refer to SCO.
 - o We therefore propose to include a clear definition of the terms ‘financing not linked to costs’, ‘unit costs’, ‘lump sums’, ‘flat rate’, ‘off-the-shelf’ and ‘simplified cost options’ in Article 4. If not, supplementary clarifications in the form of secondary legislation will be required.
 - o We also note that Article 78(1) of the NRP Regulation stipulates that projects with a total cost of less than EUR 400,000 must, as a rule, use simplified cost options or financing independent of individual costs, while this threshold has been lowered to EUR 100,000 for CAP interventions.
- Transferring the CAP-relevant articles to the CAP Regulation would ensure greater clarity

	AT (MS questions): • Why does the EC propose to define the CAP terms (Art. 4 (3) c), 9) c), 15-17), 22-25)) in the NRP Regulation and not in the CAP Regulation? DE (MS questions): DE; Definitions are laid down in Article 4 “for the purposes of this regulation”. They are obviously also intended to apply to the regulations referred to in Article 2 (2). Where does this come from?] EE (MS comments): Coherent use of definitions should be ensured throughout the act and annexes. Throughout the document, terms such as "preparedness," "resilience and crisis response," "defence capabilities and security," and "preparedness by design" are consistently used. However, it remains unclear how broadly or narrowly Member States are expected to interpret these concepts when developing their NRP Plan EL
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	(MS comments): More definitions should be added, e.g. for: dual use TEN-T infrastructure, Local Action Group (LAG), Important Projects of Common European Interest (IPCEI), output indicator, result indicator We consider very limited the number of notions defined under art. 4. Definitions referred mainly to CAP, while those for the Cohesion policy are limited. Therefore, we suggest definitions such as, relevant country specific recommendations, priority, result indicator, output indicator, financial instruments, financial product, public contribution, accounting year, irregularity, serious deficiency, accounting year, assurance package, sustainable prosperity, security etc. be added to the regulation. ES (MS questions): The analysis of the governance of the proposal reveals the presence of the Intermediate Body, a figure specific to the structural funds. Therefore, it would be necessary to include this definition as well. FI (MS comments):
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	It is essential to ensure consistency of terms in different Regulations, Annexes etc. Considering the extent to which subsidies related to forests are proposed, as is the case in the CAP Regulation, the definition of forest owner does not exist in Article 4. However, the definition of forests should remain unchanged, i.e. the national definition, because of the differences concerning forest in the Member States. LT (MS comments): Definitions related to agriculture must be transferred to the CAP regulation proposal and discussed in the Working Party on Horizontal Agricultural Questions. LT (MS questions): Will definitions related to agriculture be discussed in the Working Party on Horizontal Agricultural Questions? SK (MS comments): For the sake of clarification, we suggest to add:
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	a definition of '<i>just transition</i>' and a definition of '<i>socially fair transition</i>'. The definition of “aquaculture” is missing. Please add. SK (MS questions): Can the COM provide definitions for of '<i>just transition</i>' and a definition of '<i>socially fair transition</i>'?
	IE (MS questions): Why is there no Article 4(1)?
(2) ‘applicable law’ means Union law and the national law directly relating to its application;	DE (MS comments): Potential for simplification of the management and control systems lies in the application of national law. We ask COM to consider an approach where it certifies the principal functioning of the national management and control systems for the application of national law to go ahead.] SK (MS comments):

	According to the Regulation, the Member State is required to take appropriate measures to prevent, detect and correct irregularities, including fraud, corruption and conflicts of interest, and to apply corrective measures where applicable law is not complied with. At the same time the managing authority and the audit authority is not expected to verify the underlying costs of operations but to confirm legality and regularity of underlying transactions. We also request a more specific definition of what exactly is meant by the term "applicable law". SK (MS questions): How should the Managing Authority and Audit Authority ensure the compliance with applicable law, including Union rules on public procurement and State aid without verification of the related costs of operations? Can COM provide definition of “applicable law”?
(3) ‘beneficiary’ means:	AT

	(MS comments): We welcome the approach of clearly defining terms such as beneficiary (3), recipient (6), final recipient (7) and participant (8). However, these would need to be further clarified before the plans are implemented in order to ensure a uniform understanding in all Member States DE (MS comments): DE: Stations of the flow resources from the Union budget: EU --> national administrative authorities --> beneficiary.] DE (MS questions): DE: Is it correct to understand that this is the first "user" at national level (usually applicants) to receive EU funds from national fund managers (administrative authorities)?] EE (MS questions): Art 4 (3c) states „beneficiary“ in the context of CAP as farmer who is a natural or legal person whose principal activity is agricultural activity or
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	whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity. How this narrow definition of beneficiary (farmers) is in line with listed interventions in Art.35 of NRP Plan and requirement in art 36 (1) that has wider set of objectives? (for example LEADER, rural businesses and start-ups, knowledge sharing, territorial and cooperation units, etc). Art 4(3c)(iii) defines for CAP farmer „small legal person “- could the COM clarify who is meant (e.g. a farmer participating in the small farmer scheme)? Since the indicator "number of participants" is widely used in annex 1 of the performance framework, the MSs might face difficulties since according to the definition provided, the natural person as a participant can not match the same natural person as a beneficiary. How to understand “...responsible for initiating or both initiating and implementing an operation...” in case of a change of the beneficiary? Is it possible to change beneficiary? In 21-27, definitions also included in cases of state aid and de minimis aid. For what reason are these no longer defined? ES
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	(MS questions): Could the COM clarify the concept of “beneficiary”? A thorough analysis of the proposal suggests that the Member State is the beneficiary of the NRPs (as is the case under the RRF). Nevertheless, this definition refers to the concept of "beneficiary" as understood within the framework of traditional cohesion policy instruments. FI (MS questions): Is a Member State considered a beneficiary when implementing measures (reforms or investments) of the NRP Plan? Therefore, are measures implemented by a MS operations (only an operation has a beneficiary according to point 3.a)? HU (MS comments): We would find it useful to define the terms beneficiary, recipient, final recipient, and participant more precisely, especially since the Single Fund and the Financial Regulation provide different definitions. HU
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	(MS questions): Based on the definition of "beneficiary," it is unclear whether the beneficiary of the transferred support should be included in the beneficiary category or not—please clarify. IT (MS questions): It would be helpful to confirm that the specific definitions for the CAP included in the points mentioned are intended to apply only to certain CAP interventions (e.g. area-based measures), while for other CAP interventions (e.g. investment measures, cooperation, etc.), the general definitions of beneficiary and operation set out in points (3) and (9) will apply. LV (MS comments): It is essential to ensure a consistent interpretation of the terms “beneficiary”, “recipient”, and “final recipient” in the context of cascade funding schemes. A notable difference from the CPR is that the current regulation does not establish specific provisions for two-step schemes in relation to State aid—neither for de minimis aid nor for other types of
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	aid—raising concerns about the feasibility of such schemes. While the regulation provides (Article 4 – Definitions) clearer definitions of what constitutes a Financial Instrument , who the final recipient is, and the role of the Managing Authority, questions remain as to whether these definitions sufficiently support and enable cascade funding operations. If the grantor of aid must always be solely the Intermediate Bod , the administrative burden will increase significantly resulting in more direct projects and concentrating all functions related to granting and monitoring State aid within a single institution. This may require further guidance or clarification to ensure legal certainty and operational coherence. NL (MS questions): It is very important for the Netherlands to have full clarity that collectives (groups of farmers and other beneficiaries who currently receive AECM support) remain eligible for support under the proposed article 10 of the newly proposed CAP Regulation. Can the Commission confirm that the Dutch collectives remain eligible? PL
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	(MS comments): The Regulation does not include any provisions on cascade projects. We propose to add this type of project which would also mean adding a definition of beneficiary and recipients in the context of cascade projects. Also, we see the need to add a provision stating that the expenditures incurred by recipients are eligible and may be counted towards the project beneficiary's own contribution. PL (MS questions): In the context of such a definition of beneficiary, does the Commission see the possibility of implementing cascade projects? The possibility of implementing such projects is very important from the perspective of implementing the ESF.
(a) a public or private law body, an entity with or without legal personality, or a natural person who is not a participant, responsible for initiating or both initiating and implementing an operation under the NRP Plan and the Interreg Plan and to whom the document setting out the conditions for support has been provided;	AT (MS comments): From GAP-perspective “a group of natural or legal persons“ could also be added under this point

	Proposed Adaption: (a) public or private law body,..., responsible for initiating or both initiating and implementing an operation under the NRP Plan and or the Interreg Plan and to whom the document setting out the conditions for support has been provided FI (MS questions): Can a natural person be a beneficiary in the Home Affairs sector? FR (MS questions): La Commission peut-elle préciser la définition, notamment le sens du mot « participant » ? IE (MS questions): How can a beneficiary who is not a natural person be held accountable for compliance?
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	How can administrative penalties under Article 62 for example be applied or support recovered from them? LT (MS comments): “a public or private law body,legal person, an entity <..>” LT (MS questions): “legal person” is missing, because according to national law, a natural person carrying out economic/business activity (e.g. with a business license) without the status of a legal entity is not classified as an enterprise, therefore doubts constantly arise as to whether a natural person without the status of a legal entity, but carrying out supported activities in accordance with the procedure established by the country's legal acts, can be a beneficiary of support. As well, clearer reference is needed regarding the eligibility / applicability of other CAP beneficiaries, including LEADER LAGs, rural businesses, processors, and others. LV
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	(MS questions): Do we understand correctly that proposal no longer prohibits beneficiary to provide further support to recipients in form of state aid?. In 2021-2027 CPR beneficiary could only provide further support in form to de minimis aid. Can Commission confirm that this no longer the case and that beneficiary can provide support to recipients using other legal basis of state aid (e.g. GBER)? RO (MS comments): The definition of the beneficiary has been changed compared to the current programming period (definition 9 art. 2 of the Regulation 1060/2021). This new definition does not make any reference to PPP or state aid/de minimis aid. It is mandatory to exempt the Home Affairs Funds (Borders and Visas, Asylum, Migration and Integration and Internal Security) from the definition of beneficiary – natural person of the Fund. <u>Under no circumstances natural persons can be a beneficiary under Regulations COM(2025) 541 final - Schengen area, borders and visas, COM(2025) 542</u>
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	final – internal security and under COM(2025) 540 final – asylum, migration and integration. RO (MS questions): Could the Commission explain its logic behind this new definition? SE (MS questions): Does this definition allow for several entities collectively initiating and implementing the same operation and as such have the status as beneficiaries?
(b) in the context of financial instruments, the body that implements the holding fund or, where there is no holding fund structure, the body that implements the specific fund or, where the managing authority manages the financial instrument, the managing authority;	FR (MS questions): La Commission peut-elle préciser le contexte auquel elle fait référence ?
(c) in the context of the CAP, a farmer who is:	AT (MS comments):

	A limitation of “beneficiary” only to “farmer” is unsuitable for several intervention categories mentioned in Article 35(1) NRPP, at least for i) LEADER, m) support for knowledge transfer and innovation and n) territorial and local cooperation. As mentioned under lit. a, “groups of natural or legal persons” should be included in the definition. AT (MS questions): Does this wording mean that only farmers can be beneficiaries under the CAP? CZ (MS comments): Given that, in accordance with Article 35, forest holders and other entities are also beneficiaries under the CAP, it is misleading in the definition that in the case of the CAP only the farmer is a beneficiary. The text should be reformulated so that “in the case of a farmer: ...” DE (MS comments):
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	DE: In context with the categories of interventions mentioned in Art. 35 (1) NRPP at least for - I) LEADER - M) knowledge transfer/innovation/ - N) territorial and local cooperation the limitation of “beneficiary” to “farmers” is unsuitable. It makes it nearly impossible to achieve the objectives linked with those categories of interventions. Furthermore, it does not comply with the connected output/result indicators of Annex I to the proposal of a regulation establishing budget expenditures tracking and performance framework Especially running nr: 18, 25, 26,335. DE: The CAP interventions are laid down in Article 35(1). There are interventions where not a farmer is the beneficiary, for example letter (n) [cooperation]: here producer organisations and cooperations are beneficiaries (cf. Article 74). Producer organisations (Article 74(1)(f)), for example, are not necessarily engaged in agricultural activities.
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	The definition has a restrictive effect on the circle of beneficiaries for Article 74. On the other hand, the definition is inconsistent with Article 35(1)(i) [Investment] as it identifies ‘farmers and forest owners’ as beneficiaries.] DE (MS questions): DE: How can this contradiction between some objectives of categories of intervention in Art. 35 NRPP and this narrow definition for the CAP be solved? Could the area of application of Art. 4 (3) Point c. be limited to the relevant categories of Interventions of Art. 35? This would imply that for all other categories of interventions in Art.35 Art. 4 (3) a is applicable! DE: We understand that point 3(c) is intended to define the term ‘farmer’. What in point 3(c) gives rise to this? Point 3(c) stipulates that, in the context of the CAP, the term “beneficiary” refers to a farmer who is a natural or legal person (“a farmer who is”) and who meets the conditions set out in points (i) or (ii). However, points (i) and (ii) do not include farmers who are legal persons but not small legal persons and whose main activity is not farming.
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	DE: How is the exclusion of farmers not covered by point 3(c) from the group of potential beneficiaries justified, particularly with regard to non-discrimination and against the background of freedom of choice of legal form? DE: Under the provisions of the CAP in the NRPPV and the CAPV, the term ‘beneficiary’ alone is rarely used to describe the persons affected by a scheme. The terms ‘farmer[s]’ or ‘farmers and other beneficiaries’ are frequently used. Both go beyond the cases referred to in point 3(c). How is point 3(c) to be understood in this respect, and does the Commission see a need for adjustment in this regard, or why not? DE: Under CAP measures, forest holders are also eligible for support. However, they are not mentioned in point 3(c), which regulates who can be a beneficiary under the CAP, only certain farmers. How is point 3(c) to be understood in this respect, and does the Commission see any need for adjustment in this regard? DE: Both sub-cases of point 3(c) only include natural and legal persons as possible beneficiaries. Point 3(a) also includes entities without legal personality in the definition of beneficiary, which applies outside the context of the CAP. The current provision in Article 3(1) of Regulation (EU) 2021/2115 also includes in the definition of farmer an ‘association of
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natural or legal persons, regardless of the legal status of that association and its members under national law'. How is the narrower provision in point 3(c) justified, particularly with regard to non-discrimination?

DE: Point 3(c)(i) and (ii) use the term 'principal activity', which is explained in detail in recital 45. Recital 45 seems to assume that Member States should lay down rules on this matter. However, in point 3(c)(i), it is not clear in the English version what the words 'in accordance with the criteria defined by the Member States in line with this Regulation' refer to, and in the German translation these words clearly refer only to 'agricultural activity' (i.e. to point 22(a)). The same applies to point 3(c)(ii). What is meant in each case?

DE: If 'principal activity' is to be defined by the Member States: Can Member States also use criteria other than or in addition to those mentioned in recital 45, in particular if some of these criteria cannot be applied in the Member State or can only be applied at great expense to farmers and the administration? (The Commission proposes a significant change to the current Article 4(5) of Regulation (EU) 2021/2115, which allows a minimum level of agricultural activity to be sufficient for all farmers. In Germany, there are around 34,000 agricultural holdings that are not sole proprietorships.)

	DE: Holding' is only required in case (i), but not in case (ii). In case (i) the main activity must be 'agricultural activity' (i.e. there is a reference to point 22(a), while in case (ii) certain cases not covered by (i) are included if their main activity is 'is not agriculture'. What are the reasons for these two discrepancies between (i) and (ii)? What is the difference between 'agricultural activity' and 'agriculture'? (Is this an editorial mistake?) DE: Below what is the limit in case (ii) a 'small legal person'? (No legal flexibility for Member States is provided for here.) DE: regarding 11) (a) (i) (agricultural, activity: production) - o 'whichever of all activities aimed at obtaining those products': Is the interpretation correct that this [for example] also includes the storage of inputs for the production of agricultural products? What other differences to the current provision in Article 4(2) of Regulation (EU) 2021/2115 ('Production of agricultural products') result from the amended wording? Is the production itself still covered by the formulation? - o Would it not be appropriate to supplement other products not listed in Annex I TFEU, e.g. 'products produced by paludiculture'? DE: Regarding (a) (ii) (agricultural activity: Conservation of land)
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	o Is it sufficient for an activity under (a)(ii) if a farmer does not carry out an activity of conservation on an area not used for production during a claim year, provided that the area remains in the condition to be maintained throughout the year? DE: In the Commission's view, how does the definition of 'beneficiary' interact with the other intervention-defining articles (Article 35, Article 74)?] FI (MS questions): Other beneficiaries are mentioned in the CAP Regulation, for example due to agri-environmental and climate actions under Article 10 of the CAP Regulation. Why are they not included in this definition? FR (MS questions): La Commission peut-elle clarifier le lien entre les dispositions de l'article 10 du règlement relatif à la PAC, qui stipule que les aides peuvent être versées aux « agriculteurs et autres bénéficiaires », et la définition du terme « bénéficiaire » au point 3.c), qui stipule que, dans le cadre de la PAC, les
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	bénéficiaires sont uniquement les agriculteurs (ayant un niveau d'activité minimum) ? HU (MS comments): It is not clear if this means that only farmers can be beneficiaries of the CAP, this should unambiguous considering public or private law bodies who are not farmers, especially since Article 35 also mentions LEADER, forest holders and rural business start-ups. HU (MS questions): Can the beneficiaries detailed in points (a) and (b) also be beneficiaries in the CAP? LV (MS questions): In certain CAP rural development measures, other beneficiaries may also be eligible for support, for example forest owner or person involved in the implementation of non-agricultural activities and the provision of
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	services. Therefore, the CAP should ensure a broader coverage of beneficiaries. As Article 77 does not specify the beneficiaries, we ask for confirmation that the definition of "beneficiary" should be used in the application of Article 77. Given that the LEADER approach covers a wider range of beneficiaries than just farmers. PL (MS comments): The proposed definition of beneficiary covers both farmers and other entities engaged in at least a minimum level of agricultural activity. In our opinion farmers should be the primary beneficiaries. If LEADER is only to be implemented within CAP, the definition should also include other beneficiaries active in local development groups that reside in rural areas and cooperate within local development strategies. PL (MS questions):
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	Which definition of beneficiary should we use for the LEADER approach, the one specific to the CAP or the general one described in the whole of paragraph 3? SE (MS comments): SE believes that the proposed definition might entail a risk for administrative difficulties. The proposal risks leading to extensive investigative work as well as administrative efforts to identify farmers. Currently, there is a lack of detailed information about companies' agricultural income as a proportion of total income, labor input on the agricultural enterprise, the company's purpose, and registers of agricultural enterprises. SE (MS questions): Could the Commission verify that the production of fruits, vegetables, flowers, and plants, including in greenhouses, is included in the definition of a <i>farmer</i>.
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	Is it a deliberate choice by the Commission to exclude groups of natural or legal persons as beneficiaries under the CAP? If so, what is the reasoning behind this?
(i) a natural or legal person whose holding is situated in the Union and whose principal activity is agricultural activity in accordance with the criteria defined by the Member States in line with this Regulation; or	AT (MS questions): Furthermore, the definition of a “small legal person” is questioned. What is meant by this? We are in favor of deleting this term. It is also noted that, as in the previous period, there is no definition of “active farmer” in accordance with Article 4(5) of Regulation 2021/2115. How can the removal of this term ensure that subsidies continue to benefit only those who were already eligible? CZ (MS comments): CZ disagrees with the definition of a farmer in paragraph 3, which will in our opinion result in significant administrative burdens in implementing this new criterion. In particular it will have a significant impact on the structure of beneficiaries, affecting farms with diversified production. The

new concept, whereby Member States are required to define agriculture as the main activity, will exclude a number of businesses that farm agricultural land and contribute significantly to food security and use ecological or sustainable practices, but have diversified production and therefore do not have agriculture as their predominant or main activity. The members states should have flexibility to set the criteria on the non-discriminatory bases, such as active farmer conditions in the current CAP.

CZ

(MS questions):

We ask for explanation of wording “principal activity”.

What criteria can Member States implement to assess principal agricultural activities? Can you provide us with examples.

Can MS continue to apply the criteria for active farmer ?

DE

(MS questions):

Should Member States be given the option to also recognize non-profit institutions engaged in agriculture as “beneficiaries,” regardless of their principal activity?]

	FI (MS questions): Is the intention now to limit the group of beneficiaries, since a farmer can only be a natural or legal person? Point 3 does not restrict the beneficiary based on whether it is a legal person or not. In the context of the CAP, both the farmer and other beneficiaries should be defined more broadly to take into account varieties of form of bodies and entities. Therefore, the following wording should be included: “a natural or legal person, or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law.” Nowadays the majority of income may come from sources other than agriculture, even if farming is the principal activity. Why are those farmers, usually highly educated, outside the definition of farmer if share of agricultural income within the total income is the criteria defining the concept of principal activity? Can we accept those farmers because they are important because agricultural areas are at a risk of abandonment of agricultural production in the Eastern border regions? FR
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	(MS questions): Pourquoi la définition de l'agriculteur est-elle limitée aux entités dont l'activité principale est l'activité agricole, alors que cela n'est plus le cas depuis plusieurs années dans les règlements de la PAC, la définition de l'agriculteur actif dans la PAC actuelle n'exigeant en effet qu'un niveau minimum d'activité agricole ? . IE (MS questions): A farmer is defined as a person whose “principal activity” is agricultural activity. How does this definition this account for part-time farmers? How will this definition interact with Generational Renewal given that a new entrant’s “principal activity” may not yet be agriculture? We would like clarity on the “head of holding” term. Can MS define “farmer” and/or “active farmer”? Natural person or Small legal person is listed as being able to carry out agriculture activity? Can legal partnerships, groups etc. be considered? LT (MS comments):
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“Group” of natural or legal persons is missing in the definition. It is essential in promoting farmers’ collective investments and cooperation activities, e.g. short supply chains. Please pay attention, that a group of individuals may function without legal personality, relying on civil agreements among its members.

PL

(MS comments):

We understand that according to the future generational renewal strategy support should be available not only for young farmers who already conduct agricultural activity but also for persons being in the process of starting agricultural activity or just planning such activity at the moment of submitting an application for support.

PL

(MS questions):

According to such definition of a farmer –beneficiary is it possible to grant support for a young farmer who hasn’t started conducting an agricultural activity or being a head of the holding at the time of submitting an application for support yet?

PT

	(MS questions): What criteria can be used to define the “principal activity”?
(ii) natural person or small legal person, whose principal activity is not agriculture, but who is engaged in at least a minimum level of agricultural activity, as defined by Member States.	CY (MS questions): What is the definition of Small legal person? CZ (MS questions): We ask for clarification of “small legal person” Is up to MS to define it? What criteria may be applied? ES (MS questions): Could the COMM clarify the concepts of “small legal person” and “minimum level of agricultural activity”? Small legal person: is it equivalent to SME as established in Recommendation 2003/361/CE?

	Is it only up to the MS to define these concepts? FI (MS questions): What about part-time farmers? Are they not accepted? What about legal persons that are not “small”? Are they not farmers who are engaged in at least a minimum level of agricultural activity? Why such a delimitation and discrimination? Therefore, the following wording should be included: <i>“a natural or legal person, or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law.”</i> FR (MS questions): Que signifie « petite personne morale » ? Pourquoi cette exemption est-elle limitée à ces deux types d'entités juridiques (personnes physiques et petites personnes morales) ? Pourquoi utiliser des termes différents entre l'article 4, paragraphe 3, point c) ii), du règlement PPNR, qui fait référence aux « personnes physiques ou petites personnes morales », et l'article 6, paragraphe 5, du règlement
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	spécifique sur la PAC, qui fait référence aux « petits agriculteurs », alors que les deux dispositions concernent les exemptions pour les agriculteurs multi-actifs ? HU (MS comments): The term "small legal person" is unclear. Also, it is not only small businesses that may not have agriculture as their primary activity. IE (MS questions): How is at least a minimum level of agricultural activity to be defined? Can it refer to a minimum area where an agricultural activity takes place? PL (MS comments): Concerns (i, ii): Currently 'farmer' means a natural or legal person or a group of natural or legal persons, irrespective of the legal status of such group and its members under national law, whose holding is situated in an area within the territorial scope of application of the Treaties as defined in Article 52 of the Treaty on European Union in conjunction with Articles
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	349 and 355 of the Treaty on the Functioning of the European Union (TFEU), and which carry out an agricultural activity as defined by the Member States in accordance with Article 4(2) of this Regulation'. PL (MS questions): Why has the definition of “farmer” been changed compared to the current wording? Why does the new definition not refer to groups of natural or legal persons, the status of the group, and its members? PT (MS questions): What is meant by 'small legal person'? Why does the minimum level of agricultural activity not apply to legal persons that are not ‘small’? RO (MS questions): The term "small legal person" is not clearly defined in the context provided. However, in general terms, a small legal entity is typically understood to refer to an organization that meets certain criteria based on
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	size, turnover, or workforce. These criteria can vary depending on the legal framework or context in which the term is used. It is not clear what is a small legal person, what are the criteria to be considered small and why is defined at the national level, taking into consideration that competitiveness is an EU exclusive competence We would like to request clarifications from the Commission regarding the meaning of the concept of “small legal person” provided in Article 4(3)(c)(ii). Does this refer to a certain size of turnover, number of shareholders, number of employees, or to the percentage of agricultural activity within the company’s total economic activity? SE (MS questions): What does the Commission mean by a small legal person – is it the SME definition that should be used to determine what constitutes a small legal person?

(4) 'chapter of the NRP Plan' means a part of the NRP Plan focusing on a specific challenge, sector, policy or geographic area,	AT (MS questions): Term "Chapter of the NRP Plan": Definition needs to be clarified. Does this mean that the sector proposals AMI, IS, and BMVI are to be classified as chapters of the NRP? Is there one chapter for each sector proposal or one for all home affairs areas? BE (MS questions): Can the Commission confirm that it is not either a regional chapter OR a sectoral chapter, but their can also be 'regional, sectoral chapters' (for example 2 separate agriculture chapters for 2 different regions)? In the Commission's written answers it is stated that 'sub-chapters are not envisaged'. Would this mean it is not possible to have for example a regional chapter, that has subchapters that are sectoral? DE (MS questions): Would regional chapters be designed rather priority-based or funds-oriented? Would regional chapters allow MS and regions to maintain the
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	current fund structure? Or would there only be one chapter per region setting overarching funding priorities?] EE (MS comments): The definition in art 4(4) is unclear in combination with the wording used in art 21(2) and Annex V. It remains vague if the definition of the 'chapter' of the NRP Plan is the part of the NRP Plan template titled as a 'part'? FI (MS questions): If there are two geographic areas inside the MS based on the autonomous status, there can be two chapters concerning each sector of the Plan (one for the other autonomous area and one for the other)? PL (MS questions): Please explain if technical assistance will be provided per chapter of the Plan or if it will constitute a separate chapter.

(5) 'contractor' means an entity or a natural person with whom the beneficiary or the recipient enters into a contract for the specific purpose of implementing one or more operations or a part thereof;	DE (MS comments): DE: The term is understood to be relevant only if EU funds are further distributed as through the national fund managers (administrative authorities) by the beneficiary (context of a multi-level distribution). Stations of the flow resources from the Union budget: EU --> National Managing Authorities --> Beneficiary --> recipient The transfer by the beneficiary does not take the form of a contractual relationship (performance – payment), because then it would not be a 'recipient' but a 'contractor' in accordance with paragraph 5.] DE (MS questions): DE: Is it true that this is the 2. "user" that the EU funds are passed on at national level by the beneficiary (1. "User" of EU funds), with no client relationship?] LU (MS comments):
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	Would it not be wise to insert a minimum amount above which an entity is to be considered, in order to avoid overly burdensome obligations? PL (MS comments): The proposed definition may cause legal uncertainty and represents excessive interference with national legal frameworks. Furthermore, the provision is inconsistent with the definition set out in the Financial Regulation (Article 2(18) of Regulation 2024/2509). PL propose clarifying the definition. SE (MS questions): Is this in the case of public procurement?
(6) 'recipient' means an entity with or without legal personality, or a natural person, who is not a participant, receiving resources from the Union budget through a beneficiary;	AT (MS comments): See comment under (3) of this article AT

	(MS questions): There is particular uncertainty about the exact difference between a ‘participant’ and a ‘recipient’ for IS, BMV and AMI. Could examples be provided for these areas? FI (MS questions): Is recipient linked to financial instruments or is it applicable to all support? HU (MS questions): Are we correct in thinking that natural persons belonging to the target group of a given project are also considered "participants" if they receive financial support within the framework of the project, e.g. a small incentive for volunteers participating in the project or accommodation support for third-country nationals? LU (MS questions): Financial resources?
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(7) ‘final recipient’ means an entity with or without legal personality or a natural person who is not a participant, receiving support under a financial instrument and who is understood as a recipient for the purposes of Article 38(1) of Regulation (EU, Euratom) 2024/2509;	AT (MS comments): See comment under (3) of this article HU (MS questions): See question at (6). PL (MS comments): The phrase "who is not a participant" should be removed from the definition, as participants are often the final recipients in projects implemented in the form of financial instruments under the ESF+.
(8) ‘participant’ means a natural person benefiting directly from an operation without initiating or implementing the operation;	AT (MS comments): See comment under (3) of this article AT

	(MS questions): See question under (6) of this article HU (MS questions): See question at (6).
(9) 'operation' means:	DE (MS questions): DE: Is it correct to understand that these are operations that are likely to entitle the initiators and implementers (beneficiaries, recipients) to receive EU funding on the basis of actions?] HU (MS comments): The terminology used in the draft Single Plan regulation and CAP regulations is inconsistent. The terms "operation," "measure," and "intervention" are used interchangeably, making it unclear when they refer to the same or different concepts. The difference between the concepts of intervention and measure needs to be clarified. Intervention is

	currently not defined in the regulation. This inconsistency affects several articles. HU (MS questions): In case of the CAP, Article 35 mentions “interventions”. There is no specific definition for “intervention”. Is there a difference between the concepts of intervention and measure? IE (MS comments): Definition of “Operation” - does not align with use in Article 78 para 2 (which refers to PO schemes) IT (MS questions): See above art. 4(3) LT (MS comments):
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	We suggest assessing whether the group of contracts should also be included, as indicated for projects and actions. LV (MS comments): Some definitions are defined in several regulations and has 2 different definations, example: "operations", "measure", "target". PL (MS comments): Performance Framework Regulation proposal defines generally an operation as ‘project, action or group of projects or actions implementing one or more activities’ PL (MS questions): Could EC clarify why there is a difference in defining operation in point 9 letter a between this Regulation and Performance Framework Regulation? RO (MS comments):
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	The definition applied to the <i>operation</i> and <i>measure</i> (paragraphs 9 and 10) must be aligned not only with the proposal for a performance regulation, but also with <i>the provisions of the Financial Regulation 2024/2509</i>. It is necessary to ensure a unitary taxonomy of concepts, both from the perspective of budgetary planning and that of the management of public interventions (policies, programmes and projects) in order to avoid different interpretations of similar concepts. SI (MS questions): (9) Do points a, b, and c apply to the CAP, or only point c? If we understand correctly, in the case of the CAP, the operation refers only to the IACS interventions listed in Article 35, point 1, from a to g. Therefore, no operation is defined for other interventions, such as investments, Leader, etc.
(a) a project, contract, action or group of projects or group of actions selected in the context of implementing a measure in the Plan;	FR (MS questions): La Commission parle-t-elle du “NRRP Plan” ou du plan Interreg ?

	LT (MS comments): Explanation is needed whether, according to the definition, an operation can be selected not only by the managing authority, compared to the 2021-2027 period. PL (MS comments): Performance Framework Regulation proposal defines operation in context of financial instruments as ‘the amount of reimbursable financing provided to final recipients and supported by the Union budget; PL (MS questions): Could EC clarify why there is a difference in defining operation in point 9 letter b between this Regulation and Performance Framework Regulation? SE (MS questions):
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	If an operation (art.4(9)) is a way to implement a measure and a measure (art.4(10)) is an intervention on national level, does this mean that milestones (art. 4(11)) and targets (art. 4(12)) only will be used within the context of a measure? If that is the case, is an operation in itself a possible milestone and the aspired effect of the operation a part of the result?
	LT (MS comments): Additional definition of <i>the operation partner</i> is needed. An operation partnership means genuine cooperation between entities that jointly plan, implement, and take responsibility for activities, with clearly defined roles and contributions. Effective partnerships are based on equality, transparency, and shared decision-making throughout all key stages – from preparation to implementation and evaluation – creating sustainable relationships and shared value around common goals. We believe that to strengthen the essence of partnership it is important to add the definition of <i>the operation partner</i>.
(b) in the context of financial instruments, a contribution from the NRP Plan and the Interreg Plan to a financial instrument and the	

subsequent financial support provided to final recipients by that financial instrument;	
(c) in the context of the CAP, a payment granted to farmers under area- and animal-based CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p).	AT (MS comments): The definition of a project in connection with the CAP differs from the previous definition in Regulation 2021/2115 Art. 3 (4) (a) and is considered too narrow, as it only covers area- and animal-related measures. The definition should be broadened or clarified This would contribute to administrative simplification and flexibility in the design of interventions in accordance with Article 10 of the CAP Regulation. AT (MS questions): Are we correct in assuming that a «project» within the framework of the NRPP is the same as an «operation»? We are not sure what is meant with «project» and «operation» within the CAP- and the NRPP-Regulation.

	Within the framework of the CAP, ONLY area-/animal-related measures fall under the definition of “project/operation.” How are projects called that are supported by a CAP intervention but do not fall under Article 35 (a) to (g), (o), and (p) referred to? BE (MS questions): This definition of operation for CAP in NRP Regulation differs from the definition of operation in the Performance framework Regulation. Why a separate definition for CAP operation is given? Why is the definition of CAP operation limited to area and animal-related CAP interventions? Interventions h-k are payments to farmers as well but are not CAP operations? What is the definition of operation for the other CAP interventions (h-n, q-r)? CZ (MS comments): Given that also payments other than area- and animal-based are supported under the CAP, we request to clarify the wording to: “in the context of the CAP, also a payment granted to farmers under area- and animal-based
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	CAP income support interventions referred to in Article 35(1) [Types of intervention], points (a) to (g), (o) and (p). CZ (MS questions): Could the Commission clarify if this restrictive scope is intended, or if the definition should be understood to also cover other forms of CAP support? DE (MS comments): DE: It is not really clear, why “Operation” must be defined especially for the area- and animal-based CAP-Interventions. We assume, that for the Categories of Interventions not mentioned in Art. 35, Art. 4 (9) a) have to apply.] LU (MS comments): LU: We would prefer to maintain the term “interventions” for all our measures as it is the case for the CAP SP. To keep it simple. Also, in
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	Annex V page 26, the table defines “Interventions of the Common Agriculture Policy”. LU (MS questions): LU: What is the difference between an operation and a measure? In the case of the national strategic plan for CAP (agriculture) we already set up a plan and have a performance framework. We use the word "intervention", why change? With this formulation we have “operations” for area based and animal-based measures” and for investments for farmers, are we supposed to use the term “measures”? What is the purpose of this distinction? Moreover, the definition of operation, article 4 (9) does not include the intervention (q) of article 35.1 for the school scheme. LV (MS questions): In the context of the CAP there are also a project, contract as mentioned in point (a). Could COM confirm that point (c) is not exclusive for CAP measures?
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	NL (MS questions): can the Commission explain why certain CAP interventions of Article 35 are excluded under subpoint (c)? Do the remaining CAP interventions fall under operation subpoint (a) or (b) of operation or under point 10 ('measure')?
(10) 'measure' means a reform, an investment or another intervention at national or sub-national level supported under the NRP Plan or the Interreg Plan;	AT (MS comments): It is necessary to define the term 'measure' in relation to the terms 'operation' (point 9) and 'intervention', 'activity' and 'intervention field' from the Performance Framework Regulation, as well as their interaction. The terms have to be precisely defined and distinguished from one another. This would also contribute to administrative simplification BE (MS questions):

	Please clarify the definition of measure. Measure is defined in the NRP Regulation and in the Performance framework, in a different way. Please also clarify the definition of reforms. DE (MS questions): DE: Is it correct to understand that this corresponds to a CAP Strategic Plan measure, for example EL-0405 is therefore a ‘measure’ in the sense of paragraph (10)? Could COM give a definition of a reform?] HU (MS comments): In addition to the term "measure," it would be advisable to clarify the definitions of "action," "investment," and "intervention" and to use them consistently in the regulations. It is necessary to clarify the difference between the definition of intervention and measure. HU (MS questions):
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	Does "measure" originate from a predefined set or is it determined by the Member State? This is particularly important in relation to the reference codes in Annex V of the template (measure ID). LU (MS questions): Are farm investments included here? NL (MS questions): Could the Commission give an example of ‘another intervention’ than investments or reforms? RO (MS comments): The definition applied to the <i>operation</i> and <i>measure</i> (paragraphs 9 and 10) must be aligned not only with the proposal for a performance regulation, but also with <i>the provisions of the Financial Regulation 2024/2509</i>. It is necessary to ensure a unitary taxonomy of concepts, both from the perspective of budgetary planning and that of the management of public
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	interventions (policies, programmes and projects) in order to avoid different interpretations of similar concepts. RO (MS questions): For an Interreg Plan chapter, what exactly does ‘measure’ mean? For more clarity, the concepts used for this definition - “reform” and “investment” – should also be explained. SE (MS questions): What is the connection between “measure” and specific objectives? If a measure always implies a connection to implementation of one or more specific objectives, this should be made clear in the definition. SI (MS questions): (10) What is a “measure” in the case of the CAP? Are these the interventions referred to in Article 35? Is a measure a generic term or is it
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	the same as an intervention? What are the types of intervention (Article 35)?
(11) ‘milestone’ means a qualitative achievement used to measure progress towards the achievement of a measure;	AT (MS questions): Is there a particular reason not to use the same definition as in Regulation 2021/1060, Art. 2 (11): Milestone means an intermediate value to be achieved at a given point in time during the eligibility period in relation to an output indicator included under a specific objective? It says that milestones measure progress [...] of a “measure”. Could you please clarify what “measure” means in this context (project, operation, etc.?) BE (MS questions): What is the difference between milestones (qualitative according to art. 4 (11)) and targets (quantitative according to art. 4 (12)), since both are based on output indicators, which are quantitative (art. 14 (2a), Performance-regulation)?

	DE (MS questions): DE: What is meant with “qualitative achievement”? Do milestones not need to be quantified, but are merely descriptive in nature?] FI (MS questions): The following definition is given: ‘milestone’ means a qualitative achievement used to measure progress towards the achievement of a measure. Where are the “qualitative” criteria defined if the milestones are qualitative? Would the indicators concerning CAP still mainly be output-based? Qualitative indicators may already be in use in some other areas. Can the intermediate target for quantitative targets also be milestones? In the current period, milestone concerning CAP is a quantitative milestone. FR (MS questions): La Commission peut-elle confirmer que la notion « d’étape clé » devient uniquement un objectif qualitatif, alors que les « étapes clés » étaient
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	quantitatives dans la programmation de la PAC 2023-2027 ? La Commission peut-elle fournir un exemple d'étape clé qualitative liée à une mesure de la PAC afin de mieux comprendre le nouveau cadre de performance proposé ? Comment sera assurée la mesurabilité d'un jalon ? Comment relier les jalons aux cibles ? Le terme « milestone » est-il défini différemment de la programmation 2021-2027, s'agirait-il des réalisations intermédiaires ou finales ? HU (MS comments): The concepts of milestones need to be clarified. In the current CAP legislation, a milestone is an intermediate value in the period. IE (MS questions): Are milestones annual? IT (MS comments):
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In order to ensure the plan and its related measures have the actual capacity to request and obtain reimbursements on a yearly basis, it would be appropriate to better define what is meant by the term 'milestone', extending the underlying concept to include procedural and/or temporal targets, as it follows:

(11) 'milestone' means a qualitative, procedural or temporal achievement used to measure progress towards the achievement of a measure;

LT

(MS comments):

There is no “milestone” as a qualitative achievement for the CAP measures. Therefore, it is not clear.

LT

(MS questions):

Should such qualitative nature “milestone” be applied for the CAP measures as well?

More clearance for ‘milestone’ (qualitative achievement) within CAP measure?

	PL (MS questions): The term "<i>qualitative</i>" is subjective in nature – please clarify. SE (MS questions): Why is a milestone limited only to a qualitative achievement? If it is more suitable to have quantitative milestones it should be possible depending on the measure. It's difficult to measure qualitative achievements as qualitative data is descriptive. SI (MS questions): (11) Are the milestones annual? The achievement of milestones shall be assessed on the basis of Annex IX: • No progress (0 %-estimation), • Small progress (33 %-estimation), • Substantial progress (66 %-estimation),
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	Fulfilment (100 %) A milestone is defined as a qualitative measure of progress. Until now, milestones have been measured quantitatively? How can you measure the achievement of a milestone qualitatively? In Appendix 9, the achievement of a milestone is defined in percentages, i.e. quantitatively.
(12) 'target' means a quantitative achievement used to measure progress towards the achievement of a measure;	FR (MS questions): Le terme « target » est-il défini différemment de la programmation 2021-2027 (cf question précédente) ? HU (MS comments): See our comment at (11). PL (MS comments):

	The definition of the target is unclear, considering, among other things, the different targets referred to in the draft regulation (general targets, specific targets, intermediate targets, final targets). There is also a lack of definition for the intermediate target and the final target. SE (MS questions): Why is a target limited only to a quantitative achievement? If it is more suitable to have a qualitative target it should be possible depending on the measure.
(13) ‘pay-out value’ means the amount to be paid by the Commission to the Member State for the progress achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms;	AT (MS questions): Does this definition imply that reforms will be priced in? CZ (MS comments): The concept of “amount set aside for reforms” is not explained in the regulation, nor in its explanatory memorandum. It is mentioned only with respect to CAP in Article 35.

	CZ (MS questions): How will the pay-out value be established? How are the amounts set aside for reforms determined? How will be used in the context of the assessment of milestones and targets fulfilment and payment requests? DE (MS comments): Since the pay-out value is described per milestone/target, this should be made clearer here.] DE (MS questions): Where is the “amount for reforms” defined? What is the definition of the pay-out value for reforms and how is it calculated? Could COM explain please what “taking into account the amounts set aside for reforms” means in practice? Are these the reforms without (budgetary) costs? When progress is achieved in the implementation of reforms an amount would be paid to MS – thus they would also have a pay-out value or not?]
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	EE (MS questions): Term ‘pay-out value’ refers only to the reform, whereas the term ‘measure’ refers a reform, an investment or another intervention. Therefore, it is unclear whether every ‘pay-out value’ must be linked to a reform? FI (MS questions): If only the measures of the Plan have the pay-out value, what about operations? No pay-out value concerning operations, for example under area- and animal based CAP income support interventions (definition operation used, not definition measure)? FR (MS questions): Alors que le point 10 indique qu’une mesure comprend les réformes, pourquoi le point 13 semble-il les séparer ? NL (MS questions):
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	Could the Commission explain how the ‘pay-out value’ for reforms is determined? PL (MS questions): Please explain how the pay-out value will be calculated, how will it correspond to unit costs of targets, will it take into account also indirect/management costs related to implementing the operation? RO (MS questions): Clarification of the methodology for “paid out value” and decommitment of funds - There are ambiguities regarding how reforms and targets are managed if funds are decommitted under the N+1 cross-plan rule without corresponding modifications to the approved plan. Also, how is applied the decommitting mechanism in relation with the pay-out value and how are the sums recalculated in the decommission phase when a reform is considered reversed or not fulfilled. A clear methodology and exemplified situation are necessary to prevent inconsistencies between plans and implementation and to be aware of the financial risks on the national budget.
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	SK (MS questions): Do we understand correctly that in Article 4(13) of the NSP, the definition of " pay-out value " only takes into account amounts allocated to reforms, even though the term "measure" in Article 4(10) refers to a reform, investment, or other intervention at national or sub-national level? Is the definition in paragraph 13 complete in relation to paragraph 10?
(14) ‘Agricultural Knowledge and Information system’ or ‘AKIS’ means the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge and innovations for agriculture and interrelated fields referred to in Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation].	

(15) ‘organic farming’ means organic production system certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council²;	AT (MS comments): Clarification/addition is needed to state that farms in conversion (for the sake of simplification) are included. PL (MS comments): The definition of "operation" lacks a reference to types of projects, in particular to small-scale projects under the Interreg Plan. This creates interpretation challenges. In the 2021–2027 programming period, small projects were clearly defined in the relevant documents PT (MS comments): Need to clarify that “certified” organic production system encompasses “organic farming in-conversion”.

² Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150 14.6.2018, p. 1).

(16) ‘holding’ means all the units used for agricultural activities and managed by a farmer and situated within the territory of the same Member State, within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU;	NL (MS questions): Can the Commission confirm that paludiculture fall under the definition of holding?
(17) ‘the smaller Aegean islands’ means any islands in the Aegean Sea except the islands of Crete and Evia.	
(18) ‘seals’ means Seals of Excellence and Sovereignty Seals granted in the implementation of Union programmes in the 2021 to 2027 programming period and Seals granted under Union programmes implemented in direct management in the 2028-2034 period such as the Competitiveness seal;	SI (MS comments): (18) ‘seals’ means Seals of Excellence and Sovereignty Seals granted in the implementation of Union programmes in the 2021 to 2027 programming period and Seals granted under Union programmes implemented in direct management in the 2028-2034 period such as the Competitiveness seal <u>or any other seal that will be issued by the Commission within the period 2028 - 2034;</u> SI (MS questions):

	We suggest to enable also possibility of any other seal that will be possible to obtain from the EC or its institutions.
(19) 'subcontractor' means a person or entity with whom the contractor has concluded a contract to perform part of a contract for the specific purpose of implementing one or more operations or a part thereof;	PL (MS comments): The definition will cause legal chaos and constitutes excessive interference with national legislation. The provision is inconsistent with the definition given in the Financial Regulation (Article 2, point 18 of Regulation 2024/2509).
(20) 'crisis' means crises as defined in Article 2, point (22) of Regulation (EU, Euratom) 2024/2509;	EE (MS questions): According to the Article 1(4) Regulation 2024/1359 a situation of crisis means: (a) an exceptional situation of mass arrivals of third-country nationals or stateless persons in a Member State by land, air or sea, including of persons that have been disembarked following search and rescue operations, of such a scale and nature, taking into account, inter alia,

	the population, GDP and geographical specificities of the Member State, including the size of the territory, that it renders the Member State's well-prepared asylum, reception, including child protection services, or return system non-functional, including as a result of a situation at local or regional level, such that there could be serious consequences for the functioning of the Common European Asylum System; or (b) a situation of instrumentalisation where a third country or a hostile non-state actor encourages or facilitates the movement of third-country nationals or stateless persons to the external borders or to a Member State, with the aim of destabilising the Union or a Member State, and where such actions are liable to put at risk essential functions of a Member State, including the maintenance of law and order or the safeguard of its national security. We would like to know whether the definition in Article 4(2) is in line with the definition of crisis situation set out in the Regulation 2024/1359? What definition should MS follow in cases where EU funding is needed for managing mass influx of illegal migrants or asylum seekers or managing instrumentalization of migration? EL (MS comments):
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	This definition does not cover the definitions for crisis in the field of Home Affairs, as its definition is described in Article 1(4) of Regulation EU 2024/1359 and as it is described in the current MFF 2021-2027, in article 2 (ISF), 2 (BMVI) and 31 (AMIF). Thus, we set scrutiny reservation on this definition. EL (MS questions): How and where do you describe specific definitions in the field of “migration” “borders” and “internal security” in order to activate the emergency situation in order to use the EU Facility (Emerging challenges and priorities cushion)? HU (MS questions): Article 38 mentions “Crisis payments to farmers following natural disasters, adverse climatic events and catastrophic events”. The question that needs to be clarified is whether drought and frost damage can also be included in this category. IT
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	(MS questions): According to art. 2 point (22) of Regulation (EU, Euratom) 2024/2509 "22) 'crisis' means: (a) a situation of immediate or imminent danger threatening to escalate into an armed conflict or to destabilise a country or its neighbourhood; (b) a situation caused by natural disasters, man-made crisis such as wars and other conflicts or extraordinary circumstances having comparable effects related, inter alia, to climate change, public and animal health, food security and food safety emergencies and global health threats, such as epidemics and pandemics, environmental degradation, privation of access to energy and natural resources or extreme poverty; The definition does not appear to include adversities like natural disasters. Is this correct? If so, how would they be considered? SK (MS questions):
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	Why is the term ‘crisis’, as defined in Article 4(20), not used consistently throughout the regulation? For example, in Article 34 the term ‘crisis’ appears to have a narrower meaning.
(21) ‘pillar assessment’ means the assessment referred to in Articles 157(3) and (4) of Regulation (EU, Euratom) 2024/2509;	
(22) Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality.	DE (MS questions): DE: What is the flexibility for Member States to define the terms in point 22 in detail? Are there any elements in point 22 for which Member States have no margin of flexibility? It is not clear from the introductory part of point 22, or in part from the individual terms dealt with, what flexibility the Member States still have in the scope of definitions. On the one hand, it is said that the MS define, on the other hand, point (a)(i) defines what an activity is. In particular, unlike Article 4(1) of Regulation (EU) 2021/2115, the introductory part does not state that the Member States are also required to lay down the relevant conditions. Otherwise, too, less leeway is expressly referred to as such than in Regulation 2021/2115. To

a large extent, the formulations used can already be regarded as indefinite legal concepts that could be applied in each individual case. Where there is no room for flexibility, directly applicable definitions should be laid down in accordance with the general rule laid down in Article 4.]

EE

(MS questions):

Member States shall further establish in their NRP Plans the definitions of ‘agricultural activity’, ‘agricultural area’, ‘eligible hectare’, and ‘young farmer’ in accordance with objective and non-discriminatory criteria and the principle of proportionality- what does COM mean under principle of proportionality?

The new definition does not refer to “raising animals” compared to the current definitions. Could the COM explain this differences?

Maintenance of agricultural areas is included to these definitions with adjusted wording, which means that „maintenance „replaced by „keeping “. Does the COM see a change also in content compared to the current period? Are those farmers who do not maintain the land themselves, but keeping the land in good condition, also considered to be engaged in agricultural activities?

	The definition of “agricultural areas” refers areas which is used only for agricultural activities. As regards greenhouses and tree plants in the current period, the MS must follow the rule, that only these greenhouses and tree plants are eligible for direct payment support, if cultivation of crops has direct interaction with soil (e.g. plants are grown in containers, bricks, sacks or trays). As we understand in the next programming period it is up to the MS to define these areas to be eligible for support or not? Does agricultural activity and agricultural area also include the cultivation and areas of paludiculture? IE (MS questions): Can Member States define "farmer" and/or "active Farmer" LU (MS comments): LU: This definition should be included in the CAP regulation PL (MS comments):
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	The definition of a young farmer should include persons just starting their agricultural activities. SE (MS comments): SE would like to underline that it is important the MS are allowed to continue to use pro-rata to manage non-eligible areas. The administrative burden will increase for the support authorities if non-eligible elements must be handled by being individually removed from the blocks instead of using the pro rata method. SE (MS questions): Regarding Article 4.22 and the definitions of (a) agricultural activity (b) agricultural area, and (c) eligible hectare Could the Commission summarize the differences compared to the current rules and explain what these differences may mean in practice. For example, regarding the addition in 4.22a(ii) on extensive grazing and
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	4.22c(iii) on which landscape elements, and to what extent, may be included in the eligible hectare. How should non-eligible elements (pro rata) be handled when they are no longer regulated in the regulation?
(a) ‘agricultural activity’ shall be determined through one or both of the following activities:	AT (MS comments): Clarification/addition is needed here to state that farms whose main focus is landscape conservation or nature conservation are also included. AT (MS questions): The EC is requested to explain why paludiculture is not explicitly mentioned (in contrast to the previous provision in Article 4(2)(a) of Regulation 2021/2115). The regulatory framework for “arable land,” “permanent crops,” and “permanent grassland” is also missing here. The EC is requested to explain why this is no longer specified at EU level.

	FI (MS questions): One or both means that maintenance of agricultural areas can be left out of MS definition? Why can't Member States be given a genuine opportunity to define agricultural activity without dividing it into these two categories? LU (MS comments): LU: Art. 4 of Regulation 2115/2021 provided for the definition of “active farmer”. We have now several aspects of this definition spread over several articles of several regulations. E.g. “beneficiary” in article 4 and “agricultural activity”. In the CAP regulation, in several places, the proposal mention that aid shall be granted to farmers exercising agriculture activity, small farmers with at least a minimum agricultural activity, farmers who have not reached age of retirement, etc. We would like all the articles defining agricultural activity in the CAP regulation. SE
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	(MS questions): Could the Commission verify that the production of fruits, vegetables, flowers, and plants, including in greenhouses, is included in the definition of agricultural activity and agricultural area under point 22a(i) and point 22(b).
(i) production of agricultural products, which consists of all activities aimed at obtaining those products; where agricultural products means products listed in Annex I to the TFEU, with the exception of fishery products, as well as cotton and short rotation coppice;	DE (MS questions): DE: regarding activities aimed at obtaining those products’: Is the interpretation correct that this for example also includes the storage of inputs for the production of agricultural products? What other differences to the current provision in Article 4(2) of Regulation (EU) 2021/2115 (‘Production of agricultural products’) result from the amended wording? DE: Would it not be appropriate to supplement other products not listed in Annex I TFEU, e.g. ‘products produced by paludiculture’ (productive use of wet peatlands)?] FI (MS questions):

	Where are the products cultivated for purposes such as bioenergy (in addition to short rotation coppice) or for uses other than Annex I products, even though agricultural land is used for their cultivation? Ambiguities should be eliminated — for example, young common reed (<i>Phragmites australis</i>) can be used as fodder, but older reed used for roofs is not eligible for support. Eligibility should no longer be determined based on the intended use. PL (MS questions): Please confirm that production of short rotation coppice should be included in the definition of agricultural activity contrary to fishery products.
(ii) maintenance of agricultural areas, which consists of the activities aiming at keeping the land in a state suitable for grazing or cultivation; where duly justified for animal welfare or environmental reasons, extensive grazing of an agricultural area that does not result in an increase of agricultural production for the farmers concerned may also be considered ‘maintenance’.	DE (MS questions): DE: Is it sufficient for an activity under (a)(ii) if a farmer does not carry out an activity of conservation on an area not used for production during a claim year, provided that the area remains in the condition to be maintained throughout the year?

DE: regarding ‘extensive grazing’: What are the requirements for the audit to determine that ex-tensive grazing does not lead to an increase (compared to what?) in agricultural production for all ‘farmers concerned’? Are ‘the farmers concerned’ also referring to farmers other than those who own the area and indicate it in the application (e.g. migrant shepherds)? Moreover, how does the Commission assess this requirement in terms of simplification and red tape reduction?]

FI

(MS questions):

Maintenance of agricultural areas is part of agricultural activity (if MS so wish). How big share of the farm can be under maintenance of agricultural areas and the farmer is still a farmer who actively contributes to food security?

Why is maintenance of agricultural areas accepted? Why don’t we move towards requiring the production of ecosystem services instead of merely maintenance of agricultural areas?

There should be no need to pay support merely for maintaining areas. Wouldn’t making the production of ecosystem services a condition for receiving support be more appropriate?

	Ecosystem services — including those beyond food production — are a reality today, and they are not simply about maintenance of agricultural areas. FR (MS comments): Dans la deuxième partie du point (ii), il est essentiel que cette exigence n'implique pas une évaluation au cas par cas, ce qui constituerait une charge insoutenable pour les États membres. FR (MS questions): Quel est l'objectif poursuivi en ajoutant à la définition de l'activité agricole « lorsque cela se justifie dûment pour des raisons liées au bien-être animal ou à l'environnement, le pâturage extensif d'une zone agricole qui n'entraîne pas d'augmentation de la production agricole pour les agriculteurs concernés peut également être considéré comme un « entretien » » ? Le pâturage extensif visant à maintenir les ressources fourragères affectées par le changement climatique est-il considéré comme une raison environnementale ?
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	HU (MS questions): The question that needs to be clarified is whether extensive grazing is compatible with the minimum requirements, because the maintenance part of the definition is supplemented by extensive grazing. PT (MS questions): Under the conditions for “maintenance of agricultural areas” in the case of extensive grazing of permanent grassland area, can a minimum stocking density be required for the purposes of degressive support for basic income?
(b) ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems.	AT (MS comments): In contrast the current CAP, this is a general formulation. As a result, there are specifications regarding grassland conversion, for example This should b discussed further in terms of content.

	DE (MS comments): It should be ensured, that, e.g., habitat types whose conservation depends on agricultural use can in all cases be classified as “agricultural area.”] DE (MS questions): DE: What are the reasons for adopting a new approach to the definition of ‘agricultural area’, which no longer refers to the crops on the land but to the agricultural activity? DE: Is the interpretation correct that this definition is an extension of the eligible area compared to the status quo in so far as, in the future, not only areas which are arable land, permanent crops or permanent grassland within the meaning of the current Regulation 2021/2115 are included, but also other areas used for the production of Annex I products, e.g. areas used for livestock farming, which are not agricultural areas within the meaning of the current Regulation 2021/2115 or also areas with Christmas tree crops? How much leeway do MS have in defining “arable land”, “permanent grassland” and “permanent crops”?
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	How is overall coherence of the definitions used by MS – and thus, a level playing field – ensured, in this regard?] FI (MS questions): The following definition is given: ‘agricultural area’ shall be defined in such a way as to comprise only land which is used for agricultural activities, including when it forms agroforestry systems. We welcome the fact that sub-categories of agricultural areas are no longer defined at the EU level. However, according to Article 63(1)(a)(viii), the MSs have to collect and report the total number of hectares of those sub-categories (permanent grassland and permanent crops). Does this mean that the MS use their own definition of sub-categories for collecting and reporting data? Why is that data still needed when no sub-categories exist? Do agroforestry areas have to be productive by definition? FR (MS questions): La Commission peut-elle confirmer que les définitions des terres arables, des cultures permanentes et des prairies permanentes ont bien été supprimées ?
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	Si c'est le cas, il convient de noter que ces concepts sont toujours mentionnés à divers endroits dans le règlement sur la PAC, en particulier dans les exigences de conditionnalité pour les prairies permanentes, et que si ce concept est toujours retenu dans ce contexte, une définition commune devrait être fournie. Si la suppression de ces définitions est confirmée, les États membres auront-ils toute latitude pour identifier les différents types de terres agricoles dans le système d'identification des parcelles agricoles (SIPA) selon leurs propres critères ? HU (MS questions): This definition does not include the concepts of arable land, permanent crops, and permanent grassland—what is the reason for this? LU (MS questions): LU: Agricultural area: How to understand? Have MS now complete leeway in definition? Is there a risk of discrepancy between MS? PT
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	(MS questions): Why does this definition not include the concepts of ‘arable land’, ‘permanent crops’ and ‘permanent grassland area’? (as mentioned in article 63 of the proposed NRPP Regulation). SE (MS questions): Could the Commission verify that the production of fruits, vegetables, flowers, and plants, including in greenhouses, is included in the definition of agricultural activity and agricultural area under point 22a(i) and point 22(b).
(c) ‘eligible hectare’ shall be defined in such a way as to comprise only areas which are at the farmers’ disposal and which comprise:	AT (MS comments): Applies for (i) and (ii): Here too, ‘groups of natural or legal persons’ should be included in the definition. It is also noted that, as in the previous period, there is no definition of the term ‘active farmer’ in accordance with Article 4(5) of Regulation 2021/2115.

	AT (MS questions): How can the removal of the term “active farmer” ensure that subsidies continue to benefit only those who were already eligible? DE (MS questions): DE: regarding point (c) in general (eligible hectares): What is the significance of this provision being included again in Article 6(7) of the CAP Treaty (i.e. only for DABIS) in terms of content?] EE (MS questions): Is an area eligible for support for which a longer-term commitment has already been made in accordance with Regulation (EU) 2021/2115 for the period 2023-2027 and this commitment extends into the new programming period, or can similar new commitments also be started in the 2027+ programming period? “Eligible hectare” shall be defined in such a way as to comprise only areas which are at the farmers’ disposal, and which comprise:
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	(i) agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant. Can COM explain what the differences is between “at farmer disposal” and “under the farmers control in the terms of management, benefits and financial risks”? HU (MS comments): This definition can also be found in the CAP Regulation. To avoid duplication, we recommend that it only appear in one place. HU (MS questions): What is the change compared to the definition given in Regulation (EU) 2021/2115? LV (MS questions):
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	Why are areas used for the cultivation of eligible hemp not included in the overall definition of eligible hectares, as has been the case until now?] PL (MS questions): Why is the definition of an eligible hectare included in both: this provision and Article 6 of the draft CAP Regulation on degressive area-based income support? Why does the definition in this Regulation refer to the provisions of Regulation 2021/2115 on basic income support and payments for small farms?
(i) agricultural areas on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks. If non-agricultural activities are also performed on these areas, the agricultural activity shall be predominant.	DE (MS questions): DE: 'on which an agricultural activity is performed under the farmer's control in terms of management, benefits and financial risks': 1) For what reasons does the Commission propose this requirement in addition to the requirement that the area must be available to the farmer in order to be an eligible area?

	2) What is the difference between ‘used’ in point (b) (and in the current rule in Article 4(4) of Regulation 2021/2115) and ‘performed’? 3) What are the expectations for proof and control of ‘under the farmer’s control in terms of management, benefits and financial risks’? 4) What is the result of this requirement in the event of a change of area from one farmer to another over the course of a year? 5) What is the Commission's assessment of this new regulation in the light of the objective of simplification and red tape reduction? 6) Is the interpretation correct that Member States are not required to include in their definition of ‘eligible hectare’ all areas that meet the conditions of point (c)(i)? (Currently: ‘any area’, in this case: "areas").] FR (MS questions): Pourquoi préciser « sous le contrôle de l'agriculteur en termes de gestion, d'avantages et de risques financiers » ? Ces critères ne sont-ils pas inclus dans « à disposition » ?

(ii) areas for which support is provided under Article 35(1) points (a) and (g) [<i>degressive income support, small farmers</i>] of this Regulation, or under the basic income support for sustainability under Title III, Chapter II, Section 2, Subsection 2, [<i>BISS [all incl. entitlements], small farmers scheme</i>], of Regulation (EU) 2021/2115, where agricultural activity is not performed due to commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives	DE (MS questions): DE: 1) Which measures covered by Article 4(4)(b)(ii) and (c) of Regulation (EU) 2021/2115 are covered here and which are not? In particular, it is not apparent that farm stewardship and Directives 92/43, 2009/147 and 2000/60 could be ‘commitments and obligations’ (none of these terms in FS, Directives merely oblige MS). 2) What does ‘other programmes’ include, which here stands alongside the term ‘interventions’? 3) ‘the environmental and climate-related CAP specific objectives’: What specific objectives does this relate to and where are these objectives regulated?] FI (MS questions): Is it mandatory to pay decreasing area-based support also for forest pastures and wetlands if those are under commitments and obligations arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives? Or is the obligation after the commitments and obligations
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	arising from Union or national interventions or other programmes which contribute to the environmental and climate-related CAP specific objectives has expired? Or does this mean that certain types of climate and environmental protection areas are eligible for degressive area-based support, even if they are no longer used for agricultural activities, provided they were classified as eligible agricultural area prior to any commitments or agreements? IE (MS questions): Does the reference to the non-performance of an agricultural activity include due to measures previously carried out or continuing under previous programmes or national measures such as afforestation or other similar actions?
(iii) Member States may decide to include in the notion of ‘eligible hectare’ landscape features, not covered by the commitments and schemes referred to in point (ii), provided that these landscape features do not significantly hamper the performance of agricultural activity and are not predominant on the agricultural parcel	FI (MS questions): Could a landscape feature be something other than natural feature, for example, solar panels? The proposal does not define “landscape feature.”

(d) 'young farmer' shall be defined in such a way as to fulfil at least the following conditions:	AT (MS comments): We are in favor of the minimum qualification (defined in the NRPP) as a prerequisite for receiving support. DE (MS questions): DE: 1) Unlike farmers, young farmers are always defined as a natural person (age, manager). Would it therefore not be appropriate, particularly in view of the fact that support for young farmers is to be given a more prominent position in the future, to supplement a system for dealing with such cases? These are all characterised by the fact that it is not the natural person with the status of young farmer who is eligible, but only the farmer who is different from him. [Or should such cases always be considered as new farmers in the future, even if the farmer himself is a young farmer, since the applicant is not the farmer but the company (and old companies should never be eligible for support for young farmers)? This would also seem conceivable, but would also have to be clarified in the regulation. Compared to the current law on income payments for

	farmers, it is a change that special consideration should also be given to new farmers in the area-related income support.] Unlike farmers, young farmers are always defined as a natural person (age, manager).] FR (MS questions): Pourquoi l'exigence relative à la qualification a-t-elle été supprimée de la définition ? IE (MS questions): Can the Commission confirm that it is N=no longer requirement to have qualifications for young farmer? PL (MS questions): Does the definition of a young farmer allow a person who is <u>only planning to start farming</u> on an agricultural holding to apply for and be granted a premium for young farmers – in the context of the previous definition of a beneficiary farmer (article 4 point b letter c)? Is it possible to grant support
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	if they haven't started conducting an agricultural activity or being a head of the holding at the time of submitting an application for support yet? PT (MS questions): Can the Commission clarify the rationale for no longer requiring Member States to define training and skills requirements for young and new farmers, given the priority of generational renewal in the sector?
(i) an upper age limit set between 35 years and 40 years;	DE (MS questions): DE: Isn't it appropriate to set an upper limit for women because often they became a farmer after they have started a family?]
(ii) being 'head of the holding'.	DE (MS questions): DE: As to fulfil at least the following conditions': Only condition (i) leaves room for flexibility for Member States, but not condition (ii). However, condition (ii) re-quires Member States to regulate 'managers'. However,

	paragraph 23 uses this term in a directly applicable definition. Why should Member States regulate condition (ii) instead of Article 4 regulating it directly? DE: In Art. 4 (6) of the Cap Strategic Plan regulation n there is the additional requirement of an appropriate training or skill for young farmers. Why is this missing here?] IE (MS questions): How will this impact joint holdings or farm partnership?
Where a farmer is deemed to fall within the definition of ‘young farmer’ at the moment of first access to support, that status shall be maintained for the full duration of the period of eligibility established under the relevant support scheme, irrespective of the farmer subsequently exceeding the upper age limit.	FI (MS questions): This means that a farmer under the upper age limit when DABIS starts (2027) and s/he gets the top up for YFs can have DABIS top-up for YFs until the end of DABIS is in force (2032 + possible years of transfer to other similar kind of area based intervention)? IE (MS questions):

	Can MS set the period of eligibility?
(23) 'new farmer' shall be determined in such a way as to refer to a farmer other than a young farmer and who is head of the holding for the first time.	AT (MS comments): We are also in favor of the minimum qualification (defined in the NRPP) as a prerequisite for receiving support. DE (MS questions): DE: 1) For what reasons, unlike young farmers, should Member States not be given the power to provide for further conditions? 2) Against the background of the characteristic 'manager', the question arises - corresponding to the young farmer - of how to deal with farmers who are not natural persons.] FI (MS questions): If a farmer has earlier been part of a body or entity, but starts the farming by him/herself s/he is still the head of the holding for the first time?

	FR (MS questions): Pourquoi l'exigence relative à la qualification a-t-elle été supprimée de la définition ? HR (MS questions): What is the definition of “head of the holding for the first time”? Does this mean that the farmer is the first-time holder of that holding or any agricultural holding? IE (MS questions): Can MS establish qualifying factors such as (i.e. age, education, etc)? •What is meant by holding for the first time? Head of holding for the first time or first time holding? PT (MS questions): 1) See above question on training and skills requirements.
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	2) Must the definition of ‘new farmer’ be included in the Plan (and why is this definition not included in point 22)? RO (MS questions): In the case of a farmer who would meet the specific eligibility criteria for a “young farmer,” but who does not apply for the support granted under this intervention in the year of establishment, would such a farmer still fall within the definition laid down in Article 4(23)? If the answer is affirmative, would the same farmer, in the year following his or her establishment as “head of the holding for the first time” within the meaning of Article 4(23), still qualify as a “young farmer” and therefore be eligible to apply for the corresponding support (for instance, in situations where the application for young farmer support may be submitted within 24 months from the date of first establishment)?
(24) ‘public expenditure’ for the purposes of the CAP, means any contribution to the financing of operations the source of which is the budget of the national, regional and local public authorities, the budget of	BE (MS questions):

the Union made available to the Fund, the budget of public law bodies or the budget of associations of public authorities or public law bodies;	Can the European Commission clarify the situation regarding public contributions outside the CAP? HU (MS questions): Does ‘public expenditure’ only refer to "operation" and not to "measure"? RO (MS comments): Clarification of the “public expenditure” (art. 4 point 24) in the context not linked to CAP and also the link with the national cofinancing (art. 20) is not clear. Please correlate and specify the definitions and the links. Also, correlation between art. 20 point 4 referring to interventions falling under the scope of art. 35, g) and art. 35, 4) referring to the minimum national contribution is needed
(25) ‘support rate’ for the purposes of the CAP, means the rate of public expenditure to an operation; in the context of financial instruments it refers to the gross grant equivalent of the support as defined in Article 2, point (20) of Commission Regulation (EU) No 702/2014;	AT (MS questions): As regards “public expenditure to an operation”: The definition is unclear in connection with the definition of ‘operation’ for area/animal-related

	payments, as it is also for investments in agriculture. Does this refer to the premium rate or the funds actually paid out for an ‘operation’, and does this apply only to INVEKOS or in general? BE (MS questions): What is the scope of CAP for this definition of support rate? FI (MS questions): Why is it defined only from the CAP perspective? Does it also apply to the fisheries sector? HU (MS questions): Does ‘support rate’ only refer to "operation" and not to "measure"? SI (MS questions): (25) Article 35/4 defines: The maximum support rate applicable to the interventions referred to in paragraph 1 point (1) [investments for farmers]
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	shall be 75% of the total eligible costs of each intervention. However, the maximum support rate applicable to the interventions referred to in paragraph 1, point (i), targeting young farmers shall be 85 % of the eligible public expenditure. So does the support rate refer to the level of national and EU contributions, or to the level of support for farmers? In point 9 of the definitions, operation for the CAP is defined only for IACS interventions, but not for others. Does the support rate apply only to IACS interventions, given that the rate of expenditure to an operation (for the CAP) is defined?
(26) 'small-scale coastal fishing' means fishing activities carried out by:	BE (MS questions): Why only a definition of small-scale coastal fishing? ES (MS comments):

	With regards to definitions 26-34 below, our suggestion is to move them from this Regulation to the specific one: <i>Proposal for a Regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture.</i>
(a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in Article 2, point (1) of Council Regulation (EC) No 1967/2006 ⁽²⁸⁾; or	PT (MS comments): DGRM: (a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in Article 2, point (1) <u>of Council Regulation (EC) No 1967/2006, point (14) of Regulation (EU) No 2021/1139 of the European Parliament and of the Council</u>; or PT (MS questions): Why mention a specific Regulation for the Mediterranean (<i>Reg. 1967/2006 concerning management measures for fishery resources in the Mediterranean Sea</i>)?

	Reference should instead be made to Regulation 2021/1139 (establishing the EMFAF).
(b) fishers on foot, including shellfish gatherers;	
(27) ‘fisher’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;	ES (MS questions): The definitions provided under headings 27) “fisher” and 28) “fishing” are identical- error in definition 28). FR (MS questions): Pourquoi les définitions de « fishing » et de « fisher » sont-elles identiques ? IE (MS comments): Welcome the inclusion of definitions for both ‘fishers’ and ‘fishing’ but there needs to be a clear link to the terminology used in the CFP

	regulation which may require amendments to these definitions as it currently stands. Article 4 includes no definition of Aquaculture – the definition in the CFP Regulation Article 4(1)(25) should be included here IE (MS questions): Definitions for “fisher” and “fishing” not aligned with the definitions set down in the CFP. Any definition of same in this Regulation should reflect the range of activities comprehended by the CFP? SK (MS comments): These two points (27, 28) provide definitions of the terms "fishing" and "fisher," with the definitions of these two different terms being identical. We propose to clarify and specify the difference between these terms. SK (MS questions): Why are definitions of fisher and fishing the same?

(28) ‘fishing’ means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned;	BE (MS questions): For fishing the definition of fisher is copied. Is this correct? ES (MS comments): The text of the definition does not correspond to “fishing” but to “fisher” (same definition as the one included in definition nr. 27. ES (MS questions): The definitions provided under headings 27) “fisher” and 28) “fishing” are identical- error in definition 28). FR (MS questions): La définition des activités de pêche étant déjà prévue dans le règlement (UE) 2023/2842 relatif au contrôle des pêches, quelle sera l’articulation entre ces deux définitions pour le soutien à la PCP ? IE
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	(MS questions): Definitions for “fisher” and “fishing” not aligned with the definitions set down in the CFP. Any definition of same in this Regulation should reflect the range of activities comprehended by the CFP? LT (MS comments): It is unclear whether legal entities engaged in commercial fishing are excluded from the definition of "fishing." LT (MS questions): Does this refer only to fishing carried out by employees of fishing companies or to natural persons (owners) who engage in commercial activities in accordance with the established legal procedure and who do not have legal entity status. LV (MS comments):
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	The definition is not appropriate. We call for applying the definition of the 2021–2027 programming period. LV (MS questions): Could COM confirm that there is a mistake in definition as it is the same for fisher and fishing. PL (MS comments): Fishing' – incorrect definition: a repetition of the definition from point (27) PT (MS comments): Proposed definition in line with point 28 of article 4 of Regulation (EU) No 1380/2013 on the Common Fisheries Policy: (28) 'fishing activity' means searching for fish, shooting, setting, towing, hauling of a fishing gear, taking catch on board, transshipping, retaining on board, processing on board, transferring, caging, fattening and landing of fish and fishery products;
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	PT (MS questions): Besides adopting the definition of ‘fishing activity’ in Regulation (EU) No 1380/2013, we request clarification on the absence of a definition for ‘Aquaculture’ as defined in the same Regulation (i.e. <i>28-a) 'aquaculture' means the rearing or cultivation of aquatic organisms using techniques designed to increase the production of the organisms in question beyond the natural capacity of the environment, where the organisms remain the property of a natural or legal person throughout the rearing and culture stage, up to and including harvesting;</i> <i>(according to point 25 of article 4 of Reg. (EU) 1380/2013)</i> SK (MS comments): These two points (27, 28) provide definitions of the terms "fishing" and "fisher," with the definitions of these two different terms being identical. We propose to clarify and specify the difference between these terms.
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	SK (MS questions): Why are definitions of fisher and fishing the same?
(29) ‘sustainable blue economy’ means all sectoral and cross-sectoral economic activities throughout the internal market relating to ocean, seas, coasts and inland waters, covering the Union’s insular and outermost regions and landlocked countries, including emerging sectors and non-market goods and services, aimed at ensuring environmental, social and economic sustainability in the long term and which are consistent with the SDGs, and in particular SDG 14, and with Union environmental legislation;	IE (MS comments): Article 4(29) defines ‘sustainable blue economy’ in an broad manner – this may result in the definition cutting across a significant portion of economic sectors and making it very difficult to develop a coordinated policy framework, with supporting measures under the NRPP, at national level. Better clarity here would be helpful for the preparation of measures for inclusion in the NRPP. NL (MS comments): Retain PL (MS comments):

	Funding for 'blue economy' projects should be strictly linked to EU environmental objectives. Any project in maritime or coastal regions should demonstrate that it contributes to achieving or maintaining Good Environmental Status (GES) of marine waters, in line with the requirements of the Marine Strategy Framework Directive (2008/56/EC) PL (MS questions): What specific selection criteria will be applied to ensure that Fund support promotes actions for the reduction of marine pollution from land-based sources, including wastewater discharges, which is crucial for achieving GES objectives?
(30) 'maritime policy' means Union policy that aims to foster integrated and coherent decision making to maximise the sustainable development, economic growth and social cohesion of the Union, particularly of the coastal and insular areas and of the outermost regions, and of the sustainable blue economy sectors, through coherent maritime-related policies and relevant international cooperation;	NL (MS comments): Retain

(31) ‘maritime security and surveillance’ means activities carried out in order to understand, prevent wherever applicable and manage in a comprehensive way all the events and actions related to the maritime domain which would impact the areas of maritime safety and security, law enforcement, defence, border control, protection of the marine environment, fisheries control, trade and economic interest of the Union;	BE (MS questions): Is fishery control an activity of maritime security and surveillance? ES (MS comments): (31) ‘maritime security and surveillance’ means activities carried out in order to understand, prevent wherever applicable and manage in a comprehensive way all the events and actions related to the maritime domain which would impact the areas of maritime safety and security, law enforcement, defence, border <u>surveillance, management and</u> control, protection of the marine environment, fisheries control, trade and economic interest of the Union; ES (MS questions): Alignment with the terminology agreed under the relevant acquis, e.g. Article 2 of Regulation 2016/299 on the Schengen Borders Code. NL (MS comments):
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	Retain
(32) ‘European marine observation and data network’ or ‘EMODnet’ means a partnership assembling marine data and metadata in order to make those fragmented resources more available and usable by public and private users by offering quality-assured, interoperable and harmonised marine data;	NL (MS comments): Retain
(33) ‘maritime spatial planning’ means a process by which the relevant Member State’s authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives;	NL (MS comments): Retain
(34) ‘ocean observation’ means the foundation of all marine knowledge. It forms the basis of understanding of marine ecosystems and factors that influence them. It provides critical data for weather forecasting, climate change mitigation and adaptation strategies, extreme events monitoring, civil security – sea condition, floods-, maritime shipping, offshore energy, fisheries and aquaculture and increasingly	NL (MS comments): Retain

security and defence. It creates the foundation for evidence-based decision-making and it provides crucial information on how human activities influence ocean health and what services the ocean provides to societies.	
(35) ‘irregularity’ means any breach of applicable law, which has, or would have, the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;	AT (MS comments): In our view, this definition needs to be revised in light of the results-oriented nature of the budget. Among other things, it needs to be clarified whether violations of applicable law (e.g., conflict of interest) constitute an “irregularity” in case a milestone/target/output is achieved. CZ (MS comments): CZ is of the opinion that in the performance model, instead of the unjustified reimbursement from the EU budget in connection with the breach of applicable law, the decisive factor should be the actual or threatened reimbursement of an unjustified milestone, target, or output from the EU budget. According to CZ, the proposed wording reduces potentially legal certainty by broadening the scope for interpretation of

	which breaches of applicable law may have an impact on the achievement of milestones, targets or outputs and to what extent. CZ (MS questions): Why is the definition stipulated in such a way that any breach of applicable law affecting the budget of the Union would pose an irregularity, when in the performance model, the decisive factor should be only the actual or threatened reimbursement of unjustified milestones/targets/other outputs from the Union budget? EE (MS questions): Term irregularity includes milestones, targets and outputs, but there is no definition for outputs. How should the term “outputs” be understood here? ES (MS comments):
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	This definition should be further clarified- relation between the breach of applicable law and reimbursements based on milestones, targets and outputs? FI (MS questions): Is non-compliance with applicable law considered an irregularity, if non-compliance is related to issues other than unjustified reimbursement based on milestones, targets and outputs? Eg. non-compliance of law (national or EU) regulating actual costs and their eligibility, cases of fraud etc? The definition of irregularity does not take into account the diversity of the CAP, particularly its climate and environmental objectives. Even if the outcome — for example, due to weather conditions — does not meet the seed mixture requirements of the applicable law, a plant cover may still have been established that plays a significant role, for instance, in carbon sequestration. Why does the definition fail to consider the broader context? We propose the following addition:
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In the context of the CAP, the interpretation of irregularity must take into account that the granted compensation may be also justified based on another relevant milestone, target or output.

FR

(MS questions):

Cette nouvelle définition d'une irrégularité complètera-t-elle ou remplacera-t-elle la définition existante donnée à l'article 1^{er} du règlement n° 2988/95 ?

HU

(MS questions):

How does it differ from the definition laid down in Article 2(a) of Regulation (EU) 2116/2021? Why is it linked to milestones and targets achieved rather than to unjustified expenditure?

It is unclear what is meant by "unjustified reimbursement based on milestones, targets, and outputs." If the milestones have been fully achieved, the targets and outputs have been met, but a procedural element (e.g., public procurement, conflict of interest) has violated the rules, is

	that just as irregular as if a different result had been achieved, or no result had been achieved at all, or the target had not been fully achieved? LT (MS comments): The current definition of an irregularity in the CAP is the same as set out in Article 1(2) of Regulation (EC, Euratom) No 2988/95. The proposed definition of irregularity differs from the definition currently used in the CAP. LT (MS questions): Why is a different definition of an irregularity proposed in NRPP in comparison to the Regulation 2988/95? We propose to use the current definition for the CAP. Which of these is legally binding: the NRPP or Council Regulation (Euratom, EC) No 2988/95? LV (MS questions):
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	If a procurement procedure breach is identified, but it does not affect the implementation of the project's objectives, results, or achievements (for example, violations of environmental, social or labor law, as well as serious professional misconduct, if they are clearly indicated in the procurement documentation), nor the eligibility of the funding, can it still be classified as an irregularity under this specific definition? PL (MS comments): We propose to clarify the definition of “irregularity” by adding a word specifying its impact on the EU budget. PL (MS questions): Does the term irregularity include only the relations between the European Commission and the Member State? Is the term irregularity still valid at project level? The definition of irregularity differs from that in previous financial perspectives. What is the reason for this change in wording and for leaving out the phrase 'resulting from an act or omission by an economic operator'?
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	RO (MS questions): Please clarify the exclusion of the definition of the irregularity the result of the action from an act or an omission of an economic operator. Is the new definition widening the concept and if there is a positive answer, please provide an explanation in what way this concept is widen? SK (MS questions): Could you clarify the distinction between types of irregularities in relation to the definition of "irregularity" in the Regulation, which states: "irregularity means any breach of applicable law"? What exactly is meant by 'the effect of prejudicing the budget of the Union by receiving unjustified reimbursement based on milestones, targets and outputs to that budget;'? Does this mean only an irregularity that has a direct impact on the achievement of milestones, targets or outputs?

(36) ‘holding fund’ means a funds set up under the responsibility of a managing authority under one or more chapters of the Plan;	HU (MS comments): The expression is difficult to understand; it was previously used for a different term. SI (MS comments): (36) ‘holding fund’ means a funds set up under the responsibility of a managing authority under one or more chapters of the Plan;
(37) ‘specific fund’ means a fund through which a managing authority or a holding fund provides financial products to final recipients;	SI (MS questions): Is there “financial product” definition? Otherwise it is better to use “financial instrument”.
(38) ‘body implementing a financial instrument’ means a body, governed by public or private law, carrying out tasks of a holding fund or specific fund.	

(39) [‘less developed regions’ means regions whose GDP per capita is less than 75 % of the average GDP per capita of the EU-27 (‘less developed regions’);]	DE (MS comments): COM is requested to publish an updated list of MS regions counting as less developed region in 2028-2034.]
(40) [‘transition regions’ means regions whose GDP per capita is between 75 % and 100 % of the average GDP per capita of the EU-27 (‘transition regions’);]	DE (MS comments): COM is requested to publish an updated list of MS regions counting as transition region in 2028-2034.]
(41) [‘more developed regions’ means regions whose GDP per capita is above 100 % of the average GDP per capita of the EU-27 (‘more developed regions’).]	SK (MS questions): Does the EC plan to update the reference framework taking in to account the date of its adoption?
	CZ (MS questions):

	Why does the proposal not include any definition of financial or accounting year? Both terms are mentioned in the text of the proposal.
[The classification of regions under one of the three categories of region shall be determined on the basis of how the GDP <i>per capita</i> of each region, measured in purchasing power standards (PPS) and calculated on the basis of Union figures for the period 2021-2023, relates to the average GDP <i>per capita</i> of the EU-27 for the same reference period.]	DE (MS questions): DE: It is unclear at which “NUTS” -Level” this classification will be calculated and should be mentioned in the regulation.]
The Commission shall adopt a decision, by means of implementing act, setting out the list of regions fulfilling the criteria of one of the three categories of region set out in points 38 to 40 and of Member States fulfilling the criteria set out in paragraph 2(a) of Article 22. [That list shall be valid from 1 January 2028 to 31 December 2034.]	DE (MS comments): DE: The implementing act must be announced at an early stage, as it is crucial for implementation in the Member States. COM is requested to publish an updated list of MS regions counting as transition region in 2028-2034.] SK (MS comments): We recommend modifying the references to points 38 to 40; the individual categories of regions are described in points 39 to 41.

	IT (MS comments): The following definitions related to Annex XV, point n) are missing and need to be introduced: (42) ‘strategic nature projects’ means projects that support the achievement of Union nature and biodiversity objectives by implementing coherent programmes of action in Member States in order to mainstream those objectives and priorities into other policies and financing instruments, including through coordinated implementation of the prioritized action frameworks adopted pursuant to Directive 92/43/EEC and of the National restoration plans pursuant to Regulation (EU) 2024/1991; (43) ‘strategic integrated projects’ means projects that implement, on a regional, multi-regional, national or transnational scale, environmental or climate strategies or action plans developed by Member States’ authorities and required by specific environmental, climate or relevant energy legislation or policy of the Union, while ensuring that stakeholders are involved and promoting coordination
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	with and mobilisation of at least one other Union, national or private funding source; (44) ‘standard action projects’ means projects, other than strategic integrated projects, strategic nature projects or technical assistance projects, that pursue the specific objective set out in Article 3(1)(x).
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