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INFORMATION

From: General Secretariat of the Council
To: Ad hoc Working Party on the Multiannual Financial Framework (AHWP MFF) - National and Regional Partnerships

N° prev. doc.: 11815/25 + COR 1 + REV 1 (en) + ADD1 + ADD 2

Subject: NRPP proposal (Block 5): MS drafting suggestions and comments

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

NRPP proposal (Block 5)
MS drafting suggestions and comments

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| Proposal for a | <p>BE</p> <p>(Comments):</p> <p>General comment: We reserve the right to make more and/or adjusted drafting suggestions in a later stage.</p> <p>NL</p> <p>GENERAL COMMENTS</p> <p>(Comments):</p> <p>These suggestions are a first indication from NL. Reserving the right to make more drafting suggestions, including the bracketed parts.</p> <p>Amendment procedures. NL believes that it is important to have short timelines for amendment procedures to prevent delays in implementation.</p> |
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| REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL | |
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| <p>establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509</p> | <p>HU</p> <p>(Comments):</p> <p>General comment:</p> <p>We maintain our general scrutiny reserve and oppose the proposed approach to the structure of the MFF at a political level. However, we welcome the opportunity to submit written proposals to the draft regulation.</p> <p>General comment on the CAP:</p> <p>We emphasise that proposals included in this document do not revise and pre-empt our opinion on the future of CAP.</p> <p>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.</p> |

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| | <p>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.</p> |
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| <p style="text-align: center;">TITLE III</p> <p style="text-align: center;">NATIONAL AND REGIONAL PARTNERSHIP PLANS</p> | <p>BE</p> <p>(Comments):</p> <p>Articles and paragraphs placed in brackets — and therefore discussed within the ad hoc MFF Working Party — are not addressed in our comments below. As certain other paragraphs are linked to the bracketed wording, we also reserve our position on those.</p> <p>CZ</p> <p>(Comments):</p> <p>CZ would like to ask the Commission to prepare an annotated NRPP template, explaining the individual tables and the links to the NRPP Regulation. CZ would also like to ask Presidency to organize a technical seminar for experts on filling in the NRPP template.</p> <p>IE</p> <p>(Comments):</p> <p><u>Drafting suggestions are made without prejudice to IE’s future position on these proposals. Where no suggestion is made, this does not infer IE agreement to the proposed text.</u></p> <p>SE</p> <p>(Comments):</p> |
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| | <p>Please, see below for comments, drafting suggestions and still some questions from SE at this stage on block 5. We reserve the right to make further drafting suggestions later.</p> <p>SE has not commented on parts of the text in brackets.</p> |

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| <p style="text-align: center;">CHAPTER 1</p> <p style="text-align: center;">Preparation and adoption of the Plan</p> | <p>DE</p> <p>(Comments):</p> <p>The NRPPs must also be implementable in federal Member States. The central role of the regions must be highlighted and anchored in the partnership principle. The German Länder should be able to draw up their regional chapters, negotiate them with the Commission, and implement them, taking into account the requirements for the overall plan. This requires clarification in Article 21.</p> <p>When drafting the plan, we must take the idea of simplification and the intended reduction of bureaucracy into account from the outset and anchor them consistently with a tangible effect.</p> <p>HU</p> <p>(Comments):</p> <p>As we have stated previously, the automatic implementation of common rules may jeopardize the achievement of the objectives pursued by Home Affairs policies. We consider it essential that common rules respect the specific characteristics of those areas. Otherwise, we consider it more appropriate to plan interventions for the three Home Affairs areas in a separate Program Plan.</p> <p>RO</p> |
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| | <p>(Drafting suggestions):</p> <p>Preparation and adoption of the NRP Plan</p> <p>RO</p> <p>(Comments):</p> <p>To ensure clear delimitation by Interreg and to avoid overlapping with provisions regulating Interreg in ERDF /CF regulation.</p> <p>This whole title does not apply to Interreg, since dedicated similar articles are included in the ERDF-CF draft regulation (as also clarified by the Commission in SMOR reunion of October 10). Therefore this should be clear in all the chapter titles and in all the articles, by using the wording ‘NRP Plan’ throughout the text of this title</p> <p>To be used NRP Plan under art. 21 and Chapter 1 as wording instead of Plan, for the reason indicated above.</p> |

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| <p style="text-align: center;"><i>Article 21</i></p> <p style="text-align: center;"><i>Preparation and submission of the Plan</i></p> | <p>DE</p> <p>(Comments):</p> <p>DE requests even stronger incentives for the implementation of domestic reforms. DE advocates that the NRPP Regulation must reflect the interlinkage between investments and reforms (“RRF-model”).</p> <p>The relevant documents for defining reform needs must be clearly and exhaustively set out in the Regulation. Anyhow, we reject a regionalization of the European Semester and the country specific recommendations.</p> <p>The regulation must establish criteria for the monetary value of reforms, especially those without budgetary costs.</p> <p>HU</p> <p>(Comments):</p> <p>For the actual launch of implementation from 1 January 2028 a realistic schedule, proportional requirements and clear legal guarantees are needed. Also, further clarity and timely agreement are needed on the definitions (such as “reform”, “other investments”, “investment strategy”) for legal clarity and effective planning. It would also important to have an agreement on the list of indicators in Annex I of the performance framework regulation, and the general performance framework. Furthermore, for a timely start of the implementation, it would be necessary to reconsider the</p> |
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| | <p>requirements under Article 22 (2), and make them less burdensome and more proportionate.</p> <p>In order to ensure a smooth transition, Member States must also have an adopted Plan in time.</p> <p>An early agreement on the Plan would require a timely compromise on Annex V and the rules on the Plan as well to provide the necessary time for negotiations.</p> <p>The draft does not take into account that the implementation of area and animal-based measures should start from 1 January 2028 in order to ensure continuity. In contrast, the Commission expects the plans to be adopted towards mid-2028, completely making the continuity of direct payments impossible. For this issue, it is of utmost importance to find a solution during the negotiations.</p> <p>The legal text should include guarantees that ensure to have an adopted Plan in time. The current CAP Regulation required Member States to submit their plans by 1 January 2022 to allow the start of implementation as of 1 January 2023. Possible solutions could be either to retain the current, separate, two-pillar structure of the CAP or to allow for a partial adoption of the CAP Chapter.</p> |

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| | <p>IE</p> <p>(Comments):</p> <p><u>The regulation should clearly indicate how the specific timing and planning of CAP are to be accommodated.</u></p> <p>SK</p> <p>(Drafting suggestions):</p> <p><u>4. Member states shall establish a methodology for the preparation and drafting of the NRP that shall include detailed information about:</u></p> <p><u>(a) the criteria applied by the Member State to select measures, interventions and milestones, targets and results;</u></p> <p><u>(b) data or evidence used, data quality assurance and the calculation method; methodology and description of estimated costs;</u></p> <p><u>(c) factors that may influence the achievement of the milestones, targets or results.</u></p> <p><u>d) methodology of estimation of amounts for managing authorities, pay-out values, resulting national contribution and unit costs.</u></p> <p>SK</p> <p>(Comments):</p> |

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| | <p>We request the inclusion of a new paragraph 4, in order to explicitly specify and define the methodology for the preparation and drafting of the NRP Plan, in a similar manner as is set out in Article 17 of Regulation (EU) 2021/1060. The provisions in Article 14 of the Performance regulation are described in a very general and simplified way. A more detailed implementation methodology is missing. This request is made in order to ensure a clear and transparent procedure for the preparation of the Plan and to provide greater legal certainty for the overall approval process of the NRP, as well as for the approval of its amendments.</p> <p>Annex V of the Regulation demonstrates the need to establish a significant amount of numerical data, which cannot be communicated without a unified methodological document (such as justification of the choice of measurable indicators, reference sources, the retrospective or prospective methods applied, or the identification of factors influencing the achievement of the set objectives). Some objectives may be implemented by several providers, and without a methodological guidance the European Commission will not be able to identify clear addressees for communication, particularly in areas where competences are shared or overlap among several institutions.</p> |

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| | <p>Alternatively, we suggest including a reference in this regulation to the relevant provisions of the Performance Regulation, which would introduce a requirement for the creation of a unified methodological document. We further recommend stating the significance of this document and its practical use for the approval or change of the program, etc.</p> |

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| | <p>RO</p> <p>(Comments):</p> <p>Given that the CAP is addressed through a separate regulation, we consider that the provisions of Articles 21, 22, 23, 24, and 25 should be included in the specific CAP regulation. Furthermore, the CAP should not be addressed jointly, taking into account the specific nature of the support that must be provided to farmers, namely direct payments and rural development. In our view, the Single Plan does not lead to simplification, as intended; on the contrary, a joint approach to the CAP will create difficulties both in developing the agricultural strategy and in its implementation</p> <p>SE</p> <p>(Comments):</p> <p>For the CAP, certain rules, conditions and support measures will need to apply as of 1 January 2028 (area- and animal-based support), and beneficiaries must receive information well in advance before the application period opens. Sweden is highly doubtful whether it will be possible to have the entire NRP plan ready in sufficient time for these CAP support measures. How this will be resolved must be clarified at an early stage.</p> |
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| <p>1. [Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package.] The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</p> | <p>BE</p> <p>(Comments):</p> <p>Isn't it more logical to make the Plan publicly available after it has been approved?</p> <p>Regarding the instruments for internal security (IS) and border management (BMV), it should be possible for Member States not to make (parts of) the plan public for national security reasons.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency], <u>except the information and data where Union law or national law excludes such publication for reasons of security, public order, criminal investigations, or protection of personal data in accordance with Regulation (EU) 2016/679.</u></p> <p>EE</p> <p>(Comments):</p> |

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| | <p>Since support given for home affairs (HA) will be part of the NRP Plan and according to the article 22(2)(b)(iii) of the current regulation MSs must address challenges identified in Schengen evaluation mechanism, vulnerability assessments and the EUAA monitoring mechanism, it must be taken into account that these documents and/or challenges identified are not public information and this information should not become public in the NRP Plans. Moreover, since “all relevant documents and strategies” must be addressed in the NRP Plans, their level of confidentiality is not yet known and the leak of confidential information regarding security of each individual MS and the vulnerabilities of the EU as a whole should be prevented.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>[Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms priorities, investments, activities and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package.] The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</p> <p>HR</p> |

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| | <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency]. <u><i>The Member State may publish executive summary or non-sensitive version initially on the website. After the Commission's approval, the Member State is obliged to publish the full version.</i></u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 1 by adding: <i>The Member State may publish executive summary or non-sensitive version initially on the website. After the Commission's approval, the Member State is obliged to publish the full version.</i></u></p> <p>HR comments: While transparency is essential, making the entire Plan publicly available at the moment of submission may prematurely expose sensitive political or negotiation content. Consider allowing Member States to publish an executive summary or non-sensitive version initially, followed by the full version upon Commission approval.</p> <p>IE</p> |

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| | <p>(Drafting suggestions):</p> <p>1. <u>[Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package.] The Plan shall be submitted by _____ (specify date).</u> The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</p> <p>IE</p> <p>(Comments):</p> <p><u>The date for submission of the Plan should be specified within the NRP regulation.</u></p> <p><u>Could the Commission clarify what chapters are excepted within the National Regional Partnership Plan? We would welcome confirmation that Member States will have the option to include a dedicated rural development chapter, to help protect and expand supports for rural areas and dedicated funding for same.</u></p> <p><u>In addition, Annex V of NRP Regulations sets out the template for NRPPs, however, the template does not seem to include a place for</u></p> |

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| | <p><u>member states to outline the level of financing or investment envisaged under LEADER, whereas for other measures it is clear where the level of financing should be outlined.</u></p> <p>IT</p> <p>(Drafting suggestions):</p> <p><u>[Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. <u>The Plan will reflect the Member State’s national strategy, drawn up in accordance with its institutional framework and territorial specificities, and will identify the contribution to the Union’s objectives, taking into account national and regional challenges.</u> Each Plan shall comprise measures which form a comprehensive and coherent package.] The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</u></p> <p>IT</p> <p>(Comments):</p> <p>While situated within a common European strategic framework, the Plan must remain the expression of a medium-term vision developed at</p> |

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| | <p>national level, capable of translating the Union's priorities and objectives in a way that is consistent with each country's structural, economic and territorial needs.</p> <p>In the case of the RRF, this ownership allowed the Member State to directly define the scope of interventions, structuring reforms and investments in an integrated manner aligned with the challenges identified at EU level, while preserving the ability to adapt to national institutional and territorial specificities.</p> <p>This approach strengthened the political and administrative ownership of the Plans and contributed to the design of measures directly responsive to the needs of individual Member States and their Regions.</p> <p>For these reasons, within the new framework of the NRPP, it is essential to ensure that the European Commission plays a role of guidance, support and assessment, without undermining the Member State's autonomy to define its own intervention strategy and to set spending priorities best suited to achieving the common objectives. National ownership is a key condition to ensure effectiveness and accountability in implementation, in line with the principles of subsidiarity, proportionality and shared management that underpin cohesion policy.</p> <p>PL</p> |

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| | <p>(Drafting suggestions):</p> <p>1. Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package. The Member State shall make the Plan submitted to the Commission publicly available on a the website referred to in Article 64 [Transparency].</p> <p>PL</p> <p>(Comments):</p> <p>The proposed amendment relates to the time frame within which the website is to be created specified in Article 64.1, which indicates: ‘The Member State shall, within six months of the adoption of the Council decision referred to in Article 23 [Commission proposal and Council implementing decision], ensure that a website is operational where information on support under this Regulation is available, covering the Plan’s objectives, activities, available funding opportunities and achievements.’ Member States shall not be required to publish the NRP Plan on a website that is not yet operational. In the interest of transparency, we propose that Member States determine the website for its display (for example on that of the entity responsible for its preparation).</p> |

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| | <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: Add a new subparagraph: <u>The reforms to be included in the NRPP should be linked to investments and be based on the needs self-assessed by the Member States.</u></p> <p>PT</p> <p>(Comments):</p> <p>PT: Reforms included in the NRPP should be linked to investments based on the needs self-assessed by the Member States with due respect to their legitimate prerogatives.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p><u>Each Member State shall prepare and submit to the Commission the NRP Plan setting out their agenda of reforms, investments and other interventions. Each Plan shall comprise measures which form a comprehensive and coherent package.] The measures of the Plan shall foster ownership at all levels, with a multi-level governance and a strong regional dimension, based on shared management and the partnership principle, ensuring support is focused on the needs of</u></p> |

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| | <p><u>each Member State and its regions and sectors, as well as continuity and predictability for managing authorities and beneficiaries.</u> The Member State shall make the Plan submitted to the Commission publicly available on the website referred to in Article 64 [Transparency].</p> <p>RO</p> <p>(Comments):</p> <p>The text is imported from the Explanatory Memorandum of the NRP Regulation and introduced in a prominent way the notion of ownership, which is essential especially for reforms, and the need for structural continuity in the management system.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>Add a new subparagraph: <u>The reforms to be included in the NRPP should be linked to investments and be based on the needs of the Member States.</u></p> <p>SI</p> <p>(Comments):</p> |

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| | <p>Reforms included in the NRPP should be linked to investments based on the needs of Member States.</p> <p>The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.</p> <p>Could you please provide more guidance on preparing the plan? What does a sectoral approach entail? We believe this should be implemented at the national or regional level. Additionally, why should this be included as a separate chapter in the NRPP?</p> |
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| <p>1. Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.]</p> | <p>FR</p> <p>(Comments):</p> <p>La délégation pourra rappeler que les autorités de gestion demandent à bénéficier au plus tôt d'un guide pédagogique leur permettant d'opérer une transition progressive vers les nouveaux modes de gestion du PPNR.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>Each Member State shall prepare and implement the Plan at the appropriate territorial level in cooperation with regional authorities,</p> |

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| | <p>and in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.] <u>The regional authorities are responsible for the design, programming, mangement and implementation of their respective chapters. The regional authority responsible for the respective regional chapter shall be able to interact directly with the Commission and apply for preliminary approval of the regional chapter, without prejudice to the approval of the NRP plan as a whole.</u></p> <p>DE</p> <p>(Comments):</p> |

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| | <p>Wrong numeration.</p> <p>The NRPP respects the constitutional framework of each MS, this is in particular true for the division of competences between the different governance levels and the role of regional and local authorities.</p> <p>The Member State should comply with its constitution, in particular in view of the participation of regional and local authorities. It is insufficient that the text does only reference the institutional, legal and financial framework. We need a more comprehensive reference to the constitutional framework especially as regards the distribution of competences between national and regional levels.</p> <p>It must be clarified in the regulation that direct negotiations between regional level and COM for regional chapters are possible.</p> <p>The central role of the regions for the design, implementation of the regional chapters and the selection of projects must be more firmly anchored in the Regulation text. For instance, it must be highlighted more clearly in Art. 21 that the Plans shall be prepared and implemented in partnership with regional authorities. The specific provisions for involvement of different groups, defined in Art. 6, will have to be discussed.</p> |

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| | <p>EL</p> <p>(Drafting suggestions):</p> <p>1. Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities all partners, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>2. – error in points numbering</p> <p>HR</p> <p>(Comments):</p> <p><u>HR comment/question:</u></p> <p><u>Preparation of a single document at the level of multi-level governance sets challenges for Member States in the context of implementing mandatory public consultation with stakeholders (also regulated on national level legislative) as a process that also requires a certain period of time in the already short timeframe for adopting</u></p> |

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| | <p><u>the NRPP, i.e. the question arises of the possibility of organizing the implementation of consultations at the level of individual chapters (each body for itself) or the entire document.</u></p> <p><u>HR comments: please precise in which way is financial framework of partners connected with the preparing and implementation of Plan.</u></p> <p>IT</p> <p>(Drafting suggestions):</p> <p>Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], <u>including regional-and-local-authorities</u>; and in accordance with their institutional, legal and financial framework. <u>Regional and local authorities shall be fully involved in the preparation, implementation and evaluation of the NRP Plan.</u></p> <p>IT</p> <p>(Comments):</p> <p>‘The ‘Proposals on the National and Regional Partnership Plans and on governance’ presented by the European Commission — accompanying President von der Leyen’s letter of 9 November 2025 and strengthening, in paragraph 2 of Article 21, the provisions on the involvement of</p> |

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| | <p>regional and local authorities — are endorsed and submitted as amendment proposals.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>Each Member State shall prepare and implement the Plan in partnership with partners as set out in Article 6 [Partnership], including regional and local authorities, and in accordance with their institutional, legal and financial framework. [The Plan shall include national, sectoral and, where relevant, regional and territorial chapters.] Regional chapters should be obligatory in the Member States with two or more NUTS 2 regions.</p> <p>PL</p> <p>(Comments):</p> <p>Having in mind the uncertainty the Commission proposal has caused for regional authorities and calls from a wide number of stakeholders, Members States and the European Parliament, strengthening the role of regions in the text of the regulation is necessary.</p> <p>SE</p> <p>(Comments):</p> |

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| | <p>The specification of “regional and local authorities” in Article 21 are already described in Article 6 along with several other partners. It should be clarified why these two types of partners are written out specifically. Furthermore, Article 6 does not mention “financial framework” as a consideration, whereas this is added under Article 21.1. The responsibility of the financial framework should be clarified, is it required to be part of the partnership responsibilities or is it a Member State responsibility?</p> |
| | <p>SK</p> <p>(Drafting suggestions):</p> <p><u>“By way of derogation from the first subparagraph, expenditure relating to measures in relevant fields, including long-term investments (such as health infrastructure and digitalisation), whose implementation started before 1 January 2028 and which continues thereafter, shall be eligible for support under this Regulation, provided that:</u></p> <p><u>(a) such measures are clearly identified in the NRP Plan;</u></p> <p><u>(b) they comply with the requirements laid down in this Regulation and in the Regulations listed in Article 1(1); and</u></p> |

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| | <p><u>(c) the same expenditure is not supported by another Union instrument.”</u></p> <p>SK</p> <p>(Comments):</p> <p>Measures are eligible only from 1 January 2028 (except for CAP), which complicates seamless continuation of ongoing projects (e.g., subsequent phases of hospitals, large IT projects etc.) that cannot simply be “cut.”</p> <ul style="list-style-type: none"> • Proposed comment: Add a transitional clause similar to the CAP exception: allow eligibility of expenditure for continuing sectoral projects (if clearly identified in the NRP Plan and compliant with the new rules). |
| <p>2. Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> | <p>FR</p> <p>(Comments):</p> <p>Les autorités françaises s’interrogent sur la date d’éligibilité ; le PPNR pourrait-il soutenir des mesures préexistantes, mais seulement à compter du 1^{er} janvier 2028 ?</p> <p>BE</p> <p>(Drafting suggestions):</p> |

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| | <p>Only measures implemented from from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 12.</p> <p>Preparatory measures should be eligible with a maximum of [X%] of the total cost.</p> <p>BE</p> <p>(Comments):</p> <p>If for, for example an infrastructure project, architectural studies started before 2028, the studies and realisations of the architects realised from 2028 should be eligible. The current text leaves too much ambiguity and risks of ineligibility of important parts of measures, just because a small preparatory part of them started before 2027.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p>BG</p> |

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| | <p>(Comments):</p> <p>With a view to avoid complication of the legislation, unequal treatment and therefore the risk of confusion with respect to the measures under the Social Climate Fund which can start earlier, the current CAP commitments, the possibility to support in the period 2028-34 operations subject to phased implementation whose first phase has started in 21-27, but also the precedents where completed operations have been possible to be financed (CRII+), it should be considered to remove this principle barrier before support to measures which are important and relevant, for the sake of the improved inbuilt flexibility in the next period.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p><u>By way of derogation from the first sentence, payment applications approved under the CAP 2023-27 before 31. December 2027 can be reimbursed after the 1. January 2028.</u></p> <p>DE</p> |

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| | <p>(Comments):</p> <p>Wrong numeration.</p> <p>DE supports this.</p> <p>There needs to be an amendment for CAP payment applications that otherwise cannot be paid out in the following financial year as it is done now. Otherwise there would have to be CAP payments outside of the NRPP planned.</p> <p>A more precise definition of “measure” is needed. A measure can be based on more than one funding regulation (Förderrichtlinie). It needs to be clarified here and in Art. 4 (10) [and in Art. 4 (9) (a) “operations”) if funding is possible only if the whole measure starts from 2028 onwards or if the funding regulations (or calls, project contracts?) start from 2028 onwards.</p> <p>Also a clarification/alignment with the definition of “operation” in Art. 2 (1) of the Performance Tracking Regulation is needed.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>2. Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1<u>2</u>.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>2. Only measures whose implementation is not fully finished as of started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>Only measures whose implementation started from or after 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1</p> <p>FI</p> <p>(Comments):</p> <p>It should be noted that some measures may continue to be funded, for example, from the CAP Strategic Plan until the end of 2029. The funding</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>of these measures in the NRP will be planned accordingly.</p> <p>Implementation may not start from 1 January 2028 but after 1 January 2028</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>3. – error in points numbering</p> <p>HR drafting suggestions:</p> <p><u>3. Only measures whose implementation started on or after 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 32 by adding:</u></p> <p><u>on or after.</u></p> <p><u>HR comment: please precise legal interpretation, where the date is to be considered as included.</u></p> <p>HU</p> |

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| | <p>(Drafting suggestions):</p> <p>Only measures whose implementation started from <u>between the date of submission of the Plan to the Commission or from</u> 1 January 2028, <u>whichever date is earlier</u>, shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p>HU</p> <p>(Comments):</p> <p>CPR Art 63.</p> <p>For the sake of continuity and stability.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>2. Only measures whose implementation started from 1 January 2028 <u>or those in relation to which approvals were legally entered in 2027</u> shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p>IE</p> |

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| | <p>(Comments):</p> <ul style="list-style-type: none"> • <u>Explicit wording is required so legally entered 2027 approvals that are implemented in 2028 are eligible; carry over rules must be clarified so farmers and projects are not penalised by calendar cut off.</u> • <u>Recital (29) refers to 31 January 2028 as the date by which MS will be expected to have submitted NRP and offers a facility to Member States to submit a plan by June 2027. Per Article 17 there is a loss of pre-financing if the Council decision is not made by 31 July 2028. These are very tight timelines for the process set out here and the date of June 2027 is too early to provide any flexibility to Member States.</u> • <u>2. Only measures whose implementation started from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</u> <p>LU</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>What about projects that could potentially span two programming periods? Currently, there is the possibility of phasing.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: Only measures whose implementation starts from 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and the Regulations listed in Article 1 paragraph 1 , <u>except for measures selected under the Social Climate Fund which shall remain governed by Article 80(2).</u></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The proposed amendment is necessary to ensure legal consistency between this Regulation and Article 80(2) of the Social Climate Fund Regulation. The eligibility and implementation timelines for SCF measures are already expressly regulated and should not be altered or overridden by a general provision applicable to other measures. Introducing this clarification avoids conflicting obligations and preserves the integrity of the SCF framework including its specific programming and implementation arrangements.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>PL</p> <p>(Comments):</p> <p>In regard to the para 2 and eligibility period starting from 01.01.2028, we see a need to ensure legal certainty regarding the eligibility of phased projects by the Member State. We are open to drafting suggestions in this article or if necessary in article 79.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: Only measures whose implementation started from, <u>or expenditures occurred after</u> 1 January 2028 shall be eligible for financing provided that they comply with the requirements set out in this Regulation and Regulations listed in Article 1 paragraph 1.</p> <p>PT</p> <p>(Comments):</p> <p>PT: This provision should take into consideration the model of financing that will be adopted between COM and MS (FNLC or mixed model), to not limit the eligibility of measures that started in the current</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>programming period, namely taking into account article 79. The current wording can lead to misreadings.</p> <p>SE</p> <p>(Comments):</p> <p>The meaning of “started from 1 January 2028” should be clarified. What is relevant for different measures (reforms, investments ...)?</p> <p>It should be clarified if costs are eligible from 1 January even though the NRP plan has not been approved yet.</p> |
| | <p>EL</p> <p>(Drafting suggestions):</p> <p><u>3. Home Affairs interventions supported by Regulation (EU) XXX [establishing the Union support for asylum, migration integration and return for the period from 2028 to 2034, Regulation (EU) XXX [establishing the Union support for the Schengen area, for European integrated border management and the common policy on visas for the period from 2028 to 2034, and Regulation (EU) XXX [establishing the Union support for internal security for the period from 2028 to 2034] will be integrated into the NRPP, provided that such integration respects the specific programming, governance and</u></p> |

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| | <p><u>implementation requirements laid down in the sectoral legislation governing this support and to the dedicated Home Affairs Chapter of this Regulation.</u></p> <p>EL</p> <p>(Comments):</p> <p>It is crucial to clarify the way in which HOME AFFAIRS (AMI, BMV, IS) are to be integrated in the NRPPs. EL supports the position that a separate Chapter should be dedicated to HOME AFFAIRS just as in the case of CAP. Thus we propose to be added one more paragraph specifically for the HOME FUNDS</p> <p>ES</p> <p>(Drafting suggestions):</p> <p><u>NEW PARAGRAPH</u></p> <p><u>Spending as described in paragraph 2 shall be eligible regardless of the date of adoption of this Regulation.</u></p> <p>RO</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>This provision does not apply to the measured selected under Social Climate Fund, in line with art. 80(2).</u></p> <p>RO</p> <p>(Comments):</p> <p>A clear indication of the eligibility of measures under SCF should be included in Art. 21, for an improved coherence. An alternative is to indicate in Art. 80(2) that the provisions on start of eligibility do not apply for SCF.</p> |
| <p>By way of derogation from the first subparagraph, expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115 may be eligible for contribution, provided such expenditure is provided in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation].</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>By way of derogation from the first subparagraph, expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115 may be eligible for contribution, provided such expenditure is provided in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation].</p> <p>FR</p> <p>(Comments):</p> |

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| | <p>Cette modification vise à maintenir les conditions d'éligibilité et le taux de cofinancement définis dans le Plan stratégique national PAC, afin de ne pas complexifier la mise en œuvre de mesures déjà validées.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>By way of derogation from the first subparagraph, expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115 and Regulation <u>1308/2013</u> may be eligible for contribution, provided such expenditure is provided in the relevant NRP Plan in accordance with <u>this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation]. Regulation (EU) 2021/2115, Regulation (EU) 2021/2116 and Regulation (EU) 1308/2013.</u></p> <p>BE</p> <p>(Comments):</p> <p>This is a first suggestion for this article. Specific discussions on art. 21(3) and art. 35(10) are needed, for example on the interaction between both paragraphs.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Can the COM confirm that for these measures from the period 23-27 the rules from the period 23-27 are applicable (R 2021/2115, R 2021/2116, R 1308/2013 and other market regulations)? Can the MS further specify this in the NRP plan for which interventions and which period they want to cofinance following the old rules?</p> <p>The reference to regulation 1308/2013 is necessary for the measures related to school schemes.</p> <p>CZ</p> <p>(Comments):</p> <p>Regarding the financing of direct payments under the CAP, we would like to highlight the specific features of this system, especially the timing of advance payments and the actual disbursement process. Payments for the final year of the current programming period (including advances and balances) are made in the financial year following the year in which the aid is claimed, in accordance with the rules and allocations of the CAP Strategic Plan 2023–2027. From the following year, payments will be administered and disbursed under the new NRP legislation. We therefore ask the Commission, when setting the rules and interpreting the eligibility of expenditures, to take this schedule into account and to ensure that all expenditures related to direct payments (including advances and</p> |

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| | <p>balances) are considered eligible in the relevant financial year, regardless of the overlap between programming periods.</p> <p>Could you please clarify whether it will also be possible to finance multiannual commitments originating from regulations preceding Regulation (EU) 2021/2115 (for example, early retirement commitments or other long-term measures started under earlier CAP regulations), if these commitments are still ongoing after 1 January 2028? If so, under what conditions should these be included in the NRP plan to ensure eligibility for funding?</p> <p>EL</p> <p>(Comments):</p> <p>Regulation (EU) 2021/2115 is the CAP guarantee Fund</p> <p>HR</p> <p>(Drafting suggestions):</p> <p><u>By way of derogation from the first subparagraph, expenditure related to legal commitments to beneficiaries incurred under interventions financed under Regulation (EU) 2021/2115 may be eligible for contribution, provided that such expenditure is included</u></p> |

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| | <p><u>in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation].</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 3 by adding that and by adding is included.</u></p> <p><u>HR comments: The reference to expenditure under Regulation (EU) 2021/2115 may lead to risks of double financing. Clarification should be added to ensure that eligible costs are limited to those not already covered by other Union or national funding sources.</u></p> <p>IE</p> <p>(Comments):</p> <p><u>The 2027 applications that have been approved and paid would need to be guaranteed financing and carry over rules between 2027 and 2028 should be clarified.</u></p> <p>NL</p> <p>(Drafting suggestions):</p> |

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| | <p>By way of derogation from the first subparagraph, eligible expenditure related to legal commitments to beneficiaries incurred under the interventions financed under Regulation (EU) 2021/2115 may be eligible for contribution, provided such similar expenditure is provided in the relevant NRP Plan in accordance with this Regulation and Regulation (EU) 202X/XXXX [CAP Regulation].</p> <p>NL</p> <p>(Comments):</p> <p>To clarify that we’re talking about eligible expenditure under the current CAP and acknowledge that interventions might slightly differ in the CAP chapter of the NRP compared to the current CAP National Strategic Plan.</p> <p>RO</p> <p>(Comments):</p> <p>What types of measures are covered by the provision in the current draft regulation stating “Only measures whose implementation started from 1 January 2028”? Does this refer to measures similar to the direct payments under the CAP 2023–2027, or to all measures approved under the NRPP? We request clarifications.</p> <p>SE</p> |

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| | <p>(Comments):</p> <p>Could the Commission clarify if it is possible, as today, to create a "placeholder" measure for an action consisting solely of carry-over payments from previous period, or does the measure need to exist as a proper measure in the NRP that remains open for applications also during the period after 2028?</p> |
| | <p>FR</p> <p>(Comments):</p> <p>La délégation pourra regretter la disparition des dispositifs spécifiques de traitement des RUP comme le POSEI ou l'AS RUP et souligner l'importance d'assurer l'application pleine et entière de l'article 349 TFUE en prévoyant des dispositions spécifiques pour ces territoires.</p> <p>La Commission peut-elle préciser son acception d'une approbation partielle des plans ?</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p><u>In case of operations with phased implementation, the eligibility of the phase selected for financing under this Regulation is considered to be</u></p> |

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| | <p><u>eligible from 1 January 2028, based on the costs included in the accounting of the beneficiary.</u></p> <p>CZ</p> <p>(Comments):</p> <p>In case of those investments /operations consisting in several phases it should be clarified that the eligibility refers to that phase selected for finance under NRPP.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p><u>In addition, expenditure related to ongoing operations under multiannual sectoral interventions established pursuant to the Regulation on the Common Organisation of Agricultural Markets (CMO Regulation), in particular in the fruit and vegetables, wine and apiculture sectors, shall remain eligible for Union financing under this Regulation, provided that such operations were legally committed prior to 1 January 2028 and are duly listed in the first NRP Plan submitted by the Member State concerned.</u></p> <p>ES</p> <p>(Comments):</p> |

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| | <p>To ensure legal certainty and continuity of support, it is important to clarify that the eligibility of expenditure should also cover ongoing operations under sectoral interventions that are not only established under the CAP Strategic Plans Regulation, but are also governed by the specific legal framework set out in the Regulation on the Common Organisation of Agricultural Markets (CMO Regulation). These sectoral interventions — particularly in the fruit and vegetables, wine and apiculture sectors — are implemented through multiannual support schemes with legally binding commitments that necessarily extend beyond a single programming period.</p> <p>For instance, in the fruit and vegetables sector, operational programmes are approved for periods ranging from three to seven years. Consequently, certain operations may still be implemented after 2028. Similarly, restructuring and conversion of vineyards, as well as promotion programmes in the wine sector, are typically programmed on a biennial basis, with aid calls aligned to the corresponding years of the previous programming period.</p> <p>Without a specific provision ensuring the continued eligibility of such expenditure, there is a risk of legal and financial disruption for both managing authorities and beneficiaries. This would undermine the</p> |

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| | <p>predictability and stability required for these long-term investments and for the proper implementation of sectoral programmes under the CMO legal framework.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(10) ‘measure’ means a reform, an investment or another intervention at national or sub-national level supported under the NRP Plan or the Interreg Plan; in case of those operations implemented in phases, the measure refers to the phase selected for financing under NRPP</p> <p>RO</p> <p>(Comments):</p> <p>As a measure means an investment, in case of those investments /operations consisting in several phases it should be clarified that the eligibility refers to that phase selected for financing under NRPP and not the entire operation</p> <p>SK</p> <p>(Drafting suggestions):</p> |

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| | <p data-bbox="1137 260 2089 459"><u>4. In case of operations with phased implementation, the eligibility of the phase selected for financing under this Regulation is considered to be eligible from 1 January 2028, based on the costs included in the accounting of the beneficiary.</u></p> <p data-bbox="1137 496 1189 528">SK</p> <p data-bbox="1137 564 1312 596">(Comments):</p> <p data-bbox="1137 633 2024 783">As a measure means an investment, in case of those investments /operations consisting in several phases it should be clarified that the eligibility refers to that phase selected for finance under NRPP.</p> |

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| <p style="text-align: center;"><i>Article 22</i></p> <p style="text-align: center;"><i>Requirements for the NRP Plan</i></p> | <p>AT</p> <p>(Comments):</p> <p>Article 22 is confusing in its comprehensiveness and with a large number of enumerations. References in Annex V to Article 22 are sometimes incomprehensible, which makes it considerably more difficult to assess the article.</p> <p>CZ</p> <p>(Comments):</p> <p>Order of points in the art. 22 is not logical as in point 2 there is twice “(a)”. It also does not correspond with the template of NRPP in Annex V, where for instance table 5: <i>Milestones, targets and timeline</i>, refer to Article 22(2), point (e), which reads about monitoring and implementation arrangements.</p> <p>Also, references in point 2(a), referring to the Art. 3 doesn't seem corresponding well with expected scope of former Cohesion fund activities, are these references [<i>3(a), points (vii) and (ix), and Article 3(d), point (v)</i>]. really correct?</p> <p>HR</p> <p>(Comments):</p> |
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| | <p>HR question: Could you give a detailed elaboration on partner selection and manner of selecting them?</p> <p>HR comments: We consider the goal of 43% to achieve the climate and environmental contribution is too high as reduce the possibilities for MS to address their own priorities and therefore advocate for reduction.</p> <p>MT</p> <p>(Comments):</p> <p>MT: General Comment: The current plan appears to allow the Commission to mandate that Member States include interventions beyond those initially selected in their NRP Plans. In line with the principles of subsidiarity, Member States—responsible for food sovereignty—are best equipped to evaluate agricultural needs and socio-political impacts within their national contexts. Whilst respecting the dialogue between the MS and the Commission on the finalization of the plan in the spirit of continued shared management, this should not conflict with the bottom up identification of needs and actions established by MSs through the partnership principle.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>A new section</p> <p>RO</p> <p>(Comments):</p> <p>Since it is requested to have CAP under separate Regulation, it is necessary to include in the NRPP a distinct section describing how the CAP interventions with ring-fenced support, as well as the CAP-type interventions without ring-fenced support, are synergistic as a whole — how they act together in a complementary, efficient, and effective manner, and how they respond to the Country-Specific Recommendations.</p> <p>The absence of such a section could lead to the development of a deficient strategy, lacking medium- and long-term added value.</p> <p>SE</p> <p>(Comments):</p> <p>SE would like to have a reference in Article 22 to the activities set out in the European Water Resilience Strategy, for instance in a similar way as the reference to the Ocean Pact. Investing in sustainable water management and innovation is of high relevance for resilience and competitiveness, for example for agriculture and food production.</p> |

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| | <p>SK</p> <p>(Comments):</p> <p>The new programming period 2028-2034 is supposed to bring simplification but the plan requirements are excessive. We demand simplification especially in relation to the requirement to “effectively address all or a significant subset of challenges” identified in accordance with art. 22, paragraph 2, point b).</p> |
| <p>1. Each NRP Plan shall be duly reasoned and substantiated and shall set out the elements referred to in paragraph 2 of this Article, in accordance with the template set out in Annex V.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>Each NRP Plan shall be duly reasoned and substantiated and shall set out the elements referred to in paragraph 2 of this Article, in accordance with the template set out in Annex V.</p> <p>FR</p> <p>(Comments):</p> <p>La modification vise à supprimer les termes choisis par la Commission qui ne sont pas assez précis, afin de clarifier l’attendu.</p> |

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| | <p>La Commission peut-elle préciser comment le chapitre sur la PAC serait lié au chapitre sur les régions ultrapériphériques dans les futurs PPNR ? Plus précisément, les mesures de la PAC pour les régions ultrapériphériques doivent-elles être incluses dans le chapitre sur la PAC ? Cela aura-t-il une incidence sur les taux de cofinancement applicables à ces mesures (taux spécifiques de la PAC pour les mesures figurant dans le chapitre sur la PAC) ?</p> <p>AT</p> <p>(Comments):</p> <p>We can be open about the integration of strategic and analytical elements into the plan (e.g. strategic objective/vision and an analysis)</p> <p>Annex V should include an overview of the financial contributions of the various chapters to the specific objectives. (Such an overview exists for example for the chapters' contributions to the different regional categories.)</p> <p>BE</p> <p>(Drafting suggestions):</p> |

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| | <p>Each NRP Plan shall be a strategic document duly reasoned and substantiated and shall set out the elements referred to in paragraph 2 of this Article, in accordance with the template set out in Annex V.</p> <p>IT</p> <p>(Comments):</p> <p>It is necessary to further specify the methodology and the minimum requirements concerning the structure and contents of the Plans (Annex V). This guidance should include common criteria for defining targets and milestones and for identifying information sources, while at the same time ensuring sufficient flexibility for Member States to adapt these elements to their respective institutional and territorial contexts.</p> <p>LV</p> <p>(Comments):</p> <p>There is a concern about balanced approach for NRP plan template and Annex V in general. The section for CAP is the biggest section in the Annex V and this raise concerns that CAP section is too detailed and should only provide the substantial, strategic information with the rest being left for the MS discretion for the national legal framework.</p> <p>RO</p> |

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| | <p>(Drafting suggestions):</p> <p>1. Each NRP Plan shall be duly reasoned and substantiated and shall set out the elements referred to in paragraph 2 of this Article, in accordance with the template set out in Annex V.</p> <p>SE</p> <p>(Comments):</p> <p>It is of utmost importance that the measures in the plan can be broad in character to avoid unnecessary requirements to change the plan. The performance framework must enable this.</p> |
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| <p>1. The NRP Plan shall:</p> | <p>BE</p> <p>(Comments):</p> <p>Strong wording ‘shall’ while there are also many references to ‘recommendations’ and ‘guidance’ below. This seems contradictory.</p> <p>CZ</p> <p>(Comments):</p> <p>1. 2.</p> |

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| | <p>CZ</p> <p>(Drafting suggestions):</p> <p>Incorrect indexing. Should be nr. 2</p> <p>DE</p> <p>(Comments):</p> <p>Wrong numeration.</p> <p>The administrative burden in the context of drawing up the NRPPs and implementing the performance-based approach must be proportionate and deliver added value for the authorities involved (both national and sub-national). Overall, the bureaucratic requirements for programming must be reduced compared to the status quo.</p> <p>When deriving priorities, Article 22(2) currently places a strong focus on the Commission's analyses and recommendations. However, priorities should primarily be derived on the basis of an analysis of the social, economic, and environmental situation, as well as the regional and territorial challenges and needs of the Member States, in line with, inter alia, the recommendations and analyses of the European Semester.]</p> <p>EL</p> |

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| | <p>(Drafting suggestions):</p> <p>2. The NRP Plan shall:</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>2. The NRP Plan shall:</p> <p>IE</p> <p>(Comments):</p> <ul style="list-style-type: none"> - <u>This provision is amended to correct numbering</u> - <u>Requiring MS to meet all the requirements outlined in article 2 will limit simplification and flexibility. Priorities should reflect the needs of each MS. We request proportionality between the requirements and the allocations.</u> <p>LU</p> <p>(Drafting suggestions):</p> <p>1. The NRP Plan <u>may</u></p> <p>PT</p> <p>(Drafting suggestions):</p> |

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| | <p>1. 2.</p> <p>PT</p> <p>(Comments):</p> <p>Correction of clerical error</p> <p>SI</p> <p>(Comments):</p> <p>As stated, the paragraph 2 (Article 22) an extensive list of EU-level documents and strategies should be considered in preparing the NRPP (some of these documents have not yet been adopted). This can give the impression that the main focus during the preparation of the NRPP is on meeting EU policy requirements rather than addressing the actual needs of the regions and member states.</p> <p>The entire Article 22 more implies that the Member State should (in co-operation with the stakeholders) prepare a set of measures, which are more or less pred-fined within the EU policy framework (e.g. Single Market, Digital Decade, Saving and Investment Union etc.) and reforms (as previously already defined in the European Semester) than tackling the real issues of reducing the economic, social and territorial disparities, not</p> |

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| | merely implementing the EU defined policy on territorial level (national/regional/etc.). |
| | FR (Comments): La délégation pourra indiquer que des interrogations persistent sur l’articulation entre les objectifs généraux et les objectifs spécifiques des plans et leur caractère obligatoire et contraignant. |
| <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> | <p>FR (Drafting suggestions): (a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to <u>[all]</u> the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, <u>in particular to the challenges of the outermost regions when the Member State is concerned</u>, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it</p> |

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| | <p>contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>FR</p> <p>(Comments):</p> <p>Les modifications visent à supprimer des termes qui ne sont pas assez précis, afin de clarifier l'attendu.</p> <p>La délégation française s'interroge sur le caractère obligatoire de tous les objectifs spécifiques dans les PPNR. Une telle obligation pourrait entraîner un effet de saupoudrage des crédits du PPNR et un traitement superficiel de certains objectifs spécifiques, notamment en raison des impératifs de concentration. Par ailleurs, la prise en compte des défis propres à chaque État membre nécessite de conserver une certaine flexibilité dans la sélection des objectifs spécifiques à intégrer.</p> <p>La délégation pourra regretter l'omission des RUP dans le paragraphe 2 sur les défis à relever au sein des PPNR et souligner la nécessité de les y intégrer dans l'objectif de permettre la correcte application de l'article 349 du TFUE.</p> <p>AT</p> <p>(Drafting suggestions):</p> |

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| | <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner <u>proportionate to the allocated financial envelope</u> to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>AT</p> <p>(Comments):</p> <p>In the absence of any specific “general objective” (Article 2) and “specific objective” (Article 3) in the areas of home affairs (migration, integration, border protection, security, etc.), it is unclear where the home affairs areas should be subsumed</p> <p>It is unrealistic and highly inefficient for MS with small allocations such as AT to contribute to all (28) specific objectives. The expected</p> |

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| | <p>contribution must be proportionate to the available financial envelope. (For the 20 objectives of objective groups a,c,e the available flexible budget allocation is at most 2,8 bn. Euro. This amounts on average to 20 Mio. Euro per objective, per year, which does not allow for an effective investment program)</p> <p>We see no reason to provide a specific focus for MS with a low GNI per capita in these areas. As for all MS the needs of these MS should be articulated and argued in their NRPPs and european input for a specific focus should be provided within the European semester.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate, <u>but proportionate</u> manner to all the specific objectives laid down in Article 3, taking into account <u>their relevance</u> to the specific challenges <u>and needs</u> of the Member State <u>and regions</u> concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.</p> |

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| | <p>BE</p> <p>(Comments):</p> <p>It is not feasible to contribute to ‘all’ (28) specific objectives, as listed in art. 3. Proportionality should be taken into account.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives among those laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (viii) and (ix), and Article 3(d), point (v).</p> <p>BG</p> |

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| | <p>(Comments):</p> <p>1. In line with the core principles of Cohesion policy and that ‘one size doesn’t fit all’, flexibility should be given to MS to pick up those specific objectives that are more appropriate to their specific situation and development priorities, especially regarding the secondary specific objectives. Thus, deleting “all” will provide for making a relevance with “the specific challenges of the MS” that should be taken into account, as foreseen in the provision.</p> <p>2. Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too broad, abstract and difficult to substantiate.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all relevant the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure</p> |

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| | <p>achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>CZ</p> <p>(Comments):</p> <p>For the Czech Republic, it is important that the selection of specific objectives meets the needs of the member states and their regions. Obligation to address all 29 Specific objectives would lead the Funds in particular member states from necessary prioritization to a very broad scope of supported topics. It would also go against the idea of flexibility, if whole NRPP should be stretched among so many areas. After abandoning the idea of thematic concentration, this would lead to opposite extreme (“support everything at least somehow”). It is why we want to focus on what is needed and have the biggest added value.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p>(a) support <u>all</u> the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges according to the specific needs of the Member State <u>or region for investment and reform</u> concerned, and provide based on an analysis taking into account the identified challenges, the socio-economic situation of the Member State or region concerned with special emphasis on territorial needs, and the horizontal principals in Article 7. The plan shall an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.</p> <p><u>The specific objectives laid down in Art. 3 and the provisions of Art. 22 2. b) will follow the principle of proportionality, also with respect to the allocation of funds to the different levels of government. The Plan will ensure that each level of government will bear its own budgetary risk if a milestone or target is not met.</u></p> <p>The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a),</p> |

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| | <p>points (vii) and (ix) according to the regional development needs, and Article 3(d), point (v).</p> <p>DE</p> <p>(Comments):</p> <p>NRPPs should also be required to be coherent, efficient and effective as whole and fulfil a certain level of ambition especially with regard to the reforms (in relation to the size of the NRPP), thus such overarching criteria should be included.</p> <p>Plan should be based on elements of a socio-economic analysis of the Member State or region which are also required for the mid-term review of Art. 25 para. 1 lit. a), b), g) of this regulation.</p> <p>Each MS should have the flexibility to allocate funds that are not ringfenced to the different levels of government in line with its constitutional division of powers and current practices. Required reforms should follow the principle of proportionality for the MS as a whole and for the different levels of government.</p> <p>What exactly is meant by an intervention strategy in relation to the NRP plan?</p> <p>EE</p> |

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| | <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>EE</p> <p>(Comments):</p> <p>As there is no reasoning to ask MS to contribute in an adequate manner to these specific objectives (Article 3(a), points (vii) and (ix), and Article 3(d), point (v).)</p> <p>EL</p> <p>(Drafting suggestions):</p> |

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| | <p>a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those these objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. <u>The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</u></p> <p>EL</p> <p>(Comments):</p> <p>Article 3(a), points (vii) and (ix),</p> <p>(vii) Supporting social and affordable housing</p> <p>(ix) Support for tourism, including sustainability</p> <p>and</p> <p>Article 3(d), point (v)</p> |

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| | <p>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.</p> <p>All the above must apply horizontally to all members states and demonstrated by all, as well.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all <u>a significant number of</u> the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular</p> |

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| | <p>demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>FI</p> <p>(Comments):</p> <p><i>Finland’s key objective in the negotiations is to ensure sufficient flexibility in the implementation of funding within the NRP programme.</i></p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a <u>comprehensive and adequate manner to all the comprehensive and adequate manner to all the <i>relevant and adequately selected</i> specific objectives laid down in Article 3, <i>as identified on the basis of the assessed needs and specific challenges of the Member State concerned</i>, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the <i>relevant</i> general</u></p> |

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| | <p>objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 1, paragraph a by replacing ‘comprehensive and adequate manner to all the’ with the ‘relevant and adequately selected’ and by adding ‘as identified on the basis of the assessed needs and specific challenges of the Member State concerned’, and also by adding relevant.</u></p> <p>HR questions: Paragraph (a) states that the plan must contribute to all specific objectives. Does this mean that measures/activities covering all specific objectives must be planned in the plan?</p> <p>How will this co-financing strategy apply to home affairs funds in practice?</p> <p><u>Which are primary and which are secondary specific objectives?</u></p> <p>HR position: We advocate that, instead of requiring the mandatory inclusion of all general and specific objectives within the NRPP, Member</p> |

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| | <p>States should have the possibility to select objectives based on their own assessed needs.</p> <p>The Regulation sets out five general and five specific objectives; however, we consider that there is insufficient traceability between the general and specific objectives. For example, the specific objectives related to defence and security are not clearly linked to any of the five general objectives, which undermines coherence and hampers programming and performance monitoring.</p> <p>We believe that the NRPP should ensure a clear hierarchy of objectives — general objective – specific objective – interventions/measures — in order to guarantee transparency and a clear operational implementation.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is</p> |

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| | <p>justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>HU</p> <p>(Comments):</p> <p>1. Flexibility should be given to MS to pick up those specific objectives that are relevant to their specific development needs, especially regarding the specific subobjectives.</p> <p>If the intention of the proposed legislation was to ensure that all policies and sectoral Funds are covered in the Plans of all MS, this provision should be correlated with a reordering of the Art. 3 in order to ensure a clear link / hierarchy between the specific objectives, general objectives and the policies / funds.</p> <p>2. Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too broad, abstract and difficult to substantiate.</p> <p>For cohesion countries, if this concentration requirement is to be maintained, the corresponding financial means must also be ensured. With</p> |

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| | <p>the Cohesion Fund merged into the Single Fund, all Member States would have access to this envelope, while this criterion would apply exclusively to cohesion countries. As a result, what has so far constituted a form of positive discrimination in favour of cohesion countries would, in practice, be transformed into a disadvantage for them.</p> <p>We regard it important to have a requirement to present the contribution to territorial objectives (i.e. Urban and Territorial Agenda), and addressing the challenges stemming from regional inequalities and the specific situation of regions be a basic requirement.</p> <p>Based on previous presentations by the Commission, the current CAP Strategic Plan was used as a basis for preparing the elements contained in Article 22 of the NRP Regulation. It would therefore be worthwhile to take into account the experience gained from the preparation of CAP Strategic Plans, such as the omission of excessive, detailed explanations and justifications, which primarily increase the administrative burden for Member States. The NRP plan should be a general strategic document, reducing the level of detailed justifications.</p> <p>IE</p> <p>(Drafting suggestions):</p> |

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| | <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to those of the specific objectives laid down in Article 3 <u>which may be agreed between the Member State and the Commission</u>, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>IE</p> <p>(Comments):</p> <p><u>The NRP must be proportional and take account of the level of funds available within the NRPP and the specific challenges of the Member State. In that regard each Member State will not be able to implement each of the specific objectives and should instead propose which specific objectives they wish to pursue for agreement with the Commission.</u></p> |

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| | <p><u>Clarity is required as what extent the NRP Plan will need to be formally amended on an annual basis to accommodate these recommendations</u></p> <p>IT</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all a relevant subset of the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, based on a medium-term national strategy defined by the Member State within the common European framework, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.</p> <p>IT</p> <p>(Comments):</p> <p>It is important to ensure that each Plan articulates a coherent intervention strategy that links the EU-level framework with the Member State's</p> |

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| | <p>specific challenges: a balance between the general and specific objectives set out in Article 22 (European Semester, fiscal plans, NECPs, Digital Decade Roadmap, Single Market) and the specific needs of the regions within the national, sectoral, thematic and regional chapters is needed.</p> <p>This balance is mainly reflected in the “introductory chapter 1” of each Plan, which outlines the intervention strategy, the main challenges identified by each country, and the synergies. However, there remains a risk that the specific needs of territories and regions may be overshadowed in certain thematic areas.</p> <p>The text of Article 22(2) states that the National and Regional Partnership Plans must contribute to all the specific objectives set out in the Regulation. If maintained as a mandatory requirement, this formulation raises significant concerns among delegations, as an approach based on a closed list of predefined and compulsory objectives risks failing to adequately reflect the diversity of the Union’s economic, social and territorial contexts. Initial conditions, administrative capacities, strategic priorities and financial allocations vary considerably across Member States: requiring each Plan to address the full spectrum of specific objectives may lead to a dispersion of resources, reducing the overall effectiveness of interventions and limiting the ability to concentrate efforts on those challenges that are</p> |

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| | <p>genuinely a priority at national or regional level.</p> <p>As highlighted by several Member States, greater flexibility is requested in the application of this provision, allowing Plans to focus on a significant subset of objectives without being required to ensure uniform and comprehensive coverage of all those listed in the Regulation.</p> <p>Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too abstract and difficult to substantiate.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to [all the] relevant specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it include investments contributing in an adequate manner to the specific</p> |

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| | <p>objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>LT</p> <p>(Comments):</p> <ol style="list-style-type: none"> 1. Taking into account the place-based approach and necessity to address country specific and objectives and most pressing challenges, MS should be given flexibility choose these specific objectives that are relevant to their specific development needs. 2. Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are subjective, invite for interpretation and do not bring clarity to the legal text. <p>LV</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure</p> |

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| | <p>achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>LV</p> <p>(Comments):</p> <p>LV does not support requirement to address all specific objectives. Moreover, it is not fully clear what constitutes a specific objective in the Article 3 (letters, or roman numbers).</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: Point (a) and Annex V (section 1) – The reference to ‘all the specific objectives’ should be replaced by ‘<u>relevant/applicable</u>’ to allow for the required flexibility for Member States to address their specific challenges. The references to specific objectives should also be further clarified as referring to each letter under article 3.</p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: Flexibility should be given to MS to pick up those specific objectives that are relevant to their specific development needs, especially regarding the specific subobjectives. Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too broad, abstract and difficult to substantiate.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges <u>and the financial allocation</u> of the Member State concerned <u>and the principle of proportionality</u>, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (viii) <u>(viii)</u> and (ix), and Article 3(d), point (v), <u>and Article 3(e), points (i) and (ii)</u>.</p> |

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| | <p>NL</p> <p>(Comments):</p> <p>Important so we can add focus and cater to the identified needs instead of being forced to contribute to all specific objectives, regardless of needs and financial means.</p> <p>Article 3(e), points (i) and (ii) are fundamental to good cooperation within the Union.</p> <p>The extent to which MS are expected to address the specific objectives in Article 3 in the plan should be based on their specific needs and be proportionate to the financial allocation of the MS concerned. Especially for MS with small pre-allocated envelopes it is not feasible to address all specific objectives in an adequate manner in the Plan.</p> <p>Clerical error confirmed by the Commission. This should refer to objectives covered by the Cohesion Fund. (EZ)</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives laid down in Article 3, as identified on the basis of the assessed needs</p> |

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| | <p>and specific challenges of the Member State concerned, taking into account the specific challenges of the Member State concerned. and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.</p> <p>The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>PL</p> <p>(Comments):</p> <p>Requiring that each plan in each Member State addresses all specific objectives is contradictory to the need to take into account the specific challenges of the Member State concerned and idea of flexible approach.</p> <p>We see such a level of detail unnecessary. Moreover, there is no space in the template to provide a detailed justification of the level of financing,</p> |

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| | <p>There is no reason for additional requirements for the Member States with a per capita GNI of less than 90 % of the Union average if there is no additional funding or a higher Union cofinancing.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: (a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to <u>all</u> the relevant specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it contributes in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>PT</p> <p>(Comments):</p> |

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| | <p>PT1 (<i>with reference to the last section on Member States with a per capita GNI of less than 90 % of the Union average</i>):</p> <p>The provision reflects the objectives underlying the Cohesion fund, but the allocation formula does not include any condition that benefits MS with a per capita GNI of less than 90% of the Union average. What was an additional (but focused) support to environment and transport becomes in the current regulation an additional constraint impacting only MS with a per capita GNI of less than 90 % of the Union average.</p> <p>Accordingly, PT considers that MS with a per capita GNI of less than 90 % of the Union average should be positively discriminated (by being able to use the eligibilities of the Cohesion fund, for example), and not penalised, by being subject to mandatory allocations. Thus, this part of this provision could only make sense if the allocation method takes into consideration the need to continue to provide direct financing to the Cohesion Fund areas as provided in the Treaty.</p> <p>PT2 (replacing “<i>all the specific objectives</i>” with “<i>relevant specific objectives</i>”):</p> <p>As referred in comments to article 3, PT does not accept the one size fits all logic also implicit in this article. The objectives (some of them at least) should be pursued if there is a need, in the regions, to do so. The</p> |

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| | <p>regions are different and have different needs. It is irrational to assume that all regions must pursue all the objectives.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives laid down in Article 3, for the policies covered by the Plan, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating describing how those objectives will be addressed and financed by the Plan what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it include investments contributing es in an adequate manner to the specific objectives set out in Article 3(a), points (viii) and (ix), and Article 3(d), point (v).</p> <p>RO</p> <p>(Comments):</p> |

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| | <p>1. Flexibility should be given to MS to select/to address those specific objectives that are relevant to their specific development needs, especially regarding the specific subobjectives.</p> <p>If the intention of the proposed legislation was to ensure that all policies and sectoral Funds are covered in the Plans of all MS, this provision should be correlated with a reordering of the Art. 3 in order to ensure a clear link / hierarchy between the specific objectives, general objectives and the policies / funds.</p> <p>2. Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too broad, abstract and difficult to substantiate.</p> <p>SE</p> <p>(Comments):</p> <p>SE does not believe that there should be a requirement to meet all specific objectives. Which and how many objectives that should be supported should be adapted to the challenges and needs of the Member State and proportionate in relation to the size of the national envelope. Otherwise, the plan risks becoming fragmented.</p> <p>SI</p> |

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| | <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the relevant specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it include investments contributing in an adequate manner to the specific objectives set out in Article 3(a), points (vii) and (ix), and Article 3(d), point (v).</p> <p>SI</p> <p>(Comments):</p> <p>Terms “comprehensive” and “adequate” are very vague and introduce legal uncertainty into the provision.</p> <p>"Member States should be able to primarily address those specific objectives that respond to their needs."</p> |

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| | <p>If the intention of the proposed legislation was to ensure that all policies and sectoral Funds are covered in the Plans of all MS, this provision should be correlated with a reordering of the Art. 3 in order to ensure a clear link / hierarchy between the specific objectives, general objectives and the policies / funds.</p> <p>Phrases such as “in a comprehensive and adequate manner”, “in an adequate manner” should be removed from the text as they are too broad, abstract and difficult to substantiate</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(a) support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the <u>relevant</u> specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified. The NRP Plan of Member State with a per capita GNI of less than 90 % of the Union average shall in particular demonstrate that it <u>include investments</u> contributing tes in an adequate manner to the</p> |

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| | <p>specific objectives set out in Article 3(a), points (vii) and (x) (ix), and Article 3(d), point (v).</p> <p>SK</p> <p>(Comments):</p> <p>The plan should support all specific objectives set out in Article 3. This contradicts the idea of prioritization and financial concentration of resources, while some areas are more meaningful to address from public sources. For this reason, we propose the above addition. Furthermore, we prefer to amend the text to include “investments”.</p> <p>Point (ix) is probably an incorrect reference to "support for tourism, including sustainability". We suggest editing.</p> |
| | <p>FI</p> <p>(Drafting suggestions):</p> <p><u>i) In order take into account the specific challenges in Member States and their regions, in duly justified cases, such as when the planned measure falls under national competences either fully or partially; and considering the principle of proportionality measured especially as the amount of EU-financial contribution envisaged to be allocated for the</u></p> |

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| | <p><u>measures concerned, the NRP-plan shall include all or a majority of the specific objectives of Article 3.</u></p> <p>FI</p> <p>(Comments):</p> <p><i>Finland’s key objective in the negotiations is to ensure sufficient flexibility in the implementation of funding within the NRP programme.</i></p> |
| <p>(b) <u>effectively</u> address all or a significant subset of challenges identified:</p> | <p>AT</p> <p>(Comments):</p> <p>See comment above. The following wording is considered more adequate: “effectively address, in a manner proportionate to the available financial envelope, all or significant subset of challenges identified”:</p> <p>BE</p> <p>(Comments):</p> <p>Bracketed – therefore no comments/amendments here.</p> <p>BG</p> <p>(Drafting suggestions):</p> |

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| | <p>effectively address all or a significant subset of challenges identified:</p> <p>BG</p> <p>(Comments):</p> <p>The text is overly prescriptive and restricts Member States’ flexibility to address the challenges that are most relevant to their specific context.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>CZ has some remarks on the link with the European Semester and other documents, which we are currently putting forward at the negobox level.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(b) [effectively address all or a significant subset of challenges identified:]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>[effectively address all or a significant subset of challenges identified:</p> <p>FI</p> |

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| | <p>(Drafting suggestions):</p> <p>effectively address all or a significant a relevant subset of challenges identified:</p> <p>FI</p> <p>(Comments):</p> <p>Finland emphasises the non-binding nature of country-specific recommendations.</p> <p>COM legislative proposal only allows those reforms to be implemented under the NRPP measures which fall under the scope of proposed legal bases. Does this mean, that it may not be possible to include all or even majority of eventual CSR's in the NRP-plans?</p> <p>HU</p> <p>(Comments):</p> <p>In its current form, this wording gives too much power to the Commission. These documents should not be legally binding, but should serve only as a basis for consideration. This wording carries the risk that the COM will restrict the MS's room for manoeuvre through various recommendations.</p> <p>IT</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>effectively address all or a significant subset of <u>the</u> challenges identified:</p> <p>IT</p> <p>(Comments):</p> <p>Building on the position already expressed by Italy, with reference to Article 22, paragraph 2, point (b), the Plan is required to address all, or a significant subset, of the challenges identified in the European Semester, including the Country-Specific Recommendations (CSRs), as well as those set out in the Union’s main policy documents—such as the Common Agricultural Policy, the Digital Decade, and the National Energy and Climate Plans (NECPs)—and in sectoral strategies relating to internal security, border management and migration.</p> <p>While the objective of ensuring coherence between national priorities and the Union’s strategic guidelines is fully shared, it is essential to avoid the reference to CSRs becoming a rigid assessment criterion or an eligibility condition, as this could limit the ability to design public policies that reflect the economic, social and territorial specificities of each Member State.</p> <p>A more proportionate and flexible approach is therefore required, allowing Member States to demonstrate the consistency of their Plans with a relevant</p> |

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| | <p>set of challenges and recommendations, while preserving sufficient strategic autonomy in selecting priorities and defining intervention modalities.</p> <p>Furthermore, in parallel, it would be appropriate to ensure the full involvement of Member States in the definition and revision of the recommendations issued under the European Semester, through adequate procedural and consultation guarantees that strengthen their legitimacy and ensure coherence with national contexts. Such an approach would help consolidate the link between Union-level priorities and Member States' medium-term strategies, preventing an overly prescriptive application and ensuring a genuine principle of joint ownership and shared responsibility between the Union and the Member States.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>effectively address all or a significant subset of challenges identified:</p> <p>LV</p> <p>(Comments):</p> |

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| | <p>Latvia does not support addressing in NRP all aspects of proposed reference framework. This may lead to fragmentation of national plans thus reducing the effect of the plan.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: effectively address all or a significant subset of the challenges identified</p> <p>MT</p> <p>(Comments):</p> <p>Justification: The text is overly prescriptive and restricts Member States' flexibility to address the challenges that are most relevant to their specific context</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>effectively address all or a significant and relevant subset of challenges identified:</p> <p>PL</p> <p>(Comments):</p> |

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| | <p>The terms “effectively” and “significant” are unclear and leave too much discretionary power to the Commission to assess the NRPP. We propose to cross out the word.</p> <p>With limited allocation and long list of documents to include in the NRPP, it is nearly impossible to address ALL challenges. Only the ones relevant to a Member State or a region should be taken into account.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>effectively address all or a significant subset of relevant challenges identified:</p> <p>RO</p> <p>(Comments):</p> <p>To be considered when the Nego-Box will be agreed: The text is overly prescriptive and restricts Member States’ flexibility to address the challenges that are most relevant to their specific context.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>effectively address all or a significant subset of the challenges identified:</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>SI</p> <p>(Comments):</p> <p>The text is overly prescriptive and restricts Member States' flexibility to address the challenges that are most relevant to their specific context.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>effectively address all or a significant subset of relevant challenges identified</p> <p>SK</p> <p>(Comments):</p> <p>Proposed amendment to address relevant challenges for better prioritisation.</p> |
| | |
| <p>(i) in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;</p> | <p>BG</p> <p>(Comments):</p> |

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| | <p>A principal support for the word “relevant”, as we deem an important principle that CSRs should be relevant to the cohesion objectives and the specific objectives selected for support.</p> <p>DE</p> <p>(Comments):</p> <p>Annex VI speaks about “taking into account the specific national and regional needs and challenges identified, inter alia”, in addition to recommendations of the European Semester or in line with the European Pillar of Social Rights. This dimension is missing and should also be taken into account.</p> <p>DEU is currently assessing a further clarification of this paragraph and will submit drafting suggestions in the next commenting rounds if needed.</p> <p>HR</p> <p>(Comments):</p> <p>HR question: Is this requirement possibly redundant, given that the NRPP should already align with the National medium-term fiscal-structural plan, which in turn is aligned with the European Semester and the country-specific recommendations (CSR)?</p> |

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| | <p>IE</p> <p>(Drafting suggestions):</p> <p>(i) in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to <u>and accepted by</u> the Member State, including those related to the European Pillar of Social Rights;</p> <p>IE</p> <p>(Comments):</p> <p>Country specific recommendations emerging from the European Semester are not binding on Member States currently and this should not change.</p> <p>Clarity is required as what extent the NRP Plan will need to be formally amended on an annual basis to accommodate these recommendations</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, <u>at the time of programming</u>, including those related to the European Pillar of Social Rights;</p> |

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| | <p>MT</p> <p>(Comments):</p> <p>Justification: This is needed to clarify which CSRs need to be considered in view of the yearly nature of CSRs and the multiannual nature of the NRPP.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(i) in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;</p> <p>SI</p> <p>(Comments):</p> <p>We propose that the Country-Specific Recommendations (CSR) outlined in the European Semester be considered necessary reforms that are excluded from the system of milestones and targets. The existing EU Cohesion policy for 2021-2027 already anticipates the required reforms in Member States, either through CSR or as conditionalities. We suggest that this system remain in place. Therefore, we propose that only</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>investments and other interventions should fall under the system of milestones and targets.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>in the context of the European Semester, in particular in the relevant country-specific recommendations out of those addressed to the Member State, including those related to the European Pillar of Social Rights</p> <p>SK</p> <p>(Comments):</p> <p>Proposed amendment to address relevant challenges for better prioritisation.</p> |
| <p>(ii) in other relevant documents officially adopted or assessed by the Commission related to the objectives laid down in Article 3 [specific objectives], including CAP national recommendations laid down in Article 2 of Regulation (EU) 202X/XXXX [CAP Regulation], Digital Decade recommendations based on Article 6 of the Decision establishing the Digital Decade Policy Programme, and National Energy and Climate Plans;</p> | <p>AT</p> <p>(Comments):</p> <p>The list of relevant documents should be an exhaustive and not an indicative list, to provide clarity.</p> <p>DE</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>The relevant documents for defining reform needs must be clearly set out in the Regulation. We are critical regarding too much leeway for COM on administrative level to decide upon necessary reforms without the involvement of the Council. National level must not be liable for regional level and vice versa. However, including regional needs must not lead to regionalization auf European Semester.</p> <p>Reform requirements must be proportional to the volume of funding.</p> <p>The Council should (co)-decide which documents are relevant and should be taken into account for the national plans. There is no need for CAP recommendations since it is a fully harmonized policy.</p> <p>Deletion if relevant documents are not clearly named.</p> <p>A reference to Nature Restoration Plans should be added here, in coherence with Art. 22 Para 2 Sub-Para 2 lit. 4. Those plans have the same character as NECPs.]</p> <p>HR</p> <p>(Comments):</p> <p>HR comments: Considering that country specific recommendations will be provided by the EC, there are still foreseen CAP national</p> |

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| | <p>recommendations, which proves that special attention needs to be given to this policy. Regarding recommendations and given that the time element is very important in the programming of such a comprehensive strategic document as the NRP, including all the required consultations, it must be ensured that these recommendations are delivered as soon as possible. For this reason, the NRP Regulation should also allow for the submission of incomplete NRPs, as was the case for strategic plans under EU Regulation on CAP Strategic Plans (Article 118). <u>Also, the technical guidelines for the simplified application of the “do not significant harm” principle are affecting a preparation of NRPP since DNSH guidelines should be done until January the 1st 2027, thus we have no reason to be too optimistic about timely start of NRPP implementation.</u></p> <p>HU</p> <p>(Comments):</p> <p>All relevant requirements should be laid down in the basic act that is adopted by the co-legislators.</p> <p>LV</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(ii) in other relevant documents officially adopted or assessed by the Commission related to the objectives laid down in Article 3 [specific objectives], including CAP national recommendations laid down in Article 2 of Regulation (EU) 202X/XXXX [CAP Regulation], Digital Decade recommendations based on Article 6 of the Decision establishing the Digital Decade Policy Programme, and National Energy and Climate Plans;</p> <p><u>The requirement does not apply if the documents mentioned in this paragraph are not adopted year before submission of the plan.</u></p> <p>LV</p> <p>(Comments):</p> <p>Documents officially adopted or assessed by the Commission should be in place and adopted at least 1 year before official submission of the plan. If this is not case MS should not be obliged to take them into account when designing investments and reforms.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: in other relevant documents officially adopted or assessed by the Commission related to the objectives laid down in Article 3 [specific</p> |

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| | <p>objectives], including CAP national recommendations laid down in Article 2 of Regulation (EU) 202X/XXXX [CAP Regulation], Digital Decade recommendations based on Article 6 of the Decision establishing the Digital Decade Policy Programme, and National Energy and Climate Plans, <u>as applicable</u>;</p> <p>MT</p> <p>(Comments):</p> <p>Justification: For small plans, the dilution of efforts would hinder the impact of the plan on the ground. The NRPP is only one of the instruments that MSs will use to address gaps and shortcomings. Thus, a more realistic and flexible approach is required.</p> <p>NL</p> <p>(Comments):</p> <p>We reserve the right for drafting suggestions, but as this part is bracketed we will not bring them forward in this stage.</p> <p>PL</p> <p>(Drafting suggestions):</p> |

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| | <p><u>(ii) in relevant national or regional strategies</u> and in other relevant documents officially adopted or assessed by the Commission related to the objectives laid down in Article 3 [specific objectives] (...)</p> <p>PL</p> <p>(Comments):</p> <p>The scope of support under NRPPs should respond to the specific challenges identified in national and regional strategic documents, provided that they fall within the scope of the specific objectives indicated in Article 3. This is particularly important from the point of view of adapting the intervention to the needs of regions, which may not be sufficiently recognized in documents developed at the European level.</p> |
| <p>(iii) in relevant documents and strategies adopted by the Council or the Commission in the field of internal security, European integrated border management, visa policy and asylum and migration, taking into account the Schengen IT architecture, the Schengen evaluation mechanism in accordance with Regulation (EU) 2022/922, vulnerability assessments in accordance with Regulation (EU) 2019/1896 and the European Union</p> | <p>AT</p> <p>(Comments):</p> <p>The list of relevant documents should be an exhaustive and not an indicative list, to provide clarity.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| <p>Agency for Asylum monitoring mechanism in accordance with Regulation (EU) 2021/2303.]</p> | <p>(iii) in relevant documents and strategies adopted by the Council or the Commission in the field of internal security, European integrated border management, visa policy and asylum and migration, taking into account the Schengen IT architecture, the Schengen evaluation mechanism in accordance with Regulation (EU) 2022/922, vulnerability assessments in accordance with Regulation (EU) 2019/1896 and the European Union Agency for Asylum monitoring mechanism in accordance with Regulation (EU) 2021/2303.]</p> <p>DE</p> <p>(Comments):</p> <p>Deletion if relevant documents are not clearly named.</p> <p>MT</p> <p>(Comments):</p> <p>MT: Malta wishes to express a note of caution regarding the reliance on documents, strategies and technical requirements linked to interoperability and border management systems. Our current experience shows that the Terms of Reference for such systems are subject to periodic adjustments, with milestones and deadlines often revised by the Commission during implementation. In this context a prudent approach is</p> |

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| | <p>warranted when incorporating such elements into target setting. We would therefore appreciate assurance that, in cases where the Union subsequently amends the applicable Terms of Reference or associated timelines, Member States that have acted diligently on the basis of the information available at the time will not be placed at risk of non-compliance or loss of funds.</p> |
| <p>The Member State shall provide an explanation on how the challenges and country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> | <p>FR</p> <p>(Comments):</p> <p>Comment la Commission entend-elle garantir la correcte application de l'article 349 du TFUE s'agissant des défis auxquels sont confrontés les régions ultrapériphériques (au titre de leurs caractéristiques spécifiques telles que l'éloignement, l'insularité, la dépendance économique et la vulnérabilité climatique) ?</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>The Member State, <u>according to their institutional and constitutional organisation</u>, shall provide an explanation on how the challenges and country-specific recommendations are <u>addressed- taken into</u></p> |

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| | <p>consideration in by the NRP Plan and if they are addressed what level of financing is envisaged and how the NRP Plan will:</p> <p>BE</p> <p>(Comments):</p> <p>Is connected to paragraphs before, which are bracketed.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the challenges and the relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>BG</p> <p>(Comments):</p> <p>Alignment with Article 22 (2)(b) (i)</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the specific challenges and relevant country-specific recommendations are addressed</p> |

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| | <p>by the NRP Plan and what level of financing is envisaged and how the NRP Plan will. <u>The NRP Plan will also contain:</u></p> <p>CZ</p> <p>(Comments):</p> <p>In relation to the abovementioned remarks concerning the link to the European Semester and other country-specific recommendations, CZ argues that MS should be able to choose the challenges and CSRs to be addressed through the NRP Plans and have some leeway in addressing the remaining CSRs through other channels. Moreover, CZ would like to point out that the number of strategies and other reference points envisaged in the regulation can be a source of additional administrative burden and limit the flexibility of the MS to choose and finance their own priorities.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the <u>specific</u> challenges and <u>relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>FI</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the challenges and relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will</p> <p>FI</p> <p>(Comments):</p> <p>We are concerned over the <i>de facto</i> binding nature of the CSRs as payments will depend on the achievement of milestones and targets linked to reforms and investments that are based on CSRs. In particular, CSRs are related to policy areas that are under the national competence. Funding should be linked to the results.</p> <p>Only relevant country-specific recommendations should be addressed in the Plan.</p> <p>Finland could provide additional text to clarify the issue.</p> <p>HR</p> <p>(Comments):</p> |

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| | <p>HR comment: The obligation to elaborate all of this in detail represents additional burden for MS and is not in line with the simplification intention emphasised by the Commission.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the <u>territory-specific</u> challenges and <u>the relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged, and how the NRP Plan will:</p> <p>IE</p> <p>(Drafting suggestions):</p> <p><u>(3)</u> The Member State shall provide an explanation on how <u>each of</u> the challenges <u>identified from the above</u> and <u>relevant agreed</u> country-specific recommendations are addressed by the NRP Plan, and what level of financing is envisaged and how the NRP Plan will:</p> <p>IE</p> <p>(Comments):</p> |

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| | <ul style="list-style-type: none"> - <u>This provision is amended to correct numbering and allow the Member State to address agreed country-specific recommendations.</u> - <u>Clarity is required as what extent the NRP Plan will need to be formally amended on an annual basis to accommodate these recommendations</u> - <u>What will be included in the Cion interpretation of a Member States challenges and country specific recommendations. What data will they be using to conclude to these specific objectives!?</u> <p>IT</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the challenges <u>and the relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>IT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The redrafting of the first part of the sentence is proposed as an alignment with the Article 22 (2)(b) (i), as well as with the wording in Annex V Section 1.2. “<i>Description of the specific challenge of the Member State taking into account the relevant country specific recommendations addressed to the Member States concerned [..]</i>”</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the specific challenges and relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>LT</p> <p>(Comments):</p> <p>The drafting is proposed in relation to Art. 22 (2) (b) (i) and the annex V section 1.2. wording. Regarding the deleted text: at this stage it is redundant as the calculations are made at the level of the measure.</p> <p>LU</p> <p>(Drafting suggestions):</p> |

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| | <p>Proposal 1: ... are addressed <u>in a proportionate manner</u> ...</p> <p>Or proposal2: ... are addressed by the NRP Plan <u>in a manner commensurate with the overall allocated budget</u> and ...</p> <p>LU</p> <p>(Comments):</p> <p>It would be useful to include a proportionality clause for small envelopes or plans, in order to avoid having a partnership that is overrepresented in relation to the financial stakes.</p> <p>Proportionality operates by ensuring that any legal measures adopted are not excessively burdensome when weighed against the legal or social interests they aim to achieve.</p> <p>The principle of proportionality acts as a crucial tool for achieving equilibrium between overall Unions interests and Member States interests, ensuring that legal determinations in the NRP Plan are both reasonable and just. The relevance of proportionality highlights the indispensable role it plays in upholding fairness and accountability within the NRP Plan.</p> <p>LV</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the <u>specific</u> challenges and <u>relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>LV</p> <p>(Comments):</p> <p>It should be clarified that not all challenges and CSRs should be addressed by the plan.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: The Member State shall provide an explanation on how the <u>specific</u> challenges and <u>the relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged, and how the NRP Plan will:</p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: 1. The redrafting of the first part of the sentence is proposed as an alignment with the Article 22 (2)(b) (i), as well as with the wording in Annex V Section 1.2. “Description of the <u>specific</u> challenge of the Member State taking into account the <u>relevant</u> country specific recommendations addressed to the Member States concerned [...] The level of envisaged financing at this level is redundant as this requirement is already carried out at the level of the measures.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the challenges and relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>PL</p> <p>(Comments):</p> <p>Alignment with Article 22 (2)(b)(i)</p> <p>The level of envisaged financing at this level is redundant as this requirement is already carried out at the level of the measures.</p> <p>PT</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>PT: The Member State shall provide an explanation on how the challenges and country-specific recommendations, <u>when appropriate</u>, are addressed by the NRP Plan (...)]</p> <p>PT</p> <p>(Comments):</p> <p>PT: We agree that the NRPP should contribute to compliance with the CSRs whenever appropriate. Some recommendations may not be eligible for financing instruments or could be addressed in a better way through nationally financed measures.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the <u>specific</u> challenges and the relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged, and how the NRP Plan will:</p> <p>RO</p> <p>(Comments):</p> |

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| | <p>1. The redrafting of the first part of the sentence is proposed as an alignment with the Article 22 (2)(b) (i), as well as with the wording in Annex V Section 1.2. <i>“Description of the specific challenge of the Member State taking into account the relevant country specific recommendations addressed to the Member States concerned [..]</i></p> <p>The level of envisage financing at this level is redundant as this requirement is already carried out at the level of the measures.</p> <p>In order to follow the logic of the Annex V, the text will benefit of a reordering, by separating the explanations on specific challenges and CSRs (set in Art. 22(2) (a) and (b) – sections 1.1.&1.2), from the other requirements (starting with section 1.3).</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the challenges and country specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:</p> <p>SE</p> <p>(Comments):</p> |

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| | <p>1) Editorial comment: We believe it would be clearer if a new paragraph 3 begins here.</p> <p>2) We propose deletion of country-specific recommendations as the introduction of paragraph (b) above, only mentions challenges.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the specific challenges and the relevant country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will to:</p> <p>SI</p> <p>(Comments):</p> <p>The redrafting of the first part of the sentence aligns with Article 22(2)(b)(i) and the wording of Annex V, Section 1.2 (“Description of the specific challenge of the Member State [...]”).</p> <p>The reference to the envisaged financing is redundant, as this requirement is already addressed at the level of the measures.</p> <p>To follow the structure of Annex V, the text would benefit from reordering by separating the explanations on specific challenges and CSRs (Art.</p> |

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| | <p>22(2)(a) and (b), Sections 1.1 and 1.2) from the other requirements starting with Section 1.3.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide an explanation on how the <u>specific</u> challenges and <u>the relevant</u> country-specific recommendations are addressed by the NRP Plan and what level of financing is envisaged, and how the NRP Plan will:</p> <p>SK</p> <p>(Comments):</p> <p>We support the RO&BG proposal.</p> <p>The redrafting of the first part of the sentence is proposed as an alignment with the Article 22 (2)(b) (i), as well as with the wording in Annex V Section 1.2. <i>“Description of the specific challenge of the Member State taking into account the relevant country specific recommendations addressed to the Member States concerned [..] “</i></p> <p>The level of envisaged financing at this level is redundant as this requirement is already carried out at the level of the measures.</p> |

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| | <p>RO</p> <p>(Drafting suggestions):</p> <p><u>The NRP Plan will also contain:</u></p> <p>RO</p> <p>(Comments):</p> <p>Moved from the previous paragraph</p> <p>The renumbering of paragraphs is proposed in line with the references in Annex V</p> |
| <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council¹, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council²; and</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>be consistent, in particular <u>and when relevant with the institutional and constitutional organisation of the Member State</u>, with the national</p> |

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

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

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| <p>national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council³;</p> | <p>medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council⁴, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council⁵; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council⁶;</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration</p> |

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

⁴ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

⁵ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

⁶ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council , National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council ; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council ;</p> <p>BG</p> <p>(Comments):</p> <p>Regarding the numerous reference documents at EU level, but also to Fiche 15 from the CION and the stated need to start preparing the Plans already in 2026 and submitted by January 2028 the latest, we see inconsistencies in the timing, but also the treatment by the CION of the separate reference documents with regard to the programming of the Plans, for example CAP national recommendations will be adopted by the Commission sufficiently ahead of the submission of the NRP Plans by Member States (in the course of 2026), while the Employment Guidelines pursuant from art. 184 of the TFEU should be adopted by the Council by 1 January 2027.</p> <p>The new National Medium-Term Fiscal Structural plans should be submitted in the general case by April 2028 as a draft. The Draft NECPs for the 2031-2040 period are due to be submitted by 1 January 2028.</p> |

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| | <p>We need a proper estimation of these discrepancies from the perspective of the declared intention of the regulation to provide for a more simplified, integrated and coherent programming. The administrative burden in the process should be avoided and a relevant flexibility in programming should be provided. That could be hindered if a new information is to be provided in the draft NRP due to an on-going process of preparation of other strategic document and vice-versa. The probability of overlapping and “double reporting” of investments and reforms in both the NRP and the Fiscal Structural plans should be avoided as well as an act of unnecessary burden.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(c) a description on how it is be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council⁷, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Parliament and of the Council⁸; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council⁹;</p> <p>CZ</p> <p>(Comments):</p> <p>The introductory part is aligned with section 1.3 in Annex V.</p> <p>CZ would like to point out that the number of strategies and other reference points envisaged in the regulation can be a source of additional administrative burden and limit the flexibility of the MS to choose and finance their own priorities. The number of documents the NRP Plan should be compliant with should be limited.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>of the Council¹⁰, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council¹¹; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council¹². <u>This requirement does not apply if the documents listed are not adopted one year before submission of the Plan;</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of</p> |

¹⁰ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

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

¹² Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>the Council¹³, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council¹⁴; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council¹⁵;</p> <p>HU</p> <p>(Comments):</p> <p>We still don't see how the documents relate to the NRPP....</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, <u>having regard to the funding allocated to the Member State to implement the NRP and the Member State's scope for action,</u> with the national medium-term fiscal</p> |

¹³ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

¹⁴ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

¹⁵ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>structural plans under Regulation (EU) 2024/1263, nature restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council¹⁶, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council¹⁷; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council¹⁸;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to take account of the extent to which funding can limit the Member State’s scope of action and reflect the principle of proportionality.</u></p> <p>LT</p> |

¹⁶ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

¹⁷ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

¹⁸ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>(Drafting suggestions):</p> <p>(a c) <u>a description on how it is</u> be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council. This requirement does not apply if the abovementioned documents are not adopted one year before submission of the Plan</p> <p>LT</p> <p>(Comments):</p> <p>The text is proposed to harmonize it with the section 1.3. of Annex 5 “In particular” seems redundant.</p> <p>The provision stating that “This requirement does not apply if the abovementioned documents are not adopted one year before submission of the Plan” is necessary to ensure legal certainty.</p> <p>LU</p> |

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| | <p>(Drafting suggestions):</p> <p>Proposal 2: → be consistent, <u>in a proportionate manner</u>, with the ...</p> <p>MT</p> <p>(Comments):</p> <p>MT: What is the level of detail required under this point? Considering that there are other fora, beyond EU funds, where progress towards addressing CSRs, new EU obligations are foreseen to continue, how will this requirement simplify processes and foster coherence across procedures?</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national <u>nature</u> restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council¹⁹, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the</p> |

¹⁹ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

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| | <p>Council²⁰; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council²¹;</p> <p>NL</p> <p>(Comments):</p> <p>In line with terminology from the Nature Restoration Regulation.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(ac) <u>a description on how it is</u> consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council²², National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European</p> |

²⁰ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

²¹ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

²² Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

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| | <p>Parliament and of the Council²³; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council²⁴;</p> <p>RO</p> <p>(Comments):</p> <p>The introductory part is aligned with section 1.3 in Annex V.</p> <p>As there is now room for other strategic documents to which the Plan should be consistent, “in particular” seems redundant.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, <u>the River Basin Management Plans under Water Framework Directive 2000/60/EC,</u></p> |

²³ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

²⁴ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council²⁵, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council²⁶; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council²⁷;</p> <p>SE</p> <p>(Comments):</p> <p>SE proposes to include a reference to national River Basin Management Plans under the Water Framework Directive (WFD) as this framework is a basic prerequisite and complementary to the national restoration plans</p> <p>SI</p> |

²⁵ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

²⁶ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

²⁷ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| | <p>(Drafting suggestions):</p> <p>(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council²⁸, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council²⁹; and national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council³⁰;</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (c) instead of (a).</p> |

²⁸ Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1991/oj>).

²⁹ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>).

³⁰ Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4, ELI: <http://data.europa.eu/eli/dec/2022/2481/oj>).

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| <p>(b) contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council³¹ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council³², and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> | <p>AT</p> <p>(Drafting suggestions):</p> <p>(b) contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council , and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures</p> |

³¹ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

³² Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

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| | <p>underpinning the Savings and Investments Union <u>and taking into account macro regional strategies, where appropriate;</u></p> <p>AT</p> <p>(Comments):</p> <p>Macro regional strategies should be a policy reference, where appropriate.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council , and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union. <u>The Commission shall provide guidance to Member States on the assurance of</u></p> |

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| | <p><u>complementarity and coherence with other Union instruments as regards those measures, operations and projects;</u></p> <p>BG</p> <p>(Comments):</p> <p>It is important to be clarified well in advance how demarcation and complementarity would be sought and achieved in the course of preparation between the NRPs and the ECF on these projects. It would also be appropriate to clarify the scope of the measures under the Savings and Investment Union, their obligatory nature for every MS and possibly examples to be given for relevant measures for support from the NRPs.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p><u>(b-d) a description on how it</u> contributes to the completion of the Single Market, notably by providing for <u>including, where feasible,</u> measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European</p> |

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| | <p>Parliament and of the Council³³ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council³⁴, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> <p>CZ</p> <p>(Comments):</p> <p>The introductory part is Aligned with section 1.4 in Annex V.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(b) contribute to the completion of the Single Market, notably by providing for including, where feasible, measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in</p> |

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| | <p>Regulation (EU) 2024/1679 of the European Parliament and of the Council³⁵ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council³⁶, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> <p>HU</p> <p>(Comments):</p> <p>The introductory part is Aligned with section 1.4 in Annex V.</p> <p>As the Annex V does not provide room for other type of measures, ~notably~ looks redundant.</p> |

³⁵ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

³⁶ Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The measures proposed this paragraph should be optional, in line with the intervention strategy. The requirements are too prescriptive and limits the ability of a MS or regions to respond to the critical needs.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Proposal 2: → contribute, <u>in a proportionate manner</u>, to the ...</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, <u>where relevant</u>, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council⁶ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council⁷, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments</p> |

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| | <p>Union; Justification: Further consideration of the realities of small economies is needed.</p> <p>MT</p> <p>(Comments):</p> <p>Justification: Further consideration of the realities of small economies is needed.</p> <p>What flexibilities will be given to smaller economies and Island Member States reflecting their particularities that are also highlighted in the TFEU 174?</p> <p>NL</p> <p>(Comments):</p> <p>NL is currently still reviewing the potential implications of the different elements mentioned in this paragraph.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>(b) a description on how it contributes to the completion of the Single Market, notably by providing for including, where feasible, measures with a cross-border, transnational or multi-country dimension, including</p> |

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| | <p>by taking into account projects located on the core and the extended core <u>trans-European transport network</u> as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council.</p> <p>PL</p> <p>(Comments):</p> <p>The measures proposed in this paragraph should be optional, in line with the intervention strategy. The requirements are too prescriptive and limit the ability of a Member State or regions to respond to critical needs.</p> <p>The successful completion of the Single Market should provide measures covering not only projects located on the core and the extended core, but also on comprehensive network.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: (b) contribute to the completion of the Single Market, notably by providing for measures with a cross border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU)</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>2024/1679 of the European Parliament and of the Council³⁷ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council³⁸, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</u></p> <p>PT</p> <p>(Comments):</p> <p>PT: It should be up to the Member State to decide which of the challenges and CSRs are to be included in the NRPP.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

³⁷ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

³⁸ Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

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| | <p>(b d) a description on how it contributes to the completion of the Single Market, notably by providing for including, where feasible, measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council³⁹ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council⁴⁰, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> <p>RO</p> <p>(Comments):</p> |

³⁹ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

⁴⁰ Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

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| | <p>The introductory part is Aligned with section 1.4 in Annex V.</p> <p>As the Annex V does not provide room for other type of measures, ~notably~ looks redundant.</p> <p>The measures proposed this paragraph should be optional, in line with the intervention strategy. The requirements are too prescriptive and limits the ability of a MS or regions to respond to the critical needs.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(b) contribute to the completion of the Single Market, notably by providing for measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council⁴¹ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European</p> |

⁴¹ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Parliament and of the Council⁴², and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> <p>SE</p> <p>(Comments):</p> <p>SE proposes to delete examples mentioned in this paragraph as we believe there are other examples that are as relevant for the completion of the internal market. This should also be reflected in Annex V, Title II, section 2.5.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(b) contribute to the completion of the Single Market, notably by providing for including, where feasible, measures with a cross-border, transnational or multi-country dimension, including by taking into account projects located on the core and the extended core network as</p> |

⁴² Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

| Commission proposal | MS drafting suggestions and comments |
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| | <p>defined in Regulation (EU) 2024/1679 of the European Parliament and of the Council⁴³ by taking into account and enabling, through national network developments, projects of common interest as defined in Regulation (EU) 2022/869 of the European Parliament and of the Council⁴⁴, and by supporting Important Projects of Common European Interest (IPCEIs) and operations that have been awarded a Competitiveness Seal, and by implementing measures underpinning the Savings and Investments Union;</p> <p>SI</p> <p>(Comments):</p> <p>The measures proposed this paragraph should be optional, in line with the intervention strategy. The requirements are too prescriptive and limits the ability of a MS or regions to respond to the priority needs.</p> <p>SK</p> |

⁴³ Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (OJ L, 2024/1679, 28.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1679/oj>).

⁴⁴ Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>).

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| | (Drafting suggestions): Technical Comment: The correct wording should be point (d) instead of (b). |
| <p>(c) [provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified;</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>(c) [provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP] and Regulation (EU) 1379/2013. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified;</p> |

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| | <p>DE</p> <p>(Drafting suggestions):</p> <p>(c) provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified. <u>Each chapter must be assigned to one responsible authority on the federal, regional or local level responsible for the preparation and implementation of the respective chapter in accordance with the institutional, legal and financial framework on the national level.;</u>]</p> <p>DE</p> |

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| | <p>(Comments):</p> <p>This subparagraph does not fit into this list. It should become a standalone paragraph, e.g. Art. 22 (2) (c).</p> <p>We strictly oppose loan instrument.]</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>c) <u>provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with, their indicative completion date for each milestone and target during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP].</u></p> |

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| | <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 1, paragraph c, by replacing “their” with “the”, and by adding <i>for each milestone and target</i>.</u></p> <p><u>HR comments: It is unclear whether the date applies to each milestone and target or to the measure as a whole.</u></p> <p>IE</p> <p>(Comments):</p> <p><u>Article 22(2)(c) should include references to both CMO Regulations – for Agriculture, and for Fisheries and Aquaculture (1379/2013) measures. Why are these not included?</u></p> <p><u>The suggestion here is that Member states will “explain how the NRP will provide the list and description of the measures”. Do we need to explain how we will provide the list, then elsewhere provide the list? This seems like needless duplication. As above, this should be given a new paragraph number 3 (otherwise, what is meant by paragraph 2(a)? Is it the first 2a or the second 2a? After adding a new paragraph. points (c), (d), (e), (g), and (h) should be linked to paragraph 2, i.e. “ NRP Plans shall...”, whereas the other points</u></p> |

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| | <p><u>under the new paragraph 3 should be linked to the initial statement “Member States will explain how the NRP will...”.</u></p> <p>IT</p> <p>(Comments):</p> <p>Further clarifications are needed regarding the distribution of competences and roles between the Member State and the Regions with respect to:</p> <ul style="list-style-type: none"> - the definition of reforms and investments with a strong regional/sectoral component and the related milestones and targets; - the planning of the sectoral, thematic and regional chapters of the Plan (who is responsible for drafting the Plan in the case of regional chapters); - the implementation of the various national and regional chapters and the specific responsibilities related to verifying the achievement of milestones and targets. <p>LV</p> <p>(Drafting suggestions):</p> <p>(c) Provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily</p> |

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| | <p>pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support. Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation]. <u>In cases where no relevant indicators are available in the Annex 1 for planned intervention Member State may propose other indicators.</u> except where duly justified;</p> <p>LV</p> <p>(Comments):</p> <p>The wording is not fully clear. LV would suggest elaborating in which cases country specific indicators can be used.</p> <p>PL</p> <p>(Drafting suggestions):</p> |

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| | <p>[provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them the measures primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified <u>unless none of those indicators are adequate</u>;</p> <p>PL</p> <p>(Comments):</p> <p>The provision is unclear whether we need to define the general and specific objective at the level of measure or at the level of chapter. For clarity, we suggest to specify that it needs to be done at the level of a measure.</p> |

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| | <p>Experience from previous programming periods shows that common indicators have had very limited use in simplified cost options or financing not linked to costs, as they are often insufficient in terms of linking the indicator to the essence of the support, especially in the ESF projects. The use of these indicators for simplified methodes should be linked to the possibility of using additional indicators proposed by the Member State relating to the substance of the support. The same applies to comprehensive, multi-faceted measures proposed by a Member State for which the indicators in Annex 1 would be insufficient.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: (...) <u>By way of derogation from the first subparagraph, the Member State may identify the list and description of measures to be reimbursed by the Commission on a real-cost basis, and the corresponding indicators.</u></p> <p>PT</p> <p>(Comments):</p> <p>PT sees this provision as a critical issue. PT does not support the proposal as an approach solely based on FNLC. It seems inappropriate for the</p> |

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| | <p>whole range of investments to be supported by the Plan. This drafting suggestion already includes a provision that ensures that result-oriented approach is also in place in a real-cost basis method.</p> <p>RO</p> <p>(Comments):</p> <p>To be aligned to the rest of the text, later one.</p> <p>SE</p> <p>(Comments):</p> <p>Editorial comment) This paragraph together with (d) and (e) below would fit well in a new paragraph 4 (possibly together with more of the points below) as they have a different character than the points which aims to describe what the plan should contribute to.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>Addition: <u>By way of derogation from the first subparagraph, the Member State may identify the list and description of measures to be reimbursed by the Commission on a real-cost basis, and the corresponding indicators.</u></p> |

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| | <p>SI</p> <p>(Comments):</p> <p>An approach based solely on FNLC is insufficient for addressing the full range of investments to be supported under the NRP Plan. The drafting suggestion already incorporates a provision that ensures a result-oriented approach is maintained, even when using a real-cost-based method.</p> <p>We propose that the Country-Specific Recommendations (CSR) outlined in the European Semester be considered necessary reforms that are excluded from the system of milestones and targets. The existing EU Cohesion policy for 2021-2027 already anticipates the required reforms in Member States, either through CSR or as conditionalities. We suggest that this system remain in place. Therefore, only investments and other interventions should fall under the system of milestones and targets.</p> <p>“The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation] except where duly justified;”</p> <p>We propose that tagging for indicators : ‘climate change mitigation’, ‘climate change adaptation and resilience’, ‘environment’ and ‘social’ is reduced from four to three: ‘climate’, ‘environment’ for pursuing</p> |

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| | <p>43% target and “social” for 14 % target. RRF has only three categories (climate, environment, digital).</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (e) instead of (c).</p> <p>We propose to amend the text as follows:</p> <p>“(e) provide the list and description of measures grouped in chapters, including the general and specific objectives that each of them primarily pursues and the list of envisaged milestones and targets, with their indicative completion date during the programming period, including the additional measures and related milestones and targets in case the Member State concerned requests loan support.] Measures linked to the CAP shall comply with the requirements set out in Title V [CAP] and Regulation (EU) 202X/XXXX [CAP Regulation] and Regulation (EU) 202X/XXXX [CMO] and those linked to the Common Fisheries Policy with the requirements set out in Article XX of Regulation XX [CFP]. The indicators proposed for the targets shall be based on the output indicators listed in Annex I to Regulation (EU) 202X/XXXX [Performance Regulation]</p> |

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| | <p>except where duly justified; <u>By way of derogation from the first subparagraph, the Member state may identify the list and description of measures to be reimbursed by the Commission on a real-cost basis, and the corresponding indicators.</u></p> <p>SK</p> <p>(Comments):</p> <p>We support the PT proposal.</p> <p>The implementation of the Plan also envisages measures for which it is more appropriate to apply the real-cost model.</p> |
| | <p>RO</p> <p>(Drafting suggestions):</p> <p>Definitions related to the above provisions, proposed to be treated under this chapter:</p> <p>(11)‘milestone’ means a qualitative or quantitative achievement, used to measure progress towards the achievement of a measure, including in the form of an interim step;</p> <p>(13)‘pay-out value’ means the amount to be paid by the Commission to the Member State, as proposed by the Member State, for the progress</p> |

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| | <p>achieved in the implementation of the measures of the Plan, taking into account the amounts set aside for reforms; and reflecting both the estimated implementation pace of each measure as well as the need to ensure regular disbursement and timely delivery of the Union on the ground;</p> <p>RO</p> <p>(Comments):</p> <p>(11) and (12) The text is meant to reflect the concrete situations described by the Commission. It is important to have a definition of the interim step taking into account their significant role in triggering payments.</p> <p>(13) The proposed text reflects recitals (56) and (57), as well as the fact stated repeatedly by the COM that the pay-out values are set by the MS.</p> |
| <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and</p> | <p>FR</p> <p>(Comments):</p> <p><i>The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures” : cela signifie-t-il qu’en cas de crise ou selon les résultats de la revue à mi-parcours (article 14.2), ces montants seraient retirés des mesures auxquelles ils auraient été intégrés au dépôt du Plan, pour être affectés à</i></p> |

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| <p>commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</p> | <p>d'autres mesures ? La partie 9 "résumé des chapitres" de l'Annexe V pourrait laisser penser que le montant de flexibilité n'est pas affecté du tout dans le Plan initial (cf. la ligne "<i>flexibilité 25% du total contribution UE</i>" dans le tableau de la partie 9).</p> <p>AT</p> <p>(Comments):</p> <p>Are more specific guidelines planned for the method used by the EC to estimate total costs? How will reforms be assessed financially? Will the EC be making any proposals in this regard?</p> <p>Do cost estimates need to be updated in case of plan amendments for measures that are not affected by the amendment?</p> <p>Furthermore, we question the application of different cost principles (public cost principle/total cost principle) in the NRP plan. This could potentially lead to considerable administrative difficulties.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union</p> |

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| | <p>financial contribution <u>excluding the amounts reserved under the crisis and flexibility instruments</u>, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</p> <p>BE</p> <p>(Comments):</p> <p>The current reading isn't clear to us and the wording seems to imply that flexibility amount needs to be programmed under specific measures in the Plan instead of as a separate line in the overview of the total estimated costs and total Union financial contribution in Annex V (point 9. Summary of all chapters). The flexibility amount should not be in the initial plan, but only once a decision on the allocation will be taken.</p> <p>BG</p> <p>(Drafting suggestions):</p> |

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| | <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. <u>The amounts set aside for reforms shall not exceed 5% of the estimated costs of the investments.</u> The non-programmed amount set aside as flexibility shall be considered as part of the total estimated costs of the measures;</p> <p><u>The Commission shall provide guidance to the Member States for the cost estimation of the measures to be included in their Plans, incl. on the methodology for setting pay-out values in their implementation and, where necessary, amendments.</u></p> <p>BG</p> <p>(Comments):</p> |

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| | <p>An objective criterion is required to determine the amounts to be allocated to reforms, in order to ensure equal treatment and a level playing field for all Member States.</p> <p>We would like to propose deleting the reference to measures in the last sentence, as it is misleading.</p> <p>Instead, we propose to refer to the total estimated costs of the Plan (programmed measures 75% + flexibility amount 25%). This revision is in line with <i>Table 9. Summary of all chapters</i> in Annex V.</p> <p>With a view to a legal certainty and uniform implementation of the preparation process across MS we suggest that the CION shares in advance with MS its understanding on the methodology for cost estimation and definition of the pay out values to be used.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where</p> |

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| | <p>relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures the measures not be included in the first NRP to be adopted;</p> <p>CZ</p> <p>(Comments):</p> <p>On many occasions it was clarified by the Commission, that flexibility amount shall only be programmed during the process of NRPP implementation (mainly during the midterm review), thus it doesn't correspond with current formulation, that flexibility amount shall be considered as part of the total estimated costs of the measures.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution,</p> |

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| | <p>together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact.</p> <p>DE</p> <p>(Comments):</p> <p>This subparagraph does not fit into this list. It should become a standalone paragraph, e.g. Art. 22 (2) (d).</p> <p>We strictly oppose loan instrument.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures <u>including VAT</u> in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the</p> |

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| | <p>principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures <u>Plan</u>;</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount <u>for the MTR</u> shall be considered as part of the total estimated costs of the measures <u>and pre allocated to measures</u>;</p> <p>EL</p> <p>(Comments):</p> |

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| | <p>The flexibility amount corresponding to the MTR of the NRPP should be programmed / pre allocated to concrete measures, for a long term, more integrated planning and programming</p> <p>HR</p> <p>(Comments):</p> <p>HR question:</p> <p>Does this imply that co-financing rates will have to be justified for every measure?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. <u>The amounts set aside for reforms shall not</u></p> |

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| | <p><u>exceed 5% of the estimated costs of the investments.</u> The non-programmed amount set aside as flexibility amount as referred to in Article 14 (2) shall be considered as part of the total estimated costs of the measures Plan;</p> <p>HU</p> <p>(Comments):</p> <p>An objective criterion is required to determine the amounts to be allocated to reforms, in order to ensure equal treatment and a level playing field for all Member States. In addition, the amount set aside for the reforms should allow for sufficient finance for investments, preserving the long term investment profile of the Cohesion Policy.</p> <p>We would like to propose deleting the reference to measures in the last sentence, as it is misleading.</p> <p>Instead, we propose to refer to the total estimated costs of the Plan (programmed measures 75% + flexibility amount 25%). This revision is in line with <i>Table 9. Summary of all chapters</i> in Annex V and with the explanations provided by the Commission.</p> <p>IE</p> <p>(Drafting suggestions):</p> |

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| | <p>(d) set out the total estimated costs of the measures <u>to include those programmed and those which will be encompassed by the flexibility amount</u> in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to allow for planning / indicative and conditional programming of the flexibility about, noting the Commission’s proposal that the flexibility amount shall be considered as part of the total estimated costs of the measures.</u></p> <p><u>Will it be mandatory to use simplified cost options for all CAP schemes (excluding Direct Payments)? If SCOs are necessary, this</u></p> |

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| | <p><u>would increase the preparatory time to establish financial plan and targets.</u></p> <p>IT</p> <p>(Comments):</p> <p>Further clarifications are needed concerning the allocation of competences and roles between the Member State and the Regions with regard to:</p> <ul style="list-style-type: none"> - the procedures for defining milestones and targets, and for estimating the costs associated with each measure. <p>The table attached to the proposal follows the structure of the NRRP, with the critical issue that it risks “centralising” the costing system without ensuring the involvement of the Regions.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>ef) set out the total estimated costs of the measures including VAT in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union</p> |

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| | <p>financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The amounts set aside for reforms shall not exceed 5% of the estimated costs of the investments. The non-programmed amount set aside as flexibility amount as referred in to in Article 14 (2) shall be considered as part of the total estimated costs of the measures Plan;</p> <p>LT</p> <p>(Comments):</p> <p>An objective criterion is required to determine the amounts to be allocated to reforms, in order to ensure equal treatment and a level playing field for all Member States. In addition, the amount set aside for the reforms (we proposed 5%) should allow for sufficient finance for investments, preserving the long-term investment profile of the Cohesion Policy.</p> <p>There should be a clear indication of VAT treatment in the Regulation.</p> <p>A reference in proposed to the flexibility amount.</p> <p>LV</p> <p>(Drafting suggestions):</p> |

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| | <p>(d) set out the total estimated costs of the measures <u>including VAT</u> in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the <u>plan-measures</u>. <u>The milestones and targets will not include flexibility amount before it has been allocated for specific measures;</u></p> <p>LV</p> <p>(Comments):</p> <p>It is necessary to clarify that targets and milestones do not include flexibility amount before it is allocated to specific measures. Current wording gives the impression that flexibility amount should be included when setting M&T.</p> |

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| | <p>Moreover, it should clearly state that VAT could be included in the cost estimates.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</p> <p>MT</p> <p>(Comments):</p> <p><i>Justification: To consider the flexibility amount in costings, we reiterate that the amount needs to be programmed upfront.</i></p> |

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| | <p>MT: We request clarification on how the non-programmed amount is to be included within the total estimated costs of the measures. For the costing to reflect the full amount, all components need to be appropriately programmed otherwise the intervention logic risks losing consistency between budget and actions. To support accurate cost estimation a minimum level of guidance should be provided on VAT, contingencies and the impact of inflation, as well as risk and adjustment factors, set-up costs and indirect costs.</p> <p>We also ask the Commission to present best practice examples demonstrating how actions can be justified as plausible and reasonable and aligned with cost efficiency, sound financial management and the expected economic and social impact. This should be provided for each specific objective covering both reforms and investments.</p> <p>Finally, we seek clarification on the level of detail and documentation that will be required beyond what is set out in the NRPP template.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its</p> |

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| | <p>amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall not be considered as part of the total estimated costs of the measures</p> <p>PL</p> <p>(Comments):</p> <p>The non-programmed amount set aside as flexibility amount cannot be programmed, so it should not be considered as a part of total costs. Otherwise, this approach makes it impossible to contract the entire operation in a way that allows milestones and targets to be achieved as quickly as possible.</p> <p>PT</p> <p>(Drafting suggestions):</p> |

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| | <p>PT: (...) <u>The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures;</u></p> <p>PT</p> <p>(Comments):</p> <p>PT: With this provision, the non-programmed amount is counting to the N+1 rule. If this is the case, we suggest deleting it.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(d f) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. <u>The amounts set aside for reforms shall not exceed 5% of the estimated costs of the investments. For investments, the total estimated costs will exclude VAT and will take into account</u></p> |

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| | <p><u>national specificities, contingencies and inflation.</u> The non-programmed amount set aside as flexibility amount as referred to in Article 14 (2) shall be considered as part of the total estimated costs of the measures <u>Plan</u>;</p> <p>RO</p> <p>(Comments):</p> <p>The introductory part is aligned with the rest of the text.</p> <p>An objective criterion is required to determine the amounts to be allocated to reforms, in order to ensure equal treatment and a level playing field for all Member States. In addition, the amount set aside for the reforms should allow for sufficient finance for investments, preserving the long-term investment profile of the Cohesion Policy.</p> <p>In order to facilitate the process of cost estimation (to have adequate pay out value) a minimum guidance should be provided to the national authorities as regards at least the VAT, contingencies and impact of inflation. National specificities mentioned and adjustment methods are included in the annex.</p> <p>We would like to propose deleting the reference to measures in the last sentence, as it is misleading.</p> |

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| | <p>Instead, we propose to refer to the total estimated costs of the Plan (programmed measures 75% + flexibility amount 25%). This revision is in line with <i>Table 9. Summary of all chapters</i> in Annex V and with the explanations provided by the Commission.</p> <p>SE</p> <p>(Comments):</p> <p>We believe the wording in this paragraph need to be clarified. For example, it would be good if “<i>together with information on existing or planned Union financing where relevant</i>” could be clarified. And also “<i>backed up by appropriate justification and by explanations of how it is plausible</i>”.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(d) set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by</p> |

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| | <p>explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. <u>For investments, the total estimated costs will not include VAT and will take into account contingencies and the potential impact of the inflation.</u> The non-programmed amount <u>as referred to in Article 14 (2)</u> set aside as flexibility amount shall be considered as part of the total estimated costs of the <u>NRP Plan</u>-measures;</p> <p>SI</p> <p>(Comments):</p> <p>An objective criterion is needed to determine the amounts allocated to reforms, ensuring equal treatment and a level playing field for all Member States. The share reserved for reforms should also leave sufficient funding for investments, preserving the long-term investment profile of Cohesion Policy.</p> <p>To support the costing process, minimum guidance should be provided to national authorities, at least regarding VAT, contingencies, and the impact of inflation.</p> |

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| | <p>We propose deleting the reference to <i>measures</i> in the last sentence, as it is misleading. Instead, it should refer to the total estimated cost of the NRP Plan</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (f) instead of (d).</p> <p>set out the total estimated costs of the measures in accordance with the template set out in Annex V, as part of the Plan or of a request for its amendment, for a total amount at least equivalent to the sum of the Union financial contribution, any requested loans, and national contribution, together with information on existing or planned Union financing where relevant, backed up by appropriate justification and by explanations of how it is plausible and reasonable and in line with the principle of cost efficiency, sound financial management and commensurate to the expected economic and social impact. The non-programmed amount set aside as flexibility amount shall be considered as part of the total estimated costs of the measures <u>Plan</u>;</p> <p>SK</p> |

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| | <p>(Comments):</p> <p>We would like to propose deleting the reference to measures in the last sentence, as it is misleading.</p> <p>Instead, we propose to refer to the total estimated costs of the Plan (programmed measures 75% + flexibility amount 25%). This revision is in line with <i>Table 9. Summary of all chapters</i> in Annex V.</p> |
| <p>(e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> |

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| | <p>FR</p> <p>(Comments):</p> <p>Les autorités françaises s’interrogent sur la notion de « clear arrangements » qui semble large, la Commission pourrait-elle préciser ? Cette modification vise à supprimer une disposition qui apparaît trop détaillée et trop spécifique dans le cadre de l’élaboration des Plans, qui doivent rester des documents stratégiques.</p> <p>Les mots supprimés ne sont pas assez précis.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>set out a <u>brief explanation of how the Member State</u> will monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and</p> |

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| | <p>evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>BE</p> <p>(Comments):</p> <p>Limit administrative burdens.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>(e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>DE</p> <p>(Comments):</p> |

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| | <p>Lengthy descriptions of existing national management and control structures, which have been examined by the Commission for years, must be reduced to a minimum.</p> <p>The description of the Governance and Control System of the NRPP should serve as an assurance for MS in order to avoid potential serious deficiencies that lead to exclusions from the funds and flat-rate financial corrections.</p> <p>Germany has submitted a range of proposals for simplification in view of implementation of purely national law, audit and control.</p> <p>HR</p> <p>(Comments):</p> <p>HR comment: HR advocates for the continuation of the existing national structure within home affairs funds, i.e. one managing (responsible) authority along with a monitoring committee, an audit authority and coordination authority etc. without the introduction of an additional level of authorities, which would further complicate communication and implementation of activities under the NRPP.</p> <p>IE</p> <p>(Drafting suggestions):</p> |

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| | <p>e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of established<u>ing as part of</u> a robust multi-<u>level</u> governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to clarify the text and emphasise that authorities and monitoring committees are some but not all of the parts of a robust multi-level governance system</u></p> <p>PL</p> <p>(Drafting suggestions):</p> |

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| | <p>set out clear arrangements for the effective coordination, monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, coordination, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>PL</p> <p>(Comments):</p> <p>Coordination should also be included as it is crucial for the effective implementation.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(e-g) set out clear arrangements for the effective coordination, monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring</p> |

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| | <p>committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, the envisaged approach to identification of risk affecting the fulfilment of milestones and targets, the envisaged approach to communication and visibility, an identification of potential technical support needs, as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, coordination, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>RO</p> <p>(Comments):</p> <p>The coordination arrangements are essential to ensure coherent and effective delivery of the NRPPs.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(e) set out clear arrangements for the effective monitoring and implementation of the Plan by the Member State concerned, including the responsible authorities and monitoring committees reflecting the objective of establishing a robust multi governance system based on the</p> |

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| | <p>partnership principle, the envisaged approach to communication and visibility, an identification of potential technical support needs, <u>and where appropriate also</u> as well as clear and effective arrangements between the national and regional authorities in terms of responsibilities for programming, implementation, financial management, monitoring and evaluation, in accordance with the institutional and legal framework of the Member State;</p> <p>SI</p> <p>(Comments):</p> <p>Internal affairs projects in the Republic of Slovenia are centralized by nature, and therefore we cannot justify in reports from our field how the division of planning, implementation, and monitoring between national and regional authorities in Member States will be described in the NRPP.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (g) instead of (e).</p> |
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| <p>(f) reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:</p> | <p>CZ</p> <p>(Drafting suggestions):</p> <p>(f) <u>a comprehensive overview of the support</u> to reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by</p> <p>CZ</p> <p>(Comments):</p> <p>The introductory part is Aligned with section 1.5 in Annex V.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(f) <u>set out a comprehensive overview of the support</u> to reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>reduce economic, social and territorial disparities and <u>climate-environmental vulnerabilities</u> in less developed, transition and more developed regions, in particular by</p> |

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| | <p>IT</p> <p>(Comments):</p> <p>To reduce economic, social, and territorial disparities, it is also necessary to contrast the climate and environmental vulnerabilities.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>h)a comprehensive overview of the support to reduce economic, social and territorial disparities in less developed, transition and more developed regions, through concrete measures financed from ERDF, ESF and Cohesion Fund in particular</p> <p>LT</p> <p>(Comments):</p> <p>For the Treaty based policies a clear visibility should be envisaged in the NRPP regulation.</p> <p>MT</p> <p>(Comments):</p> <p>MT: Malta would welcome clarification on how this provision is intended to apply in the context of the HOME Funds. The reference to</p> |

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| | <p>reducing economic, social and territorial disparities is a core objective of cohesion policy yet its relevance to the specific mandate and scope of the HOME Funds is less evident. Further guidance on the intended interpretation would therefore be appreciated.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(h) <u>a comprehensive overview of the support</u> to reduce economic, social and territorial disparities in less developed, transition and more developed regions, <u>through concrete measures financed from ERDF, ESF and Cohesion Fund according to the policy-specific Regulations</u> in particular by:</p> <p>RO</p> <p>(Comments):</p> <p>The introductory part is Aligned with section 1.5 in Annex V.</p> <p>A clear visibility should be provided in the NRPP to the specific sectoral funds of the Treaty based policies.</p> <p>SI</p> <p>(Drafting suggestions):</p> |

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| | <p>(f) reduce economic, social and territorial disparities in less developed, transition and more developed regions, <u>through concrete measures financed from ERDF, ESF and Cohesion Fund</u> in particular by:</p> <p>SI</p> <p>(Comments):</p> <p>A clear visibility should be provided in the NRP Plan to the specific sectoral funds of the Treaty based policies</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (h) instead of (f).</p> |
| | <p>SE</p> <p>(Drafting suggestions):</p> <p><u>Allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment based on the specific needs of regions, including by making use of smart specialisation strategies.</u></p> |

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| | <p>SE</p> <p>(Comments):</p> <p>A new point should be added on allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment. The use of smart specialisation strategies can help in guiding innovation investments based on a region’s specific needs.</p> <p>Furthermore, SE believes that (g) (ii) “concentrate resources on social measures in accordance with Annex VI [social allocations]” could be moved to this section, i.e. section f.</p> |
| <p>(i) allocating resources to less developed, transition and more developed regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII;</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>“allocating resources to less developed transition, and more developed regions, and to outermost regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII”</p> <p>FR</p> <p>(Comments):</p> |

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| | <p>La délégation pourra regretter l'absence de mention aux RUP au paragraphe 2. f) i. Alors que l'objectif de renforcer le développement économique et social des RUP est défini au sein de l'article 22, aucun moyen adapté n'est prévu par la Commission européenne au sein des règlements post-27 pour soutenir ces territoires. Or l'appui de la Commission demeure essentiel pour accompagner les RUP, comme le démontre d'ailleurs le rapport sur la mise en œuvre de la communication RUP.</p> <p>La Commission pourrait-elle justifier son choix consistant à laisser le financement des RUP provenir du seul montant dédié aux régions les moins développées (RMD), sans prévoir de moyens spécifiques pour les RUP ?</p> <p>La délégation pourra alerter sur le risque de dilution du soutien dédié aux RUP au regard de l'intégration de régions hexagonales dans la catégorie des RMD.</p> <p>AT</p> <p>(Comments):</p> <p>Scrutiny reserve: Annex VII requires further discussion.</p> <p>BE</p> <p>(Drafting suggestions):</p> |

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| | <p>(i) allocating earmarked resources to less developed, transition and more developed regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>BE</p> <p>(Comments):</p> <p>There should be an earmarked budget for cohesion policy, for all region (in line with BE position on the negobox, pillar I)</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(i) allocating resources to less developed, transition and more developed regions <u>on NUTS [X] level</u>, in accordance with their specific challenges <u>based on the analysis according to Art. 22 (2) (a)</u>, to be reported in Annex V based on methodology set out in Annex VII;]</p> <p>DE</p> <p>(Comments):</p> <p>A clarification is needed that not all of the listed categories of regions must necessarily be allocated funds.]</p> <p>IT</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>allocating resources to less developed, transition and more developed regions <u>for Cohesion policy’ measures</u>, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII. <u>If the allocation of resources, as reported in Annex V, to transition and more developed regions is respectively lower by more than 15% than the resources made available for these categories of regions under the 2021-2027 MFF from the Resources for the Investment for jobs and growth goal within Regulation 2021/1060 [CPR], the Member State should provide a justification based on objective criteria, such as the reduction of economic, social and territorial disparities, changes in category of regions, changes in the size of the population or changes of challenges as identified in the policy reference documents listed under points (b), (c) and (d) of this paragraph.</u></p> <p>IT</p> <p>(Comments):</p> <p>The provision requires the Member State to set out, in Annex V, the criteria used for allocating resources to less developed regions, transition regions</p> |

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| | <p>and more developed regions, in line with their specific challenges and using the methodology laid down in Annex VII.</p> <p>However, the methodology contained in Annex VII (“methodology for the territorial contribution”) relies exclusively on the concept of “specific needs and challenges” of the different categories of regions — a concept that is overly broad and potentially subject to discretionary interpretation by both the Member States and the Commission while it is needed a more predictable and consistent allocation framework, which reduce room for discretion, and better reflect the traditional architecture and rationale of cohesion policy.</p> <p>Building on the VDL proposal, it is suggested to anchor this approach more directly to cohesion policy - excluding all CAP, CFP and Home Funds interventions - while providing for a lower minimum threshold with respect to the minimum threshold proposed by the VDL proposal.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: <i>allocating resources to less developed, transition and more developed regions, in accordance with their specific challenges, to be</i></p> |

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| | <p><i>reported in Annex V based on methodology set out in Annex VII <u>as applicable</u></i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The addition of ‘<i>as applicable</i>’ introduces essential flexibility for Member States whose circumstances are not fully captured by the standard regional classification.</p> <p>MT: Malta notes that the current definition of ‘<i>less developed, transition and more developed regions</i>’ rely primarily on economic indicators and does not reflect other significant factors, such as migration pressures, security challenges and operational demands that certain Member States face. If the allocation methodology is intended to support realistic and balanced planning across all sectors, a broader assessment framework may be warranted. We would therefore welcome consideration of how these additional challenges could be better reflected, including through appropriate co-financing arrangements where targets contribute directly to Union-level objectives rather than being solely within national control.</p> <p>RO</p> <p>(Comments):</p> |

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| | <p>Clarity and coherence in terminology is necessary do that, in preamble and the text of the Regulation; in this respect, by "Eastern border regions" it should be understood that it refers to NUTS2 regions of the Union that have a land or maritime border with the Russian Federation, Belarus or Ukraine . In Annex VII, the specific needs and challenges of Eastern border regions should include regions that have borders with Ukraine.</p> |
| <p>(ii) concentrate resources on less developed regions by establishing minimum amounts per Member State based on methodology set out in Annex II;</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>(ii) concentrate resources on less developed regions by establishing minimum amounts per Member State based on methodology set out in Annex II;</p> <p>BE</p> <p>(Comments):</p> <p>Connected with the paragraph above, there should be earmarking for all regions (in line with BE position on the negobox, pillar I)</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p>(ii) concentrate resources on less developed regions <u>on NUTS [X] level</u> by establishing minimum amounts per Member State based on methodology set out in Annex II;]</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(ii) concentrat<u>inge</u> resources on less developed regions by establishing minimum amounts per Member State based on methodology set out in Annex II;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to correct grammer</u></p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: <i>concentrate resources on less developed regions by establishing minimum amounts per Member State based on methodology set out in Annex II, <u>as applicable</u>;</i></p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: The addition of ‘<i>as applicable</i>’ introduces essential flexibility for Member States whose circumstances are not fully captured by the standard regional classification</p> |
| <p>(i) focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</p> | <p>AT</p> <p>(Drafting suggestions):</p> <p>(i) <u>addressing territorial challenges and needs of regions across Europe in particular by</u> focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, <u>mountain regions</u>, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>AT</p> <p>(Comments):</p> <p>Mountain regions should be included as in Art 174 TFEU</p> <p>Scrutiny reserve: The specific needs set out in Annex VII need further discussion</p> <p>CZ</p> <p>(Drafting suggestions):</p> |

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| | <p>(i)(iii)</p> <p>CZ</p> <p>(Comments):</p> <p>Incorrect indexing. Should be letter (iii).</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) <u>in accordance with Article 174 TFEU</u>, focusing on the specific needs of of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII; <u>rural areas, areas affected by industrial transition and regions which suffer from severe and permanent natural or demographic handicaps such as the northernmost regions with very low population density and island, cross-border and mountain regions [NUTS [X] level]</u>, to be reported in Annex V based on methodology set out in Annex VII;]</p> <p>DE</p> <p>(Comments):</p> <p>Wrong numeration.</p> |

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| | <p>A clarification is needed that not all of the listed categories of regions must necessarily be allocated funds.</p> <p>Regarding e.g. Article 174 TFEU and Article 4 “Support for disadvantaged areas” and Article 5 “sustainable urban development of ERDF proposal (COM(2025) 552 final), we suggest a streamlining of categories and definitions, and would welcome an extension.]</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(i) focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, <u>coastal and fisheries areas</u>, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>FI</p> <p>(Comments):</p> <p>NB: numbering is incorrect in the template</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> |

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| | <p>i) <u>focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial and just transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 1, paragraph i by adding and just.</u></p> <p><u>HR comments: Just transition has to be one of the areas of focusing taking into account specific needs of that areas.</u></p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(ii) focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is renumbered to correct a numbering error</u></p> |

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| | <p><u>The objectives of LEADER can be directly linked to a number of the Fund objectives set out in Article 3. The following points appear to relate to themes and sub-themes provided under LEADER: 1a) (i), (ii), (iv), (v), (ix), (x); 1c) (i); d) (v), supporting the argument for a Rural Development chapter within the National and Regional Partnership Plans with ring fenced funding for community-led interventions such as LEADER.</u></p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Clerical error? Point iii?</p> <p>MT</p> <p>(Drafting suggestions):</p> <p><i>MT: focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII, <u>as applicable</u>;</i></p> <p>MT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Justification: The flexibility is required for MSs that do not have particular regional disparities, different categories of region etc.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas including their functional areas, areas affected by undergoing industrial and just transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>PL</p> <p>(Comments):</p> <p>Cities and their functional urban are home to large populations, economic activity, innovation potential and environmental pressures. This creates a need for structured cooperation with urban authorities and functional urban areas so that urban policies reflect actual spatial dynamics, strengthen territorial cohesion and effectively contribute to the Union's objectives.</p> <p>PL proposes also to amend point 1, paragraph i by adding and just. Just transition has to be one of the areas of focusing taking into account specific needs of that areas.</p> |

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| | <p>SE</p> <p>(Drafting suggestions):</p> <p>(i) focusing, <u>where relevant</u>, on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on methodology set out in Annex VII;</p> <p>SE</p> <p>(Comments):</p> <p>The starting point should be the territorial needs in accordance with the specific challenges of the respective MS.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (iii) instead of (i).</p> |
| | <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p><u>(iv) focussing on the specific needs of urban areas by sustainable urban development and setting out, where appropriate, an integrated approach in accordance with Art. 74 to 76, to be reported in Annex V based on methodology set out in Annex VII;]</u></p> <p>DE</p> <p>(Comments):</p> <p>DE: In view of the streamlining with Article 4 “Support for disadvantaged areas” of ERDF proposal (COM(2025) 552 final), we would welcome an extension to sustainable urban development and integrated local and urban development in accordance with Articles 74 to 76.]</p> <p>FI</p> <p>(Comments):</p> <p>NB: numbering is incorrect in the template</p> |
| <p>(ii) strengthening the economic and social development of outermost regions; to be set out in dedicated measures for the territories concerned in accordance with Article 46;</p> | <p>FR</p> <p>(Comments):</p> <p>La Commission peut-elle préciser le type et la portée des mesures opérationnelles qui devraient être incluses par les Etats membres dans leur</p> |

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| | <p>chapitre consacré aux RUP ? Le cas échéant, la Commission peut-elle donner des lignes directrices s'agissant de ces mesures ?</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(iv)</p> <p>CZ</p> <p>(Comments):</p> <p>Incorrect indexing. Should be letter (iv).</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(v) strengthening the economic and social development of outermost regions; to be set out in dedicated measures for the territories concerned in accordance with Article 46;]</p> <p>DE</p> <p>(Comments):</p> <p>Wrong numeration.]</p> <p>IE</p> |

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| | <p>(Drafting suggestions):</p> <p>(ii) strengthening the economic and social development of outermost regions; to be set out in dedicated measures for the territories concerned in accordance with Article 46;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is renumbered to correct a numbering error</u></p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Clerical error? Point iv?</p> <p>MT</p> <p>(Drafting suggestions):</p> <p><u>(iii) strengthening economic and social development and addressing the specific needs of Island Member States</u></p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: The text should better reflect the realities of Member States with only one category of region, and which are also Island Member States, in the periphery of the Union.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: (ii) (iv) strengthening the economic and social development of outermost regions <u>as well as providing for their specific needs and challenges</u>; to be set out in dedicated measures for the territories concerned in accordance with Article 46, <u>which shall be supported by the dedicated amounts set out in Article 10</u>.</p> <p>PT</p> <p>(Comments):</p> <p>PT: There must be a specific and dedicated budget for the Outermost Regions set out in this proposal, aligned with a joint and coherent treatment for all ORs, equivalent to that of less developed regions and regardless of their GDP per capita in relation to the EU average. We also ask for the continuity of the specific financial mechanisms that contribute to offsetting the additional costs faced by these regions. These resources should be set out eventually in Article 10 (“Budget”). Without dedicated</p> |

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| | <p>funding, the ORs could be negatively affected by the considerable scope of the NRPP – which cover a wide number of policy areas - with the risk of underfunding, loss of predictability for beneficiaries and insufficient support. This would constitute a major setback and is incompatible with the tailor-made, territorial approach promoted by the Commission with regards to the ORs. It would, additionally, weaken the common treatment of the ORs at EU-level and undermine what is established in Article 349 of the TFUE.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (iv) instead of (ii).</p> |
| | <p>FI</p> <p>(Drafting suggestions):</p> <p><u>(v) strengthening competitiveness and innovation capacities for sustainable growth and employment based on the specific needs of regions, including by making use of smart specialisation strategies.</u></p> <p>FI</p> |

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| | <p>(Comments):</p> <p><i>A new point should be added on strengthening competitiveness and the use of smart specialisation strategies.</i></p> <p>IE</p> <p>(Drafting suggestions):</p> <p><u>iv) allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment based on the specific needs of regions.</u></p> <p>IE</p> <p>(Comments):</p> <p><u>A new provision is proposed on allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment.</u></p> <p>NL</p> <p>(Drafting suggestions):</p> <p><u>(v) allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment based on the</u></p> |

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| | <p><u>specific needs of regions, including by making use of smart specialisation strategies.</u></p> <p>NL</p> <p>(Comments):</p> <p>New point should be added on allocating resources to strengthen competitiveness and innovation capacities for sustainable growth and employment. The use of smart specialisation strategies can help in guiding innovation investments based on a region's specific needs</p> |
| (g) concentrate resources on: | <p>FR</p> <p>(Comments):</p> <p>La Commission peut-elle expliquer pourquoi la cohésion n'apparaît pas dans les objectifs de concentration des ressources ?</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(g i) <u>a comprehensive overview of the support to concentrate resources on:</u></p> <p>CZ</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The introductory part is aligned with section 1.6-1.8 in Annex V.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(g) allocate concentrate resources on:]</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(g) set out a comprehensive overview of the support to concentrate resources on:</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>g i) a comprehensive overview of the support to concentrate resources on:</p> <p>LT</p> <p>(Comments):</p> <p>The text is proposed in line with section 1.6.-1.8 of Annex V.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>(g i) <u>a comprehensive overview of the support to concentrate resources on:</u></p> <p>RO</p> <p>(Comments):</p> <p>The introductory part is aligned with section 1.6-1.8 in Annex V.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (i) instead of (g).</p> |
| <p>(i) supporting generational renewal in the agricultural sector, in accordance with Article 8 of Regulation XX [CAP, generational renewal], as well as in the fisheries and aquaculture sector;</p> | <p>FR</p> <p>(Comments):</p> <p>Par ailleurs, la Commission peut être préciser la façon dont sera mis en œuvre le « soutien au renouvellement des générations dans le secteur agricole, ainsi que dans le secteur de la pêche et de l'aquaculture » (point 2g)i)) ? En effet, les modalités renvoient à la réglementation sectorielle, or ce soutien au renouvellement des générations n'y figure pas.</p> |

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| | <p>AT</p> <p>(Comments):</p> <p>It is unclear what is meant by the term ‘concentration of resources on generational renewal in agriculture and in the fisheries and aquaculture sector’</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>(i) supporting generational renewal in the agricultural sector, in accordance with Article 815 of Regulation XX [CAP, generational renewal], as well as in the fisheries and aquaculture sector;</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>It is necessary to adjust the reference in Annex V under point 1.6 to this point and letter</p> <p>supporting generational renewal in the agricultural sector, in accordance with Article 8 of Regulation XX [CAP, generational renewal], as well as in the fisheries and aquaculture sector;</p> <p>CZ</p> |

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| | <p>(Comments):</p> <p>Fisheries and agriculture sector should be described separately, moreover the structure of chapter 1.6 of the Annex V does not include this sector.</p> <p>DE</p> <p>(Comments):</p> <p>Incorrect reference to Art. 8 of the CAP Regulation.]</p> <p>FI</p> <p>(Comments):</p> <p>Is the reference to Article 8 correct?</p> <p>IE</p> <p>(Comments):</p> <p><u>The support provided by LEADER specifically to rural businesses and generally to improve the accessibility of rural areas, and to enhance basic services and infrastructure, helps to support generational renewal and preserves the vitality of rural communities.</u></p> <p>NL</p> <p>(Drafting suggestions):</p> |

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| | <p>(i) supporting generational renewal in the agricultural sector, in accordance with Article 8 of Regulation XX [CAP, generational renewal] <u>by allocating at least 6% of the Member State allocation in Annex XVIII to generational renewal interventions</u>, as well as in the fisheries and aquaculture sector;</p> <p>NL</p> <p>(Comments):</p> <p>To bring the proposal in line with the generational renewal strategy.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(i) supporting generational renewal in the agricultural sector, in accordance with relevant Articles 8 of Regulation XX [CAP, generational renewal], as well as in the fisheries and aquaculture sector;</p> <p>SE</p> <p>(Comments):</p> <p>SE believes that the reference to Article 8 in the CAP-regulation is wrong. A general reference should be made to the CAP-regulation as several articles are relevant.</p> |

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| <p>(ii) social measures in accordance with Annex VI [social allocations].</p> | <p>ES</p> <p>(Drafting suggestions):</p> <p>(ii) social measures <u>through the allocation of resources to the European Social Fund</u> in accordance with Annex VI [social allocations].</p> <p>ES</p> <p>(Comments):</p> <p><u>ES strongly advocates that the Regulation should specify that the concentration of resources on social measures should be made thorough the ESF.</u></p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(ii) social measures <u>financed from ESF in</u> in accordance with Annex VI [social allocations] <u>and the policy-specific Regulation.</u></p> <p>SE</p> <p>(Comments):</p> |

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| | SE believes that a more suitable place for (ii) on social measures could be in section <i>f</i>) above, <i>reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:</i> |
| <p>(iii) supporting fisheries, aquaculture and maritime activities, including small scale fishing, the implementation of the CFP as set out in Regulation EU XX [CFP] as well as the European Ocean Pact in accordance with Annex V [Plan's template].</p> | <p>DE</p> <p>(Drafting suggestions):</p> <p>(iii) supporting implementation of the CFP, including fisheries, aquaculture and maritime activities as set out in Regulation EU XX [CFP];</p> <p>(iv) supporting implementation of the European Ocean Pact.]</p> <p>DE</p> <p>(Comments):</p> <p>The CFP provides for specific requirements that do not apply to wider maritime activities. For example, data requirements for fisheries management is defined in Art. 25 CFP Regulation, whereas marine observation, EMODnet, Digital Twins etc. are based on other legal frameworks, e.g. the MSFD.</p> |

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| | <p>Consequently, support to implementation of the CFP should be treated separately throughout the MFF proposal, including Annex V of the NRP-Regulation and the performance regulation.]</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(iii) supporting fisheries, aquaculture and maritime activities, including small scale fishing and, the implementation of the CFP as set out in Regulation EU XX [CFP] as well as the European Ocean Pact in accordance with Annex V [Plan's template].</p> <p>IE</p> <p>(Comments):</p> <p><u>As the Ocean Pact is not a legal document and is not binding on Member States, it may not be appropriate to reference it in Article 22.</u></p> <p>MT</p> <p>(Comments):</p> <p>MT: Malta would appreciate clarification on how the Integrated Maritime Policy is reflected within this provision. Past and current programmes</p> |

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| | <p>have included measures under this policy area, and it is not evident whether the Plan is expected to continue covering such interventions. In addition, the reference to supporting fisheries, aquaculture and maritime activities appears limited when set against the wider Union vision for a resilient, sustainable and more energy-efficient fleet. To ensure full alignment with ongoing EU policies, it may be useful to clarify how the broader strategic objectives for the sector are intended to be incorporated within the scope of the Plan.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(iii) supporting fisheries, aquaculture and maritime activities, including small scale fishing, the implementation of the CFP as set out in Regulation EU XX [CFP] as well as the European Ocean Pact in accordance with Annex V [Plan’s template].</p> <p>NL</p> <p>(Comments):</p> <p>Small scale fisheries are undeniably part of fisheries, so we see no reason to draw special attention to this particular type of fisheries.</p> <p>SE</p> |

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| | <p>(Comments):</p> <p>SE would like a clarification as to whether the measures listed under the activity categories in Annex V title I, section 1.8, must be included in the plan, or if it is up to each Member State to decide.</p> |
| <p>(h) effectively contribute to:</p> | <p>CZ</p> <p>(Drafting suggestions):</p> <p>(h j) <u>a description of measures</u> effectively contribute to:</p> <p>CZ</p> <p>(Comments):</p> <p>The rephrase is proposed to ensure a more realistic expectation of the proposed measures, as an effective contribution could be difficult to achieve.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(h) <u>effectively</u> contribute to:</p> <p>HU</p> |

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| | <p>(Comments):</p> <p>We have to avoid elements that potentially lead to subjective judgements by the Commission.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: (h) <u>a description of measures</u> effectively contribute to:</p> <p>MT</p> <p>(Comments):</p> <p>Justification: The rephrase is proposed to ensure a more realistic expectation of the proposed measures, as an effective contribution could be difficult to achieve.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>effectively contribute to: a description of measures:</p> <p>PL</p> <p>(Comments):</p> |

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| | <p>The rephrase is proposed to ensure a more realistic expectation of the proposed measures as an effective contribution could be difficult to measure and achieve.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(h j) <u>a description of measures</u> effectively contribute to:</p> <p>RO</p> <p>(Comments):</p> <p>The rephrase is proposed to ensure a more realistic expectation of the proposed measures, as an effective contribution could be difficult to achieve.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(h) effectively contribute to:</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> |

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| | The correct wording should be point (j) instead of (h). |
| | |
| <p>(i) promoting the use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER];</p> | <p>AT</p> <p>(Drafting suggestions):</p> <p>(i) promoting the use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development <u>as well as LEADER including transnational cooperation as referred to in Article 77 [LEADER]</u>, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER];</p> <p>AT</p> <p>(Comments):</p> <p>The implementation of transnational cooperations in LEADER should be continued.</p> <p>MT</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>MT: <i>promoting the use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER], <u>as applicable</u>;</i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The addition of ‘<i>as applicable</i>’ introduces an important element of flexibility allowing Member States to apply the provision in line with their specific governance and territorial structures.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(i) promoting the use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER] <u>and Article 18 of Regulation (EU) 202X/XXXX [CAP]</u>;</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>NL</p> <p>(Comments):</p> <p>Reference to the LEADER articles in both the NRP and CAP regulation should be included.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>(...) community-led local development <u>(including LEADER as referred to in Article 77 [LEADER])</u>, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER];</p> <p>PL</p> <p>(Comments):</p> <p>Considering efforts to include Cohesion Policy funds in the system supporting CLLD it is advisable to use one term for the same instrument, as it is used in general regulation i.e. CLLD. Using different names for the very same increases discrepancies.</p> <p>SE</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(i) promoting the planned use of cooperation interventions as referred to in Article 74 [cooperation interventions], including integrated territorial investment in cities, urban, rural and coastal areas, community-led local development, or other territorial tools including just transition and smart specialisation strategies, as well as LEADER as referred to in Article 77 [LEADER];</p> <p>SE</p> <p>(Comments):</p> <p>The starting point should be the territorial needs and challenges of the respective MS.</p> <p>SE is also of the opinion that the wording could be less detailed in this point.</p> |
| <p>(ii) improving farm resilience and management of risks at farm level and supporting the digital and data-driven transition of agriculture and rural areas to enhance their competitiveness, sustainability and resilience;</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(ii) improving farm resilience and management of risks at farm level and supporting the digital and data-driven transition of agriculture and rural areas to enhance their competitiveness, sustainability and resilience;</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: ii) <i>improving farm resilience and management of risks at farm level and supporting the digital and data-driven transition of agriculture and rural areas to enhance their competitiveness, sustainability and resilience, <u>as applicable</u>;</i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The addition of ‘<i>as applicable</i>’ introduces an important element of flexibility allowing Member States to apply the provision in line with their specific governance and territorial structures.</p> |
| <p>(iii) the environmental and climate priority areas set out in Article 4 of Regulation (EU) 202X/XXXX [CAP - Environment and climate priority areas].</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(iii) the environmental and climate priority areas set out in Article 4 of Regulation (EU) 202X/XXXX [CAP - Environment and climate priority areas].</p> <p>IE</p> |

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| | <p>(Drafting suggestions):</p> <p>(iii) advancing the environmental and climate priority areas set out in Article 4 of Regulation (EU) 202X/XXXX [CAP - Environment and climate priority areas].</p> <p>IE</p> <p>(Comments):</p> <p><u>Needs a present participle for coherence.</u></p> |
| <p>(i) promote partnership, knowledge exchange and as relevant distribution of agricultural products by setting out:</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(i) promote partnership, knowledge exchange and as relevant distribution of agricultural products by setting out:</p> <p>DE</p> <p>(Comments):</p> <p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.]</p> |

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| | <p>CZ</p> <p>(Drafting suggestions):</p> <p>(ik) a description on the promoting partnership, knowledge exchange and as relevant distribution of agricultural products by setting out:</p> <p>CZ</p> <p>(Comments):</p> <p>Introductory part of the text is aligned with the approach in Annex V.</p> <p>Description of partnership principle should be described separately not among the points related to strategic elements.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Clerical error? Point iv?</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>(i-k) a description on the promoteion of partnership, knowledge exchange and as relevant distribution of agricultural products by setting out:</p> <p>RO</p> <p>(Comments):</p> <p>The text is aligned with the approach in Annex V, making the expectation more realistic in terms of actions.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (k) instead of (i).</p> |
| <p>(i) which stakeholders have been consulted, how these were selected, how their representativeness and prevention of conflict of interest has been ensured and how their input is reflected in the Plan in line with the</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p><u>at the level of the chapters,</u> which stakeholders have been consulted, how these were selected, how their representativeness and prevention of conflict of interest has been ensured and how their input is reflected in the</p> |

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| <p>code of conduct on partnership⁴⁵, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter;</p> | <p>Plan in line with the code of conduct on partnership⁴⁶, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter;</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>(i) — which stakeholders have been consulted, how these were selected, how their representativeness and prevention of conflict of interest has been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership⁴⁷, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter</p> <p>CZ</p> <p>(Comments):</p> <p>Description of partnership principle should be described separately not among the points related to strategic elements.</p> |

⁴⁵ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

⁴⁶ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

⁴⁷ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

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| | <p>DE</p> <p>(Drafting suggestions):</p> <p>(i) — which stakeholders have been consulted, how these were selected, how their representativeness and prevention of conflict of interest has been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership⁴⁸, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter;</p> <p>DE</p> <p>(Comments):</p> <p>DE: This aspect should be deleted, as the administrative burden is too high in relation to the added value.]</p> <p>HR</p> <p>(Comments):</p> <p>HR comment:</p> |

⁴⁸ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

| Commission proposal | MS drafting suggestions and comments |
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| | <p>This section further defines partnership obligations – MS has to elaborate the process of selecting and justifying cooperation with partners for each chapter, which does not reflect the intended simplification.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Clerical error? Point v?</p> <p>SE</p> <p>(Comments):</p> <p>How does this point relate to the wording below in (j)? Is it a duplication?</p> |
| <p>(ii) an Agricultural Knowledge and Innovation System including its organisation set-up in accordance with Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation – Agricultural knowledge and innovation systems and farm advisory services];</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(ii) an Agricultural Knowledge and Innovation System including its organisation set-up in accordance with Article 20 of Regulation (EU) 202X/XXXX [CAP Regulation – Agricultural knowledge and innovation systems and farm advisory services];</p> <p>FR</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>Suppression pour les mêmes raisons d'équilibre, de simplification et d'allègement de la charge administrative (cf h)).</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Clerical error? Point vi?</p> |
| | |
| <p>(iii) the modalities for the EU school scheme in accordance with Title I, Part II, Chapter IIa of Regulation (EU) No 1308/2013.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(iii) — the modalities for the EU school scheme in accordance with Title I, Part II, Chapter IIa of Regulation (EU) No 1308/2013.</p> <p>FR</p> <p>(Comments):</p> <p>Suppression pour les mêmes raisons d'équilibre, de simplification et d'allègement de la charge administrative.</p> <p>LU</p> <p>(Drafting suggestions):</p> |

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| | Clerical error? Point vii? |
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| <p>(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan</p> <p>FR</p> <p>(Comments):</p> <p>La prise en compte du 6(3) est déjà couverte au point (i) (i). Il n'y aucune raison objective pour le demander une nouvelle fois spécifiquement sur les pratiques de protection.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6 7(3), ...]</p> <p>DE</p> <p>(Comments):</p> <p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.</p> <p>Reference should obviously go to Art. 7(3) [horizontal principle of compliance with “farm stewardship” / “do no significant harm”], not Art. 6(3) [European code of conduct on partnership].]</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3).; <u>For this purpose and regarding the agricultural sector,</u> including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective</p> |

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| | <p>practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan.</p> <p>EL</p> <p>(Comments):</p> <p>The indicated text should be separated and distinct from the previous part of the paragraph, as the way it is proposed looks like as mainly referred to agri sector</p> <p>ES</p> <p>(Comments):</p> <p><u>Not a specific drafting proposal but a comment to COMM:</u></p> <p><u>Please specify the detail needed into protective practices definitions and the complementarity that is supposed to be shown in the NRP Plan.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU)</p> |

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| | <p>202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p> <p>HU</p> <p>(Comments):</p> <p>In order to have a Plan of strategic nature, unnecessary details should be deleted from the requirements.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(j) specify the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p> <p>IE</p> |

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| | <p>(Comments):</p> <p><u>Follows from “Member States shall provide an explanation on... how the NRP Plan will:” so this will</u></p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: (j) specify <u>description of</u> the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p> <p>MT</p> <p>(Comments):</p> <p>Justification: To provide greater clarity on what is expected from Member States. It aligns the provision with a narrative approach that allows for a coherent explanation of practices and complementarities rather than implying prescriptive or detailed technical requirements.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>RO</p> <p>(Drafting suggestions):</p> <p>(j l) specify description of the way in which the NRP Plan and its implementation comply with the principle set out in Article 6(3), including a description of the protective practices referred to in Article 3(4) of Regulation (EU) 202X/XXXX [CAP Regulation], their territorial scope, farmers and other beneficiaries subject to the practice and a summary of the protective practice, and complementarity between the elements of the farm stewardship and the relevant measures supported under the NRP Plan;</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (l) instead of (j).</p> |
| <p>(k) explain how the Member State's system and arrangements are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key</p> | <p>AT</p> <p>(Comments):</p> |

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| <p>requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies;</p> | <p>This wording seems to go beyond fulfilling the key requirements. It should be clear what standard the MS have to fulfil.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>(k) explain how the Member State's system and arrangements, <u>taking into account art. 49.2</u>, are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies;</p> <p>BE</p> <p>(Comments):</p> <p>Art. 49.2 states that authorities already in charge of current shared management funds are deemed to comply with the key requirements. This should be taken into account in the context of this requirement, in order to limit administrative burdens.</p> <p>DE</p> <p>(Comments):</p> |

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| | <p>The description of the Governance and Control System of the NRPP should serve as an assurance for MS in order to avoid potential serious deficiencies that lead to exclusions from the funds and flat-rate financial corrections.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: <i>explain how the Member State's system and arrangements are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies. <u>By derogation, no explanations will be required in cases where arrangements are based on the implementation of previous EU funding programmes, which have been designated and audited;</u></i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The requirements should only be applicable for newly established set ups to facilitate a smooth transition between programmes.</p> |

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| | <p>RO</p> <p>(Drafting suggestions):</p> <p>(k m) explain description on how the Member State's system and arrangements are sufficient to ensure a regular, effective and efficient use of Union resources, in compliance with sound financial management and the protection of the financial interests of the Union, based on the key requirements laid down in Annex IV [key requirements], together with measures to address potential deficiencies</p> <p>RO</p> <p>(Comments):</p> <p>Alignment with section 3.7 in Annex V</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (m) instead of (k).</p> |
| | |
| (l) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, | FR |

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| <p>financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> | <p>(Comments):</p> <p>Est-il possible de préciser la nature des mesures prévues afin de garantir que les États membres continuent de verser les paiements aux bénéficiaires malgré une suspension de la contribution du budget de l'UE ? Quelles seraient les conséquences en cas de non-respect de ces obligations ?</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>(l) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>AT</p> <p>(Comments):</p> <p>The proposal stipulates that final recipients and contractual partners should be guaranteed to receive their funds. However, the body</p> |

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| | <p>responsible for the plan has no contractual relationship with bodies other than the beneficiaries.</p> <p>Therefore, the last part of the sentence should be deleted in any case.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>(1) — specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>BG</p> <p>(Comments):</p> <p>This requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation. Therefore, there is no need to introduce an additional obligation through the proposed provision.</p> <p>CZ</p> |

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| | <p>(Drafting suggestions):</p> <p>(l) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants <u>unless they have caused the application of these measures.</u></p> <p>CZ</p> <p>(Comments):</p> <p>Regarding paragraph 2(1), CZ believes that this obligation should be limited to cases where the mentioned entities were not responsible for the aforementioned measures by the EC.</p> <p>DE</p> <p>(Comments):</p> <p>Germany welcomes the proposal with regard to suspension of payments under Article 8 and 9. In other cases, it may be useful to make a distinction between funds or the the reason why financial corrections have been made. E.g. in the CAP it is usual that financial corrections are</p> |

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| | <p>reclaimed from the beneficiaries. Otherwise the the financial risks for public budgets are too high and it should be further explored if there is a legal basis under national budget law at all to cover these losses.]</p> <p>HR</p> <p>(Comments):</p> <p>HR comments: This raises the issue of ensuring sufficient funds under the national budget, specifically in the context of projects with high value. The experience from a parallel crisis of COVID-19 pandemic and earthquakes that hit Croatia in 2020 showed that in cases of force majeure national budget funding may be insufficient.</p> <p>HR question: Would it be possible to add a provision that in certain cases payments could be fully suspended?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(1) — specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their obligations to</p> |

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| | <p>continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>HU</p> <p>(Comments):</p> <p>This requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation. Therefore, there is no need to introduce an additional obligation through the proposed provision.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: (1) — specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: This requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation. Therefore, there is no need to introduce an additional obligation through the proposed provision</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>PL</p> <p>(Comments):</p> <p>The requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation.</p> |

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| | <p>Therefore, there is no need to introduce an additional obligation through the proposed provision.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply, <u>when possible</u>, with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>PT</p> <p>(Comments):</p> <p>PT: Member States should not be obliged to continue payments to beneficiaries in all circumstances. For instance, much like the Commission, Member States may have liquidity problems to ensure the continuation of payments.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>(1) — specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>RO</p> <p>(Comments):</p> <p>This requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation. Therefore, there is no need to introduce an additional obligation through the proposed provision.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(1) specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union’s financial interests, the Member States will comply with their</p> |

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| | <p>obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>SE</p> <p>(Comments):</p> <p>It should be enough to specify the arrangements on how the Member States will continue payments to beneficiaries.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>specify the arrangements in place to ensure that in the event of interruption of payment deadlines or suspension of Union funding, financial corrections or other measures to ensure the protection of Union's financial interests, the Member States will comply with their obligations to continue the payments to beneficiaries, recipients, final recipients, contractors and participants;</p> <p>SK</p> <p>(Comments):</p> <p>Justification:</p> |

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| | <p>This requirement is redundant and could create legal uncertainty. Currently, once contracts with beneficiaries are concluded, Member States are already obliged to make payments in accordance with their national legislation. Therefore, there is no need to introduce an additional obligation through the proposed provision.</p> <p>There is no reason for the Member States to continue making payments to a beneficiary, recipient, final recipient, contractor or participant where a breach of applicable law by that entity has resulted in a financial correction. If the beneficiary is responsible for the correction, the Member State will apply the correction on to the beneficiary and request recovery and/or stop payments. The European Commission itself confirmed in its answers to Member States' questions on Block 5 that: <i>“It is not about paying to beneficiaries that committed fraud, corruption or conflict of interest – the Member States will have to recover the support from those beneficiaries.”</i></p> <p>However, the Commission's calculation does not cover all relevant breaches of applicable law, such as a violation of State aid rules by a beneficiary, which may also lead to the application of a financial correction.</p> |
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| <p>(m) where appropriate, provide a security self-assessment based on common objective criteria identifying any security issues, and detailing how those issues will be addressed in order to comply with relevant applicable law.</p> | <p>AT</p> <p>(Comments):</p> <p>It should be clarified in the text that this pertains to defence and security related measures</p> <p>BE</p> <p>(Comments):</p> <p>Could the Commission clarify what this security self-assessment refers to?</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: What type of security does this imply? Internal, budgetary or otherwise?</p> <p>Could you please clarify how will Commission verify claims from MS self-assessment?</p> <p>LV</p> <p>(Drafting suggestions):</p> |

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| | <p>(m) where appropriate, provide a security self-assessment based on common objective criteria identifying any security issues, and detailing how those issues will be addressed in order to comply with relevant applicable law. <u>Security self-assesments containing sensitive information shall not be published.</u></p> <p>LV</p> <p>(Comments):</p> <p>It is not fully clear what are common objective_criteria and where they will be defined. Moreover, it should be made clear that security self-assesments will not be made public if containing sensitive information.</p> <p>MT</p> <p>(Comments):</p> <p>MT: Malta would welcome further clarification on the requirement for a security self-assessment. In particular it would be helpful to understand where this information is expected to be incorporated within the Plan and which entities are envisaged as responsible for preparing such assessments. We would also appreciate further detail on the common objective criteria referred to in the article, including the scope of issues to be covered and how these criteria are intended to be applied in practice.</p> |

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| | <p>RO</p> <p>(Drafting suggestions):</p> <p>TBC</p> <p>RO</p> <p>(Comments):</p> <p>In the context of the regulation, what do security self-assessment and security issues represent? What are the main aspects to be considered (national security, cyber security, classified/personal data security, social security, etc.)?</p> <p>SE</p> <p>(Comments):</p> <p>What kind of security is meant here?</p> <p>SE would also like a clarification on what is meant by “common objective criteria”? Does this refer to criteria defined jointly within the plan by the Member State, or does it refer to criteria that are common at EU level?</p> <p>SK</p> <p>(Drafting suggestions):</p> |

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| | Technical Comment: The correct wording should be point (o) instead of (m). |
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| <p>(n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p> | <p>AT</p> <p>(Drafting suggestions):</p> <p>(n) explain justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies;</p> <p>AT</p> <p>(Comments):</p> <p>It is proposed to slim down the required description of the coherence as it entails excessive administrative burden.</p> <p>BE</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>justify the coherence of the Plan, <u>in line with the institutional and constitutional structure of the Member State,</u> and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, <u>and the arrangements in place to capitalise on such synergies ;</u></p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(n) — justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies.]</p> <p>DE</p> <p>(Comments):</p> <p>DE: Doubling the content of the thematic chapters should be avoided.</p> |

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| | <p>The requirements for plan drafting include numerous additional obligations not derived from the performance-based approach, entailing high bureaucratic costs for MS with little added value.</p> <p>Deletion to reduce admin. burden and to streamline the NRPP.]</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies</p> <p>;</p> <p>HU</p> <p>(Comments):</p> <p>There is no coherence between Article 2 and Article 3. We find it excessive to expect national managing authorities and ministries to be the ones identifying coherence in the proposal. On the other hand, if Articles 2 and 3 are aligned appropriately during the negotiations, this requirement then becomes unnecessary.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>LV</p> <p>(Drafting suggestions):</p> <p>(n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural</p> <p>LV</p> <p>(Comments):</p> <p><u>Reference to more than one target group seems redunadant. LV suggests to refer only to the target group.</u> Target group determines the target audience for the planned event.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will</p> |

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| | <p><i>be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: One of the main benefits of the plan integrating all funds is purposely to ensure complementary and synergy at the design stage. This obligation seems a repetition of obligations in previous programmes without taking into account the consolidated approach of the new NRPP. Thus, this obligation would now be redundant and should be removed.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: (n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p> <p>PT</p> <p>(Comments):</p> |

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| | <p>PT: This provision seems to carry more administrative burden, not being obvious the real added value to the target groups.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(n) — justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p> <p>RO</p> <p>(Comments):</p> <p>In spirit of simplification, to avoid unnecessary text, as the measures themselves should be self explanatory</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(n) justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as</p> |

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| | <p>referred to in Articles 2 and 3, with a description, <u>if applicable</u>, of how the needs of more than one target group will be addressed, including <u>territorial</u> the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p> <p>SE</p> <p>(Comments):</p> <p>Proposal for a more general wording.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(n) — justify the coherence of the Plan and the synergies and complementarities between measures supporting the objectives as referred to in Articles 2 and 3, with a description of how the needs of more than one target group will be addressed, including the needs of rural and coastal communities, and the arrangements in place to capitalise on such synergies ;</p> <p>SI</p> <p>(Comments):</p> |

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| | <p>It is unclear what is meant by “one target group” — whether this refers to each individual measure or something else. Furthermore, it is unclear why the needs of rural and coastal communities are specifically highlighted, given that other types of regions are also relevant. The provision, as drafted, lacks clarity and could lead to inconsistent application and additional administrative burden.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (p) instead of (n).</p> |
| | <p>HR</p> <p>(Comments):</p> <p>HR question: Could you please clarify how will Commission verify claims from MS self-assessment?</p> <p>SE</p> <p>(Comments):</p> <p>SE believes there should be a requirement to provide information in relation to Article 7 on Horizontal principles.</p> |

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| <p>(o) provide a self-assessment of the compliance with the Charter horizontal condition referred to in Article 8 [Charter Article];</p> | <p>BG (Drafting suggestions): provide a self-assessment of the compliance with the Charter horizontal condition referred to in Article 8 [Charter Article].</p> <p><u>The Commission shall provide guidance to the Member States for the self-assessment.</u></p> <p>BG (Comments): With a view to a legal certainty and uniform conditions for implementation of the preparation and programming process across MS we suggest that the CION shares in advance with MS its understanding on the methodology for self -assessment to be used.</p> <p>DE (Comments): DE welcomes this provision.]</p> <p>HU (Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>[(o) provide a self-assessment of the compliance with the Charter horizontal condition referred to in Article 8 [Charter Article]];</p> <p>HU</p> <p>(Comments):</p> <p>Should be part of the negotiating box and to be decided by the Leaders.</p> <p>LU</p> <p>(Comments):</p> <p>A dedicated annex outlining the minimum requirements for such an assessment would be useful.</p> <p>LV</p> <p>(Comments):</p> <p>Will Commission written guidance on this issue? If yes, this should be included in the text with clear deadline for approval.</p> <p>MT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>MT: Which entity would be required to provide such a self-assessment? The entity responsible for the NRPP or the entity responsible for the implementation of the Charter?</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(o) provide a self-assessment of the compliance with the Charter horizontal condition referred to in Article 8 [Charter Article], <u>including, where relevant, the follow-up given to country specific findings relating to the Charter in reports from the Commission and the European Union Agency for Fundamental Rights;</u></p> <p>SE</p> <p>(Comments):</p> <p>SE believes that Member States should direct due attention to country specific findings in reports relating to the Charter in the self-assessment.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (q) instead of (o).</p> |

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| <p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.</p> | <p>CZ</p> <p>(Drafting suggestions):</p> <p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the selected relevant country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.</p> <p>CZ</p> <p>(Comments):</p> <p>Given the way CZ understands the functioning of the Rule of Law Report, questions arise regarding its use as a reference material and source of information. While the Member states <i>do</i> provide inputs, the observations are framed in a specific context. Additionally, the country-specific recommendations vary in scope, and some require a longer timeframe for implementation. CZ argues that MS should be able to choose relevant recommendations from the sources mentioned in the text.</p> |

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| | <p>DE</p> <p>(Comments):</p> <p>DE welcomes this provision.]</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges</p> <p>ES</p> <p>(Comments):</p> <p><u>We propose to delete the reference to the country-specific recommendations, to avoid having a direct relation between the acknowledgement of the non-fulfilment of the RoL condition and the country-specific recommendations of the annual RoL report.</u></p> |

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| | <p><u>Furthermore, this would be coherent with art. 9, which does not refer explicitly to the recommendations.</u></p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the relevant country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.</p> <p>FI</p> <p>(Comments):</p> <p>Only relevant recommendations should be taken into account.</p> <p>HR</p> <p>(Comments):</p> <p>HR comment: This also has to be further elaborated – NRPP should be based on regulations and established procedures anyway.</p> |

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| | <p>HU</p> <p>(Drafting suggestions):</p> <p>[(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges.]</p> <p>HU</p> <p>(Comments):</p> <p>Should be part of the negotiating box and to be decided by the Leaders.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(p) specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and <u>those agreed</u></p> |

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| | <p><u>recommadatons arising from the</u> European Semester, together with measures to address these identified <u>related</u> country-specific challenges.</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to provide for implementation of agreed recommendations and related challenges arising from the European Semester.</u></p> <p><u>Clarity is required as what extent the NRP Plan will need to be formally amended on an annual basis to accommodate these recommendations.</u></p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: specify the way in which the Plan and its envisaged implementation ensure the respect of the Rule of Law horizontal condition referred to in Article 9 [RoL horizontal condition], including the follow up given to the country specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with <i>Include measures to address <u>the country-specific recommendations issued in the</u></i></p> |

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| | <p><u><i>framework of the latest Rule of Law Report and European Semester, as applicable. those identified country specific challenges.</i></u></p> <p>MT</p> <p>(Comments):</p> <p>Justification: It would be helpful for the regulatory expectations to be clearly set out. If the intention is to ensure that any outstanding recommendations related to the rule of law are adequately addressed, then the inclusion of corresponding measures within the Plan should be sufficient to demonstrate compliance with the requirement to implement the Plan in full alignment with rule of law principles.</p> <p>As a broader reflection, it may be useful to consider whether the level of justification currently envisaged across the Plan is fully consistent with the stated objectives of simplification and subsidiarity. The present structure risks appearing overly cumulative, bringing together a wide array of existing and new requirements within a single template. The shift towards a performance based and centralised model offers an opportunity to streamline the information requested and to retain a focused approach centred on what is strictly necessary to support effective implementation and sound governance.</p> |

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| | <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (r) instead of (p)..</p> <p>“...the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges as appropriate.”</p> <p>SK</p> <p>(Comments):</p> <p>In addition to the insertion of “as appropriate” at the end of the second part of the subparagraph, we would welcome clarification what is the difference between the follow-up given the to CSRs and measures to address them. In case of duplicity, we would suggest streamlining:</p> <p><i>... including the follow-up given to the country-specific recommendations issued in the framework of the latest Rule of Law Report and European Semester, together with measures to address those identified country-specific challenges as appropriate.</i></p> |
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| <p>(q) ensure that the NRP Plan contributes to the Union’s social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p> | <p>DE</p> <p>(Comments):</p> <p>We strictly oppose loan instrument.</p> <p>DE supports an allocation on social objectives with a focus on investing directly in people.]</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>(q) ensure that the NRP Plan contributes to the Union’s social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), and (iii) as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p> <p>EL</p> <p>(Comments):</p> <p>Since actions aimed at achieving the objectives of the three sectoral Regulations do not contribute to the Union’s climate and environmental</p> |

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| | <p>targets, their inclusion in the plans will limit the Member States' flexibility in planning their NRPPs. At a minimum, the HOME funds should be excluded from the calculation base for the climate and environment spending target (Article 22 "Requirements for the NRP Plan", points 2.q & r).</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(q) ensure that the NRP Plan contributes to the Union's social objectives <u>through the Europea Social Fund</u>. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation], <u>excluding amounts dedicated to social infrastructure</u>. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p> <p>HU</p> <p>(Drafting suggestions):</p> |

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| | <p data-bbox="1137 260 2089 683">[(q) ensure that the NRP Plan contributes to the Union’s social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.]</p> <p data-bbox="1137 719 1189 746">HU</p> <p data-bbox="1137 791 1312 818">(Comments):</p> <p data-bbox="1137 863 2033 948">The whole paragraph should be bracketed as this is already part of the negotiating box.</p> <p data-bbox="1137 991 1173 1018">IE</p> <p data-bbox="1137 1062 1435 1090">(Drafting suggestions):</p> <p data-bbox="1137 1134 2069 1385">(q) ensure that the NRP Plan contributes to the Union’s social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. Only tThe amount set out in Article 10(2),</p> |

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| | <p>point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p> <p>IE</p> <p>(Comments):</p> <p>This provision is amended to provide that only the amounts set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund can excluded from the basis for the calculation of the minimum allocation.</p> <p>We would like to seek some clarity from the Commission around how are the coefficient targets are to be measured.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>ensure that the NRP Plan contributes to the Union’s social objectives. At least [14] % of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../... [Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned</p> |

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| | <p>revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation.</p> <p>LT</p> <p>(Comments):</p> <p>MS retain discretion to decide whether to request a loan, based on their fiscal strategy, investment priorities, and broader policy considerations. It is also possible that other MS may choose not to request a loan at all. The purpose of the loan facility is to provide optional, supportive financing for MS that choose to expand or accelerate specific investments. Restricting this choice by prescribing fixed shares for particular policy areas would undermine the principle of subsidiarity. Therefore, it would be disproportionate to require that the loan component also meet the 14% contribution target.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: <i>ensure that the NRP Plan contributes to the Union's social objectives. At least [14]% of the total Union contribution and loans shall be dedicated to meeting these objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) .../...</i></p> |

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| | <p><i>[Performance Regulation]. The amount set out in Article 10(2), point (a) (ii), as well as externally assigned revenue from the Social Climate Fund shall be excluded from the basis for the calculation of this minimum allocation</i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: We reiterate that it should be up to the MSs to integrate the SCF in the NRPP or retain as a separate plan. The only way the inclusion of the SCF in the NRPP can be considered is if it is fully integrated in the plan, including 100% contribution to climate and social targets. The amendments should not be interpreted as meaning that the Social Climate Fund should be considered within the base of the target but relating to the view that it should not be integrated within the plan.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (s) instead of (q).</p> |
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| <p>(r) ensure that the NRP Plan contributes to the Union's climate and environmental objectives. A minimum percentage of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in [Annex III of Regulation (EU) .../... [Performance Regulation].]</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(r) ensure that the NRP Plan contributes to the Union's climate and environmental objectives. A minimum percentage of [XX%] of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in [Annex III of Regulation (EU) .../... [Performance Regulation].]</p> <p>FR</p> <p>(Comments):</p> <p>Les autorités françaises rappellent leur demande de fixer au sein de chaque PPNR un pourcentage minimum alloué aux objectifs climatiques et environnementaux. Les autorités françaises souhaitent que cette disposition soit mise entre crochets, ou alternativement que cette disposition intègre ce chiffre.</p> <p>DE</p> <p>(Comments):</p> |

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| | <p>DE supports the spending target especially in the context of the discontinuation of the former environmental earmarking.</p> <p>The coefficients provided should adequately reflect the actual contribution.</p> <p>DE: Does this provision mean that the fruit and vegetable sector programme must achieve the target set out in Annex III? Or must the target be achieved across all sectors as a whole; for example, can lower figures be offset by higher figures in other sectors?]</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>(r) ensure that the NRP Plan , <u>with the exception of measures supported under Regulation (EU) XXX AMIR, Regulation (EU) XXX BMV, and Regulation (EU) XXX IS,</u> contributes to the Union's climate and environmental objectives. A minimum percentage of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in [Annex III of Regulation (EU) .../... [Performance Regulation]].</p> <p>EL</p> |

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| | <p>(Comments):</p> <p>See above: EL supports the exclusion of HOME AFFAIRS from the calculation towards achieving social and climate objectives (22.2.q and r)</p> <p>HR</p> <p>(Comments):</p> <p>HR comment: We consider the envisaged allocation of at least 43% of funds for climate objectives reduce the possibilities for MS to address their own priorities and therefore advocate for reduction.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>[(r) ensure that the NRP Plan contributes to the Union's climate and environmental objectives. A minimum percentage of the total Union allocation of the NRP Plan shall be dedicated to meeting these objectives, corresponding to the specific climate and environment spending target referred to in [Annex III of Regulation (EU) .../... [Performance Regulation].]</p> <p>HU</p> <p>(Comments):</p> |

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| | <p>The whole paragraph should be bracketed as this is already part of the negotiating box.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(r)</p> <p>NL</p> <p>(Comments):</p> <p>We reserve the right for drafting suggestions, but as this part is bracketed we will not bring them forward in this stage.</p> <p>SE</p> <p>(Comments):</p> <p>SE considers the minimum percentage to be an important tool to ensure Member States contribution to EU-wide environmental and climate commitments, and thus an important contribution to ensuring a level playing field.</p> <p>With regard to the contribution of the NRP-plan to the Union's environmental and climate objectives, it is important for Sweden that, well in advance of the adoption of the plans, it is clear to each Member</p> |

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| | <p>State what contribution the plan is expected to make. Any deviations from the target in the Performance Regulation should only be made in duly justified cases and need to be well-justified by the Commission.s</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Technical Comment:</p> <p>The correct wording should be point (t) instead of (r).</p> |
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| <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>FR</p> <p>(Comments):</p> |

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| | <p>Cette disposition entre crochets n'apparaît pas explicitement dans la boîte de négociation. Les autorités françaises souhaitent donc réitérer dans ce cadre leur interrogation sur les possibilités offertes à la Commission de baisser les objectifs en matière d'environnement et climat. Elle s'interroge sur le maintien de la notion de "lower" et propose l'amendement ci-contre.</p> <p>AT</p> <p>(Comments):</p> <p>Reasons to deviate from the first paragraph should be spelled out in the regulation and not left to the commission's discretion.</p> <p>BE</p> <p>(Comments):</p> <p>Bracketed wording – not to be commented here.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives.</p> |

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| | <p>The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>BG</p> <p>(Comments):</p> <p>This requirement creates legal uncertainty, as it empowers the Commission, without any substantiation or conditions, to set different minimum targets for the climate and environmental objectives.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> <p>DE</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Climate and environmental objectives should be set mandatory for all member states at Union level and not be subject to unilateral requests by the Commission.</p> <p>Therefore, the paragraph should be deleted.]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>]By way of derogation from paragraph 1, the Commission may proposerequest Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established with the approval of the Member State by the Commission in the context of the early planning approval of the NRP Plan.]</p> <p>or</p> <p>]By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> <p>EE</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>We do not consider it justified to include additional obligations or restrictions where limits of allocation are already laid down in the Regulation.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>[By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> <p>ES</p> <p>(Comments):</p> <p><u>The percentage should be fixed generally, if possible, in an equitable and fair way between MS, not through Commission intervention.</u></p> <p>FI</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>By way of derogation from paragraph 1, the Commission may request <u>in duly justified cases in collaboration with the</u> Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>HU</p> <p>(Comments):</p> <p>HU asks for the deletion of this provision, but we take note that this is bracketed.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p><u>]</u>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. <u>Should the Commission make such a request, t</u>The specific percentage shall be established by the Commission <u>in agreement with the Member State</u> in the context of the approval of the NRP Plan.<u>]</u></p> <p>IE</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p><u>This provision is amended to provide that the Commission may make a request rather than direct the establishment of a particular percentage higher or lower than that specified in paragraph 1.</u></p> <p><u>We are concerned at the lack of a range (or ceiling and floor) for the possible lower or higher minimum percentages and the absence of any required rationale which the Commission should provide where it proposes a new percentage. Question - How will Cion reach this target for CAP on Member States agriculture? What data is being used?</u></p> <p>LT</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>LT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>We call for a stable percentage to be set in the regulation both for equal treatment of Member States and predictability in the preparation or amendment of the Plan. Therefore, we propose deleting this provision.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>LV</p> <p>(Comments):</p> <p>LV is sceptical regarding provision which empower Commission to raise investments targets for climate and environmental goals. This provision would undermine predictability and create uncertainty for member states when designing the plans.</p> <p>MT</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>MT: [By way of derogation from paragraph 1, the <i>Member State may</i> Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives, <i>where duly justified. The specific percentage shall be established in agreement between the Member State and</i> by the Commission in the context of the approval of the NRP Plan.]</p> <p>MT</p> <p>(Comments):</p> <p>Justification: Even though this is a bracketed provision that is to be discussed in the Ad hoc MFF group, we feel that we need to point out that there is an issue with the proposed one-sided approach proposed in this article and hence we are proposing this amendment.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>[By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>PL</p> <p>(Comments):</p> <p>In our opinion, the present threshold of the climate and environmental objective as stated in the Regulation on performance framework is sufficient. This requirement creates legal uncertainty. As it empowers the Commission, without any substantiation or conditions, to set different minimum targets for the climate and environmental objectives.</p> <p>In our opinion a minimum percentage of the allocation contributing to the Union's climate and environmental objective should be clearly defined in the regulation and should not be subject to any changes requested by the Commission.</p> <p>PT</p> <p>(Comments):</p> <p>PT: This is an unacceptable provision as it is discretionary. We propose to delete the whole provision unless it states the opposite: that Member States can ask the Commission to fix a higher or lower percentage based on the MS's progress, which should be duly justified (see below).</p> <p>RO</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.</p> <p>RO</p> <p>(Comments):</p> <p>This requirement creates legal uncertainty, as it empowers the Commission, without any substantiation or conditions, to set different minimum targets for the climate and environmental objectives.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> |

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| | <p>SK</p> <p>(Drafting suggestions):</p> <p>By way of derogation from paragraph 1, the Commission may request Member States to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives. The specific percentage shall be established by the Commission in the context of the approval of the NRP Plan.]</p> <p>SK</p> <p>(Comments):</p> <p>This requirement creates legal uncertainty and calls into question the principle of shared management, as it empowers the Commission, without any substantiation or conditions, to set different minimum targets for the climate and environmental objectives.</p> |
| <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected</p> |

| Commission proposal | MS drafting suggestions and comments |
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| <p>Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> | <p>trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>FR</p> <p>(Comments):</p> <p>La délégation est défavorable à la possibilité offerte par la proposition de règlement de déroger au pourcentage prévu dans le règlement performance compte tenu des progrès de l'Etat membre sur les différents textes mentionnés.</p> <p>AT</p> <p>(Comments):</p> <p>A mechanism for adjusting these percentages should be specified in the regulation and should not be left to the EC</p> <p>We would ask the Commission to explain more concretely how this provision would be implemented in practice. Would such a determination be made on the basis of the latest available emissions data and projections under the Effort Sharing Regulation? And is our understanding correct</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>that therefore the reference to the NECP (assessment) refers to the currently valid NECP covering the period until 2030?</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage <u>shall be decided by [date X] and</u> take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans</p> <p>BE</p> <p>(Comments):</p> <p>This paragraph is connected to the previous one, which is bracketed, and will be discussed within the context of the ad hoc WP MFF. Without prejudice to the BE position on that paragraph, we propose here to clarify that the percentage should be known well in advance.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.]</p> <p>DE</p> <p>(Comments):</p> <p>Climate and environmental objectives should be set mandatory for all member states at Union level and not be subject to unilateral requests by the Commission. Therefore, the paragraph should be deleted.]</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU)</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>HU</p> <p>(Comments):</p> <p>We would ask for the deletion of the previous paragraph (but it's bracketed), and this deletion here is a consequence.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>LT</p> <p>(Comments):</p> <p>Please refer to the paragraph above.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>LV</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>LV</p> <p>(Comments):</p> <p>See comment on paragraph above.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p><i>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under</i></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><i>Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans <u>as well as the needs assessment identified in the NRPP, applicable national policy documents and implementation timelines.</u></i></p> <p>MT</p> <p>(Comments):</p> <p>Justification: The implementation of projects under the NRPP takes into account various variables, including policy relevance but also important implementation realities such as timelines, budget etc. In this regard, taking into account implementation realities remains critical towards ensuring the successful implementation of the plan.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU)</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>PL</p> <p>(Comments):</p> <p>In our opinion, the present threshold of the climate and environmental objective as stated in the Regulation on performance framework is sufficient.</p> <p>In our opinion a minimum percentage of the allocation contributing to the Union’s climate and environmental objective should be clearly defined in the regulation and should not be subject to any changes requested by the Commission.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: <u>The determination of the percentage shall take into account the Commission's Commission may accept the Member State’s request to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives based on the assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU)</u></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> <p>PT</p> <p>(Comments):</p> <p>PT: This is an unacceptable provision as it is discretionary. It can only be acceptable if it states the opposite: the MS ask the COM to fix a higher or lower percentage based on the MS's progress, which should be duly justified.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the Commission's assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>RO</p> <p>(Comments):</p> <p>See comments above</p> <p>SE</p> <p>(Comments):</p> <p>Should this text be bracketed as it is closely linked to the bracketed text above?</p> <p>Means and actions outside the NRPP can be very important and must be considered.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>The determination of the percentage shall take into account the <u>Commission's Commission may accept the Member State's request to contribute a lower or higher minimum percentage of the total allocation of the plan for climate and environmental objectives based on the</u> assessment of the Member State's progress and projected trajectory towards achieving their targets under Regulation (EU) 2018/842 (Effort Sharing Regulation), as detailed in its most recent</p> |

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| | National Energy and Climate Plan assessment, and their targets under Regulation (EU) 2024/1991 (Nature Restoration Regulation), in accordance with the Nature Restoration Plans. |
| <p>2. The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>2. The Commission is empowered to adopt implementing delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.</p> <p>FR</p> <p>(Comments):</p> <p>La délégation estime qu'un amendement du modèle de l'annexe V peut modifier des éléments essentiels liés aux Plans et soutient donc que cela doit relever d'un acte d'exécution permettant la pleine association du Conseil.</p> <p>C'est un point structurant du contenu des PPNR qui doit être discuté avec les colégislateurs.</p> <p>AT</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>2. — The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.</p> <p>AT</p> <p>(Comments):</p> <p>There is no need for this delegation. Once the plan is submitted and approved, the plan might be amended but would this need an amendment of the template/Annex V?</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>2. The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V <u>in accordance with art. 22(1).</u></p> <p>BE</p> <p>(Comments):</p> <p>Annex V should be a direct translation of art. 22(1). This template should not lead to additional requirements which aren't part of art. 22(1).</p> |

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| | <p>DE</p> <p>(Drafting suggestions):</p> <p>2. The Commission is empowered to adopt delegated <u>implementing</u> acts in accordance with Article 87 [Exercise of the delegation] to amend <u>correct single data fields of</u> the template set out in Annex V <u>in duly justified cases only.</u></p> <p>DE</p> <p>(Comments):</p> <p>The empowerment of the Commission in paragraph 3 to amend and possibly expand the template in Annex V via delegated acts should be limited.</p> <p>The empowerment of the Commission should be framed by a clear definition of the amendments to be made to the template in Annex V or by changing the empowerment into a implementing act.]</p> <p>FI</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V <u>concerning clerical amendments.</u></p> <p>FI</p> <p>(Comments):</p> <p>This empowerment must be limited only to clerical amendments. Is is very burdensome for MSs recourses and IT-systems to keep on track on all changes.</p> <p>HR</p> <p>(Comments):</p> <p>HR questions: <u>Why would it be necessary to change the template at all? For the sake of clarity and stability of the process, the same template have to be valid throughout the entire programming period.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>2. The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>HU</p> <p>(Comments):</p> <p>We don't see the added value. It would only create uncertainty and unpredictability.</p> <p>Any change to the template should require the full legislative procedure.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V.</p> <p>PL</p> <p>(Comments):</p> <p>The Plan template is specified in the regulation. The European Commission cannot amend this template by a delegated act during the Plan's implementation phase. Such a solution undermines the credibility of the provisions contained in the approved Plan. The Member State must be certain of the scope of the Plan's implementation, and therefore the</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>European Commission should not be authorized to independently amend the Plan's scope.</p> <p>SE</p> <p>(Comments):</p> <p>The empowerment needs to be clearly demarcated.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>The Commission is empowered to adopt delegated acts in accordance with Article 87 [Exercise of the delegation] to amend the template set out in Annex V</p> <p>SK</p> <p>(Comments):</p> <p>For legal certainty we prefer to have all provisions linked to the template of the Plan in the regulation, not in delegated act.</p> |
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| <p style="text-align: center;"><i>Article 23</i></p> <p style="text-align: center;"><i>Commission proposal and Council implementing decision</i></p> | <p>DE</p> <p>(Comments):</p> <p>We reserve further positioning in view of the Council implementing decision for the NRPP.</p> <p>HU</p> <p>(Comments):</p> <p>The Commission's discretionary powers appear excessive and, without adequate safeguards, there is a risk that the Council's role will become purely formal, since in practice the adoption of the Plan and amendments depends entirely on the Commission's initiative and action.</p> <p>Other comment: With regard to the effective and rapid adoption of the NRP Plan, we believe that significant technical background development would be necessary in the SFC in order to manage the programming of the NRP, which will be carried out under the responsibility and with the cooperation of numerous actors.</p> <p>IE</p> <p>(Comments):</p> <p><u>This article is unclear in relation to timeframe and rationale for certain decisions. Taking that into account, a precise ‘roadmap’ (similar to that in the RRF) of the approval / amendment / rejection</u></p> |
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| | <p data-bbox="1137 252 2089 395"><u>process for NRPP with detail on the particular rationale for each potential decision would greatly assist in assessing whether a swift procedure is possible.</u></p> <p data-bbox="1137 432 1171 459">SI</p> <p data-bbox="1137 504 1312 531">(Comments):</p> <p data-bbox="1137 576 2078 663">Involving the Council in the entire procedure is likely to cause additional delays in the adoption of the NRPP and any subsequent changes.</p> <p data-bbox="1137 687 2078 1161">Therefore, we suggest that the Council should only be consulted and informed by the EC upon the approval of the NRPP and its changes, rather than being actively involved in issuing the Council's implementing decision (which includes the list of measures, etc.). This approach would simplify the adoption, implementation, and future modifications of the NRPP, making the process more flexible and less complicated, while significantly reducing delays. And the list of measures to be covered by the EU contribution as an Annex to the CID is too rigid for their implementation.</p> <p data-bbox="1137 1201 2089 1345">The process for CID adoption and changes to the NRPP, as outlined in this article's provisional timeline, takes at least nine months. In today's fast-paced world, this duration is too lengthy and does not allow for the</p> |

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| | <p>flexibility that is often needed. Therefore, we propose that EC issues as is the case of the ECP 2021-2027 decision on the NRPP and its changes.</p> <p>The procedure outlined in Article 23 is too rigid and lengthy, creating significant administrative barriers for the agile adoption, implementation, and modification of the NRPP.</p> |
| <p>1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> | <p>FR</p> <p>(Comments):</p> <p>Afin de ne pas retarder l'adoption du Plan national, la délégation pourra interroger la Commission sur la possibilité d'adopter un plan alors qu'un chapitre reste en suspens, qui serait alors validé dans un second temps</p> <p>AT</p> <p>(Comments):</p> <p>The 4 months period could be shortened to avoid any delays to implementation.</p> <p>BG</p> <p>(Drafting suggestions):</p> |

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| | <p>1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four three months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>BG</p> <p>(Comments):</p> <p>The assessment of the Plan by the Commission should be reduced to three months. This would make it possible to adopt the NRP Plans and the subsequent financing decision within one month. This timeframe would keep the overall approval process within four months, as is currently the case under the CPR.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p><i><u>NB Following the proposed amendments to Article 24, corresponding changes should also be made in 23 (1).</u></i></p> <p>[The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four</p> |

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| | <p>months of its submission. In the case of an amended Plan submitted following the Commission’s observations, the Commission shall complete its assessment within two months of submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>CZ</p> <p>(Comments):</p> <p><i><u>NB Following the proposed amendments to Article 24, corresponding changes should also be made in 23 (1).</u></i></p> <p>CZ proposes to amend the text so that the Commission assesses the original draft plan within four months of its submission, but in the case of an amended draft (after incorporating the Commission’s observations), the deadline for assessment is shortened to two months from its submission. The four-month period for the initial assessment seems reasonable, but repeated assessments of an amended draft should be faster to avoid prolonging the entire approval process. Shortening the deadline to two months for the revised draft will ensure a more efficient procedure and allow Member States to start implementation in a timely manner.</p> |

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| | <p>DE</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.</p> <p><u>When assessing the Plan, the Commission will take into account the principle of proportionality with regard to the allocation of funds to and within the MS, and the competence of the respective level of government of the MS.]</u></p> <p>DE</p> <p>(Comments):</p> <p>Reform requirements need to be proportional to the volume of funding (MS and level of government).</p> <p>In the context of the assessment, COM has to take account of the distribution of competences between MS and EU-level in the are of health given Art. 168 VII TFEU (7. Union action shall respect the</p> |

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| | <p>responsibilities of the Member States for the definition of their health policy and for the organisation and delivery of health services and medical care. The responsibilities of the Member States shall include the management of health services and medical care and the allocation of the resources assigned to them. The measures referred to in paragraph 4(a) shall not affect national provisions on the donation or medical use of organs and blood.])</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>[The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within twofour months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>1. The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>two</u> months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.1</p> <p>EL</p> <p>(Comments):</p> <p>The timeframe for the process set out in Article 23 needs to be re considered. This long duration makes it difficult to carry out the appropriate follow-up of the plan, Also the adoption of the Plan and amended Plan at the Council level prolongs and unnecessarily complicates the procedure, which is against the proposed flexibility of Plans.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four three months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the</p> |

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| | <p>Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22</p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 1 by replacing “four” with the “three”.</u></p> <p><u>HR comment: HR points out the importance of enabling the timely funding of the direct payments under the CAP in order to ensure adequate income support and provide legal certainty for farmers.</u></p> <p>HU</p> <p>(Comments):</p> <p>We do not propose any amendments to the text, as the provisions are in brackets. Nevertheless, we believe that further reflection is needed on how the chapter-based architecture could be matched with an approval process that is differentiated by policy area, so that well-prepared chapters can move forward without being delayed by issues in unrelated domains. See our proposals in relation to the nego box.</p> <p>IT</p> <p>(Drafting suggestions):</p> |

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| | <p>The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation <u>and with the Fund-specific Regulations, in particular 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] and Regulation XX [establishing the European Social Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034]. The Commission shall carry out this assessment</u> within three months of its submission and make a proposal for a Council implementing decision.</p> <p>IT</p> <p>(Comments):</p> <p>It is important, as already provided for in the CPR, to ensure full consistency with the sectoral regulations. It is also considered appropriate to shorten the assessment period in order to ensure a more efficient and timely process.</p> |

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| | <p>Article 23 gives the European Commission a central role in assessing the compliance of the Plans with the Regulation, allowing it to submit observations, request additional information, or propose modifications to the measures included by the Member State. However, unlike Article 19 of the RRF, there is no provision specifying the procedures and general criteria that the Commission will apply when evaluating the Plans.</p> <p>It is therefore appropriate to introduce clear, transparent and verifiable criteria for the compliance assessment, specifying the limits within which the Commission may request substantial modifications or the inclusion of new measures. Such clarification is essential to avoid lengthy iterative negotiations—as occurred during the initial implementation phase of the RRF—and to ensure predictable timelines and legal certainty in the approval process.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four two months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure</p> |

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| | <p>that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.</p> <p>LT</p> <p>(Comments):</p> <p>We propose shortening the time frame for COM’s assessment taking into consideration that on top the financing decision is taken within a month. Therefore, a total process would take 4 months which is a continuation of current CPR practices.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within two<u>four</u> months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>LV</p> <p>(Comments):</p> |

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| | <p><u>The time of adoption should be reduced.</u> LV suggests two-month deadline.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: 1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four three months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>MT</p> <p>(Comments):</p> <p>Justification: The assessment of the Plan by the Commission should be reduced to three months. This would make it possible to adopt the NRP Plans and the subsequent financing decision within one month. This timeframe would keep the overall approval process within four months, as is currently the case under the CPR.</p> <p>NL</p> |

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| | <p>(Comments):</p> <p>We reserve the right for drafting suggestions, but as this part is bracketed we will not bring them forward in this stage.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>¶The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four two months of its submission and make a proposal for a Council implementing decision.</p> <p>When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.¶</p> <p>PL</p> <p>(Comments):</p> <p>The timeframe for assessment of the Plan submitted by the Member States should be shorter than four months. Member States should have enough time to fully implement new Plan, prepare national legislation and adjust</p> |

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| | <p>administrative systems as well as to inform farmers in advance of the shape of the Common Agricultural Policy.</p> <p>In our opinion, the current (2021-2027) method of adopting Programmes under cohesion policy and under the CAP should be maintained.</p> <p>The adoption of the Plan by the Council significantly complicates and stiffens its implementation and possible change.</p> <p>Due to complexity of the new Plan it should be considered to enable “sectoral” or “partial” approval of the Plan, especially in order to ensure that the annual payments to farmers are carried out without disruption.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within three <u>four</u> months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>PT</p> <p>(Comments):</p> |

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| | <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission. The reference to a Council Implementation Decision should be deleted.</p> <p>PT also suggests a shorter period for the Commission’s assessment.].</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>1. [The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four three months of its submission and make a proposal for a Council implementing decision. When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.]</p> <p>RO</p> <p>(Comments):</p> <p>The assessment of the Plan by the Commission should be reduced to three months. This would make it possible to adopt the NRP Plans and the subsequent financing decision within one month. This timeframe would</p> |

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| | <p>keep the overall approval process within four months, as is currently the case under the CPR.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>1. ¶¶The Commission shall assess the Plan or the amended Plan submitted by the Member State and its compliance with this Regulation within four months of its submission and make a proposal for a Council implementing decision <u>within three months of its submission.</u></p> <p>When carrying out the assessment, the Commission shall ensure that the NRP Plan complies with all requirements laid down in this Regulation, in particular in Article 22.¶</p> <p>SK</p> <p>(Comments):</p> <p>For the purpose of specification, we propose that within the four months period for assess the Plan or amend the Plan, the Commission should also be obliged to submit a draft implementing decision to the Council.</p> <p>Furthermore, we believe that the Commission’s assessment period is too long and should be reduced to three months. SK questions the addition of a Council implementing decision.</p> |

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| | <p>HU</p> <p>(Drafting suggestions):</p> <p>The Commission’s decision not to propose the approval of the Plan or its inaction within [four] months of its submission should be amenable to judicial review pursuant to Article 263 or 265 TFEU accordingly.</p> <p>HU</p> <p>(Comments):</p> <p>It should be established that if the Commission fails to propose the approval of a Plan, or remains inactive, and especially in the case of any dispute concerning the types and number of the specific objectives to be addressed, within four months of its initial submission, such inaction or decision shall be subject to judicial review under Articles 263 and 265 TFEU. This is a fundamental safeguard to ensure accountability and predictability of the approval process, while at the same time guaranteeing the effective involvement of the Council. The approval of the Plan or its amendments, including as a result of the mid-term review, may not be refused or anyhow withheld solely due to the fact that not all specific objectives are addressed in the Plan. Similarly, the Commission should not delay the process because, according to its assessment the Plan does not</p> |

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| | comply with the Charter of Fundamental Rights or with the principles of the rule of law. |
| <p>2. The Commission may make observations to Member States and request additional information.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The Commission may make observations to Member States and request additional information, <u>while approving one or several chapters of the plan.</u></p> <p>FR</p> <p>(Comments):</p> <p>Afin de ne pas freiner la mise en œuvre des PPNR, il convient de prévoir la possibilité pour la Commission d’approuver indépendamment différentes parties du plan.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>2. <u>To ensure the competences, the consistency and the compliance of the NRP Plan with this regulation and the regulations referred to in article 1(2), the Commission may, depending on the</u></p> |

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| | <p><u>results of the assessment referred to in paragraph 1, address make</u> observations to <u>the</u> Member States and request additional information.</p> <p>BE</p> <p>(Comments):</p> <p>The provision in par. 2 goes against the subsidiarity of the Member States. Only amendments which are necessary in order to comply with requirements of the legislations can be imposed.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>2. The Commission may make observations to Member States and request additional information to the Plan <u>as a whole or separate chapters.</u>]</p> <p>DE</p> <p>(Comments):</p> <p>The Council’s steering competence for key decisions must be safeguarded, and the provisions cannot be determined solely by the Commission. They must be laid down in the Regulation itself and cannot be left to bilateral</p> |

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| | <p>negotiations between the Commission and MS on the NRPPs or to secondary legislation.]</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>2. The Commission may make observations <u>within one month of the date of submission of the Plan,</u> to Member States and request additional information.</p> |
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| <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>FR</p> <p>(Comments):</p> <p>En dehors des cas de non conformité de mesures ou du plan dans son ensemble au cadre défini à l'article 22, nous ne comprenons pas quels pourraient être les cas où la Commission s'octroie la possibilité de</p> |

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| | <p>demander l'ajout ou la modification de mesures. Nous demandons donc la suppression de cette disposition.–La Commission pourrait-elle préciser les “duly justified cases” qui lui permettraient de formuler ces demandes ? Selon les cas visés, nous pourrions nous montrer ouverts à d'autres propositions de rédaction.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>BE</p> <p>(Comments):</p> <p>Member States already have to take into account many requirements, related to guidance from COM. In order to achieve a balance between European priorities and national/regional needs, MS should be in charge of their Plans.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.]</p> <p>DE</p> <p>(Comments):</p> <p>The requirements for additional measures must be laid down in the Regulation itself and cannot be left to bilateral negotiations between the Commission and MS on the NRPPs.</p> <p>DE sees too much leeway for the COM as the there is no clear definition of the relation between reforms and investments with regard to the MS allocation/GDP, see first comment on Art. 21.</p> <p>COM has ample opportunity to influence the content of the plans and exercise its duty to ensure that the NRP and the measures set out therein comply with the</p> <p>requirements of the regulation during drafting, mid-term review and other revision procedures. DEU sees too much leeway for COM as there is no definition of ‘Commission sees a need for some adjustment of the Plan’ (quote from COM answers to Block 5 questions).</p> |

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| | <p>In between those procedures there should be legal certainty for MS to actually have a Plan to implement without the risk of having to answer a request for an amendment at any given time. Therefore: deletion.]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may propose request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>HR</p> <p>(Comments):</p> <p>HR comments: The provision allowing the Commission, in duly justified cases, to request the inclusion of additional measures or modifications of measures proposed by the Member State raises concerns regarding the balance between flexibility for Member States and the Commission's oversight role. While we acknowledge the importance of ensuring compliance with the Regulation, it would be helpful to clarify the criteria and limits for such interventions by the Commission to avoid excessive or unpredictable requests that may disrupt national policy coherence or democratic ownership. We recommend specifying procedural safeguards</p> |

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| | <p>or consultation mechanisms that ensure mutual agreement and preserve the strategic autonomy of Member States when shaping their Plans.</p> <p>HR question: Could you clarify what is meant by “duly justified cases” in order to avoid subjective interpretations.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>In duly justified cases <u>where the following conditions are met</u> <u>(conditions to be specified)</u>, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>IE</p> <p>(Comments):</p> |

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| | <p><u>This provision is amended to provide for the insertion of the necessary conditions which would support a duly justified case.</u></p> <p>LT</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may propose the inclusion of additional measures or the modification of measures proposed by the Member State</p> <p>LT</p> <p>(Comments):</p> <p>Regarding the fact that NRPP are prepared in partnership involving many stakeholders and is governed in a shared management, we propose a “softer” wording for this provision. The wording is in line with the wording of this regulation provided for art. 24 (3).</p> <p>LU</p> <p>(Comments):</p> <p>LU is of the opinion that “in duly justified cases “ is not precise enough. There needs to be a precise reason for asking a MS to include additional measures.</p> |

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| | <p>LV</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may propose request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>LV</p> <p>(Comments):</p> <p>LV does support empowering the Commission to introduce new measures in the plan.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>PL</p> <p>(Comments):</p> <p>In our opinion this provision is already included in the assessment process and is not necessary to repeat it. Moreover, the Commission shall not</p> |

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| | <p>impose on Member States the implementation of measures under shared management. Given the Commission's powers stipulating from other provisions of the proposed regulation, this would mean that the Commission would hold Member States accountable for implementing the measures proposed by itself.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: <u>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</u></p> <p>PT</p> <p>(Comments):</p> <p>PT: This is an unacceptable provision as it is discretionary</p> <p>We propose to delete the whole provision.</p> <p>The COM's proposal seems incompatible with art.24(10) ("Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State".)</p> |

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| | <p>RO</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>RO</p> <p>(Comments):</p> <p>The ownership of the Plan is essential especially as the grouping of Funds and Policies is so contested. It will additionally weaken shared management.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request propose the inclusion of additional measures or the modification of measures proposed by the Member State. <u>The proposal shall be based on objective criteria and clearly justified to the Member State.</u></p> <p>SE</p> <p>(Comments):</p> |

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| | <p>The word proposal is more relevant in this context. Furthermore, the basis for the Commission's proposal must be clear and must ensure that proposed inclusions of an additional measure does not delay the process of implementation in a disproportionate way. We therefore propose an addition to the text.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, the Commission may request the inclusion of additional measures or the modification of measures proposed by the Member State.</p> <p>SK</p> <p>(Comments):</p> <p>This is an unacceptable provision as it is discretionary.</p> |

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| | <p>In line with the PT comment we propose to delete the whole provision.</p> <p>The COM’s proposal seems incompatible with art.24(10) (“Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State”.)</p> |
| <p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission. The deadline set out in paragraph 1 shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission. The deadline set out in paragraph 1 shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission</p> <p>RW: The Member State shall provide the requested additional information and, if needed, <u>and considered relevant by the Member State</u>, review its Plan, taking into account the observations and requests<u>suggestions</u> made by the Commission. The deadline set out in</p> |

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| | <p>paragraph 1 shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission. The deadline set out in paragraph 1 shall be interrupted from the working day following the date following that that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.</p> <p>EL</p> <p>(Comments):</p> <p>Syntactic correction- same meaning</p> <p>HU</p> <p>(Drafting suggestions):</p> |

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| | <p>The Member State shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission. The deadlines set out in paragraph 1 shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.</p> <p>SE</p> <p>(Comments):</p> <p>There must be a time limit for the process as in the current CPR, Article 23, Approval of programmes. See especially paragraph 2 and 4 in this Article:</p> <p>2. The Commission may make observations within 3 months of the date of submission of the programme by the Member State.</p> <p>4. The Commission shall adopt a decision by means of an implementing act approving the programme no later than 5 months after the date of the first submission of the programme by the Member State</p> |
| | <p>HU</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The deadlines set out in paragraph 1 this Article shall be interrupted from the working day following the date following that on which Commission sends its observations or a request for revised documents to the Member State and until the Member State responds to the Commission.</p> |
| <p>3. Where the Plan does not comply with the requirements referred to in paragraph 1, the Commission shall communicate a duly justified reasoning to the Member State concerned within the deadline set out in paragraph 1.</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>3. Where the Plan does not comply with the requirements referred to in paragraph 1, the Commission shall communicate by observation a duly justified reasoning to the Member State concerned within the deadline set out in paragraph 1.</p> <p>BE</p> <p>(Comments):</p> <p>Shouldn't paragraph 3 be part of paragraph 2?</p> <p>DE</p> <p>(Comments):</p> <p>COM should inform the Council when this procedure is applied.]</p> <p>HU</p> <p>(Drafting suggestions):</p> |

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| | <p data-bbox="1137 260 2089 459">3. Where the Plan does not comply with the requirements referred to in paragraph 1, the Commission shall communicate a duly justified reasoning to the Member State concerned within the deadline set out in paragraph 1.</p> <p data-bbox="1137 496 1189 528">HU</p> <p data-bbox="1137 564 1312 596">(Comments):</p> <p data-bbox="1137 639 2089 839">There is no procedure foreseen for the subsequent steps. Additionally, if this provision remains in the text, it means in practice, that the Council is unable to exercise its decision-making prerogative if the Commission takes the position that a Plan should not be proposed for adoption.</p> <p data-bbox="1137 876 1189 908">SK</p> <p data-bbox="1137 944 1312 976">(Comments):</p> <p data-bbox="1137 1019 2089 1219">This provision violates the principle of national subsidiarity. Therefore, we request the deletion of this paragraph. The Commission may propose changes to the Member State, but the Member State should have the right to accept or decline the proposed changes.</p> |
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| <p>4. Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, the Commission proposal for a Council implementing decision shall lay down:</p> | <p>EL</p> <p>(Comments):</p> <p>Within the Council implementing decision, where pre-financing and union contributions are to be stated, we propose a separate reference to the HOME Affairs union support, (either all three sectoral Regulations in total, or each one separately) having sectoral rules and percentages applicable, differing from the other components of the NRPP.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>4. Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, t 4. The Commission proposal for a Council implementing decision shall lay down:</p> <p>HU</p> <p>(Comments):</p> <p>It is of utmost importance to include the possibility of the partial approval of the Plan by chapters and amendment of the chapters, especially in case of the CAP Chapter, where the submission and adoption of the Plan is</p> |

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| | <p>essential to be on time in order to guarantee the stability and continuity of area- and animal-based payments for the beneficiaries.</p> <p>LU</p> <p>(Comments):</p> <p>Would it not be more logical to insert this paragraph as paragraph 2 in order to ensure logical continuity? The Commission assesses the plan, accepts it, accepts it in part, rejects it...</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 4. Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, the Commission proposal for a Council implementing decision shall lay down:</p> <p>PT</p> <p>(Comments):</p> <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission.</p> <p>SI</p> |

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| | <p>(Drafting suggestions):</p> <p>4. Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, the Commission proposal for a Council implementing decision shall lay down:</p> <p>SI</p> <p>(Comments):</p> <p>Over the past 20 years, all decisions regarding the adoption of shared management programmes have been taken by the Commission, in line with the principles of shared management.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Where the Commission concludes that the Plan complies with the requirements referred to in paragraph 1, the Commission proposal for a Council implementing decision shall lay down:</p> <p>SK</p> <p>(Comments):</p> <p>SK questions the need to have a Council adoption, since we are under shared management</p> |

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| (a) the total Union contribution. | |
| | |
| (b) the amount of the loan support where the Member State concerned makes such a request; and the related amount of pre-financing, as well as the availability period of the loan; | <p>DE</p> <p>(Comments):</p> <p>We strictly object the loan instrument.</p> <p>As this is a horizontal question, point (b) should be put into brackets.]</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(b) — the amount of the loan support where the Member State concerned makes such a request; and the related amount of pre-financing, as well as the availability period of the loan;</p> <p>FI</p> <p>(Comments):</p> <p>Finland does not support Catalyst Europe facility.</p> |
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| <p>(c) the list of measures covered by the Union contribution and loans contained in the NRP Plan;</p> | <p>DE</p> <p>(Comments):</p> <p>We strictly object the loan instrument.</p> <p>As this is a horizontal question, point (b) should be put into brackets.]</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(c) the list of measures covered by the Union contribution and loans contained in the NRP Plan;</p> |
| <p>5. In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures.</p> | <p>DE</p> <p>(Drafting suggestions):</p> <p>5. In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures. <u>In the proposal for the</u></p> |

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| | <p><u>implementing decision, the Commission should lay down a reasoning why the NRPP could nevertheless be adopted as a whole.</u></p> <p>DE</p> <p>(Comments):</p> <p>COM should explain, why a NRPP with identified deficiencies should nevertheless be adopted by the Council or should – if this seems appropriate – propose changes to the NRPP via the implementing decision to address those deficiencies.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>5. In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States <u>it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures. The Commission shall, before including such measures in the identification of deficiencies in its proposal referred to in</u></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>paragraph 4, allow the Member State concerned a period of at least 20 working days to provide further clarifications and documentation. The Commission may then indicate in the proposal referred to in paragraph 4 the measures to which those deficiencies relate.</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 5 by replacing “it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures” with “the Commission shall, before including such measures in the identification of deficiencies in its proposal referred to in paragraph 4, allow the Member State concerned a period of at least 20 working days to provide further clarifications and documentation. The Commission may then indicate in the proposal referred to in paragraph 4 the measures to which those deficiencies relate.”</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>5. In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred</p> |

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| | <p>to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an reasoned identification of the deficiencies affecting those measures.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, where the Commission concludes that one or more measures of the Plan does not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures.</p> <p>NL</p> <p>(Comments):</p> <p>This article should not only refer to situations in which the measures do not comply with the requirements, but also when the MS fails to comply with Article 8 [and 9].</p> |

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| | <p>It is important for NL that when RoL deficiencies impact all measures under the NRPP's (for example based on the recommendations of the European Semester) that the CION will not make any payments for the entire fund.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, where the Commission concludes that one or more measures of the Plan do not comply with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, has not been satisfactorily addressed by the Member States, it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures.</p> <p>PL</p> <p>(Comments):</p> <p>In our opinion this procedure is unclear and it should be explained if it signifies a partial approval of the Plan.</p> <p>Moreover, the Commission shall not impose on Member States the implementation of measures under shared management. Given the</p> |

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| | <p>Commission's powers stipulating from other provisions of the proposed regulation, this would mean that the Commission would hold Member States accountable for implementing the measures proposed by itself.</p> <p>SE</p> <p>(Comments):</p> <p>It would be beneficial if the end of the paragraph, i.e. “it may include in the Commission proposal referred to in paragraph 4 an identification of the deficiencies affecting those measures” can be further developed/clarified. As we understand the text, after having heard the Commissions’s explanation, it means that the proposal to the Council is that the parts of the plan affected by deficiencies should not be approved?</p> |
| | <p>ES</p> <p>(Drafting suggestions):</p> <p><u>NEW PARAGRAPH ADDED TO POINT 4:</u></p> <p><u>To facilitate an early start of the implementation of the NRPP, the Commission may propose a two or more successive partial Council Implementing decisions, each covering one or more chapters of the Plan.</u></p> <p>RO</p> |

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| | <p>(Drafting suggestions):</p> <p><u>When not all chapters of the Plan are mature enough in order to be considered as fully compliant with the requirements referred to in paragraph 1, and that a corresponding request made in accordance with paragraph 2, second subparagraph, the Commission may propose a Decision partially approving the Plan so that mature chapters can start their implementation earlier, without considering the approach as being a deficiency or triggered by a crisis situation.</u></p> <p>RO</p> <p>(Comments):</p> <p>RO considers that a provisions clearly stating the partial adoption of the Plan is needed in order to take into account the different speed of preparation of chapters at national and regional level. This will also give additional assurance for CAP stakeholders.</p> |
| <p>6. The Council shall adopt the implementing decisions referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p> | <p>AT</p> <p>(Comments):</p> <p>The proposed for the adoption of the implementing decision seems ambitious.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>BE</p> <p>(Drafting suggestions):</p> <p>6. The Council shall adopt the implementing decisions referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p> <p><u>The Council shall provide reasons in its implementing decisions for any deficiencies and related specific measures identified in the Commission proposal that it decides not to address.]</u></p> <p>BE</p> <p>(Comments):</p> <p>It is not clear from the draft NRP Regulation to what extent the Council will be able to disregard deficiencies identified in the Commission proposal.]</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>The Council shall adopt the implementing decisions referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>The Council shall provide reasons in its implementing decision for any deficiencies and related specific measures identified in the Commission proposal that it decides not to address.]</u></p> <p>DE</p> <p>(Comments):</p> <p>We are critical of the fact that the Council is to have only four weeks to adopt the implementing decisions on the approval of the NRPPs.</p> <p>The Plans are highly complex and MS need sufficient time for internal assessment.</p> <p>It is not clear from the draft NRP Regulation to what extent the Council will be able to disregard deficiencies identified in the Commission proposal.]</p> <p>HU</p> <p>(Comments):</p> <p>In addition to adopting the Single Plan, the Council also plans to adopt the chapters relating to the field of Home Affairs separately, in accordance with the Commission's presentations to date. This would lead to time loss, especially if the Council has four weeks to adopt the chapters. At the same</p> |

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| | <p>time, it further strengthens our proposal that separate adoption of chapters could also mean separate plans.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p><u>PT: 6. The Council Commission shall adopt the implementing a decisions by means of an implementing act approving the Plan no later than 5 months after the date of the first submission of the Plan by the Member State. referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</u></p> <p>PT</p> <p>(Comments):</p> <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission. In this context, we propose a drafting suggestion in line with our opinion.</p> <p>SI</p> <p>(Drafting suggestions):</p> |

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| | <p>6. The Council Commission shall adopt a decisions <u>by means of an implementing act approving the Plan no later than 5 months after the date of the first submission of the Plan by the Member State.</u> referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p> <p>SI</p> <p>(Comments):</p> <p>See the comment above.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>The Council <u>Commission</u> shall adopt the implementing a decisions <u>by means of an implementing act approving the Plan no later than 5 months after the date of the first submission of the Plan by the Member State.</u> referred to in paragraph 1, as a rule, within four weeks of the adoption of the Commission proposal.</p> <p>SK</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | As mentioned previously, we consider the approval of the Plan at the level of the Council to be an unnecessary complication and prolongation of the implementing process. |
| <p>7. Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall adopt a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall adopt a financing decision <u>within 4 weeks</u> within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509 <u>and duly communicate it to the Council</u>, including the following:</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall adopt <u>within four weeks</u> a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following</p> <p>FI</p> |

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| | <p>(Comments):</p> <p>The Council has a deadline for its decision. The CION has to have same kind of deadline.</p> <p>HU</p> <p>(Comments):</p> <p>In the current proposal, the scope of delegated and implementing acts remains overly broad, allowing the Commission to modify essential elements of the Regulation — including templates, definitions or performance frameworks — through secondary legislation.</p> <p>Delegated or implementing acts, however, cannot replace political agreement where core programming requirements are concerned.</p> <p>LV</p> <p>(Comments):</p> <p>The regulation is not really cases on cases where Council sees deficiencies and declines to adopt an implementing decision. LV would suggest to clearly indicate the procedure if Council does not adopt implementing decision.</p> <p>NL</p> |

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| | <p>(Drafting suggestions):</p> <p>Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall, <u>by means of implementing acts</u>, adopt a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509. <u>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 88 and include</u> the following:</p> <p>NL</p> <p>(Comments):</p> <p>NL thinks this financing decision should be qualified as an implementing decision. In addition, comitology should be applied to this decision. In the view of NL, the examination procedure would be appropriate here (Article 2(2)(b)(i) Regulation 182/2011).</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 7. Once the Council has adopted an implementing decision as referred to in paragraph 6, †The Commission shall adopt a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>PT</p> <p>(Comments):</p> <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission.]</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>7. Once the Council has adopted an implementing decision as referred to in paragraph 6, the Commission shall proceed directly by adopting a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p> <p>SE</p> <p>(Comments):</p> <p>In line with the wording in Article 24. 5.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>7. Once the Council has adopted an implementing decision as referred to in paragraph 6. †The Commission shall adopt a financing</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p> <p>SI</p> <p>(Comments):</p> <p>See the comment above.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Once the Council has adopted an implementing decision as referred to in paragraph 6, †The Commission shall immediately adopt a financing decision within the meaning of Article 110 of Regulation (EU, Euratom) 2024/2509, including the following:</p> <p>SK</p> <p>(Comments):</p> <p>There is no deadline for the Commission to adopt such a decision. We propose to specify the text more precisely.</p> |
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| <p>(a) the milestones and targets in relation to the implementation of measures contained in the NRP Plan, and for each of them, the corresponding pay-out value;</p> | <p>DE</p> <p>(Comments):</p> <p>Clear ex ante guidelines are needed for determining the amount of funding (pay-out value) linked to a reform milestone.</p> <p>Those criteria are also needed for the determination of the suspension amounts.]</p> <p>IE</p> <p>(Comments):</p> <p><u>Currently, Cohesion and CAP payments focus on the amount of eligible expenditure incurred. The proposal to attach pay-out values to milestones and targets rather than deal with actual expenditure represents a radical change from existing programmes including Cohesion, CAP and the RRF. In that regard IE reserves it's position on the merits and feasibility of the proposed approach. For example, in relation to LEADER (and many other interventions), the fulfilment of milestones in can take some time, e.g. additional jobs created may not happen until the end of a project, and so the setting of milestones/targets may lead to difficulty in claiming funding in the relevant year.</u></p> |

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| (b) the Union contribution per year, based on the percentages set out in Article 14(1) [commitments]; | |
| | |
| The notification of that Commission decision to the Member State concerned shall constitute a legal commitment. | |
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| [Where Article 4(2), point (b), of the MFF Regulation applies, that financing decision may be amended in accordance with the outcome of the annual budgetary procedure.] | |
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| 8. Payment applications for the specific measures affected by deficiencies identified in the implementing decisions adopted by the Council may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been remedied. | <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>8. Payment applications for the specific measures affected by deficiencies identified in the implementing decisions adopted by the Council may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>remedied. <u>suspend or reduce the corresponding payments only to the extent justified by the unfulfilled part of the milestone, target or result, while ensuring that payments are made proportionally to the part duly achieved and verified.</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes to amend point 8 by replacing “make the corresponding payments until the deficiencies have been remedied” with the “suspend or reduce the corresponding payments only to the extent justified by the unfulfilled part of the milestone, target or result, while ensuring that payments are made proportionally to the part duly achieved and verified.”</u></p> <p>HR position: We consider the provision on the suspension of payments in cases where a single key milestone, target or result included in a payment request has not been achieved to be overly rigid, and we are of the view that a proportional approach would be more appropriate.</p> <p>PL</p> <p>(Comments):</p> |

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| | <p>In our opinion this procedure is unclear and it should be explained if it signifies a partial approval of the Plan.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 8. Payment applications for the specific measures affected by deficiencies identified in the <u>Commission decision implementing decisions adopted by the Council</u> may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been remedied.</p> <p>PT</p> <p>(Comments):</p> <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission.]</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>8. Payment applications for the specific measures affected by deficiencies identified in the <u>Commission decision implementing</u></p> |

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| | <p>decisions adopted by the Council may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been remedied.</p> <p>SI</p> <p>(Comments):</p> <p>The requirement appears overly rigid. A more proportional approach would be more appropriate.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Payment applications for the specific measures affected by deficiencies identified in the Commission decision implementing decisions adopted by the Council may be submitted by the Member State concerned, but the Commission shall not make the corresponding payments until the deficiencies have been remedied. <i><u>suspend or reduce the corresponding payments only to the extent justified by the unfulfilled part of the milestone or target, while ensuring that payments are made for the part duly achieved and verified.</u></i></p> <p>SK</p> <p>(Comments):</p> |

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| | <p>We support HR proposal.</p> <p>The provision requiring a full suspension of payments when just one milestone, target, or result in a payment request is not met seem to be too inflexible. We therefore believe that a more proportionate response would be more appropriate.</p> |
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| <p style="text-align: center;">CHAPTER 3 Revision of the NRP Plan</p> | <p>HR (Comments): HR comment: This should be corrected to Chapter 2</p> <p>IE (Comments): <u>This article is unclear in relation to the timeframe and rationale for certain decisions. Taking that into account, a precise ‘roadmap’ (similar to that in the RRF) of the approval / amendment / rejection process for NRPP with detail on the particular rationale for each potential decision would greatly assist in assessing whether a swift procedure is possible.</u></p> <p>PL (Drafting suggestions):</p> <p style="text-align: center;">CHAPTER 3 Revision Amendment of the NRP Plan</p> <p>PL (Comments): In the whole proposal for the regulation the word “amendment” is applied. This place (Title of Chapter 3) is the only one where the word "revision" is</p> |
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| | applied. We propose unification of the terminology (used in previous programming periods). |
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| <p style="text-align: center;"><i>Article 24</i></p> <p style="text-align: center;"><i>Amendment of the NRP Plan</i></p> | |
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| <p>1. A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> <p>FR</p> <p>(Comments):</p> <p>La modification vise à supprimer des termes qui n'apparaissent pas de manière assez précise.</p> <p>Une approche chapitre par chapitre peut-elle être envisagée pour les modifications du PPNR ? En d'autres termes, une modification d'un</p> |

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| | <p>chapitre peut-elle être soumise alors qu'une modification d'un autre chapitre est en cours ?</p> <p>AT</p> <p>(Comments):</p> <p>Is there a limited number of amendments per year for the MS? Will there be a simplified process for non-strategic amendments?</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3</p> <p>BE</p> <p>(Comments):</p> <p>The requirements should be feasible, and should limit administrative burden.</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p>A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> <p><u>The amendment may concern either the Plan as a whole or individual chapters. If individual chapters are amended, a Member State needs to ensure that the Plan continues to form a comprehensive and coherent package.]</u></p> <p>DE</p> <p>(Comments):</p> <p>It should be possible to submit amendments of different chapters of a Plan during running amendment procedures in other chapters of a NRP.</p> <p>Even if separate chapters can be amended over time it is key that the Plan continues to be a coherent and comprehensive package.]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>1. A Member State may submit to the Commission a reasoned request for an amendment <u>or parallel amendments</u> of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of</p> |

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| | <p>that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>1.A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3. <u>Member States may submit more than one such request in case unforeseen changes are deemed necessary and in crisis situations according to Article 1(4) of Regulation EU 2024/1359</u></p> <p>EL</p> <p>(Comments):</p> <p>If only one amendment can be in progress, it may cause problems (e.g. if an amendment to one chapter is still ongoing, but a need for amending another chapter arises, the latter request would have to await the completion of the pending procedure).Especially in the case of HOME FUNDS where crisis and force majeure related situations may arise at any time.</p> |

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| | <p>ES</p> <p>(Drafting suggestions):</p> <p><u>NEW PARAGRAPH ADDED TO POINT 1:</u></p> <p><u>Several amendments may be submitted simultaneously by a Member State, for which the approval by the Commission may occur separately.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>1. A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the <u>relevant</u> objectives laid down in Articles 2 and 3.</p> <p>HU</p> <p>(Comments):</p> <p>We must preserve the achievements of the Omnibus III simplification package, which introduced the differentiation of strategic and other type of amendments that only require notification.</p> <p>IT</p> |

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| | <p>(Comments):</p> <p>According to the provisions of this article, only Member State at central level (through the Coordinating Authority) may submit a request for an amendment of the Plan.</p> <p>However, if the amendment request concerns a reform/investment (and the related milestones and targets) included in a regional chapter, what role would the Region, acting through its Managing Authority, have?</p> <p>Can it interact directly with the Commission regarding potential modifications to the chapters falling under its responsibility, or must it necessarily be supervised at central level by the Coordinating Authority?</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>A Member State may submit to the Commission a reasoned request for an amendment or parallel amendments of its NRP Plan together with the amended NRP Plan setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> <p>LT</p> <p>(Comments):</p> |

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| | <p>This will ensure a timely response to necessary sectoral changes without disrupting the overall functioning of the plan.</p> <p>LV</p> <p>(Drafting suggestions):</p> <ol style="list-style-type: none"> 1. A Member State may submit to the Commission a reasoned request for an amendment <u>or parallel amendments</u> of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3. <p>LV</p> <p>(Comments):</p> <p>It should also be allowed to amend separate chapters of the Plan in parallel. LV suggests clearly stating this in the text</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>A Member State may submit to the Commission a reasoned request for an amendment <u>or parallel amendments</u> of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that</p> |

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| | <p>amendment on the achievement of the objectives laid down in Articles 2 and 3.</p> <p>RO</p> <p>(Comments):</p> <p>We consider that the Common Agricultural Policy should be addressed separately, given its specific nature, which includes both annual direct payments and interventions dedicated to rural development. Throughout the implementation of the CAP, unforeseen situations have arisen — such as amendments to national legislation directly affecting eligibility criteria — requiring adjustments to the CAP Strategic Plan. In a context where plan modification would be unique and common to all programmes, the risk of delays in launching measures becomes significant.</p> <p>More clarity is required in the wording of this article / para so that to avoid misunderstandings on how amendments can be proposed and approved – chapter by chapter or all chapters amended in one request (e.g. given that the measures under the NRPP follow different implementation timelines, carrying out a single, common amendment for all chapters becomes extremely difficult).</p> <p>If the wording refers to a single/common amendment, since the N+1 rule already imposes strict constraints on project completion, and the inability</p> |

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| | <p>to make real-time modifications would inevitably lead to failure in meeting the established targets. From an administrative perspective, managing a single amendment for all programmes represents a major challenge.</p> <p>The need to adjust intervention fiches arises in most cases after the launch of calls for proposals, as beneficiaries face diverse situations requiring adaptation. A relevant example is represented by the Pillar I interventions for the 2023–2027 period. In such cases, when a Member State identifies the need for an adjustment, the modification procedure is excessively lengthy and rigid. This highlights the difficulty of applying a single framework — such as that provided for in Article 24 of the Regulation — to policies with distinct specificities and implementation cycles, such as the CAP.</p> <p>Support under the NRPP must primarily take into account market needs and those of private stakeholders, while EU and Member State administrative regulations should be less restrictive. At present, the new architecture does not lead to the intended simplification. Simplification should also be viewed from the perspective of both fund beneficiaries and administrations.</p> |
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| <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three months of the submission of the amended NRP Plan.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan <u>in case of substantial revision and regular revision</u> with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three months of the submission of the amended NRP Plan.</p> <p>FR</p> <p>(Comments):</p> <p>La Commission pourrait-elle préciser que ce délai de 3 mois d'évaluation s'applique bien uniquement aux "révisions substantielles" et aux "révision régulière", et pas dans le cas d'une "révision mineure", tel qu'indiqué dans sa présentation lors du dernier sous-groupe PPNR portant sur le bloc 5 ? Le cas échéant, il convient de le préciser dans cet article (proposition ci-contre).</p> <p>Par ailleurs, la Commission pourrait-elle expliquer ce délai au regard des délais d'examen des plans sur la présente programmation ? .</p> <p>AT</p> |

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| | <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three months 30 days of the submission of the amended NRP Plan.</p> <p>AT</p> <p>(Comments):</p> <p>The deadline for the EC to respond to proposed plan amendments should be reduced (e.g from 3 months to 30 days).</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with <u>the requirements laid down in</u> this Regulation <u>and in case of paragraph 6 with the last decisions of, including</u> Article 23 [Commission proposal and Council implementing decision], and may make observations within three one months of the submission of the amended NRP Plan.</p> <p>BG</p> |

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| | <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>BG</p> <p>(Comments):</p> <p>The assessment of the amended NRP Plan by the Commission should be reduced to two months provided the timeframe for the assessment of the initial Plan in art. 23(1) is reduced to three months.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>CZ</p> <p>(Comments):</p> |

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| | <p>To ensure sufficient flexibility in the implementation of the programme and to maintain a swift amendment process, it is proposed to shorten the Commission’s assessment deadline from three months to two months. This timeframe aligns with current practice for programme changes and aims to limit administrative burden, taking into account that preparing amendments is a complex and time-consuming process.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three <u>two</u> months of the submission of the amended NRP Plan.]</p> <p>DE</p> <p>(Comments):</p> <p>Since the plan will encompass many different, currently separate programmes, we expect amendments to be necessary rather frequently. In order to act swiftly, the amendment procedure needs to be lean and quick. We doubt that the procedure laid down in Art. 23 meets those requirements.]</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>EE</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within two three months of the submission of the amended NRP Plan.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three three-two months of the submission of the amended NRP Plan.</p> <p>HR</p> <p>(Comments):</p> <p><u>HR propose to amend point 2 by replacing “three” with the “two”.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> |

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| | <p>2. The Commission shall assess the compliance of the amended NRP Plan attached with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>HU</p> <p>(Comments):</p> <p>The assessment of the amended NRP Plan by the Commission should be reduced to two months provided the timeframe for the assessment of the initial Plan in Art. 23(1) is reduced to three months.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>LT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Taking into account the current RRF practices and the proposed 3 months assessment in art. 23 (1), we proposed to shorten the assessment of the Plan amendment.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Proposal: ...may make observations within two months ...</p> <p>LU</p> <p>(Comments):</p> <p>This will speed up the process.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within twothree months of the submission of the amended NRP Plan.</p> <p>LV</p> <p>(Comments):</p> |

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| | <p>The amount of time for amendments should be reduced.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>NL</p> <p>(Comments):</p> <p>Otherwise this process takes roughly half a year, which may hinder the speed of implementation.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>PL</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>Given the lengthy process of accepting the Plan, the deadlines in the regulation should be defined in a clear manner, leaving no room for interpretation. We propose to have a balanced process, with similar deadlines for the Commission and Member States to take action.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within <u>two</u> three months of the submission of the amended NRP Plan.</p> <p>PT</p> <p>(Comments):</p> <p>PT: Three months for assessing amendments is too long. It should be reduced to two months, which seems enough.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>RO</p> <p>(Comments):</p> <p>The assessment of the amended NRP Plan by the Commission should be reduced to two months provided the timeframe for the assessment of the initial Plan in art. 23(1) is reduced to three months.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within three two months of the submission of the amended NRP Plan.</p> <p>SE</p> <p>(Comments):</p> |

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| | <p>Today CPR gives the Commission two months. This should be sufficient. Especially as the Council procedure prolong the decision process.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within <u>one</u> three months of the submission of the amended NRP Plan.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>2. The Commission shall assess the compliance of the amended NRP Plan with this Regulation, including Article 23 [Commission proposal and Council implementing decision], and may make observations within <u>two</u> three months of the submission of the amended NRP Plan.</p> <p>SK</p> <p>(Comments):</p> <p>Given that the implementation of the NRP Plan is already ongoing at the time a Member State requests an amendment to its plan, we consider the</p> |

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| | <p>three-month assessment period granted to the Commission to be disproportionately long compared to the four-month period under Article 23(1), which applies to the assessment of the entire NRP. During the implementation, it is essential to respond swiftly to amendment proposals submitted by Member States.</p> <p>We request the addition of a provision authorizing the Member State to apply in the implementation the elements of the Plan that are the subject of an amendment to the Plan, from the date of submission of this amendment for assessment to the Commission, similarly to what is permitted by Article 63 point (3) of Regulation (EC) No. 2021/1060 of the European Parliament and of the Council.</p> |
| <p>3. <u>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.</u></p> | <p>AT</p> <p>(Comments):</p> <p>An obligation for Member States to implement proposals from the European Commission is viewed very critically.</p> <p>BE</p> <p>(Comments):</p> <p>Bracketed wording. Not to be commented here.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>BG</p> <p>(Drafting suggestions):</p> <p>3. — [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>BG</p> <p>(Comments):</p> <p>This provision is not consistent with the shared-management framework of the NRP Plans.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>[In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1. <u>In view of a Plan amendment according to Art. 34 in case of crisis situation</u> the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>DE</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>DE: COM shall have the right to propose new measures or amendments of existing plan (which were assessed and adopted by COM and the Council in 2028) in crisis situations only. MS needs planning certainty.</p> <p>This element of independent entitlement to demand amendments for the Commission seem to be new. The Commission shall take into consideration, that some amendments have consequences for co-financing and therefore national budget law.</p> <p>COM competence for requesting additional measures must be limited. The requirements for additional measures must be laid down in the Regulation itself and cannot be left to bilateral negotiations between COM and MS on the NRPPs.]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>EL</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>[In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>EL</p> <p>(Comments):</p> <p>Commission should not be in a position to imply any new measure to a M-S if M-S disagree, no matter of the justification</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>3. [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>ES</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>ES proposes to delete this paragraph. Initiative for amendments should only come from the Member State, which is the best placed to assess changes in circumstances that would justify an amendment.</u></p> <p>FI</p> <p>(Comments):</p> <p>This should be somehow limited, and should reflect the recommendations given earlier by the CION.</p> <p>HR</p> <p>(Comments):</p> <p>HR comments: We would appreciate the Commission's clarification regarding Article 24 paragraph 3 – could you please clarify which are the exceptional and justified cases when the EC proposes the MS to introduce new measures by amending the NRP. In the implementation of the CAP, the introduction of measures has been exclusively at the request and proposal of the MS.</p> <p>HU</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.</p> <p>IE</p> <p>(Comments):</p> <p><u>IE requests clarification in relation to the provision that the Commission can request an amendment of a Plan, (which is a new feature compared to current arrangements) and in particular, what the parameters and process will be in relation to same?</u></p> <p>IT</p> <p>(Drafting suggestions):</p> <p><u>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.</u></p> <p>IT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Article 24, paragraph 3, authorises the Commission to propose amendments or new measures “in duly justified cases”, even without a request from the Member State.</p> <p>This provision represents a substantial strengthening of the Commission’s powers, allowing it to modify or expand the content of the Plan on its own initiative and potentially to redefine, in practice, parts of the programming priorities.</p> <p>This constitutes a power that has no precedent in cohesion policy, where programme amendments remain the exclusive responsibility of Member States — subject to Commission approval, but never to its direct initiative — and should therefore be rejected.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones</p> <p>LT</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The provision creates uncertainty regarding the stability and integrity of the approved Plan, as MS could be obliged to reconsider or modify measures based not on their own initiative.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>3. — [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>LV</p> <p>(Comments):</p> <p>LV does not support empowering Commission to introduce new measures in the plan.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: 3. [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>MT</p> <p>(Comments):</p> <p>Justification: This provision is not consistent with the shared-management framework of the NRP Plans.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>[In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>PL</p> <p>(Comments):</p> <p>This provision is not consistent with the shared management framework of the NRP Plans.</p> <p>PT</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>PT: In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>PT</p> <p>(Comments):</p> <p>PT: This is an unacceptable provision as it gives power to the COM to propose new measures even outside of a NRPP amendment.</p> <p>We propose to delete the whole provision.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>3. — [In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>RO</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>To be considered when the Nego-Box will be agreed: This provision is not consistent with the shared-management framework of the NRP Plans.</p> <p>Any proposals from the Commission should be agreed through a dialogue with the Member State or the region concerned in order to ensure the ownership of the measure and without affecting the predictability and implementation of the existing measure. Member State or the region could accept the proposed measure except if it considers will affect the integrity of the intervention strategy of the Plan</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>3. In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.]</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>In duly justified cases, irrespective of whether the Member State submitted a reasoned request for an amendment of its NRP Plan</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>pursuant to paragraph 1, the Commission may also propose to the Member State to amend existing measures or to introduce new ones.</p> <p>SK</p> <p>(Comments):</p> <p>We do not consider this provision to be consistent with the shared-management principle.</p> |
| <p>4. The Member State shall review the amended NRP Plan within one month from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall <u>may</u> review the amended NRP Plan <u>shall provide the requested additional information and, if needed, review its Plan, taking into account the observations and requests made by the Commission</u> within one month from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>BE</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>4. The Member State shall review the amended NRP Plan within one two months from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3</p> <p>BE</p> <p>(Comments):</p> <p>This paragraph is connected to the previous paragraph, which is bracketed. Should be discussed in line with outcome on bracketed wording.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall review the amended NRP Plan within one month from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account these these observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>BG</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>See the comment above.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>The Member State shall review the amended NRP Plan within one two month from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3 <u>and submit the amended version of the Plan to the Commission. The Member State must justify where observations and proposals by the Commission have not been taken into account.</u></p> <p>DE</p> <p>(Comments):</p> <p>MS need more time for internal processes.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>The Member State shall review the amended NRP Plan within one month from the date of submission of the Commission’s observations referred to</p> |

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| | <p>in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall review the amended NRP Plan within one two month from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>HU</p> <p>(Comments):</p> <p>See the comment above.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The Member State shall review the amended NRP Plan within one month two months from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>LT</p> <p>(Comments):</p> <p>Taking into account the number of parties involved in the amendment, we propose a longer term for the amendment of the Plan. Moreover, this deadline would be closer to the Commission's deadlines.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall review the amended NRP Plan within one month from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>LV</p> <p>(Comments):</p> <p>See the comment on paragraph 3.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: 4. The Member State shall review the amended NRP Plan within one two months from the date of submission of the Commission's observations</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>MT</p> <p>(Comments):</p> <p>Justification: Considering the longer timeframes for the Commission, the possibility of holiday periods falling within such time periods as well as internal reviews and validations required at local and national level within MSs, the timeframe should be increased to at least 2 months.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>4.The Member State shall review the amended NRP Plan within one month two months from the date of submission of the Commission’s observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>PL</p> <p>(Comments):</p> <p>We propose to have a balanced process, with similar deadlines for the Commission and Member States to take action. Moreover, given the broad</p> |

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| | <p>scope of the NRPP Plan and numerous institutions engaged in the process of its implementation, as well as the need to proceed the change formally in line with the national regulations (e.g. adoption of the revised Plan by the Government), the time needs to be extended to 2 months.</p> <p>Reference to paragraph 3 removed consequently with the proposed change in p. 3.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall review the amended NRP Plan within <u>three months</u> one month from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>RO</p> <p>(Comments):</p> <p>See the comment above.</p> <p>The 1-month deadline for submitting responses to the COM's observations could be insufficient if amendment are made under single comprehensive request, despite the speed required under N+1 rule, given the complexity</p> |

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| | <p>of the intervention typologies and the large number of entities involved — aspects that require extensive coordination.</p> <p>SE</p> <p>(Comments):</p> <p>When the initiative for an amendment comes from the Commission, according to paragraph 3, it will not be possible for the Member State to respond within one month. The reference to point 3 should therefore be adjusted.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall review the amended NRP Plan within two one months <u>two</u> months from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3.</p> <p>SI</p> <p>(Comments):</p> |

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| | <p>The NRP Plan covers a wide range of content, many institutions will be involved in the NRP Plan amendment process, so we anticipate that review and corrections may require more than 1 month. Our experience from the RRF is that the process of amending the RRF required the preparation of corrections and comments with inappropriately short deadlines, which worsened the quality of the prepared documents.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>4. The Member State shall<u>may</u> review the amended NRP Plan within three<u>one</u> months from the date of submission of the Commission's observations referred to in paragraph 2, taking into account the observations and the proposals by the Commission as referred to paragraphs 2 or 3</p> <p>SK</p> <p>(Comments):</p> <p>According to the given provision, the Member State "shall review" the draft amendment to the Plan based on the EC's comments. This provision seems to be very strict, as the EC's comments should also be open to discussion. We propose to "soften" the given provision. Furthermore, we</p> |

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| | believe that the proposed review period for the Member States is not sufficient. |
| | |
| <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) <u>(substantial revision)</u> [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP <u>(splitted as follows : three months for the Commission’s assessment and one month for Member State’s review on Commission’s observations)</u>. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the</p> |

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| | <p>financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>FR</p> <p>(Comments):</p> <p>La Commission peut-elle préciser le calendrier du dépôt d'un amendement au PPNR? Faut-il comprendre que le délai prévu au paragraphe 2 (3 mois) et 5 (4 mois + 4 semaines pour le Conseil) sont cumulatifs?</p> <p>Par ailleurs, il convient de compléter cet article (aléas 5 et 6) pour clarifier les trois types de révisions possibles et les étapes de leur évaluation et de validation. Les éléments ajoutés sont indiqués dans la présentation de la Commission faite au cours du dernier sous-groupe PPNR sur le bloc 5 mais ne figurent pas dans cet article.</p> <p>Le délai pour l'approbation d'une modification doit être plus court que pour l'approbation initiale du plan. La Commission pourrait-elle expliquer le délai proposé au regard des délais d'examen des plans sur la présente programmation ?.</p> <p>BE</p> <p>(Comments):</p> |

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| | <p>Connected to current discussion on the negobox (para 16). We cannot amend this paragraph without political agreement on the negobox.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>BG</p> |

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| | <p>(Comments):</p> <p>Based on the provisions of the Regulation, we can anticipate a considerable number of amendments to the NRP Plans. Therefore, the proposed involvement of the Council in the adoption — and especially in the amendment — of the Plans would not contribute to streamlining the process. On the contrary, it would further delay implementation by introducing an additional layer of approval and extending the respective decision-making procedure by one month.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, or the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four three months after the submission of the amended NRP.</p> |

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| | <p>CZ</p> <p>(Comments):</p> <p>CZ considers that a CID should be required only in cases where the amended Plan would entail a modification of the total Union contribution or of the amount of loan support. In all other cases, amendments should follow the established practice of Commission approval, ensuring a streamlined procedure and maintaining flexibility in NRP Plan implementation.</p> <p>To ensure sufficient flexibility in the implementation of the programme and to maintain a swift amendment process, it is proposed to shorten the Commission's deadline from four to three months. This timeframe aims to limit administrative burden, taking into account that preparing amendments is a complex and time-consuming process.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than five four months after the submission of the amended NRP.</p> <p><u>A new implementing decisions for the Plan amendment adopted by the Council is needed only if the financial decision will be changed by more than [25%] of the first financial decision.</u></p> <p>The Council shall adopt the new implementing decisions, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>DE</p> <p>(Comments):</p> <p>We are critical of the fact that the Council is to have only four weeks to adopt the implementing decisions on the approval of the NRPPs.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>If COM has two months for observations and MS two months for amendments, four months after the amendment-request are not realistic. COM needs to prepare the implementing decision.</p> <p>Council cannot adopt every single Plan-amendment of 27 MS.</p> <p>Administrative burden needs to be reduced. A threshold is needed that Council has to approve amendments only, if the change of the financial decision is above [25%] of the total NRPP budget].</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four two months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal.</p> |

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

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

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

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| | <p>Based on the provisions of the Regulation, we can anticipate a considerable number of amendments to the NRP Plans. Therefore, the proposed involvement of the Council in the amendment of the Plans would not contribute to streamlining the process.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>[...] the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four three months after the submission of the amended NRP.</p> <p>LT</p> <p>(Comments):</p> <p>In order to ensure an efficient and timely process, we propose shortening the time up to three months. This would allow for faster decision-making while maintaining sufficient time for the Commission to carry out its assessment.</p> <p>LV</p> <p>(Drafting suggestions):</p> |

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

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| | <p>measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>MT</p> <p>(Comments):</p> <p>Justification: Based on the provisions of the Regulation, we can anticipate a considerable number of amendments to the NRP Plans. Therefore, the proposed involvement of the Council in the adoption — and especially in the amendment — of the Plans would not contribute to streamlining the process. On the contrary, it would further delay implementation by introducing an additional layer of approval and extending the respective decision-making procedure by one month.</p> <p>NL</p> |

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

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

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| | <p>PT questions the need to have a Council adoption, since we are under shared management and usually the decisions are only taken by the European Commission.]</p> <p>PT: COM’s decision should be taken within 3 months.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> |

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| | <p>RO</p> <p>(Comments):</p> <p>Based on the provisions of the Regulation, we can anticipate a considerable number of amendments to the NRP Plans. Therefore, the proposed involvement of the Council in the adoption — and especially in the amendment — of the Plans would not contribute to streamlining the process. On the contrary, it would further delay implementation by introducing an additional layer of approval and extending the respective decision-making procedure by one month.</p> <p>SE</p> <p>(Comments):</p> <p>Can the language be clarified. It is difficult to follow the first part of the paragraph.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of</p> |

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| | <p>measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>SI</p> <p>(Comments):</p> <p>Based on the provisions of the Regulation, a considerable number of amendments to the NRP Plans may be expected. In this context, the proposed involvement of the Council in the adoption — and particularly in the amendment — of the Plans may not facilitate a more streamlined process. Instead, it could risk delaying implementation by adding an additional layer of approval and extending the decision-making procedure.</p> <p>SK</p> |

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| | <p>(Drafting suggestions):</p> <p>5. Where the Commission has not submitted observations or where it is satisfied that any observations made have been duly taken into account, and where the amendment of the NRP Plan would result in a modification of the total Union contribution, of the amount of loan support or the list of measures or in one or more measures of the Plan no longer complying with the requirements referred to in Article 23(1) [Commission proposal and Council implementing decision], the Commission shall make a proposal for a new Council implementing decision in accordance with Article 23 no later than four months after the submission of the amended NRP. The Council shall adopt the new implementing decision, as a rule, within four weeks of the adoption of the Commission proposal. The Commission shall then immediately amend the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>SK</p> <p>(Comments):</p> <p>Based on the provisions of the Regulation, we can anticipate a considerable number of amendments to the NRP Plans. Therefore, the proposed involvement of the Council in the adoption — and especially</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>in the amendment — of the Plans would not contribute to streamlining the process. On the contrary, it would further delay implementation by introducing an additional layer of approval and extending the respective decision-making procedure by one month.</p> <p>As in the case of Article 23(7), there is no deadline for the Commission to adopt the financing decision. We suggest that the text be more precise.</p> <p>Furthermore, we continue to support the single-level approval of the NRP plan exclusively at the level of the Commission, as has been the case so far.</p> |
| | |
| <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures (regular revision), the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) <u>no later than four months after the submission of the amended NRP (splitted as follows : three months for the Commission’s assessment and one</u></p> |

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| | <p><u>month for Member State’s review on Commission’s observations).</u> [Commission proposal and Council implementing decision] accordingly.</p> <p>FR</p> <p>(Comments):</p> <p>Il convient de compléter cet article (aléas 5 et 6) pour clarifier les trois types de révisions possibles et les étapes de leur évaluation et de validation. Les éléments ajoutés sont indiqués dans la présentation de la Commission faite au cours du dernier sous-groupe PPNR sur le bloc 5 mais ne figurent pas dans cet article.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>BG</p> <p>(Comments):</p> |

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| | <p>See the above comment.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, <u>or</u> of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>CZ</p> <p>(Comments):</p> <p>CZ considers that a CID should be required only in cases where the amended Plan would entail a modification of the total Union contribution or of the amount of loan support. In all other cases, amendments should follow the established practice of Commission approval, ensuring a streamlined procedure and maintaining flexibility in NRP Plan implementation.</p> <p>DE</p> <p>(Comments):</p> |

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| | <p>We strictly object loan instrument.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>HU</p> <p>(Comments):</p> <p>See the above comment.</p> |

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| | <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>MT</p> <p>(Comments):</p> <p>Justification: As above</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly</p> <p>PT</p> |

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| | <p>(Comments):</p> <p>PT: see previous comments.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>RO</p> <p>(Comments):</p> <p>See the above comment.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the</p> |

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| | <p>financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>SI</p> <p>(Comments):</p> <p>See the comment above.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>Where the amendment of the NRP Plan would not result in a modification of the total Union contribution, of the amount of loan support or the list of measures, the Commission shall proceed directly by amending the financing decision referred to in Article 23(7) [Commission proposal and Council implementing decision] accordingly.</p> <p>SK</p> <p>(Comments):</p> <p>See comment above</p> |
| | <p>AT</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>5x Member States can make separate concurrent requests for amendments pursuant to paragraph 1 that pertain to different chapters or measures of the NRP Plan. Such requestst shall be processed in parallel.</u></p> <p><u>In duly justified cases, the Comission may process separte concurrent requests jointly. If multiple requests are processed jointly time limits in this article pertain to the request that has been submittet last.</u></p> <p>AT</p> <p>(Comments):</p> <p>Ongoing amendment procedures pertaining to one chapter should not block amendment requests pertaining to other chapters of the plan. It should, thus, be possible to process different amendment requests in parallel. Otherwise, the overall amendment process risks to become overly cumbersome and inflexible.</p> |
| <p>6. The adoption of the decisions referred to in paragraph 5 shall not be required:</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The adoption of the decisions referred to in paragraph 5 shall not be required <u>for minor revisions</u>:</p> |

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| | <p>FR</p> <p>(Comments):</p> <p>Il convient de compléter cet article (aléas 5 et 6) pour clarifier les trois types de révisions possibles et les étapes de leur évaluation et de validation. Les éléments ajoutés sont indiqués dans la présentation de la Commission faite au cours du dernier sous-groupe PPNR sur le bloc 5 mais ne figurent pas dans cet article.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>6. The adoption of the decisions referred to in paragraph 5 shall not be required:</p> <p>BG</p> <p>(Comments):</p> <p>See the above comment.</p> <p>MT</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>MT: 6. <u>In case of the following situation</u>, the adoption of the decisions referred to in paragraph 5 shall not be required. <u>The Member States will inform the Commission on the needed changes.</u></p> <p>MT</p> <p>(Comments):</p> <p>Justification: As above</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>6. <u>In case of the following situation</u>, the adoption of the decisions referred to in paragraph 5 shall not be required. <u>The Member States will inform the Commission on the needed changes.</u></p> <p>RO</p> <p>(Comments):</p> <p>See the above comment.</p> |
| | |
| <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member</p> | <p>FR</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| <p>States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> | <p>for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 10% of a target set out in the NRP Plan. Member States shall apply those the rules only <u>regarding the increase or decrease of a target</u> once per target and shall notify the Commission of such adjustments. <u>Commission approval is not required.</u> Such amendments shall be notified to the Commission and comply with all requirements of the NRP Plan, , including the revision of costing information;</p> <p>FR</p> <p>(Comments):</p> <p>Il convient de compléter cet article (aléas 5 et 6) pour clarifier les trois types de révisions possibles et les étapes de leur évaluation et de validation. Les éléments ajoutés sont indiqués dans la présentation de la Commission faite au cours du dernier sous-groupe PPNR sur le bloc 5 mais ne figurent pas dans cet article.</p> <p>Il s'agit de clarifier les dispositions de ce paragraphe et de permettre d'effectuer des modifications de performance mineures plusieurs fois dans la programmation.</p> <p>BE</p> |

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| | <p>(Drafting suggestions):</p> <p>(a) for corrections or adjustments of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, that do not lead to representing an increase or decrease of more less than 5-15% of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information</p> <p>BE</p> <p>(Comments):</p> <p>It should be easier to make relatively small adjustments to the targets set out in the plan, in order to avoid excessive administrative burdens and delays.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 10 5 % of a target set out in the NRP Plan. Member States shall may apply those rules only <u>more than</u> once per target, <u>provided each</u></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>adjustment is duly justified,</u> and shall notify the Commission of such adjustments.</p> <p>CZ</p> <p>(Comments):</p> <p>The 5% threshold for a possible change of a target without prior Commission approval is insufficient. It should also be possible to make such changes more than once per period and per target. Based on experience with the limited flexibility for changes during the implementation of the RRF and the complexity of the approval process, there is a clear need to increase flexibility for potential changes. Any conditions for such changes should be set realistically, reflecting the practical challenges of NRP Plan implementation and ensuring that the process remains manageable.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5% 15% of a <u>final milestone or</u> target set out in the NRP Plan. Member States shall apply those rules only <u>twice</u> once per</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>DE</p> <p>(Comments):</p> <p>The threshold for plan corrections should be higher to avoid administrative burden for minor changes of the plan.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5<u>10/15</u> % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>EE</p> <p>(Comments):</p> |

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| | <p>We propose to increase the percentage to at least up to 10, which the last two implementation periods have been considered a minor change. More changes than once, linked for example to MTR, might be needed.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information, <u>if deemed appropriate;</u></p> <p>EL</p> <p>(Comments):</p> <ol style="list-style-type: none"> 1. In several cases, a minor target adjustment does not necessarily entail a revision of the underlying costing. 2. The limitation “only once per target” does not seem to add substantive value, given that the 5% threshold already ensures the marginal nature of |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>the adjustment. Multiple amendments could, in principle, remain permissible provided that each amendment stays within that threshold.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan <u>or of the estimated cost of one or several measures.</u> Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information, <u>and shall be effective from the moment they are notified to the Commission;</u></p> <p>ES</p> <p>(Comments):</p> <p><u>The procedure for “minor” amendments should be streamlined and also referred to the estimated costs of the measures potentially affected.</u></p> <p>FI</p> <p>(Comments):</p> |

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| | <p>The percentage for minor adjustments should be calculated from a larger entity than a target, that would give more flexibility to the implementation of the plan.</p> <p>HR</p> <p>(Comments):</p> <p><u>HR comment: HR advocates for greater flexibility and a broader scope of minor adjustments to the NRPP, as the proposed amendment procedure is more elaborate than the current one and includes more stakeholders.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan,</p> <p><u>(b) amendments</u> representing an increase or decrease of less than <u>5 10 %</u> of a target set out in the NRP Plan,</p> <p><u>(c) amendments taking account of inflation.</u> Member States shall apply those rules only once <u>twice</u> per target, <u>once prior to the mid-term review and once after it</u>, and shall notify the Commission of such adjustments.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 510 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>IE</p> <p>(Comments):</p> <p><u>This provision is amended to provide for a tolerance of 10%.</u></p> <p><u>Following the principle of proportionality maximum flexibility should be provided.</u></p> <p>IT</p> <p>(Drafting suggestions):</p> |

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| | <p>For corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>IT</p> <p>(Comments):</p> <p>To allow more than one minor adjustment where justified, improving implementation flexibility over a long programming period.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 15 % of a target set out in the NRP Plan, Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> |

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| | <p>LT</p> <p>(Comments):</p> <p>The percentage is proposed at a higher level in view of established implementation practices and with the aim of avoiding frequent amendments, which generate additional administrative burden and complicate the overall implementation process. Moreover, in light of potential unforeseen challenges, it is important to ensure that MS retain adequate flexibility to adjust their targets.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>We would be in favour of increasing the 5%. In our opinion, 5% is too low.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 15 % of a target <u>or financial allocation of the measure</u> set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments.</p> |

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| | <p>Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>LV</p> <p>(Comments):</p> <p>LV suggest to increase the flexibility to adjust targets by 15%. In 2014-2020 period this threshold was used in performance framework to determine the sufficient level of implementation. Moreover, it is crucial that MS have more flexibility to transfer financial resources between measures not only adjust target values.</p> <p>Approach with notifications to CAP amendments as currently agreed during the Omnibus III (CAP) discussions should be taken over and explicitly reflected in the regulation.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: (a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than <u>15</u> % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all</p> |

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| | <p>requirements of the NRP Plan, including the revision of costing information;</p> <p>MT</p> <p>(Comments):</p> <p>Justification: Considering the current international dynamics and the volatility of variations from what is originally forecasted at programming stage, a 5% variation allowance is insignificant. This should be increased to 15%, allowing flexibility to address changes within reasonable risk and adjustment parameters (typically between 10-20%) without overburdening administrations with plan changes. Furthermore, only once per target does not allow for flexibility to adapt to emerging circumstances which might be difficult to project at initial programming stage.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than <u>5 up to 20%</u> of a target set out in the NRP Plan. Member States shall <u>can</u> apply those rules only once per <u>a few times up to 20%</u> and shall</p> |

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| | <p>notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>PL</p> <p>(Comments):</p> <p>It is impossible to precisely plan indicators and related expenditures at the time of the Plan development and therefore to ensure that the 5% threshold for allowable deviations is not exceeded during the implementation phase. Therefore, virtually every reform and investment implemented under the NRPP will require updating and approval by the European Commission through a Plan amendment. This means a significant administrative burden and creates the risk of delays in the implementation of reforms and investments.</p> <p>Flexible management of investment implementation may also require over-targeting to mitigate the risk of potential problems that could result in the target value not being achieved.</p> <p>In order to avoid frequent amendments of the Plan, we propose to increase the percentage up to 20%.</p> <p>PT</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Comments):</p> <p>PT: The percentage of flexibility provided (5%) could be increased.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 10 % of a target set out in the NRP Plan.</p> <p>Member States shall may apply those rules only once twice per target, <u>once prior to the mid-term review and once after it</u>, and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>SE</p> <p>(Comments):</p> <p>The scope of what can be notified should be expanded compared to the current proposal for keeping the administrative burden at a reasonable level. The proposal is more restrictive than current CAP provisions especially after the changes proposed in the latest omnibus.</p> |

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| | <p>Furthermore, the wording “of a target” is not clear enough.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than <u>5</u>10 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information.</p> <p>SI</p> <p>(Comments):</p> <p>We believe that an increase in the value of the target contributes to the quality of implementation of the NRP Plan, so in this case we would not limit the increase to 5 %. We think it makes sense that such changes are possible several times for a single target, as a series of smaller changes usually occur during the implementation of (especially longer-term) measures. Regulating such amendments through a lengthy procedure would impose an unnecessary significant administrative burden.</p> <p>SK</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(Drafting suggestions):</p> <p>(a) for corrections of a purely clerical or editorial nature or in the case of minor adjustments to the NRP Plan, representing an increase or decrease of less than 5 10 % of a target set out in the NRP Plan. Member States shall apply those rules only once per target and shall notify the Commission of such adjustments. Such amendments shall comply with all requirements of the NRP Plan, including the revision of costing information;</p> <p>SK</p> <p>(Comments):</p> <p>Simplification for the programming period 2028-2034 was promised and it should be delivered. Allowing increase or decrease of less than 5 % of a target and only once per target seems to us to be significantly inflexible compared to the programming period 2021-2027 and has the expected impact of the need for revision and approval of the Plan, which will slow down implementation. We demand a significantly higher level of flexibility. The rule “only once per target” is also too restrictive and more discussion is needed in this regard for a possible compromise.</p> |
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| Commission proposal | MS drafting suggestions and comments |
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| (b) for amendments in accordance with Article 31(7). | |
| | <p>HU</p> <p>(Drafting suggestions):</p> <p><u>6bis Member States may amend the content of the CAP Chapter by submitting requests for strategic amendment to the Commission or by notifying the amendment to the Commission. Strategic amendments shall be the following amendments of the CAP Chapter:</u></p> <p style="padding-left: 40px;">(a) <u>amendments introducing new interventions or deleting interventions</u></p> <p style="padding-left: 40px;">(b) <u>amendments that lead to changes of milestones or targets</u></p> <p><u>amendments of the target and financial plans</u></p> <p><u>Member States may, at any time, make and apply other amendments to the elements of the CAP Chapter, than strategic amendments. They shall notify those other amendments to the Commission by the time they start applying them and add them to the amended Plan submitted together with the next request for amendment. Where the Commission does not object to notified amendments within 30 working days from the submission of the notification, the amendments shall have legal effects from the date of the notification. The Commission shall object</u></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>to a notified amendment if it finds that the amendment is not compatible with this Regulation. The notified amendments to which the Commission made objections shall not have legal effects and Member State shall delete them from the amended Plan. The Member State may submit those amendments to the Commission for approval in a request for strategic amendment.</u></p> <p>HU</p> <p>(Comments):</p> <p>We must preserve the achievements of the Omnibus III simplification package, which introduced strategic amendments and other type of amendments that only require notification, not approval from the COM regarding the CAP Strategic Plans.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p><u>c) for adjustments representing an increase or decrease of a target arising exclusively from the impact of inflation or from the lack of demand in the case targets depending on market response.</u></p> |
| <p>7. Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout</p> | <p>FR</p> <p>(Drafting suggestions):</p> |

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| <p>its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> | <p>Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> <p>FR</p> <p>(Comments):</p> <p>La révision à mi-parcours prévue par l'article 25 est suffisante pour encadrer ce risque (alinéas 2 et 3a), nous proposons par conséquent de supprimer cet alinéa.</p> <p>La Commission pourrait-elle préciser dans quels cas cette disposition pourrait être mobilisée et justifier son intérêt en dehors de l'article 25 ?</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>7. Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and effective plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>AT</p> <p>(Comments):</p> <p>There should be no obligation for Member States to constantly monitor the total costs of the implemented projects as this would contradict the performance-based nature of the overall framework. Member States should strive to allocate the NRPP funds in a reasonable and efficient manner.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p><u>Should be merged with Art. 22 (2) (d):</u></p> |

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| | <p>Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible <u>when finalizing and amending the plan throughout its implementation</u>, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> <p>DE</p> <p>(Comments):</p> <p>Ensuring that the estimated total costs remain reasonable and plausible and amending the plans accordingly is contrary to the performance-based approach. This adds a cost-based component.</p> <p>This requirement should be merged with Art. 22 (2) (d) as the requirement for cost-effectiveness of the Plan should be taken into account while drafting the plans.</p> <p>Further explanations on practical implementation would be desirable. Does the Commission plan to issue additional guidelines?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> <p>HU</p> <p>(Comments):</p> <p>Non-defined terms.</p> <p>The constant need for adjustments would be an extreme and unnecessary burden for Member States, while hinders stability and predictability for beneficiaries.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>7. Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan where necessary in accordance with paragraph 1.</p> <p>PL</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>The agreed Plan should remain in effect unless the Member State deems part of it unfeasible (due to, for example, price increases) or plans additional measures. The European Commission adopts the value of the Plan's actions as part of the Plan's approval procedure. Therefore, the European Commission and the Member State agree at the outset on what is to be implemented and how much the European Commission will pay for it. However, paragraph 7 provides the European Commission with a basis for questioning the amounts once agreed upon. This assumption contradicts the results-based approach to Plan implementation and indicates that the Member State is to implement a project (not a Plan), which is settled through invoices.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: 7. Member States shall ensure that the amount of the estimated total costs of their NRP Plan remain reasonable and plausible throughout its implementation, in accordance with the principle of sound financial management, and request an amendment of their Plan <u>to increase or decrease the total costs</u> where necessary in accordance with paragraph 1.</p> <p>PT</p> |

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| | <p>(Comments):</p> <p>PT: It should be possible to increase or decrease the total costs of the Plan.</p> |
| | <p>PT</p> <p>(Drafting suggestions):</p> <p>8. Member States shall ensure that amendments affecting regional competences are prepared in effective partnership with the regional authorities concerned.</p> <p>PT</p> <p>(Comments):</p> <p>We suggest a new paragraph to mitigate the risk of mid-cycle amendments undermining regional planning or creating implementation conflicts.</p> |
| <p>8. The specific measures identified in the implementing decision referred to in Article 9(4) or subject to a decision imposing measures for the protection of the budget under Regulation (EU, Euratom) 2020/2092 shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to the</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The specific measures identified in the implementing decision referred to in Article 8(4) or 9(4) or subject to a decision imposing measures for the protection of the budget under Regulation (EU, Euratom) 2020/2092 shall</p> |

| Commission proposal | MS drafting suggestions and comments |
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| <p>fulfilment of the Rule of Law horizontal condition or to addressing the situation that led to the adoption of the aforementioned decisions.</p> | <p>not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to the fulfilment of the Rule of Law horizontal condition or to addressing the situation that led to the adoption of the aforementioned decisions.</p> <p>FR</p> <p>(Comments):</p> <p>La délégation soutient une harmonisation des deux procédures Etat de droit et Charte.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>[8. The specific measures identified in the implementing decision referred to in Article 9(4) or subject to a decision imposing measures for the protection of the budget under Regulation (EU, Euratom) 2020/2092 shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to the fulfilment of the Rule of Law horizontal condition or to addressing the situation that led to the adoption of the aforementioned decisions.]</p> <p>HU</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>This paragraph should be put in brackets due to its connection to the provisions included in the negotiating box.</p> <p>SE</p> <p>(Comments):</p> <p>Should paragraph (8) and (9) switch order, resulting in them appearing in the text in the same order as the articles they refer to. Right now, article 24(8) refers to article 9 and article 24(9) refers to article 8.</p> |
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| <p>9. The specific measures identified in the implementing decision referred to in Article 8(4) [Charter conditions] shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to:</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>The specific measures identified in the implementing decision referred to in Article 8(4) [Charter conditions] shall not be amended until the decision has been repealed, unless the amendment is intended to support measures that contribute to:</p> <p>HU</p> <p>(Drafting suggestions):</p> <p><u>9.</u> The specific measures identified in the implementing decision referred to in Article 8(4) [Charter conditions] shall not be amended until the</p> |

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| | <p>decision has been repealed, unless the amendment is intended to support measures that contribute to:</p> <p>HU</p> <p>(Comments):</p> <p>This paragraph should be put in brackets due to its connection to the provisions included in the negotiating box.</p> |
| <p>(a) the fulfilment of the Charter horizontal condition;</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>(a) the fulfilment of the Charter horizontal condition;</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(a) the fulfilment of the Charter horizontal condition;</p> |
| <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p> | <p>FR</p> <p>(Drafting suggestions):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>(b) addressing significant changes in the priorities of the Union, within the limit of 10 30% of the amounts associated with the specific measures concerned.</p> <p>DE</p> <p>(Comments):</p> <p>Article 24(9)(b) of the NRP Regulation allows too much leeway for the amendment of measures subject to an implementing decision according to Article 8 (4). This requires further refinement.</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p> |

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| | <p>NL</p> <p>(Drafting suggestions):</p> <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p> <p>NL</p> <p>(Comments):</p> <p>In the view of NL it should not be possible to re-allocate funds that are blocked due to non-fulfilment of the Rule of Law or Charter conditions, as long as these conditions have not been fulfilled.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(b) addressing significant changes in the priorities of the Union, within the limit of 30% of the amounts associated with the specific measures concerned.</p> <p>SE</p> <p>(Comments):</p> <p>We cannot see the logic behind this proposal.</p> |

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| <p>10. Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State. <u>An amendment to the plan may be submitted without waiting for the previous amendment to be approved, provided that the amendment does not relate to the same measures.</u></p> <p>FR</p> <p>(Comments):</p> <p>L'expérience du Plan stratégique national de la PAC montre que les modifications du Plan en cours de programmation sont des exercices très lourds, avec des délais d'élaboration, de soumission et de validation de presque 6 mois. La soumission uniformisée des modifications entre les chapitres serait une contrainte majeure et pourrait avoir pour conséquence de retarder les paiements aux bénéficiaires. Avec cette modification il est proposé de pouvoir procéder à une révision du PPNR par parties.</p> <p>HR</p> |

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| | <p>(Comments):</p> <p><u>HR question: Who determines if amendments directly affect parts of the NRPP? EC or MS? Does it have to be justified?</u></p> <p>LT</p> <p>(Drafting suggestions):</p> <p>Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State. It is possible to proceed several NRP Plan amendments independently at the same time, as long as they concern different chapters of the Plan.</p> <p>LT</p> <p>(Comments):</p> <p>It is necessary to enable parallel changes of different chapters of the Plan.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State. It is possible to proceed several NRP Plan amendments</p> |

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| | <p>independently at the same time, as long as they concern different chapters of the Plan.</p> <p>PL</p> <p>(Comments):</p> <p>Given the broad scope of the NRP Plan and very lengthy process of its amendments it is necessary to enable parallel changes of different chapters of the Plan.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>10. Member States shall not be required to review parts of the NRP Plan that are not directly affected by the intended changes proposed by the Member State. <u>It is possible to proceed with several NRP Plan amendments independently at the same time, as long as they concern different chapters of the Plan.</u></p> |
| | <p>ES</p> <p>(Drafting suggestions):</p> <p><u>NEW PARAGRAPH</u></p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p><u>11. Costs of the new or revised measures shall be eligible from the moment when the proposal for amendment is presented to the Commission.</u></p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT: <u>11. In duly justified cases, the amendment presented by the Member State may propose revised or new milestones and targets.</u></p> <p>PT</p> <p>(Comments):</p> <p>PT: It should be clear that the revision of milestones and targets is not limited to the mid-term review. PT suggests a new paragraph accordingly.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p><u>11. Expenditure which becomes eligible as a result of a programme amendment shall be eligible from the date of the submission of the corresponding request to the Commission.</u></p> <p>SK</p> <p>(Comments):</p> |

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| | <p>We request the addition of a provision authorizing the Member State to apply in the implementation the elements of the Plan that are the subject of an amendment to the Plan, from the date of submission of this amendment for assessment to the Commission, similarly to what is permitted by Article 63 point (7) of Regulation No. 2021/1060 of the European Parliament and of the Council.</p> |

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| <p><i>Article 25</i> <i>Mid-term review</i></p> | <p>AT (Drafting suggestions):</p> <p style="text-align: center;">Article 25 Mid-term review</p> <p>IE (Comments):</p> <p>As currently structured the regulation requires programming / reprogramming on at least three separate occasions. The programming period is fragmented into potentially differently focused parts, particularly when the remaining elements of the flexibility amount are due for programming and distribution.</p> <p>Separately, it is not clear how the mid-term review might interact with the interim evaluation set out in the Performance Framework Regulation. Mid-term review should be aligned with the Performance Framework interim evaluation, limited in scope, and must respect ring-fenced elements unless transparent reprogramming criteria are met and allow for flexibility in programming/reprogramming.</p> <p>Overlap and duplication with the Performance Framework interim evaluation; uncertainty whether direct income support/ringfenced CAP elements are within reprogramming scope. Deadline for amended plans</p> |
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| | <p>(31 March 2031) is fixed but may be impractical if implementation delays occur.</p> <p>IT</p> <p>(Comments):</p> <p>The mid-term review under Article 25 is closely linked to the procedure for allocating the flexibility amount provided for in Article 14. The new system introduces, for each Member State, a "flexibility amount" equal to 25% of the total Union financial contribution, which is not programmed ex ante in the NRP Plan, but remains in a national reserve. This reserve can be mobilised only when specific conditions are met and at predetermined time points, thus constituting a centralised and conditional reallocation mechanism.</p> <p>In particular, three fifths of the flexibility amount (i.e. 15%) are earmarked for the mid-term review to be carried out by 31 March 2031, which becomes the main instrument for the strategic reprogramming of resources during the 2028–2034 cycle. Through this review, Member States may propose revisions or the introduction of new measures, updates of estimated total costs and targets.</p> <p>The new model represents a structural shift from the current cohesion policy framework. In the 2021–2027 period, the performance reserve was</p> |

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| | <p>embedded within individual programmes and its use was conditional on the achievement of specific performance results, with ex post reallocation across priorities of the same programme. Under the proposed system for the NRP Plans the reserve becomes a single national reserve applied to the entire National and Regional Partnership Plan (NRPP), managed in a unified manner and intended not only for the strategic revision under Article 25 (mid-term review), but also for activating crisis-response measures under Article 34, with the risk that a significant share of resources may be diverted away from the core objectives of the various policies included in the Plan.</p> |
| | <p>SK</p> <p>(Comments):</p> <p>The described mid-term review procedure is formulated strictly. We recommend that the Commission define the above procedures more softly, e.g. in the event that the estimated total costs are not revised, new measures are not proposed, or existing measures are not revised, etc. (article 18 (4) Regulation No. 1060/2021)</p> |
| <p>1. The Member State shall review their NRP Plans, taking into account the following elements:</p> | <p>FR</p> <p>(Comments):</p> |

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| | <p>La révision à mi-parcours s'applique-t-elle à l'ensemble des chapitres ou sera-t-elle facultative pour certains chapitres ?</p> <p>AT</p> <p>(Comments):</p> <ul style="list-style-type: none"> . • In our view, a mid-term review does not offer any substantial added value. • This is because the achievement of objectives is determined on an ongoing basis through performance reviews and, if necessary, can be responded to with changes to the plan. This also applies to the programming of flexibility amounts. • In our view, removing this requirement would therefore lead to less bureaucracy without jeopardizing the fundamental focus on objectives. • If a mid-term review is nevertheless carried out, greater flexibility in terms of timing would appear to be appropriate, i.e., instead of specifying a specific date, the effective start date (e.g., approval of the national programs) + 3 years could be defined as the date of the mid-term evaluation. <p>BE</p> |

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| | <p>(Drafting suggestions):</p> <p>1. The Member State shall review their NRP Plans, <u>in accordance to their institutional characteristics</u>, taking into account, <u>where relevant</u>, the following elements:</p> <p>DE</p> <p>(Comments):</p> <p>Some of these following elements like the socio-economic situation of the Member State or region concerned, with special emphasis on regional and territorial needs, or main results from evaluations or SWOT analysis, should also apply for the programming of the NRPP under Art. 22 (1) b.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>1. <u>The Member State shall proportionally review their NRP Plans, taking into account, where relevant, the following elements:</u></p> <p>HR</p> <p>(Comments):</p> <p>HR propose to amend point 1 by adding: “<i>where relevant</i>”.</p> |

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| | <p>HU</p> <p>(Comments):</p> <p>Based on the experiences of the MTR of cohesion programmes in the current programming period, we do not support the mandatory MTR, especially not with the proposed scope. A mandatory procedure seems unnecessary also because Member States would have the opportunity to initiate the amendment of their Plans anytime during the period.</p> <p>The review should serve as a technical adjustment tool, not as a new negotiation round.</p> <p>It should focus on updating key parameters — financial implementation, milestones achieved, and major contextual changes — rather than reopening the entire architecture of the NRPP. “Normal” amendments to the Plans should not be postponed or affected by the mere fact that a mid-term review will take place later. The two processes must remain distinct and should not block each other.</p> <p>To ensure credibility, the same procedural guarantees as for the approval phase should apply — including a clear deadline for Commission action and the possibility of judicial review in case of inaction.</p> |

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| | <p>This would preserve predictability and accountability while keeping the process genuinely streamlined.</p> <p>IT</p> <p>(Comments):</p> <p>Article 25 (Mid-term review) significantly expands the range of factors that Member States must take into account for the mid-term review. Compared with the elements set out in Article 18 of the CPR — namely the new challenges identified in the 2024 Country-Specific Recommendations, progress in implementing the NECP, implementation of the European Pillar of Social Rights, the national or regional socioeconomic situation, evaluation findings and progress towards intermediate targets — the proposal introduces additional dimensions of analysis, specifically:</p> <ul style="list-style-type: none"> • progress made towards the achievement of the measures, with particular attention to any significant difficulties encountered in the implementation of the NRP Plan; • important projects of common European interest (IPCEIs) and projects that have been granted a European label; • the occurrence of major crises affecting implementation; |

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| | <ul style="list-style-type: none"> the need to ensure continuous compliance with the horizontal conditionalities related to the rule of law and the Charter of Fundamental Rights, taking into account country-specific challenges highlighted in the Rule of Law Report and the European Semester. <p>The inclusion of these new factors, combined with the maintenance of the dual Commission–Council decision-making level for Plan revision, makes the mid-term review process more complex and burdensome than the current CPR procedure. This results in potentially higher administrative costs and an increased risk of lengthier revision timelines, which runs counter to the objective of making the new instrument more flexible and responsive to emerging needs.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>The Member State shall review their NRP Plans, taking into account, <u>where relevant</u>, the following elements:</p> <p>PL</p> <p>(Comments):</p> <p>PL proposes to amend point 1 by adding: “where relevant”.</p> |

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| (a) the challenges identified in accordance with Article 22(2), points (a), (b) and (c) [Requirements of the Plan]; | |
| | |
| (b) the socio-economic situation of the Member State or region concerned, with special emphasis on territorial needs, taking into account any major negative financial, economic or social development; | <p>DE</p> <p>(Drafting suggestions):</p> <p>(b) the socio-economic situation of the Member State or region concerned, with special emphasis on territorial needs, taking into account any major negative financial, economic, or social <u>and environmental</u> development;]</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(b) the socio-economic situation of the Member State or region concerned, with special emphasis on territorial needs, taking into account any major negative financial, economic or social development;</p> <p>NL</p> <p>(Comments):</p> |

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| | Positive financial, economic or social developments could also be considered relevant when reviewing a plan. ‘Major negative’ would also require further definition. Therefore suggestion to delete. |
| | |
| (c) the main results of relevant interim assessment reports; | <p>CZ</p> <p>(Drafting suggestions):</p> <p>(c) the main results of relevant interim assessment reports <u>evaluations</u>;</p> <p>CZ</p> <p>(Comments):</p> <p>For the mid-term review, only evaluations that are available in a timely manner can be used, regardless of whether an interim evaluation is among them. Given the potential timing mismatch between the MTR deadline (31 March 2031) and the results of the required interim evaluation (within three years from the start of implementation), it is appropriate to retain the wording used in the 2021–2027 General Regulation for the mid-term review, which refers to ‘the main results of relevant evaluations’.</p> <p>HR</p> <p>(Drafting suggestions):</p> |

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| | <p>HR dragging suggestions:</p> <p>c) <u>the main results</u> of relevant interim assessment reports <u>of relevant interim assessment reports of available evaluations;</u></p> <p>HR</p> <p>(Comments):</p> <p>HR proposes amend to point 1, paragraph c by deleting the “<i>of relevant interim assessment</i>”</p> <p>HR comment: The term "interim assessment reports" in Article 25(1)(c) lacks clarity. It would be beneficial to explicitly state whether these reports are expected to be prepared by the Member States or by the Commission, and whether they are to be understood as formal EC evaluations under Article 10 of the PF Regulation or as other forms of implementation monitoring by MS. Given the importance of these reports in informing the mid-term review and potential reprogramming, greater specification on their nature, authorship, and expected methodology would improve legal certainty and consistency in interpretation across Member States.</p> <p>HU</p> <p>(Comments):</p> |

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| | <p>The results of the interim evaluations would surely not be available by 2031.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>Proposal: ... of relevant interim assessment reports, <u>if available;</u></p> <p>PL</p> <p>(Drafting suggestions):</p> <p>the main results of relevant interim assessment reports <u>of available evaluations;</u></p> <p>PL</p> <p>(Comments):</p> <p>The term "interim assessment reports" in Article 25(1)(c) lacks clarity. It would be beneficial to explicitly state whether these reports are expected to be prepared by the Member States or by the Commission, and whether they are to be understood as formal EC evaluations under Article 10 of the PF Regulation or as other forms of implementation monitoring by MS. Given the importance of these reports in informing the mid-term review and potential reprogramming, greater specification on their nature,</p> |

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| | authorship, and expected methodology would improve legal certainty and consistency in interpretation across Member States. |
| (d) the progress towards the achievement of measures, taking into account major difficulties encountered in the implementation of the NRP Plan; | |
| | |
| (e) Important Projects of Common European Interest (IPCEI) and projects that have been awarded a Seal; | <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>e) <u>Important Projects of Common European Interest (IPCEI) and projects that have been awarded a Seal; if they are directly related to the objectives of the relevant chapter;</u></p> <p>HR</p> <p>(Comments):</p> <p>HR proposes amend to point 1, paragraph e by adding: “<i>if they are directly related to the objectives of the relevant chapter</i>”;</p> <p>HU</p> |

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| | <p>(Drafting suggestions):</p> <p>(e) — Important Projects of Common European Interest (IPCEI) and projects that have been awarded a Seal;</p> <p>HU</p> <p>(Comments):</p> <p>Why would this trigger a mid-term? Their financing is allowed continuously....</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>Important Projects of Common European Interest (IPCEI) and projects that have been awarded a <u>Seal if they are directly related to the objectives of the relevant chapter;</u></p> <p>PL</p> <p>(Comments):</p> <p>PL proposes amend to point 1, paragraph e by adding: “if they are directly related to the objectives of the relevant chapter”;</p> |
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| (f) occurrence of any crisis; | |
| (g) the need to ensure continuous compliance of the Rule of Law and the Charter horizontal conditions in the implementation of the Plan, taking into consideration in particular the country-specific challenges identified in the context of the Rule of Law Report and the European Semester. | <p>HU</p> <p>(Drafting suggestions):</p> <p>(g) — the need to ensure continuous compliance of the Rule of Law and the Charter horizontal conditions in the implementation of the Plan, taking into consideration in particular the country-specific challenges identified in the context of the Rule of Law Report and the European Semester.</p> <p>HU</p> <p>(Comments):</p> <p>This provision should not depend on newly emerged, non-binding recommendations.</p> |
| | <p>PL</p> <p>(Drafting suggestions):</p> <p><u>By way of derogation from the first subparagraph, Member State may decide that annual interventions referred to in Article 35(1), points (a) to (d), (f) and (g) may be excluded from the mid-term review of the NRP.</u></p> |

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| | <p>PL</p> <p>(Comments):</p> <p>There is a need for flexibility as regards certain, annual payments to farmers. Experience gained during implementation of CAP Strategic Plan in the years 2023-2025 proved that these payments should be treated differently.</p> |
| <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031.</p> | <p>FR</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031. <u>Depending on the outcome, the review can affect some or all chapters of the Plan.</u></p> <p>FR</p> <p>(Comments):</p> <p>La délégation souhaite que le règlement soit explicite sur la possibilité de réviser seulement certains chapitres du Plan.</p> |

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| | <p>BE</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional <u>or revised</u> measures, <u>where relevant</u>, to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031.</p> <p>BE</p> <p>(Comments):</p> <p>It should not be an obligation to introduce additional measures. Measures could also be revised or strengthened, depending on what is the most relevant for the Member State.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit the outcome of the mid-term review <u>including a proposal for the allocation of the flexibility amount and, where the outcome shows it necessary an amended NRP Plan presenting a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2)</u>, including a</p> |

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| | <p>review of the estimated total costs of the measures covered by the Plan by 31st March <u>June</u> 2031.</p> <p>BG</p> <p>(Comments):</p> <p>1. The process now is too prescriptive and doesn't reflect situations where the Mid-Term review shows that an amendment of the Plan would not be necessary. We consider it necessary that the relevant mechanism for implementation review and distribution of the reserve is objective, transparent and explicit enough and is based on the principles of partnership and dialogue between the Commission and Member States, following a procedure similar to the set out in Regulation (EU) 2021/1060.</p> <p>Furthermore, according to art. 22.2.d, MS should actually include the amounts under the flexibility reserve in their initial estimates of the costs for implementation of the plans and the measures implemented therein that they present with the plans already at the beginning. In this case and in order to avoid ambiguity with the present para, it should be clear enough that a procedure for amendment of the Plan with a new list of measures and estimated total costs would be necessary only if the outcome of the Mid-Term Review shows it necessary.</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>2. The deadline for the mid-term review should be extended, as the proposed one comes at too early a stage of implementation.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal <u>on</u> for additional measures, to be supported by the <u>allocation of the</u> flexibility amount referred to in Article 14(2). <u>The review shall be submitted</u> by 31 March 2031 <u>30 June 2031</u>.</p> <p>CZ</p> <p>(Comments):</p> <p>On the basis of the information provided to date by the EC, the flexibility amount is not required to be allocated solely to new measures; rather, it may also be applied to measures already included in the Plan. The current wording may therefore be misleading. Moreover, the scope of the MTR is further clarified in paragraph 3, which explicitly states that it may concern new measures.</p> |

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| | <p>Based on extensive experience with the mid-term review in the 2021–2027 period, it is necessary to shift the submission deadline from 31 March 2031 to at least 30 June 2031. There is no clear rationale for setting the deadline in March, and in practice, the mid-term reviews of several Member States have been extended until the end of 2025 at the request of the Commission, following the Communication of 1 April 2025. The main reason for extending the deadline is the limited time available to process the review using the most recent data, which are only available by 15 February of the relevant year (see Article 59). Maintaining a March deadline would require drafting the review on predicted values, making the MTR process significantly more complex and time-consuming.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review for each chapter and the Plan as a whole, including a review of the estimated total costs of the measures covered by the Plan and a proposal for the final allocation of additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031.]</p> <p>DE</p> |

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| | <p>(Comments):</p> <p>As a first step, only the mid term assessment shall be submitted to COM.]</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031 <u>2032</u>.</p> <p>EE</p> <p>(Comments):</p> <p>Based on the practice of the current period, we propose to set the date of the mid-term review at a later stage. In this case, there is more data and results to estimate the implementation progress.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including, where relevant, a review</p> |

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| | <p>of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2032⁴.</p> <p>ES</p> <p>(Comments):</p> <p><u>Three years from the start of the MFF is not enough to properly and comprehensively review the program and thus present the outcome of such a mid-term review.</u></p> <p><u>ES considers that by 2032 there will be a much more robust ground for assessment (this has been shown by the experience of managing all funds, but more specifically home affairs, fisheries and ESF funds)</u></p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>2. <u>The Member State shall shall may submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by <u>presenting the outcome of the mid-term review, including a review of the estimated total costs of</u></u></p> |

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| | <p><u>the measures covered by the Plan and a proposal for additional measures to be</u> <u>if review showed a significant deviation from the goals or the need to use the reserve supported by (the flexibility amount) referred to in Article 14(2) at latest by 3011 March 2031.</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes amend to point 2 by deleting the “shall” and by replacing “presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported” with the “if review showed a significant deviation from the goals or the need to use the reserve”. Also by replacing “31” with “30”.</u></p> <p><u>HR comment: HR expresses concern about the earlier date of the mid-term review comparing to the current MFF, as it is possible that milestones and targets will not be achieved by that time, consequently delaying the payment of financial support.</u></p> <p><u>There appears to be a potential misalignment between the deadline for submitting the amended NRP Plan by 31 March 2031 and Article</u></p> |

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| | <p><u>10(2) of the Performance Framework Regulation, which requires the Commission to publish implementation reports no later than four years after the start of implementation. Clarification is needed as to whether the Commission’s implementation reports under Article 10(2) are intended to inform the mid-term review under Article 25 or are separate reporting requirements.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>2. <u>If the Member State concludes that an amendment is necessary,</u> The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31³⁰ March <u>June</u> 2031.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit, <u>if necessary,</u> an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a</p> |

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| | <p>proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March October 2031.</p> <p>IE</p> <p>(Comments):</p> <p>This provision is amended to provide that an amended NRP Plan be submitted only where necessary – rather than by default - noting our previous proposal that the Member State can plan / indicatively programme the flexibility amount and the Commission proposal in it's draft NRP regulation that the flexibility amount be included in costings.</p> <p>From IE experience of the CAP Strategic Plan period, March 2031 is very early to have analysed the performance of the initial years of the implementation, identified appropriate amendments, consulted with the partners and agreed on changes. In that context the provision is amended to provide for October 2031.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional</p> |

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| | <p>measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031 <u>30 June 2032</u>.</p> <p>LT</p> <p>(Comments):</p> <p>We propose extending the deadline for MTR in order to have a more time for the Plan amendment.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>LU: not every mid-time review will lead to an amended NRPP. (2) should be adopted and “Shall” replaced by “may”.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 20321.</p> <p>LV</p> |

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| | <p>(Comments):</p> <p>LV suggests moving mid-term review requirements one year later – to 2032 as there are significant delays in implementation for 2021-2027 investments and new regulation require substantial changes for planning requirements (Cohesion Policy and Recovery and Resilience Facility approaches mixed together) and requirements of NRP Plan are far more detailed than previously for Partnership Agreements and RRF plans.</p> <p>LV position on this provision is closely linked to the size of flexibility amount and length of eligibility period.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>MT: 2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31st March <u>June</u> 2031.</p> <p>MT</p> <p>(Comments):</p> |

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| | <p>Justification: The deadline for the mid-term review should be extended, as the proposed one comes at too early a stage of implementation.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March <u>30 June</u> 2031.</p> <p>PL</p> <p>(Comments):</p> <p>There is no need to indicate a cost review. The review covers the entire Plan and should be carried out to the extent necessary in the Member State's assessment.</p> <p>The deadline for the mid-term review should be extended, as the proposed one comes at a too early stage of implementation.</p> <p>PT</p> <p>(Drafting suggestions):</p> |

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| | <p>PT: 2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March 2031 2032.</p> <p>PT</p> <p>(Comments):</p> <p>PT: We do not understand the reasons to undergo the MTR in 2031, one year earlier than in the 2021-2027 programming period (although there was general recognition that the 2021-2027 MTR took place too early).</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>2. The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March June 2031.</p> <p>RO</p> |

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| | <p>(Comments):</p> <p>The deadline for the mid-term review should be extended, as the proposed one comes at too early a stage of implementation.</p> <p>SE</p> <p>(Comments):</p> <p>It is important that the period for preparing the MTR does not coincide with the work with the final report for the period 2021-2027.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>The Member State shall submit an amended NRP Plan presenting the outcome of the mid-term review, including a review of the estimated total costs of the measures covered by the Plan and a proposal for additional measures to be supported by the flexibility amount referred to in Article 14(2) by 31 March <u>30 June 2031</u>.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>We request to postpone the date for submission of the amended NRP Plan presenting the outcome of the mid-term review to <u>30 June 2031</u>.</p> |

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| | <p>SK</p> <p>(Comments):</p> <p>Given to the new implementation setup which may cause delay in the implementation we would like to propose to postpone the deadline for submission of the outcome of the mid-term review, along with the amended NRP Plan.</p> |
| | <p>DE</p> <p>(Drafting suggestions):</p> <p><u>3) Following the mid-term review of the NRP plan or chapters, if deemed necessary and for programming the flexibility amount according to Art. 14, the Member State shall submit an amended Plan or chapters to the Commission.]</u></p> <p>DE</p> <p>(Comments):</p> <p>As a second step, if necessary, a revised Plan shall be submitted to COM.]</p> |
| <p>3. The amended NRP Plan shall include the following:</p> | <p>BG</p> <p>(Drafting suggestions):</p> |

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| | <p><u>Where the outcome of the mid-term review referred to in paragraph 2 shows that an amendment of a Plan is necessary based on the assessment of the elements referred to in Paragraph 1, the amended</u></p> <p>NRP Plan shall include the following:</p> <p>BG</p> <p>(Comments):</p> <p>See comment above</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p><u>3. The amended NRP Plan shall include depending on the scope of the change the following the following:</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes amend to point 3 by deleting “the following”.</u></p> <p>PL</p> <p>(Drafting suggestions):</p> |

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| | <p>The amended NRP Plan shall include, depending on the scope of the change: the following:</p> <p>PL</p> <p>(Comments):</p> <p>PL proposes amend to point 3 by deleting <i>“the following”</i>.</p> |
| <p>(a) revised or new measures;</p> | <p>BE</p> <p>(Drafting suggestions):</p> <p>(a) revised or new measures, <u>where relevant</u>.</p> <p>BE</p> <p>(Comments):</p> <p>If the mid-term review results in the assessment that no adjustments in the measures is necessary, it should also be possible to keep the Plan as initially foreseen.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>a) revised or new measures; <u>where relevant</u></p> |

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| | <p>NL</p> <p>(Comments):</p> <p>Suggestion to add ‘where relevant’. The plan should be able to contain existing measures if there is no reason for revision.</p> |
| <p>(b) the updated estimated total costs of the Plan and the flexibility amount requested;</p> | <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>b) <u>the updated estimated assesment total costs of the Plan and the flexibility amount requested total costs of the Plan and the flexibility amount requested; at the chapter level (instead of individual measures) and the flexibility amount the amount of the reserve proposed to be activated;</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes amend to point 3, paragraph b by deleting ‘total costs of the Plan and flexibility amount request’, and by adding: “at the</u></p> |

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| | <p><u><i>chapter level (instead of individual measures) and the flexibility amount proposed to be activated;</i></u></p> <p>PL</p> <p>(Drafting suggestions):</p> <p>b) the updated estimated total costs of the Plan and the flexibility amount requested;</p> <p>PL</p> <p>(Comments):</p> <p>There is no need to indicate a cost review. The review covers the entire Plan and should be carried out to the extent necessary in the Member State's assessment.</p> |
| (c) revised or new milestones and targets. | <p>BE</p> <p>(Drafting suggestions):</p> <p>(c) revised or new milestones and targets, <u>where relevant.</u></p> <p>BE</p> <p>(Comments):</p> |

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| | <p>If the mid-term review results in the assessment that no adjustments in the milestones or targets is necessary, it should also be possible to keep the Plan as initially foreseen.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>c) <u>revised or new milestones and targets, for revised measures only</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes amend to point 3, paragraph c by adding: “for revised measures only”</u></p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(c) revised or new milestones and targets, <u>where relevant</u></p> <p>NL</p> <p>(Comments):</p> |

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| | <p>Suggestion to add ‘where relevant’. The plan should be able to contain existing measures if there is no reason for revision.</p> |
| | |
| <p>4. The revised Plan shall be approved in accordance with Article 24 [on amendment].</p> | <p>HR</p> <p>(Drafting suggestions):</p> <p>HR drafting suggestions:</p> <p>4. <u>The revised Plan shall be approved in accordance with Article 24 [on amendment]. If the amendments are limited to the reallocation of financial resources or minor technical adjustments without affecting the overall objectives of the Plan, the Commission shall approve the amendments by a shortened written procedure within 2 months.</u></p> <p>HR</p> <p>(Comments):</p> <p><u>HR proposes amend to point 4 by adding: “If the amendments are limited to the reallocation of financial resources or minor technical adjustments without affecting the overall objectives of the Plan, the Commission shall approve the amendments by a shortened written procedure within 2 months.”</u></p> |

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| | <p>PL</p> <p>(Drafting suggestions):</p> <p>The revised Plan shall be approved in accordance with Article 24 [on amendment]. If the amendments are limited to the reallocation of financial resources or minor technical adjustments without affecting the overall objectives of the Plan, the Commission shall approve the amendments by a shortened written procedure within 2 months.</p> <p>PL</p> <p>(Comments):</p> <p>We propose a shorter procedure for minor changes.</p> |
| | <p>FR</p> <p>(Drafting suggestions):</p> <p><u>5. By way of derogation from paragraph 1 of this Article, interventions referred to in Article 35(1) points (a) to (h), (j), (k) and (r) [types of intervention] and which are not taken into account in the flexibility amount in accordance with Article 14(1), shall not be subject to the mid-term review.</u></p> <p>FR</p> |

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| | <p>(Comments):</p> <p>S'agissant de la PAC, et compte tenu du fait que la plupart de ses mesures ne sont pas soumises à la flexibilité, la pertinence d'une telle révision interroge fortement et l'expérience montre sur la PAC qu'il est indispensable d'assurer la stabilité des dispositifs, tant pour les bénéficiaires que pour les organismes payeurs. Cette modification vise à rendre facultative cette révision pour les mesures qui ne sont pas soumises à la flexibilité.</p> |
| Annexes | |
| | <p>AT</p> <p>(Comments):</p> <p>An overview of the financial contributions of the plan to the specific objectives of Art. 3 would be useful.</p> <p>An overview of the planned contributions of the measures to the objectives under Article 22(q, r), climate and environmental objectives, and social spending objectives would be useful.</p> |
| Annex V | <p>FR</p> <p>(Comments):</p> |

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| | <p>La France a une réserve d'examen générale sur cette annexe, dont le contenu ne peut être stabilisé qu'à l'issue des discussions sur les articles. Il conviendra donc d'en ajuster le contenu en fonction. Dans ce contexte, la France ne propose pas de modifications de cette annexe à ce stade mais le fera lorsque les discussions auront suffisamment avancé.</p> <p>La France s'interroge néanmoins sur l'absence de référence également aux objectifs spécifiques des trois règlements sectoriels sur les instruments financiers JAI, afin de garantir leur intégration dans le PPNR, si ceux-ci ne sont pas inclus dans les objectifs spécifiques mentionnés à l'article 3 du règlement PPNR.</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>2.3. Detailed information on who and what is targeted by the measure;</p> <p>For CAP interventions, the analysis should include:</p> <ul style="list-style-type: none"> – A description of the notions and elements necessary to ensure that CAP income support interventions referred to in Article X [Types of support] and other CAP interventions are targeted to those most in need of CAP |

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| | <p>support, including the notions of “agricultural activity”, “agricultural area”, “eligible hectare”, “farmer”, “young farmer” and “new farmer”.</p> <p>– A description of the targeting of the selected sectors and groups and complementarity with other CAP interventions and measures set out in the Plans.</p> <p>3.1. The following structured information:</p> <ul style="list-style-type: none"> - Monitorability of eligibility conditions (via AMS) - Farming practices covered (where applicable) <p>5. Milestones, targets and timeline</p> <p>Table containing outputs and timeline for interventions:</p> <p>Reference: Reference: Article 22(2), point (e)</p> <p>Timeline for achievement: Quarter/Year</p> <p>AT</p> <p>(Comments):</p> <p>Chapter 5: The Table “Milestones, targets and timeline” contains too many columns and will be very hard to read. The information should be split across several tables.</p> |

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| | <p>Table containing outputs and timeline for interventions:</p> <p>This (data like ‘uniform or average’, ‘min./max’ ‘value per unit for output’ per output indicator) sounds very much like the system of “planned unit amounts” of CAP 21-27. For the CAP 21-27 the EC proposes to abolish the system of planned unit amounts and the performance clearance after having experienced 2 years of administrative burden and no added value. Therefore, we seriously question the proposed requirements (data points).</p> <p>Chapter 1.11: A proposal was submitted to the Council Working Party (CAP Regulation) as regards phrasing of priority areas under Art. 4 in a more consistent and concise manner. This structure should be reflected here.</p> <p>These notions are already defined in Art. 4 (Definitions). What should be described here?</p> <p>Quarterly disclosure not possible and therefore deletion.</p> <p>BE</p> <p>(Comments):</p> <p>Annex V should be a direct translation of art. 22(1) and shouldn’t lead to additional requirements. Further discussions on this text are necessary but</p> |

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| | <p>before this can happen, we need clarity on all the elements which it covers. The references should also be brought in line with the article.</p> <p>The Plan itself should focus on the strategic elements, and operational elements should be included in documents managed by each managing authority.</p> <p>Section 3.5 Knowledge exchange The proposed number of characters is not sufficient, having regard to the requirements of Article 20 of the CAP Regulation</p> <p>Section 5 « Milestones, targets and timeline”: we propose the inclusion of a larger number of precise references to the Performance Regulation.</p> <p>CZ</p> <p>(Drafting suggestions):</p> <p>Chapter 3 CAP interventions - It appears that the reference to Article 22(1)(e) is likely incorrect.</p> <p>Tables in chapter 3 we ask for harmonising the terminology in tables - measure/ intervention.</p> <p>Our unclear understanding based on the draft regulation is that "Sustainable urban development" refers to targeted and separately monitored support for the development of urban areas, which is, however, not solely implemented</p> |

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| | <p>through the Integrated Territorial Investment (ITI) instrument, and which contributes to balanced territorial development, taking into account environmental, social, and economic aspects of urban life.</p> <p>Change of terminology in Table 1.9: from "integrated territorial development in cities, urban and rural areas" and "integrated territorial investments" to "ITI (Integrated Territorial Investments)".</p> <p>Addition/explanation of definition: In Table 1.9, “integrated territorial development is equivalent to integrated territorial and urban development” as referred to in Article 74 of the NRPP – add a note or explanation.</p> <p>CZ</p> <p>(Comments):</p> <p>CZ is of the opinion that a number of references to article 22 in the NRPP template are incorrect.</p> <p>Table 1.5, point i): We draw attention to the fact that the term 'sustainable urban development' is not clearly defined in the draft regulation. Is this term used for territorial support for urban areas not implemented through the ITI instrument (areas not tackled with 1.5, point j), or do points (i) and (j) overlap?</p> |

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| | <p>Table 1.9 – Different terminology is used for the same purpose in Annex V (in Table 1.9 “integrated territorial development in cities, urban and rural areas”, in Table 1.5 “integrated territorial investment”). There is a <u>terminological inconsistency</u> between Tables 1.5 and 1.9, as well as between Articles 22(h) and (i) and Article 74. We propose <u>harmonising the terminology</u> – using ITI (Integrated Territorial Investments) as the standard term, or alternatively defining ITI as a subset of the broader terms “integrated territorial development in cities, urban and rural areas” and “integrated territorial and urban development.”</p> <p>Table 1.9 – We propose including a definition of the term “integrated territorial development” stating that it is equivalent to “integrated territorial and urban development” as referred to in Article 74 of the NRPP.</p> <p>DE</p> <p>(Comments):</p> <p>DE assumes that information from the thematic chapters is automatically transferred to the upstream strategic chapters in the SFC system.</p> <p>However, duplications in the plan must be avoided in principle.</p> |

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| | <p>In the sense of a performance-oriented approach, the information here should be limited to a “need to know”.</p> <p>A further streamlining of the reporting requirements is needed to a reporting minimum to reduce administrative burden and to have concise NRPPs.</p> <p>In our understanding, Milestones/targets are shall be based on output-indicators. Therefore, it is unclear why there are two separate tables in Annex V to report on milestones/targets and output indicators separately. Shouldn’t the table for output indicators been replaced by a table for result indicators?</p> <p>In correspondence to adding a horizontal principle on the need to pursue the objectives of the Fund in line with the objective of promoting sustainable development (see DE comment on Art. 7, Block 2), a new No. 2.4 should be added, “compliance with the principle of funding in line with sustainable development”.</p> <p>A new field should be added for an explanation on the contribution to the spending targets for climate and environment as well as the social spending target.</p> |

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| | <p>Question regarding Table 2.7: Is it correct that Table 2.7 “Territorial dimension of the measure” in Annex V only lists the codes of the measure in accordance with Article 14(4) and Annex II [Performance Regulation] and therefore does not list any financial or material targets?]</p> <p>ES</p> <p>(Drafting suggestions):</p> <p><u>In 1.8 of the Annex, there is an error in the reference to Article 22, paragraph 2, letter i), item iii)</u></p> <p><u>The reference should be to</u></p> <p><u>Article 22, paragraph 2, letter i), item iii</u></p> <p>FI</p> <p>(Comments):</p> <p>Annex V, point 6 (verification of the achievement of milestones, targets and outputs): it is not clear what is meant by document(s)/system that will be used to verify the achievement of the result or condition. Detailed drafting proposals will be possible once the structure is fully known.</p> <p>HR</p> <p>(Comments):</p> |

| Commission proposal | MS drafting suggestions and comments |
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| | <p>HR comments: On the one hand, the proposed template is too complex and requires MS to submit a lot of different data and detailed explanations and on the other, the number of characters used is in some cases very restricted.</p> <p>In the tables in the plan form, the terms primary and secondary specific objectives are mentioned, but nowhere is it explained what exactly this means.</p> <p>In the first table in chapter 5. Milestones, targets and timeline there is no section "intervention field"</p> <p>It follows from the proposed Regulation on NRPF that three types of rules would apply to CAP in programming: (1) common rules that apply to all areas of financing; (2) specific rules for CAP, which are included in the proposal for the Regulation on NRPF and make up a third of the text of the proposed Regulation; (3) specific rules for CAP, which will be included in new CAP regulation. This introduces major uncertainties in the implementation of the Proposal for the Regulation on NRPF for CAP.</p> <p>HR questions: With regard to the part of the Annex 'Chapters', point 1.2., we would appreciate an explanation as to how the measures address the identified challenges and relevant policy objectives - namely, which policy objectives does this refer to?</p> |

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| | <p>HR comment: 3.4. Technical support - there is no envisaged number of characters.</p> <p>Do the chapters describe general objectives, primary or secondary specific objectives, or something else?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>1.7 chart (Comprehensive overview of the Plan's support to the social measures listed in Annex VI [methodology for contribution to social objectives], taking into account the specific national and regional needs and challenges identified, inter alia, in the context of the European Semester):</p> <p>We suggest rephrasing category a) and d) to be more in line with the terminology used in Annex VI. Furthermore, as we have already indicated related to Block 1, we suggest a consistent use of the term 'social' throughout the whole regulation (as well as in the ESF Regulation and the performance framework and monitoring regulation).</p> <p>a) Social inclusion <u>and employment</u></p> <p>d) Combatting youth unemployment, including through <u>the implementation of the Youth Guarantee</u>, education and training</p> |

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| | <p>HU</p> <p>(Comments):</p> <p>1.7 chart</p> <p>a) social inclusion</p> <p>Annex VI refers to this point as 'to foster active social inclusion and socio-economic integration with a view to promoting equal opportunities, non-discrimination and active participation, <u>and improving employability, in particular for disadvantaged groups, third-country nationals including migrants and marginalized communities.</u>' Improving employability and supporting employment may be understood as part of social inclusion but according to both Article 3 of the Single Plan regulation (Specific objectives) and Annex VI, the related measures are referred separately. Based on this, we suggest referring to employment besides social inclusion in the table as well.</p> <p>d) combatting youth unemployment</p> <p>The main Union initiative to deal with youth unemployment is the Youth Guarantee as also referred to in Annex VI ('to <u>implement the Youth Guarantee</u> through targeted actions and structural reforms to support youth employment, vocational education and training (...)'). Education and</p> |

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| | <p>training are also part of the policy mix, however, the Youth Guarantee should be referred here as the main instrument.</p> <p>TITLE II: CHAPTERS; 2.1 ‘The nature, type and size of the measure, indicating whether it is new or an existing measure intended to be extended with the support from the Plan.’</p> <p>What is meant by the nature, type, and scale of the measure? The description in Article 22(2)(e) does not provide an explanation.</p> <p>Furthermore, we perceived that the reference to the Articles is not accurate, we believe that under this point if the Annex the reference should be Article 22(2)(c). In this case it is still unclear what should be described under this point of the Plan.</p> <p>IE</p> <p>(Comments):</p> <p><u>IE’s view is that where the Commission proposes that Member States be subject to legally binding requirements arising from the NRP that such legally binding requirements should be assigned dedicated funding. Noting the range of ringfenced funding under the NRP and the demands on Member States, it is not appropriate for the Commission to rely on Member States unallocated funding to assure</u></p> |

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| | <p><u>coherent and efficient implementation of the legally binding requirements it proposes.</u></p> <p><u>For example, Annex V – section 1.8 requires that the MS sets out the Plan’s support to:</u></p> <p><u><i>‘Activities on implementing the CFP, including on fisheries, control and enforcement, fight against IUU fishing and collection of scientific data for knowledge-based decision-making, generational renewal’</i></u></p> <p><u>The Commission is requiring MS to make provision to fund measures related to fisheries control or enforcement or to data collection under the NRP, but has ring-fenced CFP funding to an article that does not make provision for these measures. Commission clarifications to date have been that such measures may be funded from the unallocated funds and/or technical assistance. Given other likely demands on both unallocated funds and technical assistance, it is not clear that we will have sufficient funding under the NRP to fund these measures, and as such they not be funded under the Plan but directly by national funding. If the Commission requires MS to make provision for these measures in the Plan, then funding should be ring-fenced for same. These measures are costly, and account for a significant proportion of the funding allocation under EMFAF currently.</u></p> |

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| | <p><u>Section 1.9 of Annex V NRPP template does not seem to include a place for member states to outline the level of the total estimated cost envisaged under LEADER, whereas for other measures it is clear where the level of financing should be outlined.</u></p> <p>LV</p> <p>(Comments):</p> <p>Annex V section 1.2. <i>“Description of the specific challenges of the Member State taking into account the relevant country-specific recommendations addressed to the Member State concerned, in particular in the context of the European Semester and in line with the European Pillar of Social Rights, the CAP national recommendations and challenges identified in the documents and strategies referred to in Article 22(2), point (b)”</i> - please note that only name of CSR or CAP recommendation will require more than 300 characters, not to mention name of official document or strategy. Please increase characters available in template for Plan section 1.2. of Annex V.</p> <p>MT</p> <p>(Comments):</p> |

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| | <p>MT: By way of general comment, MT welcomes a more streamlined template structure. Nevertheless, we feel there is a mismatch between the level of detail required at programming stage and the timeframes Member States are expected to deliver within.</p> <p>The template does not evidence the extensive detail and work associated with FNLC that will now be required for all funds upfront, most of which will be unprecedented work for most Member States.</p> <p>Whilst welcoming the inclusion of character limits, we ask the Presidency to clearly explain which other documents will be required to be submitted alongside the plan. For the sake of transparency, we would appreciate detailed guidance on the level of detail, format needed for financial and costing assessments across all chapters of the plan. Whilst the template, at face value seems simplified, the additional documentation requested by the Commission in the negotiations leading up to the plan submission is usually much more extensive. For the new programming period, we feel it is time to truly move towards simplified processes.</p> <p>Furthermore, the detailed tables on territories, gender, climate/environment not only do not provide further simplification, but they rescind the simplification achieved in the 21-27 period over the previous 14-20 period.</p> |

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| | <p>Here there needs to be some serious reflection on what is really needed at initial programming stage and what can be left for reporting/evaluation purposes. We either want all the detail or the timeliness of plan adoption. As the proposal stands both aspects are in direct conflict.</p> <p><i>1.1. Plan’s contribution to all specific objectives referred to in Article 3, taking into account the specific challenges of the Member State concerned.</i></p> <p>As per earlier comment on Article 22(2)(a) above, the obligation on Member States to select all Specific Objectives does not allow for the required flexibility nor does it take into account plans with small budgets whereby it would be unrealistic to target all SOs and achieve an adequate impact.</p> <p><i>7. Financing and costs and social target</i></p> <p>In the table which is required to be filled in for every measure, there is a column 'Result indicator (where relevant)' – MT requests a confirmation that, should the MS decide to include result indicators, this would only be used for reporting/evaluation purposes and that there is no link between indicators and payment claims.</p> <p>PL</p> |

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| | <p>(Drafting suggestions):</p> <p>Annex V Template for the National and Regional Partnership Plan</p> <p>point 1.5. Comprehensive overview of the Plan’s support to the territories listed in Annex VII, taking into account their specific needs and challenges</p> <p>point e) The specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia, Belarus or the Ukraine), particularly in the areas of security, border management and economic development</p> <p>Annex V, 3. PART C point: Arrangements for the implementation of the plan, point 3.9. „Description of the envisaged approach to communication and visibility for the Plan Reference: Article 22(2), point (g) (e) Description of the envisaged arrangements in place to ensure the visibility of the Union funding, in particular when promoting the actions and their results and inform recipients of the existence of Union support or oblige other financial intermediaries to inform such final recipients of that support. [2 000]”</p> <p>1.9. Comprehensive overview of the planned use of integrated territorial development in cities and their functional areas, urban and rural areas, community-led local development, in particular LEADER, or other territorial tools including just transition, smart specialisation strategies and</p> |

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| | <p>strategies for decarbonisation developed with the support of Union instruments in the 2021-2027 period [1 000]</p> <p>PL</p> <p>(Comments):</p> <p>General comment: On one hand, the proposed template is too complex and requires MS to submit a lot of different data and detailed explanations and on the other, the number of characters used is in some cases very restricted.</p> <p>We propose clarifying and applying constantly the definition of Eastern Border Regions taking into account <u>the regions bordering Ukraine</u> in the package of regulations regarding the MFF 2028-2034.</p> <p>Russia's aggression against Ukraine in 2022 resulted in destabilization of the geopolitical situation especially on the EU's eastern border, thus support for this part of the EU is of priority importance for the security and socio- economic stability of whole Union.</p> <p>Regions located on the EU's eastern border are affected by particularly strong migratory pressure and destabilizing activities. Furthermore, they face specific development challenges, primarily a decline in investors' interest. The linear infrastructure (transport, energy, broadband) as well as public service systems require the implementation of dedicated security</p> |

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| | <p>mechanisms due to consistent hybrid attacks, disinformation and attempts of destabilization.</p> <p>The NRP Plan will be a comprehensive document, but it is important to be mindful that it should be as transparent and legible as possible and written in plain language. At the same time, we would like to maintain consistency between expectations and the substantive description. This is why we propose the indicated change, which states that the envisaged arrangements will be set out in this section [in accordance with Article 22(2) point (e)].</p> <p>*Please note that several incorrect references have been made in Annex V 3. PART C: Arrangements for the implementation of the plan, indicating Article 22(2)(g) instead of Article 22(2) point (e).</p> <p>Adding “in the cities and their functional areas” clarifies that the planned actions in the field of the integrated territorial development concern not only the cities themselves, but also surrounding areas. This is of a great importance in EU cohesion policy, as many territorial tools, such as the ITI, are designed for interconnected urban areas rather than isolated administrative unities.</p> <p>PT</p> <p>(Comments):</p> |

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| | <p>PT proposes to leave the discussion of the Annex V to a later stage.</p> <p>RO</p> <p>(Drafting suggestions):</p> <p>1.5 Comprehensive overview of the Plan support to territories listed in Annex VII - point e). The specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia, Belarus and Ukraine).</p> <p>point 5. Milestones, targets and timeline, column 5 Funded under Grants or Loans/Financial Instruments.</p> <p>RO</p> <p>(Comments):</p> <p>All regions at the Eastern border should be included in an unitary approach in the Plan.</p> <p>It is important to clarify how all types of Financial Instruments are reflected in Table 5 of the Plan</p> <p>SE</p> <p>(Comments):</p> <p>TITLE I</p> |

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| | <p>1.2) SE wonders whether it is relevant to state the level of financing in the table describing how the specific challenges are taken into account. It is likely that certain measures will contribute to several different challenges and requiring the level of funding to be reported risks being misleading.</p> <p>1.6) Could the Commission clarify whether the national generational renewal strategy (requirement in the CAP-regulation) should be included in 1.6?</p> <p>2.2-2.3) SE would like to underline how important it is that the guidelines are provided in good time to make it possible to do what is required according to sections 2.2 and 2.3.</p> <p>3.5 and 3.6) SE would ask the Commission to clarify why these descriptions are part of section 3 Arrangements for the implementation of the plan. SE believes that this should be moved to the relevant chapter (i.e. in conjunction with the CAP-measures)</p> <p>3.8)- The reference should not be to Article 22. 2 point (n) but to Article 22. 2 (l).</p> <p>Please see SEs comments on Article 22 (2) point (l)</p> <p>3.10) Should not the reference be to 22.2 point (m) instead of 22.2 point (o)?</p> |

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| | <p>TITLE II</p> <p>2.3) Editorial comment: In the heading, the word "who" could be replaced by "target group".</p> <p>2.4) What is the purpose of describing a timeline per measure? What will it be used for and what does it add? It is important to clarify what happens if a measure is not implemented within the expected timeline. Will there be any financial consequences? Will it be necessary to amend the plan? If the requirement does not simplify and improve the implementation of the plan SE proposes a deletion of section 2.4.</p> <p>2.5) See our comment on Article 22 2 (b) on the completion of the Single Market.</p> <p>5) Milestones, target and timeline</p> <p>-Information should according to section 5 title II, be provided on the primary specific objective and the secondary specific objective. Our opinion is that a measure could be relevant for more than two specific objectives as it is of utmost importance that the measures in the plan can be broad in character. The Annex should therefore be changed accordingly.</p> |

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| | <p>- Qualitative indicators should be specified for milestones and quantitative indicators for targets. SE believes that it should be possible to use quantitative indicators also for milestones.</p> <p>Annex V and national co-financing) Our understanding is that the proposal does not entail requirements to be able to verify national co-financing paid by the Member State. Can the Commission confirm this understanding?</p> <p>SK</p> <p>(Comments):</p> <p>Chapter 7 „Financing and costs and social targets“ - Could you please specify whether the amount including the flexibility amount is stated in the "EU financial contribution" column?</p> |
| | <p>EL</p> <p>(Drafting suggestions):</p> <p>TITLE I: OVERVIEW AND PROCESS FOR ESTABLISHING THE NATIONAL AND REGIONAL PARTNERSHIP PLAN</p> <p>1. PART 1: Challenges and objectives addressed by the Plan</p> |

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| | <p>1.1. Plan's contribution to all specific objectives referred to in Article 3, taking into account the specific challenges of the Member State concerned</p> <p>Reference: Article 22(2), point (a)</p> <p>-1.2. Description of the specific challenges of the Member State taking into account the relevant country-specific recommendations addressed to the Member State concerned, in particular in the context of the European Semester and in line with the European Pillar of Social Rights, the CAP national recommendations, <u><i>the Schengen IT architecture, the Schengen evaluation mechanism in accordance with Regulation (EU) 2022/922, vulnerability assessments in accordance with Regulation IEU) 2019/1896 and the European Union Agency for Asylum monitoring mechanism in accordance with Regulation (EU) 2021/2303</i></u> and challenges identified in the documents and strategies referred to in Article 22(2), point (b) .</p> <p>HU</p> <p>(Comments):</p> <p>TITLE II: CHAPTERS; 2.6 and 2.7</p> |

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| | <p>On the field of Home Affairs we still do not see what data need to be provided for projects implemented in third countries (e.g., the deployment of liaison officers) and how these measures and projects will be classified.</p> <p>TITLE II; 5.</p> <p>How should Primary and Secondary Specific Objectives be interpreted?</p> <p>What is the interpretation of and difference between:</p> <ul style="list-style-type: none"> - ‘Amount for Managing Authority’ - ‘Pay-out value relevant for COM payment to the Member State’ <p>It would be useful to receive an example for these.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>Please change name of section 2.4 “The timeline of the implementation of the measure” to “The indicative timeline of the implementation of the measure”. If it will be necessary to update section 2.4. "The timeline of the implementation of the measure", the NRP plan would have to be amended on regular bases just to keep up with delays or any changes in timeline for each measure.</p> |

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| | <p>Correction needed in point 1.6. “Comprehensive overview of the Plan’s support to generational renewal in accordance with Article 15” point “c”. Reference in the table to the breakdown of funding by measure in points “c”; d (regarding investments); “e” to “i” should be delete.</p> <p>Correction needed in point 3.6 “Distribution of Agricultural products”: reference to Article 22(2), point (k)(ii) should instead be reference to Article 22(2), point (j)(ii)</p> <p>LV</p> <p>(Comments):</p> <p>Please clarify, if it is required that new National Energy and Climate Plan covering 2028-2034 is adopted prior to creation of NRP Plan (Annex V) or information regarding existing National Energy and Climate Plan can be included in Plan template section 1.3. “Description of how the Plan is consistent with the national medium-term fiscal structural plans, national restoration plan”.</p> <p>Please clarify regarding section 1.5. “<i>Comprehensive overview of the Plan’s support to the territories listed in Annex VII, taking into account their specific needs and challenges</i>” of Annex V – in column “<i>List of</i></p> |

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| | <p><i>supporting reforms (where appropriate)</i> – for this table does “reform” is meant as “measure” (as set in p.(10) Art. 4 of Regulation).</p> <p>Please increase the number of characters allowed in section 3.2. “Monitoring committee(s) and coordination committee” as 1000 characters is not enough to describe organisation and structure of both committees, especially in cases where there will be multiple Monitoring committees.</p> <p>In relation to Annex V, Table 7 “Financing, costs and social target”, please clarify why the term “social target” is included in the title when none of the table’s columns refer to it. How is this table related to the achievement of social targets?</p> <p>The condition regarding the reflection of the start-up package in the funding breakdown by measure is too detailed, which may significantly hamper the implementation of measures, especially those providing for increased aid intensity or priority in project selection.</p> <p>Does the Commission envisage elaboration of more detailed and specific guidance or template on how the modalities of the EU School scheme should be described in its NRP by the Member State? 1.8.</p> <p>It is unclear how the CFP interventions referred to in Article 35(11) of this Regulation integrate with the Category of activities referred to in point 1.8</p> |

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| | <p>of Annex V. In order to prepare detailed comments or proposals, it is necessary to obtain clarification on how to fill in the table included in point 1.8 - what is meant by Contributing Chapter, List of supporting reforms</p> <p>RO</p> <p>(Comments):</p> <p>A new definition on „Amount for managing authorities” should be added. To be discussed under Bl. 6</p> <p>SK</p> <p>(Comments):</p> <p>According to Article 22(q) and (r), the Plan should include a minimum amount for the contribution to social objectives, or climate and environmental objectives. We propose to amend the relevant Table 7 by adding columns so that the SFC automatically calculates the Plan's contribution to these objectives.</p> |
| Annex VI | <p>CZ</p> <p>(Drafting suggestions):</p> <p>For the purpose of Article 22(2), point (i), letter (ii), and taking into account the specific national and regional needs and challenges identified, inter alia,</p> |

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| | <p>in the context of the European Semester and in line with the European Pillar of Social Rights, Member States shall concentrate resources in their Plans on the following measures:</p> <p>(a) to foster active social inclusion and socio-economic integration with a view to promoting equal opportunities, non-discrimination and active participation, and improving employability, in particular for disadvantaged groups, third-country nationals including migrants and marginalized communities.</p> <p>(b) to address material deprivation through food and/or basic material assistance to the most deprived persons and providing accompanying measures supporting their social inclusion;</p> <p>(c) to implement the Child Guarantee through targeted actions and structural reforms to tackle child poverty particularly in Member States that have an average rate above the Union average of children of less than 18 years old at risk of poverty or social exclusion, based on Eurostat data, between the years 2024 and 2026;</p> <p>(d) to implement the Youth Guarantee through targeted actions and structural reforms to support youth employment, vocational education and training, particularly in Member states that have an average rate above the Union average of young people of 15 to 29 years of age who are not in</p> |

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| | <p>employment, education or training, based on Eurostat data, between the years 2024 and 2026;-</p> <p><u>(e) to address challenges stemming from the demographic change and ageing of population.</u></p> <p>The indicative amounts allocated to the above categories of measures shall be submitted based on the template for the Plan set out in Annex V and agreed with the Commission.</p> <p>CZ</p> <p>(Comments):</p> <p>CZ suggests adding a new point (e) on which resources contributing to EU social objectives should be concentrated. The reason is that the draft ESF regulation in its article 5 envisages addressing challenges stemming from the demographic transition in one or more dedicated chapters of the National Regional and Partnership Plan, while the draft NRPP regulation does not contain any similar provision so far. Furthermore, addressing the challenges of demographic change is one of the specific objectives defined in article 3, point c), item (v).</p> <p>DE</p> <p>(Drafting suggestions):</p> |

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| | <p>(b) “to address material deprivation through food and/or basic material assistance to the most deprived persons, providing accompanying measures supporting their social inclusion, <u>or by promoting social integration of people at risk of poverty or social exclusion, including the most deprived persons and children</u>”.]</p> <p>DE</p> <p>(Comments):</p> <p>We need corrections in letter (b).</p> <p>Support to most deprived persons should be not limited to material support to address material deprivation through food and/ or basic material assistance with accompanying measures linked to this assistance, but also include social inclusion measures for most deprived persons (in the continuity of FEAD OP II and specific objective Art. 4 (l) ESF+ regulation, in addition to Art. 4 (m)). Therefore, we need changes accordingly to the proposal for the ESF regulation Art. 6.)</p> <p>DE agreed to the introduction of the FEAD (Fund for European Aid to the Most Deprived) for 2014-2020 and integration into ESF+ for 2021-2027 only under the condition that FEAD has always two implementation</p> |

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| | <p>options for Member states, not only provision of food and/or basic consumer goods, but promotes also social inclusion measures for most deprived persons.]</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(b) to address material deprivation through food and/or basic material assistance to the most deprived persons and providing accompanying measures supporting their social inclusion <u>particularly in Member States where social security systems do not provide an adequate level of income to meet the basic needs of the most deprived persons, based on Eurostat data, between the years 2024 and 2026. (Impact of social transfers (other than pensions) on poverty reduction is lower than the EU average);</u></p> <p>FI</p> <p>(Comments):</p> <p><i>Finland emphasises that binding lists of measures and reforms to be implemented should be presented in the articles and that there should be no overly detailed list of reforms and measures, that should be targeted without taking into account the identified needs of Member States and</i></p> |

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| | <p><i>regions. In addition, the Member States' capacity to support the mentioned measures at the national level should be taken into account.</i></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>As for point d) on youth unemployment and the implementation of Youth Guarantee, we do agree with the need to support the implementation of the Youth Guarantee. We propose however the modification of both the measure and its criteria: „to implement the Youth Guarantee through targeted actions and structural reforms <u>in the areas of employment, social policy, education and training</u> to support youth employment, vocational education and training particularly in Member states that have a [] rate above the Union average of young people of 15 to 29 years of age who are not in employment, education or training <u>on average and broken down by sex</u>, based on Eurostat data, between the years 2024 and 2026. (...)”</p> <p>HU</p> <p>(Comments):</p> <p>NEETs are heterogeneous in terms of gender, age and educational attainment level. Supporting youth employment and the successful implementation of the Youth Guarantee are not only based on supporting</p> |

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| | <p>access to employment and vocational training, but also on identifying inactive young people and other social services. Not only low educational attainment or lack of qualification can lead to NEET status, but factors such as health problems or caretaking responsibilities. It is also evidenced by the breakdown of the NEET rate by educational attainment (at EU level, the NEET rate in the ISCED 3-4 category is not much lower than in the case of those with ISCED 1-2 qualifications). Based on this, we propose to refer to social policy related to the YG besides employment and training.</p> <p>Furthermore, at Union level, the average NEET rate (15-29) was 11.1%, 10% in case of men and 12.1% in case of women. Gender differences are significant on MS level as well: eight MSs have higher total NEET rates than the EU average, while ten MSs have higher than average NEET rates both in case of men and women. (Source: Young people neither in employment nor in education and training by sex NEET). Based on this, we propose to use the NEET rate broken down by sex as a criteria for defining the need for MS's actions instead of the general NEET rate.</p> <p>The references to Article 22 (2) point (i) letter (ii) are incorrect (the correct reference is point (g) (ii)).</p> <p>IE</p> <p>(Comments):</p> |

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| | <p><u>Article 22(2), point (h) references LEADER. IE seeks confirmation if the territorial contribution methodology in Annex VII is relevant for all LEADER allocations.</u></p> <p>NL</p> <p>(Drafting suggestions):</p> <p>to foster active social inclusion and socio-economic integration with a view to promoting equal opportunities, non-discrimination and active participation, and improving employability, in particular for disadvantaged groups, third-country nationals including migrants and marginalized communities. (b) to address material deprivation through food and/or basic material assistance to the most deprived persons and providing accompanying measures supporting their social inclusion; (c) to implement the Child Guarantee through targeted actions and structural reforms to tackle child poverty particularly in Member States that have an average rate above the Union average of children of less than 18 years old at risk of poverty or social exclusion, based on Eurostat data, between the years 2024 and 2026; (d) to implement the Youth Guarantee through targeted actions and structural reforms to support youth employment, vocational education and training, particularly in Member states that have an average rate above the Union average of young people of 15 to 29</p> |

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| | <p>years of age who are not in employment, education or training, based on Eurostat data, between the years 2024 and 2026.</p> <p><u>to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by: (i) supporting employment, equal access to the labour market, fair and quality working conditions and labour mobility; (ii) enhancing labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling; EN 35 EN (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; (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; (v) addressing the challenges of demographic change across the EU, which include labour shortages and disparities between generations and regions; (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</u></p> <p>NL</p> |

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| | <p>(Comments):</p> <p>The social objectives listed in Annex VI should correspond to those listed under article 3(c). The current objectives listed in Annex VI seem mandatory (shall) and do not align with these objectives and include measures that are not applicable or relevant for all member states. Additionally, important elements, such as skills, are not mentioned in the current wording of Annex VI. The objectives under article 3(c) give a better overview of the social objectives.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>PT1: “For the purpose of Article 22(2), point (i) (g), letter (ii)...]”</p> <p>PT</p> <p>(Comments):</p> <p>PT1: Correction needed.</p> <p>PT2: This Annex (“Methodology for the contribution to social objectives”) keeps the thematic concentration that exists in the current MFF within the ESF, essentially targeting the same areas: social inclusion, material deprivation, combating child and youth poverty, without setting a percentage of the ESF budget to be allocated. Analysing</p> |

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| | <p>the various instruments relating to the ESF/social objectives quota (provisions of the Regulation on the ESF/social objectives quota, Annex VI, specific ESF Regulation and Article 6 of the Performance Regulation and Fiche 22), it is not clear how they should be coordinated. For example, it is not clear whether the areas of intervention described in Annex VI can correspond to the 40% and 100% levels identified in the Performance Regulation.</p> <p>RO</p> <p>(Comments):</p> <p>A reference to ESF Regulation should be introduced in the text in order to ensure the link between the NRPP Regulation and the policy-specific Regulations</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>ANNEX VI</p> <p>Methodology for the contribution to social objectives</p> <p>For the purpose of Article 22(2), point (i), letter (ii), and taking into account the specific national and regional needs and challenges identified, inter alia, in the context of the European Semester and in line with the European Pillar</p> |

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| | <p>of Social Rights, Member States shall <u>where relevant</u> concentrate resources in their Plans on the following measures:</p> <p>(...)</p> <p>SE</p> <p>(Comments):</p> <p>SE believes, with reference to what challenges and needs that the MS identifies as well as the CSR:s and the guidelines for employment policies to MS, that this passage could be altered.</p> <p>SE further considers that point b) in the annex is already covered by point a) and should therefore be deleted. In this context, SE would like to emphasise the importance of leaving room for MS to develop measures according to their specific needs and context.</p> <p>In addition, the Commission should clarify the role of the annex in relation to the specific objectives in article 3. As the two are not fully aligned, it is not clear how MS should prioritise their resources.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p><i>Add a new indent under point (a):</i></p> |

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| | <p>“— health interventions aimed at improving access to primary care, preventive and mental health services, long-term care and rehabilitation for disadvantaged groups, where they have a direct and verifiable impact on reducing social exclusion and barriers to accessing services.”</p> <p>SK</p> <p>(Comments):</p> <p>The four categories (social inclusion, material deprivation, Child Guarantee, Youth Guarantee) do not explicitly mention health measures (prevention, primary care, mental health, long-term care, workforce), although these are crucial for social goals.</p> <p>• Proposed comment:</p> <p>o Explicit recognition of health under category (a) social inclusion:</p> <p>“Supported measures also include health interventions aimed at access to primary care, prevention, mental health, long-term care and strengthening the health workforce, where they demonstrably reduce social exclusion and barriers to accessing services.”</p> |
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| Annex VII | <p>AT</p> <p>(Comments):</p> |

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| | <p>The categories of regions should be consistent with the categories of regions in Annex II of the Performance Framework. (e.g., Annex VII(d) islands/Annex II islands and coastal areas).</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>For the purpose of Article 22(2), point (h), Member States shall allocate resources to the</p> <p>below categories of regions, if applicable, taking into account:</p> <p>(a) the specific needs and challenges of less developed regions, whose GDP per capita measured in purchasing power standards (2021-2023) is below 75% of the EU-27 average [NUTS x];</p> <p>(b) the specific needs and challenges of transition regions, whose GDP per capita measured in purchasing power standards (2021-2023) is between 75% and below 100 % of the EU-27 average [NUTS x];</p> |

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| | <p>(c) the specific needs and challenges of more developed regions, whose GDP per capita measures in purchasing power standards (2021-2023) are equal to or above 100 % of the EU-27 average <u>[NUTS x]</u>.</p> <p>DE</p> <p>(Comments):</p> <p>The reference in Annex VII to Art. 22 (2) point (h) is wrong. In our view, the Annex should be linked to Art. 22 (2) point (f).</p> <p>Clarification is needed in Annex VII as to whether funds must be allocated to all listed categories of regions (“shall”) and at which level (NUTS2 or NUTS3) the categorization should take place. This clarification should also be reflected in the overarching definition of region categories in Article 4(39–41).</p> <p>FI</p> <p>(Drafting suggestions):</p> |

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| | <p>(e) the specific needs and challenges of Eastern border regions (NUTS 2 or NUTS 3 regions that have borders with Russia and Belarus), particularly in the areas of security, border management and economic development;</p> <p>FI</p> <p>(Comments):</p> <p>This could also be added to art 35(5) and art 63(b)iv.</p> <p>HU</p> <p>(Comments):</p> <p>The terminology used is not consistent and does not reflect the Single Plan Regulation. In relation to integrated territorial and urban development, it needs to be aligned with Article 22(h) and Articles 74–77.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>Anex VII Methodology for territorial contribution</p> <p>pkt (e): The specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia, Belarus or the Ukraine), particularly in the areas of security, border management and economic development.</p> |

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| | <p>PL</p> <p>(Comments):</p> <p>We propose clarifying and applying constantly the definition of Eastern Border Regions taking into account <u>the regions bordering Ukraine</u> in the package of regulations regarding the MFF 2028-2034.</p> <p>Russia's aggression against Ukraine in 2022 resulted in destabilization of the geopolitical situation especially on the EU's eastern border, thus support for this part of the EU is of priority importance for the security and socio- economic stability of whole Union.</p> <p>Regions located on the EU's eastern border are affected by particularly strong migratory pressure and destabilizing activities. Furthermore, they face specific development challenges, primarily a decline in investors' interest. The linear infrastructure (transport, energy, broadband) as well as public service systems require the implementation of dedicated security mechanisms due to consistent hybrid attacks, disinformation and attempts of destabilization.</p> <p>RO</p> <p>(Drafting suggestions):</p> |

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| | <p>e). the specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia, Belarus and Ukraine).</p> <p>RO</p> <p>(Comments):</p> <p>A reference to ERDF/CF Regulation should be introduced in the text in order to ensure the link between the NRPP Regulation and the policy-specific Regulations</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(j) the specific needs and challenges identified in the planned use of integrated territorial investment, community led local development or other territorial tools including just transition and smart specialisation strategies.</p> <p>SE</p> <p>(Comments):</p> <p>Categories of regions and territorial tools should not be mixed. They are two different things. SE therefore proposes deletion of (j) in Annex VII.</p> |
| | HU |

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| | (Comments): Ukraine is not mentioned in point (e), which is odd (in contrast, the country is mentioned in the ERDF Regulation, e.g. in Article 4.) |
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