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LIMITE

DEVGEN ECOFIN RELEX ASIM MAMA

WORKING PAPER

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WORKING DOCUMENT

From: To:	Spain Friends of the Presidency Group on the External Investment Plan and the European Fund for Sustainable Development
Subject:	Proposal for a Regulation of the European Parliament and of the Council on the European Fund for Sustainable Development (EFSD) and establishing the EFSD Guarantee and the EFSD Guarantee Fund - Recitals - Comments from Spain

Please find attached, for information, comments from Spain on the draft recitals.

SPAIN

We are surprised by this procedure, where many issues presented in the recitals are not agreed yet in the articles. Moreover, the short time given to analyse them and the fact that FoP delegates are in their majority in Valletta for CODEV informal is not helping in this dossier. We understand the pressure on the Presidency, but would like to recall that the quality of the final product should be our common guide. Additionally, we would like to underline that the relative delay in this dossier is due to the complex internal EP procedures, not to any problem in the Council. The trilogue could not start until May, and this was not due to any delay by the Presidency. We thank the Maltese Presidency for all its efforts in this dossier, but cannot agree on the text as it is presented now.

In concrete terms, Spain cannot agree on:

- line 15, for two reasons: there is a confusion between the EFSD and the Guarantee; and the Guarantee should be used PRIMARILY IN Africa and the Neighborhood.
- Line 28, where we would like to come back to the Partial General Approach to reintegrate the European dimension.
- Lines 35 and 36, which should be examined further at the technical level