

## Public consultation on the next MFF: Performance of the EU budget

### Part 1: About you

Which EU funds are you familiar with?

*250 character(s) maximum*

Structural and Investment funds; mainly: ERDF, Cohesion Fund, ESF+JTF, EAFRD, AMIF but also direct management funds: LIFE, HORIZON

### Promotion of general EU priorities and principles

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How do you assess the effectiveness of each of those tools?

	Very effective	Effective	Moderately effective	Not effective	Don't know / not applicable
Embedding policy priorities into the design of EU funds, for instance by defining specific objectives (e.g. gender equality).		X			
Applying principles and rules to ensure that funded projects are aligned with such priorities and principles.		X			
Establishing a strong performance framework to measure the results achieved through the EU budget (e.g. through indicators).		X			
Using minimum spending targets either at the level of the entire			X		

EU budget or within specific EU funds.					
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If you replied 'moderately effective' or 'not effective', please give us more details on why you think those tools have not been effective/very effective?

*Thematic concentration at national level (Cohesion Policy) prevented flexibility and for the funds to be really fit for purpose at local/regional level*

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How effectively do you believe the EU budget promotes each of these general priorities?

	Very effective	Effective	Moderately effective	Not effective	Don't know / not applicable
Gender equality			X		
Digitalisation		X			
Climate action		X			
Biodiversity		X			
UN Sustainable Development Goals		X			

The EU budget supports gender equality. For instance, by funding dedicated projects (e.g. encouraging women into the labour market, combatting gender segregation, promoting women's rights and empowerment), and by including this objective in the design of some EU funds (e.g. 'enabling condition' in the Common Provisions Regulation, or requirement under some EU funds for proposals to support gender equality or for beneficiaries to have Gender Action Plans). Moreover, the Commission developed a methodology to measure expenditure supporting gender equality in the 2021-2027 MFF, which assigns scores to interventions based on their objectives. It is estimated for the year 2024 that 11% of the EU budget is contributing to gender equality, while 73% has the potential to do so. How do you assess the way in which gender equality has been promoted across the EU budget so far?

Very effective

Effective

Moderately effective

Not effective

Don't know/not applicable

Could you please give us more details on why? And which EU funds are you referring to?

**500 character(s) maximum**

*Local and regional authorities may experience a mixed impact: the authorities may see positive contributions from gender equality-focused EU funds, but the impact could be uneven depending on their capacity to engage with and implement these initiatives. So while it is promoted at the EU level, it does not yet fully reach the local level.*

The 2024 Financial Regulation requires that the EU budget is implemented taking into account the principle of gender equality, where feasible and appropriate in accordance with the relevant sector-specific rules. It also requires breaking down by gender the data collected, where appropriate. For the future, how do you think the EU budget could better support gender equality? Please indicate if you agree with the objectives below.

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know / not applicable
More consistency is needed in the way gender equality is embedded in the design of EU funds (e.g. in the form of specific objectives or conditions).	X					
The EU budget should be used to incentivise gender-specific reforms in the Member States (e.g. by setting milestones and targets)		X				

Respect and promotion of gender equality as part of the fundamental rights should be a precondition to EU funding.		X				
Support from the EU budget should be monitored in a consistent way by means of gender-specific indicators.		X				
Data collected on the implementation of the EU budget should be systematically disaggregated by gender, where appropriate and available.		X				
Support should be provided to develop capacities of EU funds beneficiaries to mainstream gender equality in the implementation of their projects.		X				

Is there any other way in which the EU budget could better support gender equality?

**500 character(s) maximum**

*The EU budget should better support gender equality by strengthening gender-responsive budgeting; (there is currently no comprehensive and mandatory gender-responsive budgeting framework across all EU funds - which makes it harder to implement at the local level); across all funds, addressing gender gaps in economic and social policies, ensuring transparency in spending, and improving access to expertise and resources for municipalities and regional authorities to apply for EU funding.*

How do you assess the contribution that the principle of 'do no significant harm' has made to ensuring that the current EU budget and relevant EU funds do not undermine climate and environment objectives?

Very effective

Effective

Moderately effective

Not effective

Don't know/not applicable

Do you identify some of the following problems as challenges with the application of the principle of 'do no significant harm'? Please select all that apply.

Lack of clear guidance on how to implement the principle of 'do no significant harm'

Lack of knowledge, skills or human capacity

Lack of environmental data

Disproportionate administrative burden

Difficulties in monitoring and verification

No significant challenge

Other, please specify

If you have selected 'Disproportionate administrative burden': for whom? [select all that apply]

For Member State authorities and bodies managing and implementing EU funds

For beneficiaries of EU funding

For implementing partners (such as promotional banks implementing budgetary guarantees)

For others

If you have selected 'Disproportionate administrative burden', please share with us any information and potential estimates (qualitative and/or quantitative) you may have about such administrative burden and costs.

*Before the start of the current financial perspective, the European Commission presented a set of 80 simplification measures, which were welcomed. Problematically, however, the impact of all the simplification measures was then negated by the introduction of requirements for compliance with horizontal and other principles (DNSH, New European Bauhaus, climate resilience, nature-based solutions, etc.), for which neither the national authorities nor the municipalities were prepared.*

Specify which EU funds you have experience with, in relation to the implementation of the DNSH principle:  
*European structural and investment funds, mainly: ERDF, Cohesion Fund, ESF+, JTF, EAFRD*

What would be your suggestions to help implementing the DNSH principle?  
*Given that all programming documents are thoroughly scrutinised by the European Commission and that these principles are already assessed at programme level, and that calls for tenders and territorial mechanisms are derived from the programme, there should be a presumption that all projects that comply with the terms of the call for tenders and the content of the programme also comply with the DNSH principle and the other principles. It is necessary to achieve a way to stop assessing this aspect on a project-by-project basis (whereby not only investment projects but also soft content are assessed, which does not make sense), which would greatly simplify as well as cheapen the implementation of the ECPI, both for applicants and for the national authorities reviewing the applications.*

## Performance framework including monitoring and reporting tools

The EU budget has encouraged a stronger focus on performance, for instance by making possible payments to beneficiaries conditional on the achievement of outputs and/or results, or by relying on strategic planning to ensure a stronger focus on results. How do you assess the attempts to strengthen the performance dimension of the EU budget so far?

Very effective,

Effective

Moderately effective

Not effective

Don't know/not applicable

Please give us more details on why you think this system has not been effective/very effective?

*Simplification options such as Financing not linked to cost or Simplified Cost Options are not always used by Managing Authorities, mostly because of the risk identified with multiple audit levels and the risk of unfavourable opinions from non-EU auditors or different interpretations of funds rules by different auditors. In this regard, it is essential that for the next budgetary period the EU propose a system of single audits, for instance with a label "compliant with EU rules" attributed to national audit processes that are evaluated as compliant with EU standards of audit.*

The EU budget has a system to monitor the support provided for our priorities. It is made up of a set of tools, such as indicators, which are usually set for each EU fund. How do you assess the current monitoring system?  
Very effective,

Effective

Moderately effective

Not effective

Don't know/not applicable

Please give us more details on why you think this system has not been effective/very effective?

*Each EU funds still follow different rules with different set of indicators. At local level it becomes very difficult to combine these different funds for an integrated approach to local/ territorial development. We propose a single set of rules for beneficiaries across the different funds for simplification.*

The EU budget uses indicators providing an indication of how each programme has performed. Those indicators could measure 'inputs' (e.g. amount of EU funds dedicated to supporting researchers), 'output' (e.g. number of researchers supported by a project), 'results' (e.g. number of patents thanks to EU funds) or 'impacts' (e.g.

boosting EU competitiveness thanks to research projects financed through the EU budget). How do you assess those indicators?

	Very effective	Effective	Moderately effective	Not effective	Don't know/not applicable
Input indicators			X		
Output indicators			X		
Result indicators		X			
Impact indicators			X		

How do you assess reporting obligations when benefiting from an EU fund?  
Very effective,

Effective

Moderately effective

Not effective

Don't know/not applicable

The Commission reports performance information on the EU budget through a number of reports (such as the Programme Performance Statements) and dashboards (such as the Cohesion Open Data Platform and the Recovery and Resilience Scoreboard). How do you assess the way in which the Commission reports information about the implementation of the EU budget?

Very effective

Effective

Moderately effective

Not effective

Don't know/not applicable

For the future, would you support the objective of moving towards a simpler and more streamlined reporting system?

Yes,



No

Don't know/not applicable

The Commission manages websites that inform potential beneficiaries about funding opportunities and calls available under EU funds, such as the Funding and Tenders Portal and the EU Rural toolkit. How do you assess the way in which the Commission informs about funding opportunities?

Very effective

Effective

Moderately effective

Not effective

Don't know/not applicable

Would you support the objective of simplifying and streamlining the websites through which the Commission informs applicants about funding opportunities and calls available under EU funds?

Yes,

No

Don't know/not applicable

Please share with us any other ideas about the future performance framework for the EU budget.

500 character(s) maximum

*The EU must prioritise quality and accountability in cohesion funds. Strengthening the Partnership Principle ensures funds align with local needs. A place-based approach prevents policy shifts, while simplified, standardised rules reduce administrative burdens. Predictability, decentralisation, and extended project timelines enhance local capacity and fund absorption. Performance-based financing with adequate pre-financing ensures efficient use of EU funds.*

Closing questions

## Question

If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.  
(500 characters maximum)

*The EU budget needs simplified, standardised rules across all funds to reduce administrative burdens. A place-based approach ensures stability, while decentralisation improves local fund absorption. Performance-based financing, with adequate pre-financing, enhances efficiency. Extended project timelines and predictability help local governments plan effectively. Strengthening the Partnership Principle ensures investments align with real local needs, improving overall cohesion fund performance.*

Feel free to attach any relevant documents to support your replies.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

→ <https://ccre-cemr.org/wp-content/uploads/2025/02/Proposal-MFF-post-2027-CEMR-Position-Paper-2025.pdf>