

# CEMR amendment proposals on

## The European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security [pages 4-26]

and

## The European Fund for Regional Development [page 26-27]

The [Council of European Municipalities and Regions](#) (CEMR), the European umbrella associations representing local and regional governments, endeavours to foster peaceful, inclusive, just, and resilient territories and communities. **The European Cohesion policy is the main long term investment policy of the EU**, it has proven instrumental to deliver improved infrastructure, public services and quality of life to European wherever they live: from capital cities to functional urban regions to rural areas, from mountains to outermost regions.

**Local and regional governments are key actors to manage and implement** the Cohesion policy funds<sup>1</sup>, they are the government level closest to citizens and therefore are the best place to understand the specific needs and assets of their communities. Empowering local and regional governments to deliver on their democratic mandate, also contribute to strengthening the idea of European Integration with strong, resilient public administrations at all levels, capable of addressing current challenges.

In this respect, the Commission's regulations proposals for the next Multiannual Financial Framework raises key questions and **present the risk of failing to deliver on Treaty objectives** of strengthening economic, social and territorial cohesion across the Union. We identify the following main issues:

- 1) **Overall reduction of the EU budget for economic, social and territorial cohesion**, in relative terms compared to current and previous periods. While the Cohesion Policy used to represent a third of the Union's budget, indicating the strong priority given to this policy and the objectives of social, economic and territorial cohesion in the Union's. In addition, the eligibility of beneficiaries is extended to fully include private companies of any size. Not only creating higher competition for fewer resources but potentially putting in competition local public governments with limited resources against private companies with the capacity to strategically allocate human and financial resources towards funding opportunities. CEMR believes that the resilience and security of European inhabitants cannot be guaranteed without strong, independent and resilient public services and administrations and without ensuring good quality of life of people, including for future generations.

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<sup>1</sup> CEMR publication "Cohesion policy funds 2021-2027 – An overview of the management and implementation of European Structural and Investment Funds in the European countries" [https://ccre-cemr.org/wp-content/uploads/2024/04/230621\\_984\\_EISF\\_web.pdf](https://ccre-cemr.org/wp-content/uploads/2024/04/230621_984_EISF_web.pdf)

- 2) Beyond the use of key words such as “**partnership**” and “**multilevel governance**”; the proposal lacks substance and strong safeguards to ensure these principles will be upheld in all phases of the programming period. CEMR also recalls that while Partnership Principle concerns all relevant stakeholders in the implementation of the funds, multi-level governance is about permanent exchanges and cooperation between each government level: EU, national, regional, intermediate and local.
- 3) **Lack of long-term structural European vision for Cohesion policy.** The Commission is giving up any responsibility regarding what is to be done with this budget as it will be up to the Member States to decide on their own investment priorities. Member States have such important margin for decisions on funds allocations that there is no guarantee that all regions and territorial typologies will continue benefiting from cohesion policy investments, not even all less developed regions in each Member State. The European dimension of EU investment policy is becoming inexistant, putting the very European project in jeopardy – why continue contributing to a common EU budget if at the end of the day, the national governments may decide without any clear European guidelines and common direction?
- 4) Unlike the current period, the Commission proposals did not include **earmarking for integrated sustainable urban and non-urban development approaches** through Integrated Territorial Investments (ITI) or other effective place-based territorial development approaches, which may result in some Member States not considering it at all in future. ITI, CLLD (Community-led local development) and similar locally developed integrated development approaches have proven key to bringing EU closer to Europeans, by empowering local communities in designing their own territorial development strategies with the support of Cohesion Policy funds. These approaches contribute to reinforcing the capacities of the local administrations and strengthened links and trusts between different government levels (concept of vertical and horizontal administrative integration).
- 5) **Investments priorities and reforms** will be identified from the European Semester Country Specific Recommendations, a process largely ignoring the local and regional governments inputs and competences<sup>2</sup>. It is therefore necessary to “localise” the European Semester and define a designated role for the participation of local and regional governments. As the European Charter of Local Self-Government states, local authorities must be consulted in the planning and decision-making processes for all matters, which concern them directly (Art. 4) – and Cohesion Policy is such a case.

CEMR recalls previous practices of the European Commission, contradicting the principles of good governance such as inciting Member States to start programming before the adoption of the regulation, leaving a grey space on the involvement of stakeholders, and local and regional governments, especially in the programming phase.

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<sup>2</sup> CEMR study “Top level decision – Local consequences The European Semester explained” <https://ccre-cemr.org/wp-content/uploads/2024/11/EU-Semester-Study-2024.pdf>

We call on Member States and on the European Parliament to ensure the shortcomings of the Recovery and Resilience Facility<sup>3</sup>, or of the Social Climate Plans<sup>4</sup> will not be repeated for the sake of fast implementation. **Good programming deserves the time for proper consultation and involvement** of the main stakeholders responsible for final implementation of EU investments and reforms recommended by the European Semester –in many cases that is the local level.

To address the shortfalls of the Commission’s proposal, **we call on the Member States and on the Member of the European Parliament:**

- **To increase the budget allocations of “The Fund”** dedicated to the objectives of economic, social and territorial cohesion (referred to in Article 10 [Budget] paragraph 2 (a) [NRP Plans allocation], except for (ii) [CAP interventions] and (iii) [Home funds].
- **Make mandatory to include in the NRP Plans regional and territorial chapters**, covering the entire Member States territory. This will ensure that no place is left behind and that local and regional governments will have dedicated role in the monitoring committees. Such a proven place-based approach will ensure the leverage of EU long-term investments.
- **Strengthen the Partnership Principle and the multilevel governance** approach by making these principles as conditions for the allocation of funds and defining consequences when these principles are not abided by the Member States.
- Include a **mandatory earmark of 30% of the national allocations** (referred to in Article 10 [Budget] paragraph 2 (a) [NRP Plans allocation], except for (ii) [CAP interventions] and (iii) [Home funds].) **for integrated sustainable territorial development** (covering both urban and non-urban areas in a synergetic, complementary way). A higher EU cofinancing could also be included to make integrated territorial approaches more appealing.

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<sup>3</sup> CEMR - CoR study on the implementation of the post-pandemic Recovery and Resilience Facility (RFF) <https://ccre-cemr.org/press/rff-study-with-cor>

<sup>4</sup> Local Alliance policy brief “With the deadline near, Local Governments still left out of national Social Climate Plans” [https://www.climatealliance.org/fileadmin/Inhalte/4\\_Activities/Policy\\_papers/Local-Alliance-policy-brief-SCF-06-2025.pdf](https://www.climatealliance.org/fileadmin/Inhalte/4_Activities/Policy_papers/Local-Alliance-policy-brief-SCF-06-2025.pdf)

## On the Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509

### [AM 1] Recital 14

Text proposed by the Commission	CEMR amendment
(14) The support to Member States, regions and local communities in delivering on Union policy priorities and maximising efficiency maximisation of Union funding should be achieved, through the support for measures of high Union relevance linked to the most pressing challenges affecting Europe. Those challenges should be addressed by pursuing five high level objectives: Europe's sustainable prosperity across all regions; Europe's defence capabilities and security; supporting people, strengthening Europe's societies and Europe's social model; sustaining Europe's quality of life; protecting and strengthening democracy, rule of law and upholding Union values.	(14) The support to Member States, regions and local communities in delivering on Union policy priorities and maximising efficiency maximisation of Union funding should be achieved, through the support for measures of high Union relevance linked to the most pressing challenges affecting Europe. Those challenges should be addressed by pursuing five high level objectives: Europe's sustainable prosperity across all regions; Europe's defence capabilities and security; supporting people, strengthening Europe's societies and Europe's social model; sustaining Europe's quality of life <b>across all territories</b> ; protecting and strengthening democracy, rule of law and upholding Union values.

*Justification: it is important to recall the territorial dimension of the funds, in line with Article 174 TFEU.*

### [AM 2] Recital 22

Text proposed by the Commission	CEMR amendment
(22) Since the objectives of this Regulation cannot be sufficiently achieved by the Member States but can rather – by reason of the extent and specificities of some the aforementioned challenges – be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union (TEU). In accordance with the principle of proportionality as set out in that Article, this Regulation does not go beyond what is necessary to achieve those objectives. <b>Regions</b> will remain at the centre of the Fund with the	(22) Since the objectives of this Regulation cannot be sufficiently achieved by the Member States but can rather – by reason of the extent and specificities of some the aforementioned challenges – be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union (TEU). In accordance with the principle of proportionality as set out in that Article, this Regulation does not go beyond what is necessary to achieve those objectives. <b>Subnational governments</b> will remain at the

partnership principle and multi-level governance as the underlying elements. To ensure continuity, the Fund will build as much as possible on existing structures with regional and local authorities and other relevant stakeholders playing a key role in the design, management, implementation and monitoring of the supported measures under the Fund.	centre of the Fund with the partnership principle and multi-level governance as the underlying elements. To ensure continuity, the Fund will build as much as possible on existing structures with regional and local authorities and other relevant stakeholders playing a key role in the design, management, implementation and monitoring of the supported measures under the Fund.
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*Justification: while the role of regional governments in shaping, managing and implementing EU's investments in their regions is clear, it should not overlook the equally important role of all subnational governments such as municipalities, cities and provinces who can also act as Managing authorities<sup>5</sup>, intermediate bodies and leading partners in the context of territorial integrated development.*

*Alternative wording: "local and regional governments"*

### [AM 3] Recital 29

Text proposed by the Commission	CEMR amendment
(29) Each Member State should submit to the Commission a NRP Plan, as a rule, by 31 January 2028 so that it can be given careful and timely consideration. To ensure fast implementation of the Fund, Member States should be able to submit a draft NRP Plan from June 2027. Member States should design and implement the NRP Plans in partnership with local and regional authorities, economic, social and rural partners and civil society organisations and other relevant stakeholders in accordance with the national legal framework and the rules set out in this Regulation. The NRP Plans should be designed in close cooperation with the Commission, prepared in accordance with the template provided and made publicly available following their adoption by the Council on the basis of the Commission's assessment and proposal for a Council implementing decision. In line with current arrangements, Member States <b>will have the possibility to</b> include regional and territorial chapters in their NRP Plan and	(29) Each Member State should submit to the Commission a NRP Plan, as a rule, by 31 January 2028 so that it can be given careful and timely consideration. To ensure fast implementation of the Fund, Member States should be able to submit a draft NRP Plan from June 2027. Member States should design and implement the NRP Plans in partnership with local and regional authorities, economic, social and rural partners and civil society organisations and other relevant stakeholders in accordance with the national legal framework and the rules set out in this Regulation. The NRP Plans should be designed in close cooperation with the Commission, prepared in accordance with the template provided and made publicly available following their adoption by the Council on the basis of the Commission's assessment and proposal for a Council implementing decision. In line with current arrangements, Member States <b>shall</b> include regional <b>chapters</b> and territorial chapters in their NRP Plan and should be

<sup>5</sup> See CEMR publication ["Cohesion Policy funds 2021-2027: An overview of the management and implementation of European Structural and Investment Funds in the European countries"](#)



should be required to ensure that regional managing authorities receive regular payments, based on the progress of their respective measures, and an amount at least equivalent to their Union contribution by the end of the period, subject to potential corrections resulting from the implementation of their respective chapter(s). To ensure effective governance of the NRP Plan, Member States should set up monitoring committees for the chapters and a coordinating committee at the level of the NRP Plan.	required to ensure that regional managing authorities receive regular payments, based on the progress of their respective measures, and an amount at least equivalent to their Union contribution by the end of the period, subject to potential corrections resulting from the implementation of their respective chapter(s). To ensure effective governance of the NRP Plan, Member States should set up monitoring committees for the chapters and a coordinating committee at the level of the NRP Plan.
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*Justification: Against the risk of centralisation and to avoid repeating the absence of involvement of partners and of local and regional governments in recent national plans such as the Recovery and Resilience Plans<sup>6</sup> or the Social Climate Fund plans<sup>7</sup>, “The Fund” should ensure it will be implemented through a place-based and territorial sensitive approach. Imposing regional chapters and territorial chapters to reflect territorial disparities or local specificities within regions is the only way to ensure local and regional governments will have a meaningful contribution in the design of the National and Regional Partnership Plans.*

#### [AM 4] Recital 30

Text proposed by the Commission	CEMR amendment
(30) In order to ensure the national ownership, Member States wishing to receive support should submit to the Commission NRP Plans that are duly reasoned and substantiated. The NRP Plans should detail how it represents a comprehensive contribution to all objectives of the Fund, taking into account the specific national, regional and territorial challenges of the Member State concerned. It should also include an explanation of how it contributes to effectively addressing the relevant country specific challenges identified, inter alia, in the context of the European Semester and other relevant documents officially adopted by the Commission related to the objectives supported by the Fund, and how it contributes	(30) In order to ensure the national, <b>regional and local</b> ownership, Member States wishing to receive support should submit to the Commission NRP Plans that are duly reasoned and substantiated. The NRP Plans should detail how it represents a comprehensive contribution to all objectives of the Fund, taking into account the specific national, regional and territorial challenges of the Member State concerned <b>and detailing how the Plan was elaborated in accordance with multi-level governance and the Partnership Principle</b> . It should also include an explanation of how it contributes to effectively addressing the relevant country specific challenges identified, inter alia, in the context of the

<sup>6</sup> CEMR - CoR study on the implementation of the post-pandemic Recovery and Resilience Facility (RFF) <https://ccre-cemr.org/press/rff-study-with-cor>

<sup>7</sup> Local Alliance policy brief “With the deadline near, Local Governments still left out of national Social Climate Plans” [https://www.climatealliance.org/fileadmin/Inhalte/4\\_Activities/Policy\\_papers/Local-Alliance-policy-brief-SCF-06-2025.pdf](https://www.climatealliance.org/fileadmin/Inhalte/4_Activities/Policy_papers/Local-Alliance-policy-brief-SCF-06-2025.pdf)

<p>to the completion of the internal market, notably by including reforms, investments and other interventions with a cross-border, transnational or multi-country dimension. To strengthen Union competitiveness in strategically important sectors while ensuring that the level playing field is not compromised, the NRP Plans should include cross-border and multicountry projects, in particular Important Projects of Common European Interest (IPCEIs) focusing on either research, development, innovation or first industrial deployment or on the construction of important infrastructure open for third party use, taking into account, in particular, the analyses provided in the latest Annual Single Market and Competitiveness Report. Member States should concentrate resources under their Plans on reducing economic social and territorial disparities, in particular in less developed regions. They should also support generational renewal and social measures and thriving fisheries and aquaculture production.</p>	<p>European Semester and other relevant documents officially adopted by the Commission related to the objectives supported by the Fund, and how it contributes to the completion of the internal market, notably by including reforms, investments and other interventions with a cross-border, transnational or multi-country dimension. To strengthen Union competitiveness in strategically important sectors while ensuring that the level playing field is not compromised, the NRP Plans should include cross-border and multicountry projects, in particular Important Projects of Common European Interest (IPCEIs) focusing on either research, development, innovation or first industrial deployment or on the construction of important infrastructure open for third party use, taking into account, in particular, the analyses provided in the latest Annual Single Market and Competitiveness Report. Member States should concentrate resources under their Plans on reducing economic social and territorial disparities, in particular in less developed regions. They should also support generational renewal and social measures and thriving fisheries and aquaculture production.</p>
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#### [AM 5] Recital 31

Text proposed by the Commission	CEMR amendment
<p>(31) The Plan should ensure complementarity and synergies between different measures supporting different policy areas and targeting different groups of beneficiaries. This is particularly important to offer a comprehensive policy response to develop thriving rural and coastal areas and ensure vibrant agricultural and fisheries sectors. Member States are in particular encouraged to promote such synergies in the design of the measures and chapters and in the application of the cofinancing rates. For measures supporting basic services and infrastructure in</p>	<p>(31) The Plan should ensure complementarity and synergies between different measures supporting different policy areas and targeting different groups of beneficiaries, <b>with a particular focus on ensuring strong and resilient local and regional governments and public services.</b> This is particularly important to offer a comprehensive policy response to develop thriving rural and coastal areas, <b>functional areas</b> and ensure vibrant agricultural and fisheries sectors. Member States are in particular encouraged to promote such synergies in the design of the measures</p>

<p>rural and coastal areas as well as rural and coastal businesses, Member States should developed an integrated planning to ensure that rural and coastal communities have access to finance through appropriate mechanisms, including policy actions to specific; mechanisms and governance structures to coordinate the programming and implementation of EU, national, regional and local policies, the programming of locally and regionally integrated funding approaches, taking into account the specific context and capacities of the target beneficiaries, the creation of capacity building targeting both the administrations and the beneficiaries. The NRP Plan should set out the detailed set of measures and arrangements for its monitoring and implementation, including establishing NRP Plan authorities, monitoring and coordinating committee, the estimated costs of those measures and the national contribution and measures to enhance the quality of governance and reinforce the administrative capacity of public administrations. Close cooperation between the Commission, the Member States and their <b>regions</b> should be sought and achieved throughout the process; policy learning and experimentation should be encouraged.</p>	<p>and chapters and in the application of the cofinancing rates. For measures supporting basic services and infrastructure in rural and coastal areas as well as rural and coastal businesses, Member States should developed an integrated planning, <b>including functional areas</b> to ensure that rural and coastal communities have access to finance through appropriate mechanisms, including policy actions to specific; mechanisms and governance structures to coordinate the programming and implementation of EU, national, regional and local policies, the programming of locally and regionally integrated funding approaches, <b>including functional areas</b> taking into account the specific context and capacities of the target beneficiaries, the creation of capacity building targeting both the administrations and the beneficiaries. The NRP Plan should set out the detailed set of measures and arrangements for its monitoring and implementation, including establishing NRP Plan authorities, monitoring and coordinating committee, the estimated costs of those measures and the national contribution and measures to enhance the quality of governance and reinforce the administrative capacity of public administrations. Close cooperation between the Commission, the Member States and their <b>local and regional governments</b> should be sought and achieved throughout the process; policy learning and experimentation should be encouraged.</p>
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*Justification: multilevel governance is about cooperation between all levels of governments: national, regional, intermediate and local. The regulation should not overlook, in addition to regions, the critical role of municipalities, cities or provinces, that may also be identified as Managing Authorities, intermediate bodies or active partners of integrated territorial development strategies. New Leipzig Charta and the Territorial Agenda 2030 support the place-based approach of functional urban areas or functional regions as to safeguard and enhance the quality of life in all European towns and cities and their functional areas, which relies on a complex network of functional interdependencies. This approach should be part of the programming, fostering urban-rural partnerships and links.*

*Alternative wording: subnational governments*



**[AM 6] Article 3 – Specific objectives of the Fund - 1. (b) (ii)**

Text proposed by the Commission	CEMR amendment
(ii) strengthening Union's preparedness to crises and disasters by mainstreaming the principle of 'preparedness by design';	(ii) strengthening Union's preparedness to crises and disasters by mainstreaming the principle of 'preparedness by design' <b>at all levels;</b>

*Justification: adding 'at all levels' brings attention to the specific needs and potential vulnerabilities of local and regional governments and administrations when it comes to crisis and disaster preparedness, and the need to target EU's support also at subnational levels for this specific objective.*

**[AM 7] Article 3 – Specific objectives of the Fund - 1. (c)**

Text proposed by the Commission	CEMR amendment
(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by:	(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model <b>across all regions</b> by:

*Justification: The objective of article 174 TFEU is to strengthen economic, social and territorial cohesion and reducing disparities across the Union, this means that, in consistency with specific objectives mentioned in Article 3. (a) and (b) of this regulation proposal, all specific objectives should clarify that they apply "across all regions".*

**[AM 8] Article 3 – Specific objectives of the Fund - 1. (d)**

Text proposed by the Commission	CEMR amendment
(d) to sustain the quality of life in the Union by:	(d) to sustain the quality of life <b>across all regions</b> in the Union by:

**[AM 9] Article 3 – Specific objectives of the Fund - 1. (e)**

Text proposed by the Commission	CEMR amendment
(e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values by:	(e) to protect and strengthen fundamental rights, democracy, equality, the rule of law and to uphold Union values <b>across all regions</b> by:

**[AM 10] Article 4 – Definitions - 4.**

Text proposed by the Commission	CEMR amendment
(4) 'chapter of the NRP Plan' means a part of the NRP Plan focusing on a specific challenge, sector, policy or geographic area,	(4) 'chapter of the NRP Plan' means a part of the NRP Plan focusing on a specific challenge, sector, policy, <b>region</b> or geographic area,

**[AM 11] Article 6 – Partnership and multilevel governance – 2.**

Text proposed by the Commission	CEMR amendment
2. The partnership established in accordance with paragraph 1 shall operate in accordance with the multi-level governance principle and a bottom-up approach. The Member State shall involve partners referred to in each subparagraph of paragraph 1 in the preparation of the Plan and throughout the preparation, implementation and evaluation of chapters, including through participation in monitoring committees in accordance with Article 55.	2. <del>The partnership established in accordance with paragraph 1 shall operate in accordance with the multi-level governance principle and a bottom-up approach.</del> The Member State shall involve partners referred to in each subparagraph of paragraph 1 in the preparation of the Plan and throughout the preparation, implementation and evaluation of chapters, including through participation in monitoring committees in accordance with Article 55.

*Justification: The text proposed by the Commission mixes together and therefore confused two different yet equally important principles: Partnership Principle is about involving all stakeholders relevant for the implementation of the Fund. Multilevel governance is about cooperation between all government level within a Member State: national, regional, intermediate and local governments, for better policy making. In order to clearly differentiate Partnership Principle from multilevel governance, the proposal is to move the reference to multilevel governance to paragraph 4.*

**[AM 12] Article 6 – Partnership and multilevel governance – 4.**

Text proposed by the Commission	CEMR amendment
4. <del>Regarding the partners referred to in paragraph 1, point (a),</del> the Member State shall ensure that all authorities concerned by the relevant chapters of the Plan are appropriately represented in accordance with the corresponding territorial level and the geographical coverage of the chapter, as appropriate.	4. <b>In addition to Partnership Principle, each Member State shall ensure multilevel governance and bottom-up approach through proper consultation and involvement of all relevant authorities mentioned in paragraph 1, point (a).</b> The Member State shall ensure that all authorities concerned by the relevant chapters of the Plan are appropriately represented in accordance with the corresponding territorial level and the geographical coverage of the chapter, as appropriate.

**[AM 13] Article 6 – Partnership and multi-level governance – 6.**

Text proposed by the Commission	CEMR amendment
6. At least <del>once</del> a year, the Commission shall consult organisations which represent partners at Union level on the implementation of the Plans.	6. At least <b>twice</b> a year, the Commission shall consult organisations which represent partners at Union level on the implementation of the Plans. <b>The Commission shall ensure a consultation of stakeholder's representative organisations before approving the NRP</b>

	<b><i>Plans in order to collect information on effective implementation of Article 6.</i></b>
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*Justification: in the 2021-2027 period the Common Provision Regulation foresees at least once a year meeting of the Dialogue with Common Provisions Regulation partners. The practice until 2023 was however of two meetings a year, and as participant in this dialogue CEMR considers this a bare minimum to have meaningful engagement on the implementation of the structural funds with the European Commission. This forum could be an additional opportunity for the Commission to control respect of the Partnership Principle and Multilevel governance in the approbation of the NRP Plans.*

**[AM 14] Article 6 – Partnership and multi-level governance – 7 - 13 (New)**

Text proposed by the Commission	CEMR amendment
<b><i>7 -13. (New)</i></b>	<p><b><i>7. Where the Commission considers that a Member State does not fulfil or no longer fulfils the Partnership and multilevel governance conditions, as provided for in paragraph 1 to 4, it shall notify the Member State concerned of its assessment, based on information provided by the Member State concerned in its NRP Plan, in response to Commission observations, and taking into account relevant information, including from stakeholder's consultation as provided for in paragraph 6.</i></b></p> <p><b><i>8. The Member State concerned may present its observations and eventual remedial measures, including changes to the NRP Plan, within two months following the notification of the assessment pursuant to paragraph 7.</i></b></p> <p><b><i>9. Where the Commission concludes that the Partnership and multilevel governance conditions are not fulfilled, it shall adopt an implementing decision determining the non-fulfilment of the Partnership and multilevel governance conditions and identifying the specific measures of the NRP Plan affected by the non-fulfilment, within two months of receiving the Member State's observations referred to in paragraph 8.</i></b>  <b><i>For that purpose, the following aspects of the non-fulfilment of the Partnership and multilevel governance conditions shall be taken into consideration:</i></b>  <b><i>(a) the actual or potential impact on the sound financial management of the Union budget or on the financial interests of the Union;</i></b></p>

	<p><i>(b) the nature, duration, gravity and scope.</i></p> <p><i>10. The Member State may submit payment applications for the specific measures identified in the decision referred to in paragraph 9, but the Commission shall not make the corresponding payments until the Partnership and multilevel governance conditions have been fulfilled.</i></p> <p><i>11. The Member State concerned shall inform the Commission as soon as it considers that the Partnership and multilevel governance conditions have been fulfilled. The Commission shall assess that information within two months from receipt. Where the Commission considers that the Partnership and multilevel governance conditions have been fulfilled, it shall repeal the decision referred to in paragraph 4. Where the Commission disagrees with the Member State regarding the fulfilment of the Partnership and multilevel governance conditions, it shall inform the Member State thereof and set out its assessment.</i></p> <p><i>12. The Commission shall reduce proportionately the Union financial contribution of the Member State as regards the specific measures concerned or, in respect of loan support, take any measure available under the loan agreement, where the decision referred to in paragraph 9 has not been repealed within one year of its adoption.</i></p> <p><i>13. The activation of Article 6 paragraph 7-12 shall not affect the obligations government entities have towards final recipients or beneficiaries, including the obligation to make payments under this Regulation.</i></p>
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*Justification: previous experience with the Recovery and Resilience Facility and the Social Climate Plans demonstrated the limits of the provisions included in the relevant regulations for consultation and participation of local and regional governments in drafting national plans. In order to secure the proper enforcement of both Partnership Principle and Multilevel governance, this and following amendment proposal (additional paragraphs 7 to 12) aim at aligning the wordings used for Article 8 [Charter of Fundamental Rights] and Article 9 [Rule of law] to ensure the same rigour is awarded to Article 6.*

*Paragraph 13 mirrors the wording of Article 5, paragraph 2 of Regulation (EU, Euratom 2020/2092) on a general regime of conditionality for the protection of the Union budget and aims at protecting final beneficiaries in case of interruption of payments resulting from breach to Article 6.*

**[AM 15] Article 7 – Horizontal principles – 1. (c) (New)**

Text proposed by the Commission	CEMR amendment
<b>(c) (New)</b>	<b>(c) the principles of partnership and multi-level governance set out in Article 6</b>

*Justification: This amendment was suggested by the European Commission President in her letter to the Council and the European Parliament of 9 November 2025 and aligns with the objective of strengthening the Partnership principle and multi-level governance throughout the Fund.*

**[AM 16] Article 7 - Horizontal principles – 5. (a)**

Text proposed by the Commission	CEMR amendment
(a) complementarity and consistency among different instruments at Union, national <b>and</b> regional levels, both in the planning phase and during implementation;	(a) complementarity and consistency among different instruments at Union, national, regional <b>and local</b> levels, both in the planning phase and during implementation;

**[AM 17] Article 7 - Horizontal principles – 5. (b)**

Text proposed by the Commission	CEMR amendment
(b) close cooperation between the authorities responsible for implementation and control at Union, national <b>and</b> regional levels to achieve the objectives of the Fund and synergies between measures under different objectives of the Fund.	(b) close cooperation between the authorities responsible for implementation and control at Union, national, regional <b>and local</b> levels to achieve the objectives of the Fund and synergies between measures under different objectives of the Fund.

**[AM 18] Article 10 – Budget – 2. (a)**

Text proposed by the Commission	CEMR amendment
2. The financial envelope shall be allocated as follows:  (a) EUR 782 879 000 000 shall be allocated to the NRP Plans referred to in Title III in accordance with Annex I [Allocation key], of which:  (i) At least EUR 217 798 000 000 for less developed regions by establishing minimum amounts per Member State based on the methodology set out in Annex II;	2. The financial envelope shall be allocated as follows:  (a) EUR 782 879 000 000 shall be allocated to the NRP Plans referred to in Title III in accordance with Annex I [Allocation key], of which:  <b>(i) At least EUR 452 963 490 000 for the objective of economic, social and territorial cohesion as defined in Article 174 of the Treaty on the Functioning of the EU;</b>



<p>(ii) At least EUR 295 700 000 000 for CAP interventions referred to in Article 35(1) [types of support], paragraph 1, points (a) to (k) and (r) and paragraph 10 and for interventions listed in article 35 paragraph 11;</p> <p>(iii) At least EUR 34 215 510 000 as follows: EUR 11 975 428 500 as set out in Article 4 of Regulation (EU) 202X/XXX [establishing the Union support for asylum, migration and integration for the period from 2028 to 2034], EUR 15 396 750 000 as set out in Article 4 of Regulation (EU) 202X/XXX [Establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034] and EUR 6 843 331 500 as set out in Article 4 of Regulation (EU) 202X/XXX [establishing the Union support for internal security for the period from 2028-2034] for the objectives set out in Article 3 of those Regulations.</p>	<p>(i) At least EUR 217 798 000 000 for less developed regions by establishing minimum amounts per Member State based on the methodology set out in Annex II;</p> <p>(ii) At least EUR 295 700 000 000 for CAP interventions referred to in Article 35(1) [types of support], paragraph 1, points (a) to (k) and (r) and paragraph 10 and for interventions listed in article 35 paragraph 11;</p> <p>(iii) At least EUR 34 215 510 000 as follows: EUR 11 975 428 500 as set out in Article 4 of Regulation (EU) 202X/XXX [establishing the Union support for asylum, migration and integration for the period from 2028 to 2034], EUR 15 396 750 000 as set out in Article 4 of Regulation (EU) 202X/XXX [Establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034] and EUR 6 843 331 500 as set out in Article 4 of Regulation (EU) 202X/XXX [establishing the Union support for internal security for the period from 2028-2034] for the objectives set out in Article 3 of those Regulations.</p>
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*Justification: this amendment aims at safeguarding a minimum amount of the Fund budget for the objectives of Cohesion Policy given the risk of the budget becoming a political bargain with other economic sectors including farmers (cf. negotiations on Mercosur).*

**[AM 19] Article 10 – Budget – 5. bis (New)**

Text proposed by the Commission	CEMR amendment
<b>5. bis (NEW)</b>	<b><i>At least 15% of the financial envelope referred to in paragraph 2(a) and of the amount referred to in paragraph 4 shall be dedicated to rural development, calculated by using the code 02 referred in Part I of Annex II of Regulation (EU) [Performance Regulation], and for the purpose of the specific objective defined in Article 3 paragraph 1. (a) and (c). The amount set out in paragraph 2, point (a) letter (ii), as well as the external assigned revenue from the Social Climate Fund, shall be excluded from the basis for the calculation of this minimum allocation.</i></b>

*Justification: this amendment builds on the proposal by the Commission President in her letter to Council and the European Parliament of 9 November 2025, suggesting a 10% earmarking for rural areas. CEMR suggests raising this earmark to 15% and also to clarify that the objectives for this earmark is **to support rural development [second pillar of the CAP]** and therefore attaches it to the specific objective included in Article 3, paragraph 1. (a) “to support the Union’s sustainable prosperity across all regions” and (c) “to strengthen social cohesion by supporting people and strengthening the Union’s societies and the Union social model”*

#### [AM 20] Article 13 - Technical assistance at the initiative of the Member State

Text proposed by the Commission	CEMR amendment
Article 13 Technical assistance at the initiative of the Member State  1. At the initiative of a Member State, the Fund may support actions, which may concern previous and subsequent programming periods, necessary for the effective implementation of the Fund, including to provide financing for carrying out, amongst other, functions such as preparation, training, management, monitoring, evaluation, information, visibility and communication.	Article 13 Technical assistance at the initiative of the Member State <b>or Managing Authorities</b>  1. At the initiative of a Member State <b>or Managing Authority</b> , the Fund may support actions, which may concern previous and subsequent programming periods, necessary for the effective implementation of the Fund, including to provide financing for carrying out, amongst other, functions such as preparation, training, <b>capacity building of partners identified in Article 6 of this regulation</b> , management, monitoring, evaluation, information, visibility and communication.

#### [AM 21] Article 15 - Decommitments

Text proposed by the Commission	CEMR amendment
1. The Commission shall decommit any amount in an NRP Plan and the Interreg Plan chapter which has not been used for pre-financing, in accordance with Article 17 [pre-financing] or for which a payment application has not been submitted in accordance with Articles 65 [submission and assessment of payment applications], by 31 October of the calendar year following the year of the budgetary commitments.	1. The Commission shall decommit any amount in an NRP Plan and the Interreg Plan chapter which has not been used for pre-financing, in accordance with Article 17 [pre-financing] or for which a payment application has not been submitted in accordance with Articles 65 [submission and assessment of payment applications], by 31 October of the <b>third</b> calendar year following the year of the budgetary commitments.

*Justification: In the 2014-2020 MFF cycle, managing authorities had time until 3 years after the end of the cycle (i.e. 2023) to submit claims, while in the 2021-2027 cycle they have time until 2 years after the end of the cycle (i.e. 2029). CEMR members, including associations representing Managing Authorities (regions, provinces) call on the Commission to come back to the N+3 rule which is more appropriate for long term investments.*

#### [AM 22] Article 17 – Pre-financing – 2 bis (New)

Text proposed by the Commission	CEMR amendment
<b>2 bis. [New]</b>	<b>2 bis. The Commission shall pay a pre-financing of an amount of 30% of the Union financial contribution from The Fund for interventions referred to in Articles 75 and 76. [Integrated territorial and urban development and Community-led local development]</b>

*Justification: measures implemented through integrated territorial development tools mostly rely on local governments or local stakeholders which may be deterred to participate because of liquidity stress issues on local budget. Increased pre-financing for these local governments and stakeholders would also contribute to accelerating absorption of the funds at the beginning of the programming period;*

#### [AM 23] Article 20 – National contribution to estimated costs – 3 bis (New)

Text proposed by the Commission	CEMR amendment
<b>3 bis. [New]</b>	<b>3 bis. The minimum national contribution rate listed under paragraph 1 shall be decreased by ten percentage points for interventions referred to in Articles 75 and 76. [Integrated territorial and urban development and Community-led local development]</b>

*Justification: This amendment mirrors a provision included in the Common Provision Regulation 2021-2027 (Article 112 – determination of co-financing rates) which increased the EU co-financing by 10% for priorities delivered through community-led local development. Lower national co-financing (i.e. higher EU co-financing rate) will be an incentive to encourage Member States to allocate resources to integrated territorial development*

#### [AM 24] Article 21 - Preparation and submission of the Plan - 2

Text proposed by the Commission	CEMR amendment
2. 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 <del>and, where relevant,</del> regional and territorial chapters.	2. Each Member State shall prepare and implement the Plan <b>at the appropriate territorial level</b> 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. <b>Subnational governments shall be fully involved in the preparation, implementation and evaluation of the NRP Plan.</b> The Plan shall include national, sectoral, regional and territorial chapters.

*Justification: this amendment mirrors the wording of the 2021-2027 Common Provision Regulation Article 7, paragraph 1: “Member States shall prepare and implement programmes at the appropriate territorial level in accordance with their institutional, legal and financial framework”. It also adds the amendment suggested by Commission President in her letter to the Council and the Parliament of 9 November 2025 (while preferring the wording “subnational government” to the wording of ‘regional and local authorities’ which ignores intermediate governments (départements, counties, provinces, etc). Finally it suggests removing “where relevant” to ensure all regions would be covered by a dedicated chapter in the Plan.*

**[AM 25] Article 22 – Requirements for the NRP Plan – 2. (c)**

Text proposed by the Commission	CEMR amendment
(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;	(c) provide the list and description of measures grouped in <b>regional</b> chapters <b>and territorial chapters</b> , 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;

**[AM 26] Article 22 – Requirements for the NRP Plan – 2. (i) (i)**

Text proposed by the Commission	CEMR amendment
2. (i) (i) <del>which stakeholders</del> have been consulted, how these were selected, how their representativeness <del>and prevention of conflict of interest has</del> been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership, and by including a summary of the consultation process conducted for the preparation of the Plan and each chapter;	2. (i) (i) <b>ensure a comprehensive multilevel governance check of the NRP Plan by involving regional, local, urban, rural and other public authorities or associations representing such authorities in the design of the NRP Plan and by setting out which authorities have</b> been consulted, how these were selected, how their representativeness has been ensured and how their input is reflected in the <b>NRP</b> Plan in line with the code of conduct on partnership, and by including a summary of the consultation



	process conducted for the preparation of the Plan and each chapter;
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*Justification: This amendment builds on the proposal made by European Commission President in her letter to the Council and European Parliament of 9 November 2025 of a “regional check”; CEMR suggests for clarification to call it “multi-level governance check”, as the objective would be to ensure respect with multilevel governance principle (i.e. looking at relevant legal competences of all subnational governments in the Member State).*

**[AM 27] Article 22 – Requirements for the NRP Plan – 2. (n)**

Text proposed by the Commission	CEMR amendment
(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 ore 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 ;	(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 ore 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. <b>Member States shall promote integrated projects such as LEADER and locally-led strategies, contributing to several objectives thus resulting in synergies across different specific and general objectives.</b>

*Justification: This amendment builds on the proposal made by European Commission President in her letter to the Council and European Parliament of 9 November 2025, in support of place-based integrated approaches.*

**[AM 28] Article 24 – Amendment of the NRP Plan – 9bis (New)**

Text proposed by the Commission	CEMR amendment
<b>9bis. (New)</b>	<b>9bis. The specific measures identified in the implementing decision referred to in Article 6(9) [Partnership] 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 Partnership and multilevel governance conditions or to addressing the situation that led to the adoption of the aforementioned decisions.</b>

*Justification: this amendment follows the rationale developed to strengthen and clarify the binding nature of Article 6 on Partnership principle and multilevel governance.*

**[AM 29] Article 49 – Plan authorities – 1.**

Text proposed by the Commission	CEMR amendment
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1. For the purposes of Article 63(3) of Regulation (EU, Euratom) 2024/2509, each Member State shall identify one or more managing authorities, one or more paying agencies and one or more audit authorities for the Plan. The authorities identified shall fulfil the relevant key requirements set out in Annex IV to this Regulation. All authorities identified for the purposes of this Article shall have the possibility for exchanges with the Commission.	1. For the purposes of Article 63(3) of Regulation (EU, Euratom) 2024/2509, each Member State shall identify one or more managing authorities, one or more paying agencies and one or more audit authorities for the Plan. The authorities identified shall fulfil the relevant key requirements set out in Annex IV to this Regulation.  <b>1 bis.</b> All authorities identified for the purposes of this Article shall have the possibility for exchanges with the Commission. <b>When the Plan consists of regional and territorial chapters pursuant to Article 21(2), the managing authorities at the relevant territorial level responsible for their design, programming, management and implementation shall be able to interact directly with the Commission.</b>
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*Justification: this amendment builds on the proposal made by European Commission President in her letter to the Council and European Parliament of 9 November 2025, to explicit the direct link between the Managing Authorities and the Commission. It clarifies that the role of Managing Authority could be entrusted to any subnational government level, i.e. regions, provinces, cities, etc., as is the case in the current programming period (see [CEMR publication on Cohesion Policy funds 2021-2027](#)).*

#### [AM 30] Article 55 – Composition of the monitoring committee – 1.

Text proposed by the Commission	CEMR amendment
<p>1. Each Member State shall determine in a public procedure and based on objective and transparent criteria, the composition and the size of the monitoring committee, ensuring a balanced representation of the relevant Member State authorities and intermediate bodies and of representatives of the partners referred to in Article 6 [partnership]. The number of such partners shall be equal or superior to members belonging to authorities or intermediate bodies.</p> <p>The composition of the monitoring committee shall take into account the chapter or the chapters of the Plan the monitoring committee is responsible for. The composition and size of the monitoring committee shall enable the committee to carry out its work efficiently and effectively.</p> <p>Each member of the monitoring committee shall have a vote.</p>	<p>1. Each Member State shall determine in a public procedure and based on objective and transparent criteria, the composition and the size of the monitoring committee, ensuring a balanced representation of the relevant Member State authorities, <b>including subnational governments</b>, and intermediate bodies and of representatives of the partners referred to in Article 6 [partnership]. The number of such partners shall be equal or superior to members belonging to authorities or intermediate bodies.</p> <p>The composition of the monitoring committee shall take into account the chapter or the chapters of the Plan the monitoring committee is responsible for. The composition and size of the monitoring committee shall enable the committee to carry out its work efficiently and effectively.</p>

The Member State shall publish and annually update the list of the members of the monitoring committee on the website referred to in Article 64.	Each member of the monitoring committee shall have a vote.  The Member State shall publish and annually update the list of the members of the monitoring committee on the website referred to in Article 64.
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*Justification: this amendment builds on the proposal made by European Commission President in her letter to the Council and European Parliament of 9 November 2025 but prefers the wording “subnational governments” which allows to include intermediate levels (e.g. départements, counties, provinces, etc). Alternative wording: “subnational authorities”.*

#### **[AM 31] Article 75 – Integrated territorial and urban development**

Text proposed by the Commission	CEMR amendment
Article 75 – Integrated territorial and urban development	Article 75 – Integrated <b>sustainable</b> territorial and urban development

*Justification: the Commission proposal for the next long-term budget represents a step backward on the green transition and sustainable development, especially with the end of a self-standing LIFE programme, that have been greatly supporting local and regional government’s actions towards sustainable development and the green transition. This amendment aims at reintroducing the sustainability dimension, especially in place-based investments.*

#### **[AM 32] Article 75 – Integrated territorial and urban development – 2. (f) New**

Text proposed by the Commission	CEMR amendment
<b>2. (f) New</b>	<b>2. (f) be dedicated a minimum of 30% of the total national allocation as defined in Article 10 [Budget] paragraph 2 (a) to the exception of interventions covered by Article 10, paragraph 2 (ii) and (iii).</b>

*Justification: the urban earmark included in previous programming cycle showed positive results, with several Member States going beyond the minimum 8% earmark; on the other hand we saw that no earmarking for the Policy Objective 5 “Europe closer to citizens” in the programming period 2021-2027 translated in some Member States not using it at all<sup>8</sup>. Integrated territorial development (understood that “territorial refers to any type of places) is a powerful approach to ensure EU’s investments are fit for purpose and answer real needs of local and regional communities. Given its embedded flexibility allowing to use this approach in all constitutional contexts, CEMR recommends a minimum 30% earmark to integrated territorial development strategies (in both urban and non-urban contexts).*

#### **[AM 33] Article 76 – Community-led local development – 5 (New)**

Text proposed by the Commission	CEMR amendment
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<sup>8</sup> See CEMR publication [“Cohesion Policy funds 2021-2027: An overview of the management and implementation of European Structural and Investment Funds in the European countries”](#)

<b>5. (New)</b>	<b>5. LEADER local action groups can benefit from support under this article for activities not covered by article 18 of Regulation (EU) 202X/XXXX (CAP Regulation) under the conditions set out in this article.</b>
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*Justification: this amendment builds on the proposal made by European Commission President in her letter to the Council and European Parliament of 9 November 2025.*

#### **[AM 34] Annex IV – Key requirements for the Member State’s management, control and audit systems**

Text proposed by the Commission	CEMR amendment
11. Appropriate transparent and non-discriminatory criteria and procedures for the selection of operations to maximise the contribution of Union funding towards the achievement of the objectives of the Plan and respecting the principles of sound financial management, transparency and non-discrimination, taking account of the Charter of Fundamental Rights of the European Union. Appropriate information to beneficiaries on applicable conditions for support for the selected operations ensuring access to funding opportunities to a diverse range of entities, including small and medium-sized enterprises.	11. Appropriate transparent and non-discriminatory criteria and procedures for the selection of operations to maximise the contribution of Union funding towards the achievement of the objectives of the Plan and respecting the principles of sound financial management, transparency and non-discrimination, taking account of the Charter of Fundamental Rights of the European Union. Appropriate information to beneficiaries on applicable conditions for support for the selected operations ensuring access to funding opportunities to a diverse range of entities, including small and medium-sized enterprises <b>and local governments</b> .

*Justification: local governments, in particular smaller cities and municipalities function under specific constraints of accountable governance level, with specific rules and resources constraints. It will be important that local governments do not find themselves in a position of competition for funding with other private stakeholders playing with different rules and different resources. Specific attention should be dedicated to ensuring support also goes to local governments’ policies, investments, services and infrastructures.*

#### **[AM 35] Annex V – Template for the National and Regional Partnership Plan – Title I – 1. Part 1 – 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 and challenges identified in the documents and strategies referred to in Article 22(2), point (b)**

Text proposed by the Commission	CEMR amendment
National or regional level  (National for the CAP)	National or <b>subnational</b> level  (National for the CAP)

*Justification: The country-specific recommendations formulated as part of the European Semester may concern subnational governments levels (regions, provinces, cities, municipalities, etc) depending on*

the specific competences reserved to these local and regional governments by law. For complete information on the impact of EU Semester on local and regional governments, refer to CEMR publication "[Top level decision – Local consequences: The European Semester explained](#)"<sup>9</sup>. For complete overview of the competences of subnational governments in European countries, refer to CEMR publication "[TERRI report – Territorial governance powers and reforms in Europe](#)"<sup>10</sup>.

**[AM 36] Annex V – Template for the National and Regional Partnership Plan – Title I – 1. Part 1 – 1.3.** Description of how the Plan is consistent with the national medium-term fiscal structural plans, national restoration plans under Regulation (EU) 2024/1991, National Energy and Climate Plans under Regulation (EU) 2018/1999 and the national digital decade strategic roadmaps under Decision (EU) 2022/2481

Text proposed by the Commission:

National Plans and roadmaps	Describe how the measures included in the Plan are consistent with the objectives set out in these documents
National medium-term fiscal structural plan	[1 000]
National restoration plan under Regulation (EU) 2024/1991	[1 000]
National Energy and Climate Plan under Regulation (EU) 2018/1999	[1 000]
National digital decade strategic roadmap under Decision (EU) 2022/2481	[1 000]
Other relevant national plans	[1 000]

CEMR amendment:

National Plans and roadmaps	Describe how the measures included in the Plan are consistent with the objectives set out in these documents, <i>including a description of the impact of the measures on subnational governments competences and resources</i>
National medium-term fiscal structural plan	[2 000]
National restoration plan under Regulation (EU) 2024/1991	[2 000]
National Energy and Climate Plan under Regulation (EU) 2018/1999	[2 000]
National digital decade strategic roadmap under Decision (EU) 2022/2481	[2 000]
Other relevant national plans	[2 000]

<sup>9</sup> <https://ccre-cemr.org/wp-content/uploads/2024/11/EU-Semester-Study-2024.pdf>

<sup>10</sup> <https://terri.cemr.eu/en/>

*Justification: the documents mentions often have a direct impact on subnational governments, either on financial resources as they are directly impacted by the national medium-term fiscal structural plan, or they are the competent government level for the implementation of measures related to nature restoration, energy and climate plans, digital decades and other relevant national plans. It is important to flag the impact of these regulations and relevant measures on local and regional governments' competences and financial resources.*

**[AM 37] Annex V – Template for the National and Regional Partnership Plan – Title I – 1. Part 1 – 1.9.** Comprehensive overview of the planned use of integrated territorial development in cities, urban and rural areas, community-led local development, in particular LEADER, or other territorial tools including just transition, smart specialisation strategies and strategies for decarbonisation developed with the support of Union instruments in the 2021-2027 period [1 000]

Text proposed by the Commission:

Planned use of territorial tools:	Measures
Integrated territorial development	[List of measure ID and titles]
Community-lead local development / LEADER	
[other territorial tools]	

CEMR amendment:

Planned use of territorial tools:	Measures	Total estimated costs (EUR)	EU contribution (EUR)	Percentage of the plan [Article 75 – Integrated territorial and urban development – 2. (f) New ]
Integrated <b>sustainable</b> territorial development	[List of measure ID and titles]			
Community-lead local development / LEADER				
[other territorial tools]				
<b>Total</b>				<b>X% (Minimum: 30%)</b>

*Justification: the urban earmark included in previous programming cycle showed positive results, with several Member States going beyond the minimum 8% earmark; on the other hand we saw that no earmarking for the Policy Objective 5 “Europe closer to citizens” in the programming period 2021-2027*



*translated in some Member States not using it at all<sup>11</sup>. Integrated territorial development (understood that “territorial refers to any type of places) is a powerful approach to ensure EU’s investments are fit for purpose and answer real needs of local and regional communities. Given its embedded flexibility allowing to use this approach in all constitutional contexts, CEMR recommends a minimum 30% earmark to integrated territorial development strategies (in both urban and non-urban contexts)*

**[AM 38] Annex V – Template for the National and Regional Partnership Plan – Title I – 1. Part 3 – 3.3**

Text proposed by the Commission	CEMR amendment
<p>Partnership and multi-level governance Reference: Article 22(2), points (g) and (k) (i)</p> <p>A summary of all actions ensuring the involvement of partners, including the consultation and dialogue process conducted for the preparation of the Plan and each chapter, including an explanation on which stakeholders have been consulted, how these were selected, how their representation has been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership. [2 000]</p>	<p><b>Compliance with</b> partnership and multi-level governance Reference: <b>Article 6</b>, Article 22(2), points (g) and (k) (i)</p> <p>A summary of all actions ensuring the involvement of partners, including the consultation and dialogue process conducted for the preparation of the Plan and each chapter, including an explanation on which stakeholders have been consulted, how these were selected, how their representation has been ensured and how their input is reflected in the Plan in line with the code of conduct on partnership. [2 000]</p> <p><b>And a summary of all actions ensuring multi-level governance and the consultation of subnational governments and representative associations at national level, including through the establishment of national platforms for multilevel governance. [2000]</b></p>

*Justification: it is important not to confuse Partnership Principle and Multilevel Governance, these are two essentials, yet different principles: partnership principle is about involving in a horizontal way all representatives of various partners relevant for the implementation of the funds, it therefore includes, in addition to local and regional governments, civil society organisations, economic and social partners, universities, etc. On the other hand, multilevel governance refers to vertical cooperation between all different governance levels: national, regional, intermediate (e.g. provinces, counties, département), and local. Each subnational governments have legal competences and democratic mandate that make them accountable to the citizens on efficient delivery of public investments and territorial development strategies. This is the reason why multilevel governance processes are essential, in addition to partnership principle, to ensure effective implementation of EU structural investments at subnational levels.*

**[AM 39] Annex V – Template for the National and Regional Partnership Plan – Title II – 2. Measures - 2.7 (New)**

<sup>11</sup> See CEMR publication [“Cohesion Policy funds 2021-2027: An overview of the management and implementation of European Structural and Investment Funds in the European countries”](#)

Text proposed by the Commission	CEMR amendment
<b>(New)</b>	<b>2.7. Multilevel governance</b>  <b>List of the subnational government levels to be associated for the implementation of the measure [1500]</b>

*Justification: This will ensure local and regional governments role in implementing reforms and investment is duly considered in the elaboration of the plans. It will also allow the European Commission to judge whether multilevel governance was properly addressed, comparing consultation processes and the list of subnational government levels to be associated for the implementation of each measure.*

#### **[AM 40] Annex VII – Methodology for territorial contribution**

Text proposed by the Commission	CEMR amendment
(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.	(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. <b>The amount dedicated to integrated territorial approaches shall be no lower than 30% of the total national allocation as defined in Article 10 [Budget] paragraph 2 (a) to the exception of interventions covered by Article 10, paragraph 2 (ii) and (iii)</b>

*Justification: The urban earmark included in previous programming cycle showed positive results, with several Member States going beyond the minimum 8% earmark; on the other hand we saw that no earmarking for the Policy Objective 5 “Europe closer to citizens” in the programming period 2021-2027 translated in some Member States not using it at all<sup>12</sup>. Integrated territorial development (understood that “territorial refers to any type of places) is a powerful approach to ensure EU’s investments are fit for purpose and answer real needs of local and regional communities. Given its embedded flexibility allowing to use this approach in all constitutional contexts, CEMR recommends a minimum 30% earmark to integrated territorial development strategies (in both urban and non-urban contexts).*

<sup>12</sup> See CEMR publication [“Cohesion Policy funds 2021-2027: An overview of the management and implementation of European Structural and Investment Funds in the European countries”](#)

## On the Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the 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

### [AM 1] Article 4 – Support for disadvantages areas

Text proposed by the Commission	CEMR amendment
<p>1. In accordance with Article 174 TFEU, Member States shall pay special attention to addressing the challenges of disadvantaged regions and areas, in particular rural areas, areas affected by industrial transition, 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, and also just transition areas and regions bordering Russia, Belarus and Ukraine. Member States and regions shall <del>where appropriate</del>, set out an integrated approach to addressing demographic challenges or specific needs of the regions and areas referred to in this paragraph in their National and Regional Partnership Plans in accordance with Articles 72 to 74 [integrated local and urban development] of Regulation (EU) [NRP Regulation]. Such an integrated approach <del>may</del> include a commitment on dedicated funding for that purpose and may be included in dedicated chapters of the National Regional and Partnership Plan.</p>	<p>1. In accordance with Article 174 TFEU, Member States shall pay special attention to addressing the challenges of disadvantaged regions and areas, in particular rural areas, areas affected by industrial transition, 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, and also just transition areas and regions bordering Russia, Belarus and Ukraine. Member States and regions shall set out an integrated approach to addressing demographic challenges or specific needs of the regions and areas referred to in this paragraph in their National and Regional Partnership Plans in accordance with Articles 72 to 74 [integrated local and urban development] of Regulation (EU) [NRP Regulation]. Such an integrated approach <b>shall include for that purpose a commitment corresponding to a minimum of 30% of the total national allocation as defined in Article 10 of Regulation (EU) [NRP Regulation] paragraph 2 (a) to the exception of interventions covered by Article 10, paragraph 2 (ii) and (iii). This commitment shall be detailed in dedicated</b> chapters of the National Regional and Partnership Plan.</p>

### [AM 2] – Article 5 – Sustainable urban development

Text proposed by the Commission	CEMR amendment
<p>As part of their territorial development, Member States shall support integrated urban development strategies which focus on sustainable development and tackle</p>	<p>As part of their territorial development, Member States shall support integrated urban development strategies which focus on sustainable development and tackle</p>

<p>environmental, energy and climate challenges, in particular the fair transition towards a clean and climate neutral and resilient economy by 2050, paying special attention to housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages.</p>	<p>environmental, energy and climate challenges, in particular the fair transition towards a clean and climate neutral and resilient economy by 2050, paying special attention to housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages <b>and shall allocate at least 15 % of the total national allocation as defined in Article 10 [Budget] paragraph 2 (a) to the exception of interventions covered by Article 10, paragraph 2 (ii) and (iii)., other than for technical assistance, to sustainable urban development.</b></p>
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