

CPMR response to the EU Consultation on the Connecting Europe Facility I 2014-2020 and II 2021-2027, Ex-post and Interim evaluations

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BACKGROUND INFORMATION

The European Commission has launched a public consultation in the framework of ex-post and interim evaluations covering the CEF1 period 2014-2020 and the current CEF2 ongoing to 2027. The CEF is a key financing instrument to complete the Trans European Network in the transport, energy and digital sectors. It started in 2014 and continues through 2027. In transport, CEF supports projects to complete and modernize the European transport network, focusing on major cities and regions. In energy, CEF helps build cross-border infrastructure, supporting the shift to climate neutrality and the integration of EU energy markets. It funds Projects of Common Interest (PCIs) and projects of Mutual Interest (PMIs), including renewable energy projects.

In the General Assembly of Gozo in November 2024 the CPMR has adopted a policy position exposing the expectations for the future of the CEF and particularly in terms of budget. The level of envelope dedicated to the CEF programme in the future MFF will define the capacity of completion of the objectives of the transport policy in the European Union and will impact on its regions.

The consultation covers the three pillars of the CEF, with a particular focus on the synergies between them. It is structured around the effectiveness, efficiency, and coherence of the past and current programme. Below you will find the CPMR response to the EU consultation on the CEF based on the previous political position on CEFIII and the contributions of the member regions of the CPMR.



Relevance

For CEF Transport:

Question 1. *In the past 10 years since the creation of CEF, to what extent was EU financial support needed to complement investments at national level for better inter-connecting the European transport network?*

☒ **To a large extent** / ☐ To a moderate extent / ☐ To no extent at all / ☐ I don't know

Question 2. *Today, to what extent is EU financial support still needed to complement investments at national level for better inter-connecting the European transport networks?*

☒ **To a large extent** / ☐ To a moderate extent / ☐ To no extent at all / ☐ I don't know

Question 3. *In your opinion, how necessary have been investments of CEF in these specific areas?*

	To a large extent	To a moderate extent	To no extent at all	I don't know
Completion of the TEN-T core network	<input checked="" type="checkbox"/>			
Completion of the TEN-T comprehensive network	<input checked="" type="checkbox"/>			
Smart and interoperable mobility (e.g. European Rail Traffic Management System/ERTMS, River Information System/RIS, Intelligent Transport Systems for Road/ITS, Air Traffic Management Systems)	<input checked="" type="checkbox"/>			
Roll-out of recharging/refuelling infrastructure for alternative fuels along the TEN-T	<input checked="" type="checkbox"/>			
Sustainable and multimodal mobility (e.g. Motorways of the Seas, multimodal passenger hubs)	<input checked="" type="checkbox"/>			
Safe and secure mobility (e.g. parking areas for truck drivers, adaptation/resilience to climate change)				
Dual-use civilian-military transport infrastructure to increase capacity for transport of military equipment (CEF 2021-2027)	<input checked="" type="checkbox"/>			
Transport connections to neighbouring third countries, including Ukraine, Moldova and Western Balkan countries	<input checked="" type="checkbox"/>			
Other (please use text box to explain)				

Please explain your choices:

Completion of the network

The CEF has been a key funding mechanism to advance the implementation of the TEN-T network. It supports infrastructure that connects regions, promotes modal shifts toward sustainable transport, and enhances territorial cohesion, especially for remote, island and maritime areas. While significant, the budgets of CEF I and CEF II have been inadequate to meet the full investment needs required to complete the core and comprehensive TEN-T networks by the target dates (2030 for core, 2050 for comprehensive). An assessment of the needs expressed during the current CEF calls will have to be carried out. The objective of completing the core network by 2030 can only be achieved by drawing the consequences of



the current underfunding, particularly for rail infrastructure (except ERTMS which is well funded). Furthermore, the share of the CEF dedicated to the comprehensive network is minimal and does not allow sufficient financing of projects via this instrument. Resources from the CEF facility face a risk of mitigation costs for already planned prioritised investments with compelling ROI figures.

Cross-border connections

While CEF has supported crucial improvements in cross-border transport infrastructure and facilitated the integration of certain regions into the broader EU network, the overall progress has been slowed by funding shortages, governance limitations, and under-addressed territorial disparities. Future phases are urged to expand funding and improve regional involvement to better support territorial connectivity. The Commission must also ensure that projects granted in cross-border areas comply with the implementation deadlines set by the TEN-T regulation.

Smart and interoperable mobility

CEF investments in smart and interoperable mobility has been fundamental for delivering a modern, efficient, climate-neutral, and cohesive European transport system. These systems underpin modal shift, boost safety, optimize cross-border flows, and enable Europe's green and digital transitions. CEF investments in ERTMS are crucial to realize the TEN-T core and comprehensive networks, particularly for freight corridors and the modal shift to rail. These investments are not just about convenience they're about cutting carbon, improving safety, and digitally transforming transport operations in line with EU digitalization goals. Modern ATM Air Traffic Management Systems improve safety, reduce delays, and support climate-neutral aviation objectives by enabling smoother, more direct routing and fuel efficiency. For peripheral and maritime regions, these systems bridge geographic gaps, making them better connected and more competitive.

As the CPMR has consistently argued, smart solutions must be extended to all regions to ensure inclusive innovation and interoperability in whole regions across the EU.

Sustainable and multimodal mobility

CEF investments in sustainable and multimodal mobility have been crucial not only for the goal to achieving climate neutrality, but also for promoting territorial cohesion, competitiveness, and connectivity across the EU. These investments represent a cornerstone of modern EU transport policy, especially as Europe moves toward a smart, sustainable, and inclusive mobility framework.

As the CPMR underscores, such investments must be expanded and targeted, particularly in peripheral and maritime regions, to ensure that no territory is left behind in Europe's mobility transformation.

Alternative fuels

Investments by the Connecting Europe Facility (CEF) in the roll-out of recharging and refuelling infrastructure for alternative fuels along the Trans-European Transport Network (TEN-T) have been absolutely critical for enabling the European Union's transition to a climate-neutral transport system. Transport is the only major sector in the EU where greenhouse gas emissions have continued to rise over the past decades. To meet the EU's targets of 55% emissions reduction by 2030 and climate neutrality by 2050 the roll-out of alternative fuel infrastructure (AFIR) is indispensable and CEF's support ensures that this



transition is not limited to market-driven urban hubs, but includes rural, remote, island and maritime regions as well.

Peripheral, maritime, outermost, and island regions risk being excluded from the clean transport transition without dedicated infrastructure. CEF investments ensure and should reinforce a fair territorial coverage of recharging networks and support for ports and airports in transitioning to low-carbon operations. The CPMR advocates for support to relevant projects in regions, recognizing their strategic potential for energy innovation and maritime transport.

Safe and secure mobility

Investments by the Connecting Europe Facility (CEF) in safe and secure mobility, including secure truck parking areas and climate-resilient infrastructure, have been highly necessary in addressing both immediate operational challenges and long-term systemic risks in Europe's transport ecosystem. CEF funding helps fill critical gaps by supporting the construction or upgrading of Safe and Secure Parking Areas (SSPAs) along key TEN-T corridors. This enhances both driver welfare and supply chain integrity.

Transport infrastructure is increasingly exposed to extreme weather events which could disrupt connectivity, cause structural damage, and endanger users. Investments in climate-resilient infrastructure help mitigate these risks by strengthening bridges, roads, railways, and ports against rising sea levels, flash floods, and temperature extremes. This reduces the cost of post-disaster recovery and ensures continuity of services, which is critical for both economic activity and emergency responses. The CPMR has stressed that resilience and adaptation must be integrated into all infrastructure projects, especially in vulnerable regions like coastal, insular, and mountainous areas. Ensuring safe and secure mobility along major transport corridors requires the development of dedicated infrastructure to support emergency responses during these adverse weather events (such as snow, wind, or heavy rain) and other critical incidents. A key identified need is the availability of designated parking and holding areas for heavy goods vehicles (HGVs) during such situations, in order to mitigate risks to road safety and ensure the continuity of traffic flow. It is equally important to provide adequate spaces for police control operations, which are essential for safeguarding public safety and maintaining secure and orderly mobility.

Dual-use civilian-military transport infrastructure

Investments through the Connecting Europe Facility (CEF) in dual-use civilian-military transport infrastructure have been quite necessary and strategically important, particularly in light of recent geopolitical developments which have unequally impacted the regions of Europe. It is still difficult at this stage to assess the level of success of CEF2 in this type of investment. The war in Ukraine has starkly highlighted the importance of resilient and interoperable transport infrastructure that can support both civilian and military mobility. Dual-use infrastructure allows the EU to rapidly deploy forces and equipment, which is essential for collective defence and crisis response across Member States. By funding infrastructure that serves both civilian and military needs, the CEF ensures better use of public funds. Roads, railways, ports, tunnels, and bridges that can handle heavy military equipment also benefit civilian logistics, trade, and emergency services. The integration of technology is key to detecting and neutralising threats, and to enabling a more effective response in emergency and collective defence situations, while also benefiting civil logistics.



Peripheral, outermost, Sparsely Populated Areas (these regions are also marked by sparse economic activity and low GDP concentration per km²), and border regions often less prioritized in national plans could become more integrated into strategic networks and the alternative routes thanks to dual-use investments. This promotes both cohesion and preparedness, reducing vulnerabilities at Europe's external borders. The CEF financial contribution is intended to be complementary, ideally enabling investments in infrastructure which otherwise would be in jeopardy although serving a greater purpose for Europe as a whole and serving the planning and pursuit of security for all members of NATO and member states.

Securing Transport Links Amid Geopolitical Instability

For regions bordering Russia and Belarus, the consequences of the Russian aggression in Ukraine have profoundly disrupted logistical dynamics. These territories are facing a forced redirection of logistic flows toward new, safer routes and corridors, particularly by strengthening land connections with Nordic and Central European countries. In this unstable geopolitical context, investment needs in transport infrastructure have become critical. However, as illustrated by the case of Finland, national budgets often fall short of meeting these emerging challenges. The Connecting Europe Facility (CEF) is therefore an essential European instrument to secure funding for key infrastructure projects, especially in peripheral regions.

Transport connections to neighbouring third countries

Investments by the Connecting Europe Facility (CEF) in transport connections to neighbouring third countries including Ukraine, Republic of Moldova and the Western Balkan countries have been not only necessary, but increasingly critical for both geopolitical and socio-economic reasons. These transport links improve resilience, allow for the movement of humanitarian and military support, and align infrastructure with EU standards which is a critical factor for eventual EU accession or integration. Improved transport infrastructure fosters trade, investment, and mobility, integrating the economies of third countries with the EU's single market. Efficient rail and road links between the EU and its neighbours promote economic opportunities, particularly for border and peripheral regions. The extension of corridors to Ukraine and Moldova reflects the recognition that transport infrastructure must adapt to shifting political realities and support candidate and associated countries in a tangible, impactful way. Especially after the attack on Ukraine in 2022, there have been drastically changed priorities in the north of Europe. Nevertheless, the infrastructure planning processes in Member States is a slow process and give little room for rapid responses.

In case you have observations on the need for investment in above-mentioned areas that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

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Effectiveness

Question 4. *Since the creation of the CEF instrument in 2014, how would you qualify the progress made on the ground in relation to CEF's sectoral objectives below?*

	To a large extent	To a moderate extent	To no extent at all	I don't know
Support infrastructure for interconnected, cross-border transport	<input checked="" type="checkbox"/>			
Support infrastructure for multimodal transport operations		<input checked="" type="checkbox"/>		
Support infrastructure for smart, interoperable transport	<input checked="" type="checkbox"/>			
Support infrastructure for sustainable transport	<input checked="" type="checkbox"/>			
Support infrastructure for inclusive, accessible mobility		<input checked="" type="checkbox"/>		
Support infrastructure for safe, secure mobility	<input checked="" type="checkbox"/>			
Adapt the TEN-T network for dual-use civilian-military mobility (only CEF 2021-2027)		<input checked="" type="checkbox"/>		

In case you have observations on progress made in above-mentioned areas that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

See also explanations question 3

Question 5. *In your opinion, to what extent do the following features of CEF help deliver tangible outcomes?*

	To a large extent	To a moderate extent	To no extent at all	I don't know
Fixed budget per sector (transport, energy and telecom/digital) throughout the seven-year period of the Multiannual Financial Framework		<input checked="" type="checkbox"/>		
"Use it or lose it" principle (in case of delays in the project's implementation, the grant is reduced accordingly and the budget made available in another call for proposals)		<input checked="" type="checkbox"/>		
Competitive calls for proposals	<input checked="" type="checkbox"/>			
Frequency of calls for proposals		<input checked="" type="checkbox"/>		
Selection of projects proposed by the Commission and endorsed by Member States in the CEF Committee				
Stable Multiannual Work Programme	<input checked="" type="checkbox"/>			
Implementation of the programme by the executive agency INEA/CINEA		<input checked="" type="checkbox"/>		
Funding of projects and studies through non-repayable grants	<input checked="" type="checkbox"/>			
Combining non-repayable grants with repayable instruments such as loans, guarantees and equity				



Use of unit costs/lump sums for certain projects				<input checked="" type="checkbox"/>
Providing technical assistance to help prepare and deliver projects		<input checked="" type="checkbox"/>		

Please explain your choices:

Fixed budget per sector

A fixed sectoral budget allows for predictable and stable investment planning, which is crucial for large-scale infrastructure projects that typically require long development and implementation timelines. It enables both public and private stakeholders to align their own financial planning with EU funding opportunities over a multi-year horizon. By earmarking a specific portion of the overall budget for each sector the CEF ensures that key EU policy priorities (e.g. completion of the TEN-T network, deployment of alternative fuels, digital connectivity) are consistently supported. This sectoral ring-fencing helps maintain political commitment and reduces the risk of funds being diverted away from strategic goals. CEF investments must remain consistent and allow for the funding of different types of projects throughout the programme, ensuring that the financing needs of a region's specific infrastructure can be met, regardless of national-level priorities.

Calls and “use it or lose it” principle

The "use it or lose it" mechanism ensures that unused resources are not locked into stagnant projects, but re-injected into the system through new calls for proposals. It could optimize the budget by redistributing unused funds, the principle supports continuous investment flow. It prevents the accumulation of idle funds and boosts the CEF's ability to address a broader range of high-quality proposals, especially in a competitive context where more than 60% of eligible projects go unfunded.

But regions with fewer administrative or technical resources may struggle more to meet strict deadlines and risk losing funding. This could unintentionally widen disparities, especially if technical assistance is not sufficient to level the playing field. Without dedicated support or simplified application procedures, this could undermine cohesion and accessibility goals. Duration of calls seems quite short for us regions to send our message to the national level.

Selection of projects

The project selection system under CEF is robust and strategically grounded, ensuring coherence with both EU and national goals. More transparency is needed concerning the degree of involvement of the Member States, especially for infrastructures that include regional authorities. Encouraging flexibility to allow direct submissions from regions, ports, or urban authorities.

Budget and Multiannual Work Programme

Funding must be steady, sustained, and accessible across the entire MFF period. Avoiding blank years and frontloading will ensure that projects especially large-scale, complex, or regional infrastructure can be delivered without financial or administrative disruption. The concentration of funding at the beginning of the programming period can cause some projects to become financially unbalanced.



Regarding the AFIF, combining non-repayable grants with repayable instruments such as loans, guarantees and equity

A bank agreement does not produce tangible results. In fact, the European subsidy alone is more effective in moving a project forward than combining it with loans or guarantees. Some projects that receive both (European and bank) support fail despite everything. Furthermore, some banks are reluctant to grant loans. The combination can therefore be interesting, but it should not be extended to the whole CEF.

Question 6. *In your opinion, to what extent are the following features of CEF useful for addressing unforeseen challenges (e.g. delays due to Covid, energy crisis or connectivity problems for Ukraine/Moldova due to Russia's war of aggression)?*

	To a large extent	To a moderate extent	To no extent at all	I don't know
Competitive calls for proposals and selection of projects proposed by the Commission				
Adaptation of sectoral work programmes		<input checked="" type="checkbox"/>		
Possibility to adapt grant agreements together with the executive agency		<input checked="" type="checkbox"/>		
Buy-in of Member States during the CEF Committee voting				
Association of Ukraine and Moldova to the CEF programme in 2023 enabling those countries to submit their own project proposals and be part of the joint proposals together with a Member State		<input checked="" type="checkbox"/>		
Openness to third country participation (if indispensable for the project on the Member State territory)				
Legal base giving sufficient flexibilities for instance for front-/backloading budget and transfers between sectors				<input checked="" type="checkbox"/>
Other (please use text box to explain)				

Question 7. *In the current MFF, a new objective was added to CEF Transport, namely adapting the TEN-T to dual-use civilian-military mobility. EUR 1,7 billion were earmarked for that purpose which have been allocated to around 95 projects. Do you consider that CEF Transport has delivered on its military mobility objective?*

☐ Yes / ☐ No / ☐ I don't know

If not, please explain:

Efficiency

Question 8. *To what extent do you see potential space for simplification and streamlining in the following areas of CEF?*



	To a large extent	To a moderate extent	To no extent at all	I don't know
Application process	<input checked="" type="checkbox"/>			
Calculation of costs				
Use of unit costs/lump sums	<input checked="" type="checkbox"/>			
Payments		<input checked="" type="checkbox"/>		
Reporting obligations	<input checked="" type="checkbox"/>			
Digital tools (e.g. eGrants)	<input checked="" type="checkbox"/>			
Other (please use text box to explain)	<input checked="" type="checkbox"/>			

Please explain your choices and add concrete examples if possible:

Simplification

CPMR emphasizes the need to simplify the CEF, particularly the application procedures and implementation mechanisms. Facilitating the role of CEF project coordinators could significantly reduce the administrative burden for applicants.

Removing the current requirement for national pre-approval of project submissions, making it possible for project leaders to submit applications directly to EU authorities, provided there is no contradiction with national interests.

A greater emphasis on digitalization in both the application and project monitoring phases could significantly streamline administrative processes.

Improving the timetable

- The timetable for calls for projects should be modified so that the results can be published after the summer and grant agreements negotiated before the end of the year.
- The time between publication of the results and signature of the grant agreement should be reduced.
- A system of delegation of signature should be introduced for all parties for the grant agreement.

Administrative rationalisation and better-defined support

- Guidelines should be established and shared with all partners in a project (particularly cross-border) to establish a common understanding of EU expectations.
- More support documents should be available and dedicated to the implementation phase of projects, including on the use of the CINEA agency's online platforms.
- Forms and documents to be provided should be streamlined and simplified (e.g. on contracts).
- Project coordinators should be able to use their own documents.

Strengthening support, coordination, and project monitoring



- To improve coordination between the partners and better monitor the implementation of CEF projects with the CINEA project officer, standardised tools could be put in place, such as an online platform, where it would be possible to upload all the documents and information requested (deliverables, reports, important documents, etc.), not just those intended to validate the milestones set out in the agreements.
- For each project, a kick-off meeting should be systematically organised between all the partners and the CINEA project manager. He/she should then present all the European rules to be respected.
- Project monitoring should automatically be the subject of an annual meeting between all the project partners and the CINEA project manager. This meeting would enable the progress of the project to be monitored, as well as the documents and information requested by the agency for the final report.
- The CINEA agency should step up its support for coordinators, particularly in the run-up to project closure.
- Annual seminars should be made available to all CEF project coordinators. The rules could then be regularly reminded, for example in terms of communication obligations.

In case you have observations on simplification/streamlining in above- mentioned areas that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

Question 9. *Do you have other suggestions on how to improve the efficiency and/or decrease the administrative burden for applicants and beneficiaries of the CEF programme?*

Preparing an application in response to a call for projects from the CEF requires a major investment in terms of time and money. The forms to be completed are cumbersome, given the degree of competition and the limited chances of success. The process is lengthy and requires very specific skills. It is regrettable to note that the help from external consultancy firms is essential in order to meet these complex requirements.

Question 11. *In the previous and current MFF, CEF provided several instruments to combine its funds with private financing from the European Investment Bank (EIB) and national promotional/commercial banks, e.g. CEF Debt Instrument, CEF Transport Blending Facility (all CEF 2014-2020), Alternative Fuels Infrastructure Facility (CEF 2021-2027). In your opinion, how difficult was it to access CEF funding via these initiatives?*

☐ Very difficult / ☒ Somewhat difficult / ☐ Not difficult / ☐ I don't know

Please explain your choices and if possible, add examples for the instruments you know about:



The complexity of blending mechanisms has been identified as a barrier to accessing CEF funding by project promoters in regions.

In case you have observations on leveraging private funds that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

Question 12. Below are some potential challenges for the implementation of CEF. In your opinion, how significant would you say they are?

	Very significant	Somewhat significant	Not significant	I don't know
Lack of awareness of the CEF instrument				
Lack of administrative capacity to identify/propose/implement projects	<input checked="" type="checkbox"/>			
Predetermined allocation of funds in work programmes and per priority		<input checked="" type="checkbox"/>		
Frequency and duration of calls for proposals	<input checked="" type="checkbox"/>			
Application and selection process managed by the executive agencies (INEA/CINEA/HaDEA)				
Amount of available EU budget	<input checked="" type="checkbox"/>			
Low EU co-funding rates		<input checked="" type="checkbox"/>		
Lack of available budget for national co-funding from national public sources/from beneficiaries	<input checked="" type="checkbox"/>			
Combining funds from multiple sources for projects				
Involvement/investment from the private sector				
Obstacles relating to the granting of permits				
Obstacles in delivering complex (cross-border) infrastructures on time	<input checked="" type="checkbox"/>			
Obstacles in creating/exploiting synergies between the three CEF sectors		<input checked="" type="checkbox"/>		
Obstacles in reflecting changes in the technological development		<input checked="" type="checkbox"/>		
Creation of market distortions				
Administrative burden	<input checked="" type="checkbox"/>			
Other (please use text box to explain)				

Please explain your choices and add concrete examples if possible:

See comments question 5

Please explain if you see any material differences between the funding period 2014-2020 (CEF1) and funding period 2021-2027 (CEF2):



Compared to the 2014–2020 period, the 2021–2027 CEF has been simplified in several key areas. Expenditure reporting is now conducted annually rather than once at the end of the project. Greater flexibility has been introduced during the life of the project, by reducing the number of cases that require the use of a formal amendment. Budget flexibility between project partners has also been improved, alongside a reduction in the number of milestones. Additionally, there is now an early visibility of both the content and timetable of calls for projects.

Coherence

Question 13. *The aim of CEF is to provide a common funding instrument for the trans-European networks mentioned under Article 170 TFEU. In your opinion, was it a good approach to combine the transport, energy and telecom/digital sectors under a common funding instrument?*

☐ A good approach/ ☐ A slightly good approach/ ☒ Not a good approach/ ☐ I don't know

If not a good approach, please explain:

The common CEF instrument has made funding simpler; however, its coverage of such a diverse range of infrastructures reduces both the visibility and availability of specific funds, such as those dedicated to transport infrastructure.

Question 14. *In your opinion, to what extent are the synergies between the three CEF sectors exploited (e.g. charging/refuelling infrastructure for alternative fuels, 5G along trans-European transport corridors)?*

☐ To a large extent/ ☐ To a moderate extent/ ☐ To no extent at all/ ☐ I don't know

Please explain your choices and add concrete examples or suggestions of synergies between the three CEF sectors:

In case you have observations on synergies between the three CEF sectors that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

Synergies between the various CEF funds seem to be limited or insufficiently known by regional authorities.

Question 15. *In addition to CEF, several other EU programmes are financing the development and deployment of infrastructure. In your opinion, to what extent are the following EU funding instruments complementary to CEF?*



	Very significant	Somewhat significant	Not significant	I don't know
European Regional Development Fund (ERDF)	<input checked="" type="checkbox"/>			
Cohesion Fund	<input checked="" type="checkbox"/>			
European Fund for Strategic Investments / InvestEU				
Horizon 2020 / Horizon Europe		<input checked="" type="checkbox"/>		
Recovery and Resilience Facility (CEF 2021-2027)	<input checked="" type="checkbox"/>			
Innovation Fund		<input checked="" type="checkbox"/>		
Other (please use text box to explain)				

Please explain 'Other' :

Clarity on the variety of financial instruments

Despite the clear potential for synergy between the Connecting Europe Facility (CEF) and other EU funding instruments, combining these funds in practice often proves complex and challenging. One of the main barriers lies in the fragmentation of rules, timelines, and procedures across programmes such as the ERDF, **Interreg**, Horizon Europe, InvestEU, and the Recovery and Resilience Facility. Each instrument operates under its own legal basis, eligibility criteria, co-financing rates, and reporting requirements, which can be burdensome and confusing for beneficiaries particularly public authorities or smaller project promoters with limited administrative capacity. This complexity not only discourages blended or sequential use of different EU funds but also leads to underutilized opportunities for scaling or replicating successful infrastructure initiatives. There is therefore a pressing need for greater clarity, guidance, and simplification in how these instruments can be combined effectively. Clear EU-level frameworks or operational guidelines, joint application templates, and better inter-service coordination within the Commission could go a long way in enabling more strategic, coherent, and efficient use of EU resources to support infrastructure development.

Question 16. *Where do you see overlaps or gaps between CEF and the above-mentioned EU funding instruments?*

In case you have observations on complementarity/overlaps/gaps between CEF and other EU funding instruments that only relate to the funding period 2014-2021 (CEF1) or only to funding period 2021-2027 (CEF2) you may add them here:

Question 17. *CEF aims to fund projects with high EU added value that improve connections between Member States. In view of this, to what extent did projects supported by CEF Transport complement Member States' national investments in transport infrastructure?*

☒ To a large extent/ ☐ To a moderate extent/ ☐ To no extent at all/ ☐ I don't know

Please explain your choices and add concrete examples if possible:

CEF funding has been used to develop the TEN-T core network at the national level, thereby substantially supporting the development of the transport network. In the coming years, the



role of projects with high-EU added value should be further emphasised. Where the national funding level being low in the coming years, the CEF instrument will be needed even more. Peripheral and border regions share the priority given by the European Union to cross-border connections. These are not always a priority at national level.

Question 18. *Do you have any other feedback on the CEF instrument that you would like to share?*

For CEF 2014-2020:

For CEF 2021-2027:



The Conference of Peripheral Maritime Regions (CPMR) represents more than 150 regional authorities from 24 countries across Europe and beyond. Organised in Geographical Commissions, the CPMR works to ensure that a balanced territorial development is at the heart of the European Union and its policies.



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