EUregions4cohesion

JOINT POSITION PAPER of European Regions on the **Cohesion Policy 2028-2034**: towards Regional Partnership Plans

BRUSSELS, NOVEMBER 2025

We, the Regions, are at the heart of Europe and the "face" of Europe on the ground. We have proven to be the most efficient in investing EU resources in an effective and targeted way, advancing the European integration project. We, the Regions of the alliance EUregions4cohesion recognise the ambition of the European Commission to foster a stronger integration among policy areas and efforts for a more harmonised performance framework among all funds. However, it is unacceptable that this comes at the expense of the Europe of Regions.

EUregions4cohesion strongly opposes the renationalisation of cohesion policy and the weakening of long-term territorial policies. We also call for a dedicated solid budget for cohesion and the active and full involvement of local and regional authorities both, in the definition of investment prioritization, and in the realisation of concrete interventions. We stress the importance of a place-based policy to ensure that the regions can choose effective measures that harness their comparative advantages, adapt to specific territorial characteristics and support capacity-building to unlock development potential in all regions. From a democratic perspective and for the long-term legitimacy of the EU's role in effectively tackling regional disparities, it is vital that the local and regional level remains at the centre of cohesion policy. A renewed cohesion policy requires a genuine, binding partnership and inclusion of regions. The new National and Regional Partnership Plans (NRPP) entail competition between policies, territories and areas of intervention:

- Between envelopes for cohesion policy, common agricultural policy (CAP) and other policies;
- Between categories of regions (less developed, in transition, and more developed, as well as other types of territories identified in Annex VII);
- Between regions inside each category;
- Between regions and cities, potentially resulting in the marginalization of the most vulnerable territories.

The regions of EUregions4cohesion reassert once again the call for:

- A clear, distinct and ring-fenced European budget for Cohesion policy;
- The definition, at EU level, of indicative regional allocations of resources based on the current consolidated methodology that takes into account social and economic indicators, as well as territorial specificities, thus ensuring a dedicated budget for each category of regions. A safety net allocation, in comparison to the 2021-2027 period, should be granted;
- A European budget safeguarded to support rural development;
- The recognition of the urban aspect and the special role of urban areas;

- The full respect of the principles of partnership and subsidiarity by granting Europe's regions a paramount role in the programming and implementation process, through shared management, multilevel governance, ensuring direct negotiation between regions and the European Commission without the need for prior authorisation by the Member State.

A MULTIANNUAL FINANCIAL FRAMEWORK PROPOSAL 2028-2034 TO BE REVISED

Governance, partnership and implementation of NRPP

The proposed new model for implementing cohesion policy after 2027, which allows for the central management of the NRPP, represents a step backward compared to the current system based on the principles of partnership and subsidiarity, risks disregarding the competences and extensive experience of regional authorities in implementing regional programmes. The lack of a clear budget allocation creates planning uncertainty for regional and local authorities and therefore hampers their ability to invest strategically and on a long-term basis. The Regions have to participate in the decision-making in a direct negotiation with the EC, and in the implementation processes. Therefore, we cannot support the commission proposals for the first pillar of the Multiannual Financial Framework, the National and Regional Partnership Plans in their current form.

To meaningfully sustain the principles enshrined in the treaties, the plans should include, at minimum:

- Regional chapters;
- One chapter per region, the regions being managing authorities having full responsibility for its planning, definition of milestones and targets at regional level and implementation.
- A direct negotiation between the managing authority, responsible for one or more chapter(s) of a NRP Plan, and the European Commission;
- Regions, when they are managing authorities, should have the possibility to have their own legally and financially secure responsibility for the planning, negotiation and implementation of their programmes;
- NRP Plans should only be adopted by the European Commission and not by the Council.

Support for rural development

The integration of Cohesion Policy and the Common Agricultural Policy into a single financial instrument framework creates competition between the policies. There is the need to ensure comprehensive and complementary support for rural development without undermining the achievement of cohesion objectives at the regional level. The post-2027 model of Cohesion Policy implementation shifts the financial burden of rural development onto Cohesion Policy itself, at the expense of other territorial priorities.

European Social Fund and social objectives

In order to further strengthen the European social model and implement the European pillar of social rights the ESF should continue to be implemented at regional level and in line with the challenges and social economic background. The Regions are in the best position to programme policies that integrate social interventions and measures in support of employment.

The Regions request therefore to:

- have the possibility to decide the share dedicated to ERDF and ESF.
- reinforce ESF contribution to help respond to new raising challenges (for example STEP-like interventions on strategic autonomy or emergencies).

Cohesion for EU growth and competitiveness

While S3 strategies have fostered competitiveness through a bottom-up long-term term approach and have strengthened regional innovation ecosystems that are the backbone of EU value chains, the proposal weakens the potential of S3 strategy that disappeared as a key strategy to support research and innovation.

Regions request therefore that:

- S3 strategies continue to play a key role in fostering coordination of European, national and regional industrial and innovation efforts and balancing top-down European strategies with bottom-up and place-based opportunities.
- S3 strategies be valorised a strong tool for developing synergies between pillar I and II of the MFF proposed structure, facilitating co-investments and deployment of innovative solutions and value chains across the EU.

The regions note that the support to the different types of businesses is not clarified in the proposed legislation of the European Commission. The regions request that the support to big enterprises and/or to (small) mid-caps be mentioned in the regulation.

Performance framework

The proposed performance framework with the related indicators is prescriptive and top down if not adapted to the regional specificities. With the new performance system proposed, the Regions fear the risk of double monitoring of milestones and targets, on the one side, and of expenditures and costs, on the other.

The Regions request therefore that:

- Qualitative milestones and quantitative targets, their corresponding indicative completion dates, as well as the output indicators, be chosen and set by the Managing Authority at regional level.

Link to reforms

The European Semester should have a territorial dimension: the regions reject the idea that the non-fulfilment of centrally defined reform targets could block payment applications if the reforms are not within the responsibility of the regions. Furthermore, it is important to recall that regions are responsible for implementing country-specific recommendations in Member States when they fall within their competence.

The Regions therefore request:

- A modernised European Semester by reinforcing the subnational dimension of country reports. Regions should be involved in the drafting of country reports and country-specific recommendations with a view to consolidating ownership of the shared process at all levels.
- That the European Semester includes a multiannual strategic approach.

Implementation and decommitment

The rule proposed by the Commission at N+ 10 months (Article 15) is too challenging, given the time needed to operationalize the programmes. Such an obligation excludes the possibility of implementing long-term investments and planning for quality projects. The proposal of N+ 10 months risks decommitment and loss of funds especially in the transitional years between the current and next MFF.

The regions request therefore to:

- Define a realistic implementation framework;
- Ease the transition between the two programming period.

Pre-financing

The proposed levels of pre-financing are too low. While the European Commission proposed to reinforce the performance dimension of the NRP Plans, taking inspiration from the Recovery and Resilience Facility (RRF), the same levels of pre-financing are not proposed.

The regions ask to increase the amount of pre-financing from 10% to 13% (as adopted in the Mid-term review regulation).

Flexibility

While the Regions recognise the value of flexibility provisions, they also point out that too much flexibility is not compatible with a long-term policy and that the flexibility amount of 25% is far too high.

The regions request therefore that:

- The flexibility amount be reduced to 10% like in the 2021-2027 mid-term review.
- The flexibility instruments need to remain under shared management at regional level.

Interreg

Beyond its role as a cooperation tool, Interreg needs to be strengthened as a tool for developing European territories. In addition, the proposed single performance framework could be very challenging to apply to cross-border, transnational, interregional or outermost regions programmes.

The regions therefore request that:

- Cross-border, transnational and outermost regions programmes should be explicitly empowered to address structural development needs beyond traditional cooperation activities.
- Each programme be granted the authority to define its own performance thresholds, select appropriate indicators from the common framework, and establish mitigation measures adapted to the specific nature of territorial cooperation.
- Implementing acts are not extensively used, as they reduce predictability during programme preparation and legal certainty during implementation. As in the 2021–2027 period, the legal framework should be defined through regulations that should cover all the essential elements (including eligibility rules).

Stronger together: no region should be left behind

All regions must be supported to ensure cohesion, resilience, and shared prosperity across the EU. The regions therefore call for:

- A separate allocation for the eastern border regions adjacent to Russia, Belarus, and Ukraine. The present proposal considers “eastern border regions” only regions bordering Russia and Belarus. The challenges and burdens resulting from the ongoing armed conflict affect, in different intensities, all border regions — including those neighboring Ukraine.
- The reinstatement in the budget proposal for 2028-2034 of targeted allocations for specifically designated regions as in the current budget and call for respecting articles 174 and 349 of the Treaty.

Abruzzo

Auvergne-Rhône-Alpes

Açores

Baden Württemberg

ADR Centru

Balears

ADR Nord-Est

Basilicata

ADR Nord-Vest

Berlin

Andalucía

Bourgogne-Franche Comté

Aragon

Brandenburg

Asturias

Bratislava Region

Bremen

Freie Hansestadt Bremen

Bretagne

Région Bretagne

Burgenland

Land Burgenland

Calabria

Regione Calabria

Campania

Regione Campania

Canarias

Gobierno de Canarias

Cantabria

Gobierno de Cantabria

Castilla – La Mancha

Castilla-La Mancha

Castilla y León

Junta de Castilla y León

Catalunya

Generalitat de Catalunya

CCDR Lisboa e Vale do Tejo

CCDR LVT
Comissão de Coordenação e Desenvolvimento Regional de Lisboa e Vale do Tejo, I.P.

Central Finland

Keski-Suomen liitto
Regional Council of Central Finland

Centre-Val de Loire

Région Centre Val de Loire

Centro

CCDR Centro

City of Prague

Praha

Corse

Cullettività di Corsica
Collectivité de Corse

Crete

Drenthe

Eastern Slovenia

Eastern and Midland Regional Assembly

Emilia-Romagna

Extremadura

Flevoland

Fryslân

Galicia

Gelderland

Gotland

Grand Est

Groningen

Guadeloupe

Guyane

Halland

Häme	HÄMEEN LIITTO Regional Council of Häme	**Kujawsko-Pomorskie**	Kujawsko-Pomorskie Region
Hauts-de-France	Région Hauts-de-France	**La Réunion**	REGION REUNION www.regionreunion.com
Helsinki-Uusimaa	Helsinki-Uusimaa Regional Council	**La Rioja**	La Rioja
Île-de-France	Région îledeFrance	**Lazio**	REGIONE LAZIO
Ionian Islands	REGION OF IONIAN ISLANDS	**Liguria**	REGIONE LIGURIA
Jämtland Härjedalen	REGION JÄMTLAND HÄRJEDALEN JÍEMHTEN HERJEDAELIEN DAJVE	**Limburg**	provincie limburg
Kärnten	LAND KÄRNTEN	**Lombardia**	Regione Lombardia
Kaunas	kauno rajonas	**Lower Silesia**	LOWER SILESIA DOLNY ŚLĄSK

Lodzkie

Mazovia

Lubelskie

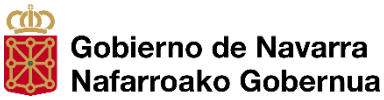
Mecklenburg-Vorpommern

Lubuskie

Murcia

Madeira

Navarra



Madrid

Niederösterreich

Małopolska

Niedersachsen

Marche

Noord-Brabant

Mayotte

Noord-Holland

Normandie	RÉGION NORMANDIE	**Östergötland**	Region Östergötland
Norrbotten	REGION NORRBOTTEN	**Ostrobothnia**	Regional Council of Ostrobothnia
Northern and Western Regional Assembly	Tionól Réigiúnach An Tuaiscirt & An Iarthair Northern & Western Regional Assembly	**Overijssel**	provincie Overijssel
Nouvelle Aquitaine	RÉGION Nouvelle-Aquitaine	**Päijät-Häme**	Päijät-Hämeen liitto The Regional Council of Päijät-Häme
Norte	PORTUGAL NORTE	**Pays de la Loire**	RÉGION PAYS DE LA LOIRE
Occitanie	La Région Occitanie Pyrénées · Méditerranée	**País Vasco**	EUSKO JAURLARITZA GOBIERNO VASCO
Opolskie		**Piemonte**	REGIONE PIEMONTE
Örebro	Region Örebro County	**Podkarpackie**	PODKARPACKIE infinite possibilities

Podlaskie		**Saint-Martin**	
Pomorskie	 POMORSKIE VOIVODESHIP	**Sardegna**	
Prešov		**Satakunta**	
Provincia Autonoma di Bolzano/Alto Adige		**Self Governing Trnava Region**	
Puglia		**Silesia**	
Rhineland-Palatinate		**Skåne**	
Sachsen		**South Moravian Region**	
Sachsen-Anhalt		**South Ostrobothnia**	

Southern Regional Assembly

Southwest Finland

Stockholm Region

Sud Provence-Alpes-Côte d'Azur

Swietokrzyskie

Tampere Region

Thüringen

Tirol

Toscana

Trnava

Umbria

Uppsala

Utrecht

Valencia

Valle d'Aosta

Värmland

Västerbotten

Västernorrland

Västmanland

Västra-Götaland

Veneto

Warmia and Masuria

West Pomerania

Western Greece

Wielkopolska

Zahodna (Western) Slovenija

Zeeland

Žilina Self-Governing Region

Zuid-Holland

Other supporters: