



Amendments from the Helsinki-Uusimaa Region

On the proposal for a regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, and maritime, prosperity and security for the period 2028-2034 (2025/0240) – NRP Fund

April 2026

The Helsinki-Uusimaa Region welcomes a strong and forward-looking EU cohesion policy beyond 2027. The proposed National and Regional Partnership Plans (NRPPs) can support better coordination of EU funding, provided that they preserve the territorial logic, multilevel governance and partnership principle at the core of cohesion policy. As highlighted in the REGI opinion on the MFF, cohesion policy must remain a distinct, place-based investment policy with predictable funding, clear territorial allocations and full involvement of regional and local authorities.

NRPPs should function as investment plans enabling regions and cities to contribute to Europe's competitiveness, resilience and clean transition, while tackling disparities. In Finland, this is particularly relevant given the concentration of jobs, innovation and societal challenges in urban areas. Roughly 30% of Finland's population lives in the Helsinki-Uusimaa region, where three of the Finland's fourth largest cities are located in.

Helsinki-Uusimaa also stresses the continued importance of the ERDF and the ESF+ funding for regional development. Finland's weak growth and a deteriorated labour market have increased pressure on Europe's cities and regions. By the end of 2025 the employment rate in Helsinki-Uusimaa was 71.3%, lower than the national average of 71.9%. Eurostat figures also show that Finland's unemployment rate is the worst in the European Union. Thus, cohesion policy should continue to support long-term investment in regional innovation, employment, skills, social inclusion and urban development.

Our key messages and proposed amendments

1. Strengthen the role of regions and local authorities in the design and implementation of the NRPP by including regional chapters as well as an urban chapter

The Regulation should ensure the meaningful involvement of regional, cities and local authorities throughout the preparation, implementation, monitoring and evaluation of the NRP Plans. Making regional and urban chapters a standard component of the Plans would support a more balanced and effective multilevel governance model and reinforce the policy's territorial dimension. This is also consistent with Eurocities' position, which has called for an urban chapter to be included in each national and regional partnership plan.





2. Ensure a clear intervention logic between general and specific objectives

Helsinki-Uusimaa Region supports the overall intervention logic of the NRPP. However, to maintain strategic focus, NRP Plans should be guided by the general objectives of cohesion policy while allowing Member States, in close partnership with regional and local authorities, to prioritize the most relevant specific objectives based on national, regional and territorial contexts. This is essential to avoid fragmentation and to ensure that funding remains effective.

3. Take into account the specific needs of all regions located in member states bordering Russia and Belarus

The current definition of Europe's eastern border regions based on NUTS-2 borders is too narrow to ensure that the full range of economic, logistical, and security impacts of the ongoing Russian aggression is captured. The effects should be looked at from a national viewpoint. Helsinki-Uusimaa region calls for support mechanisms, such as the EastInvest Facility or possible funding calls, to be available to all regions in member states bordering Russia and Belarus. Prioritization should be carried out, based on regional and local needs, on the Member State level.

4. Cohesion through support across all categories of regions

Helsinki-Uusimaa supports the introduction of an 8% earmark for developed regions, as suggested by the REGI committee's opinion on the MFF interim report (2025/0571R(APP)). This should be complemented by a safety net to ensure that overall allocations do not fall below 90% of the indicative allocation by the European Commission for the previous programming period (2021-2027). Furthermore, sustainable urban development must be ensured with an earmarking, as within the current MFF. Funding for sustainable urban development must be maintained at least at the current level.

At the current NRPP, ringfence funding was proposed for Less Developed Regions, and only at the national level. It overlooks disparities between regions within the same category or differences within a single region. The Regulation should ensure a balanced allocation across less developed, transition, and more developed regions, while maintaining a high level of planning security. Dedicated support for sustainable urban development through regional and urban chapters, and earmarked funding for transition and more developed regions, would strengthen competitiveness, innovation, and resilience while addressing challenges, such as social segregation, which concentrate in urban regions.

5. Safeguard additionality and place-based instruments, including dedicated funding line for urban development in the EU Facility

Helsinki-Uusimaa welcomes the continuation of the Interreg. In addition, the Regulation should reinforce the principle of additionality and preserve key place-based instruments, such as Smart Specialisation Strategies, integrated territorial approaches, and a dedicated funding line for urban development, both within the NRP plans (sustainable urban development, currently 8% of ERDF) and in the EU Facility. This would help ensure that EU funding delivers genuine added European value at the regional and local level and supports innovation-driven territorial development.



Proposals for Amendment

1. Strengthen the role of regions and local authorities in the design and implementation of the NRPP by including regional chapters as well as an urban chapter

Amendment 1

Article 21 – Paragraph 2 – Preparation and adoption of the Plan

Text proposed by the Commission

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 and, where relevant, regional and territorial chapters.

Amendment

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, **regional and urban** chapters. **These shall set out, in partnership with regional and local authorities, the measures contributing to the relevant specific objectives.**

Justification

The current wording leaves regional and territorial chapters optional, while not adding enough importance to the urban dimension. This weakens the territorial dimension of the NRPP and shifts planning to the national level. Making regional and urban chapters mandatory is the clearest legal way to anchor specific objectives territorially and to ensure meaningful multilevel governance. This also aligns with the position of Eurocities, which has called for mandatory urban chapters to support the EU Agenda for Cities 2025.

Amendment 2

Article 22. Paragraph 2 “Requirements for the NRP Plan”

Text proposed by the Commission

Article 22. Paragraph 2. "Requirements for the NRP Plan"

g) concentrate resources on.

Amendment

New paragraph g(iv)

g) concentrate resources on any relevant Union policy framework for cities; to be addressed by the urban chapter.

Justification

Same as above

Amendment 3





Article 55 – Paragraph 1 – Composition of the monitoring committee

Text proposed by the Commission

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.

Amendment

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, **including regional and local 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.

Justification

The representation of regional and local authorities in the monitoring committee should be enforced with stronger wording.

Amendment 4

Article 56 “ Functions of the monitoring committee”

Text proposed by the Commission

. (...)

Amendment

New paragraph 1 (h) committee"

1. The monitoring committee shall examine:
(h) the meaningful involvement of local and regional authorities in the framework of the partnership and multi-level governance laid down in Article 6, and the involvement of local authorities in the preparation of the mandatory urban chapters in the NRPPs.

Amendment 5

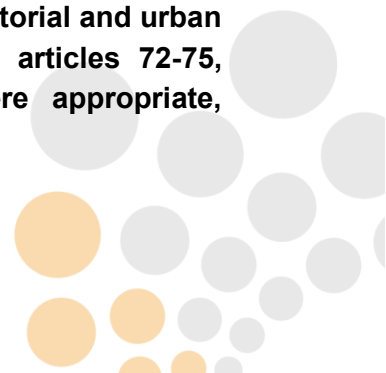
Article 49 – Paragraph 4 – new paragraph (4a)

Text proposed by the Commission

The managing authority may identify one or more intermediate bodies to carry out certain tasks under their responsibility. Arrangements between the managing authorities and intermediate bodies shall be recorded in

Amendment

(4a) For the purposes of implementing measures for integrated territorial and urban development referred to in articles 72-75, Member States shall, where appropriate,





writing. The tasks delegated to intermediate bodies shall not be entrusted further to other bodies.

designate regional or local authorities as managing authorities or intermediate bodies.

Justification

To reflect a functioning multi-level governance and the partnership principle of the NRP Plans, regional and local authorities should be designated as the managing or intermediate authorities. This helps to align decision-making and delivery close to the ground.

Amendment 6

Article 51 – Functions of the managing authority

Text proposed by the Commission

1. The managing authority shall be responsible for managing the Plan or a part of the Plan with a view to delivering its objectives. It shall have the following functions:

(...)

New point (ai) after point (a)

Amendment

1. The managing authority shall be responsible for managing the Plan or a part of the Plan with a view to delivering its objectives. It shall have the following functions:

(...)

(ai) **selecting and setting milestones and targets, as well as their corresponding indicative completion dates, and the selected indicators.**

Justification

The regional or local managing authorities should be co-responsible for all dimensions, including setting qualitative milestones and quantitative targets.





Amendment 7

Article 24 Amendment of the NRP Plan

1. A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.

1. A Member State may submit to the Commission a reasoned request for an amendment of its NRP Plan, together with the amended NRP Plan, setting out the expected impact of that amendment on the achievement of the objectives laid down in Articles 2 and 3.

1a. Where the amendment concerns regional territorial or urban chapters of the NRP Plan or significantly affects measures implemented at regional or local level, the Member State shall prepare the request in partnership with the partners referred to in Article 6, in particular the regional, local and urban authorities concerned, in accordance with its institutional legal and financial framework.

Justification

Article 6 already establishes a comprehensive partnership including regional, local and urban authorities, to be involved "throughout the preparation, implementation and evaluation of chapters" of the Plan. This amendment clarifies that when an amendment affects regional, territorial or urban chapters, or measures implemented at regional/local level, the amendment request itself must be prepared in partnership with those authorities and other partners. This is where many reforms and investments are actually delivered, so their involvement improves feasibility and ownership, without changing the Member State's final responsibility for the Plan.

2. Ensure a clear intervention logic between general and specific objectives

Amendment 8

Recital 30

Text proposed by the Commission

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.

Amendment

The NRP Plans should detail how **they contribute to the general objectives of the Fund and to the specific objectives selected by the Member State**, taking into account the specific national, regional and territorial challenges of the Member State concerned. **The**



specific objectives should be operationalized, where relevant, through regional, territorial and urban chapters in order to ensure a place-based approach.

Justification

Helsinki-Uusimaa welcomes the simplification and integration ambitions of the proposed National and Regional Partnership Plans. However, the current proposal risks undermining the strategic focus of cohesion policy by requiring a comprehensive contribution to all specific objectives. NRPPs should be anchored in the general objectives of the Fund, while allowing Member States to select and implement the most relevant specific objectives in a place-based approach.

Amendment 9

Article 6 - Partnership and multi-level governance

Text proposed by the Commission

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.

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 ensure that partners are involved in a time/□ meaningful and continuous manner*** and shall involve partners referred to in each subparagraph of paragraph 1 in the preparation of the Plan and throughout the preparation, implementation, monitoring and evaluation of chapters, ***as well as in their mid-term review and any amendment in accordance with Articles 24 and 25,*** including through participation in monitoring committees in accordance with Article 55.

(new) 2a. Each NRP Plan shall include a concise description of the organisation and implementation of the partnership for the Plan and for each chapter, including national, ectoral, regional, territorial and urban chapters. That description shall indicate the types of partners involved, the stages at which they were consulted and the main results of the consultation on both reforms and investments.



3. The organisation and implementation of the partnership shall be carried out in accordance with the European code of conduct on partnership established by Commission Delegated Regulation (EU) No 240/2014.

4. Regarding the partners referred to in paragraph 1, point (a), 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.

[...]

6. At least once a year, the Commission shall consult organisations which represent partners at Union level on the implementation of the Plans.

New paragraph (7) to be added after 6

3. The organisation and implementation of the partnership shall **respect the principles of subsidiarity, partnership and multilevel governance, ensuring the consultation of civil society and relevant socio-economic stakeholders.**

4. Regarding the partners referred to in paragraph 1, point (a), 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. **Such representation shall ensure the direct involvement of competent regional and local authorities in the design, programming, implementation and monitoring of the measures concerned.**

[...]

6. **The Commission shall ensure a consultation and involvement of stakeholders' representative organizations in order to collect information and verify the effective implementation of Article 6 in the preparation process before approving the Plans.** At least once a year, the Commission shall consult organisations which represent partners at Union level on the implementation of the Plans. **Organisations representing the partners may submit a reasoned request for consultation to the Commission at least twice during the programming period.**

7. **For coordination between the chapters and, more broadly, of the NPR plan, the Member States shall establish permanent mechanisms for consultation with regional and local authorities. The partnership plans shall specify the arrangements for coordination between the national and regional levels.**



Justification

Aiming to strengthen Article 6, this proposal seeks to embed multilevel governance in the NRPPs by requiring effective partnerships with territorial authorities and civil society. It also offers a concrete way for regional and local authorities, being in charge of the NRP plans chapter, to refer a matter directly to the European Commission.

Amendment 10

Article 22 – Paragraph 2 – point (a)

Text proposed by the Commission

a. support the general objectives laid down in Article 2 and contribute in a comprehensive and adequate manner to all the specific objectives laid down in Article 3, taking into account the specific challenges of the Member State concerned, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.

Amendment

a. support the general objectives laid down in Article 2 and contribute in a **targeted and adequate manner to the specific objectives selected by the Member State in accordance with its national, regional and territorial challenges** laid down in Article 3, and provide an intervention strategy demonstrating how those objectives will be addressed and financed by the Plan, what level of financing is needed to ensure achievement of the general objectives, and how that level of financing is justified.

Justification

This amendment is necessary to ensure that NRPP Plans remain strategic, focused and responsive to territorial realities. Requiring Member States to contribute “in a comprehensive manner” to all specific objectives risks diluting resources across too many priorities. The amendment restores the place-based logic of cohesion policy by allowing prioritisation based on territorial needs.

Amendment 11

Article 22 – Paragraph 2 – point b

Text proposed by the Commission

2. The NRP Plan shall:
(...)
effectively address all or a significant subset of challenges identified:

(i) in the context of the European Semester, in particular in the relevant country-specific

Amendment

2. The NRP Plan shall:
(...)
effectively address all or a significant subset of **national and regional needs** and challenges identified:

(i) in the context of the European Semester, **taking into account the specific national and**



recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;

regional needs and challenges identified, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights, **and taking into account the territorial dimension in partnership with regional and local authorities**;

Justification

This amendment aims to strengthen the territorial dimension of the European Semester by ensuring the meaningful involvement of regional and local authorities, in line with their competences. A more place-based approach to the Semester is essential to reflect territorial disparities, diverse development needs, and the specific challenges faced by regions and local authorities.

Amendment 12

Article 22 – Paragraph 2 – point (c)

Text proposed by the Commission

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.

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 contributing to specific objectives under Article 3 shall, where appropriate, be included in the relevant regional or urban chapter and shall be justified by reference to the regional or local needs identified in that chapter.**

Justification

This amendment strengthens the territorial logic of the Plans and makes the principle of multilevel governance operational. It helps ensure that measures linked to specific objectives are grounded in identified regional or local needs rather than defined only at national level.

3. Take into account the specific needs of all regions located in member states bordering Russia and Belarus



Amendment 13

Recital 12

Text proposed by the Commission

The Eastern border regions of the EU face the dual challenge of enhancing security while supporting their economies, businesses and people that have been negatively impacted as a direct or indirect consequence of Russia's war of aggression against Ukraine. The National and Regional Partnership Plans will provide comprehensive and coherent support to the Member States and regions facing those challenges.

Amendment

The Eastern border regions of the EU, **regions located in Member States which border Russia and Belarus** face the dual challenge of enhancing security while supporting their economies, businesses and people that have been negatively impacted as a direct or indirect consequence of Russia's war of aggression against Ukraine. The National and Regional Partnership Plans will provide comprehensive and coherent support to the Member States and regions facing those challenges.

Justification

This amendment ensures that Member States most affected by Russia's war of aggression against Ukraine have sufficient flexibility within the NRPP to address its differentiated territorial impacts. The NRPP framework should allow for targeted allocation of support to the areas most affected, based on objective impact criteria rather than solely on predefined statistical classifications such as NUTS-2.

Amendment 14

Article 22- Requirement for the NRP Plan - (2)(f)(iii)

Text proposed by the Commission

(iii) focusing on the specific needs of border regions, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on the methodology set out in Annex VII;

Amendment

(iii) focusing on the specific needs of **regions located in Member States bordering Russia and Belarus**, northern sparsely populated regions, rural and urban areas, areas affected by industrial transition, islands, to be reported in Annex V based on the methodology set out in Annex VII

Justification

Same as above

Amendment 15





ANNEX V Template for the National and Regional Partnership Plan - 1.5. Comprehensive overview of the Plan's support to the territories listed in Annex VII, taking into account their specific needs and challenges [2000] – (e)

Text proposed by the Commission

(e)

The specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia, Belarus), particularly in the areas of security, border management and economic development., to be reported in Annex V based on the methodology set out in Annex VII;

Justification

Same as above

Amendment

(e)

The specific needs and challenges of regions **located in Member States bordering Russia and Belarus**, particularly in the areas of security, border management and economic development., to be reported in Annex V based on the methodology set out in Annex VII;

Amendment 16

ANNEX VII - Methodology for territorial contribution – (e)

Text proposed by the Commission

(e)

the specific needs and challenges of Eastern border regions (NUTS 2 regions that have borders with Russia and Belarus), particularly in the areas of security, border management and economic development;

Justification

Same as above

Amendment

(e)

The specific needs and challenges of regions **located in Member States bordering Russia and Belarus**, particularly in the areas of security, border management and economic development., to be reported in Annex V based on the methodology set out in Annex VII;

4. Maintaining balanced support across all categories of regions

Amendment 17

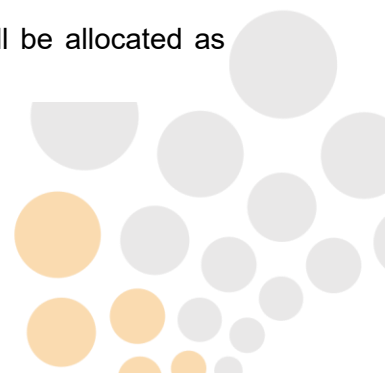
Article 10 – Budget

Text proposed by the Commission

2. The financial envelope shall be allocated as follows:

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:

(l) 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;

(a) EUR [965 000 000 000 000] shall be allocated to the NRP Plans referred to in Title III in accordance with Annex I [Allocation key].

The budget allocated for cohesion policy (i.e., a total of EUR [392 300 000 000]) shall be allocated as follows:

(a) 75% (EUR xx xxx 000 000) for less developed regions;

(b) 17% (EUR xx xxx 000 000) for transition regions;

(c) 8% (EUR xx xxx 000 000) for more developed regions;

Justification

This amendment is necessary to ensure a balanced and predictable allocation of cohesion funding across all categories of regions. From a regional and local perspective, earmarked funding for less developed, transition and more developed regions is essential to maintain the place-based nature of cohesion policy and to enable long-term investment planning in all regions. The European Parliament's REGI Committee has explicitly warned that the absence of earmarking for all categories of regions and the flexibility left to Member States undermines regions' ability to plan structural investments and risk increasing territorial disparities.

Amendment 18

Article 14 – budgetary commitments

Text proposed by the Commission

...

2. A flexibility amount, corresponding to 25% of the Union financial contribution of a Member State as set out in Annex I [allocation method], shall only be available for programming as follows:

Amendment

2. A flexibility amount, corresponding to **10%** of the Union financial contribution of a Member State as set out in Annex I [allocation method], shall only be available for programming as follows:

Justification

While it's good to have a flexibility amount, from a practitioners point of view the 25% reduces planning security and might lead to smaller and less meaningful projects.

Amendment 19

Article 22 – Paragraph 2





Text proposed by the Commission

2. (...)

- (f) reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:

allocating **resources to less developed, transition and more developed** regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII;

(...)

New point (v) to be added after (iv)

Amendment of the original text via the November letter of President Von der Leyen

'If the allocation of resources), as reported in Annex V, to transition and more developed regions is respectively lower by more than **25%** than the resources made available for these categories of regions under the 2021-2027 MFF from the Resources for the Investment for jobs and growth goal within Regulation 2021/1060 [CPR], the Member State should provide a justification based on objective criteria, such as the reduction of economic, social and territorial disparities, changes in category of regions, changes in the size of the population or changes of challenges as identified in the policy reference documents listed under points (b), (c) and (d) of this paragraph.'

(...)

Amendment

2. (...)

- (f) reduce economic, social and territorial disparities in less developed, transition and more developed regions, in particular by:

(i) allocating **funding resources to less developed, transition and more developed each category of** regions, in accordance with their specific challenges, to be reported in Annex V based on methodology set out in Annex VII;

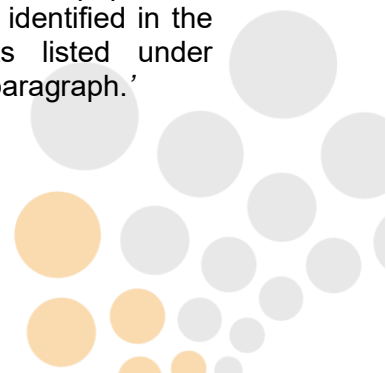
(...)

- (v) **allocate a minimum annual level of support, excluding ring-fenced amounts for agriculture and home affairs, corresponding to 90% of their indicative average annual allocation in the 21-27 period (in current prices) under the Investment for Jobs and Growth goal.**

Amendment of the original text via the November letter of President Von der Leyen

'If the allocation of resources **for Specific Objectives under Article 3, paragraph 1 (a) and 1 (c)**, as reported in Annex V, to transition and more developed regions is respectively lower by more than ~~25~~**10%** than the resources made available for these categories of regions under the 2021- 2027 MFF from the Resources for the Investment for jobs and growth goal within Regulation 2021/1060 [CPR], the Member State should provide a justification based on objective criteria, such as the reduction of economic, social and territorial disparities, changes in category of regions, changes in the size of the population or changes of challenges as identified in the policy reference documents listed under points (b), (c) and (d) of this paragraph.'

(...)





Justification

The proposed amendment ensures that minimum allocations are safeguarded for each region, not only categories of regions at national level. This is based on and developed from (1) the Commission President’s letter of November 2025, which introduced that any reduction in funding of more than 25% for transition and more developed regions at national level, compared to the current programming period, must be justified; (2) paragraph 14 of Annex XXVI to the current Common Provisions Regulation which foresees minimum allocations to certain regions; and (3) the safeguards introduced in NRPP Annex II for Less Developed Regions at national level.

5. Safeguard additionality and place-based instruments, including dedicated funding for urban development in the EU Facility

Amendment 20

New Article 20 – Paragraph 2

Text proposed by the Commission

2. (...)

(...)

The Member State shall provide an explanation on how the challenges and country specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:

(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council; **and** national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council;

Amendment

2. (...)

(...)

The Member State shall provide an explanation on how the challenges and country specific recommendations are addressed by the NRP Plan and what level of financing is envisaged and how the NRP Plan will:

(a) be consistent, in particular, with the national medium-term fiscal structural plans under Regulation (EU) 2024/1263, national restoration plans under Regulation (EU) 2024/1991 of the European Parliament and of the Council, National Energy and Climate Plans under Regulation (EU) 2018/1999 of the European Parliament and of the Council; **and** national digital decade strategic roadmaps under Decision (EU) 2022/2481 of the European Parliament and of the Council;

Justification

This proposed amendment is to ensure that Smart Specialisation Strategies continue to be supported and taken into account when preparing Cohesion-related chapters of the NRP Plans. Smart Specialisation Strategies have helped regions identify their comparative advantages and prioritise investments in areas where they can be globally competitive. This structured, evidence-based approach has reduced fragmentation and made regional innovation systems more strategic





and results-oriented, directly contributing to higher productivity, better use of public funds, and stronger EU value chains.

Amendment 21

New Article 20a - Additionality

Text proposed by the Commission

Amendment

1. In accordance with Article 174 TFEU, support provided under the National and Regional Partnership Plan shall respect the principle of additionality.

2. EU funding under the NRPP shall not replace or reduce equivalent national, regional or local public expenditure, but shall complement it and contribute to strengthening long-term economic, social and territorial cohesion. Member States shall ensure that investments supported under the NRPP generate genuine added value at territorial level, in line with the objectives and priorities set out in the Plan.

Justification

This amendment safeguards a core principle of cohesion policy from a regional perspective: EU funding under the NRPP must remain additional to, and not a substitute for, national, regional, or local public investment. For regions, additionality is essential to ensure that EU resources genuinely strengthen long-term territorial development rather than compensate for shrinking domestic funding. Without a clear additionality principle, there is a risk that the NRPP could weaken the capacity of regions and cities to pursue place-based investment strategies tailored to their specific development needs. Embedding this principle in the Regulation would help preserve the added value of EU support, protect territorial cohesion objectives, and ensure that NRPP funding delivers real impact on the ground.

Amendment 22

Title IV – EU facility – Article 26 – new paragraph (4c)

Text proposed by the Commission

Amendment

New paragraph 4c
As part of its Union actions, the Facility shall provide funding to:

- (a) Local authorities to implement the EU Agenda 2025 for Cities
- (b) Social enterprises



- (c) Organisations promoting skills, education, training or supporting the implementation of the European Pillar of Social Rights

Justification

The Facility should include a dedicated budget line for (sustainable) urban development. Most Europeans live, work and access essential services in urban areas.

Amendment 20

Article 31(a) – New article – EU Facility

Text proposed by the Commission

Amendment

(New)

Article 31(a) – Interregional Innovation Investments

1. The EU Facility shall support the Interregional Innovation Investments Instrument with an envelope of €700 million and the Urban in 2025 prices.

2. The Interregional Innovation Investments Instrument shall support the commercialisation and scaling up of interregional innovation projects having the potential to encourage the development of European value chains.

3. The Commission shall implement those investments under direct or indirect management.

4. The Commission shall be supported in its work by a group of experts.

The expert group shall be composed of representatives from Member States, regional authorities and cities, and representatives of business, research and civil society organisations. The composition of the expert group shall aim to ensure gender balance.

The expert group shall support the Commission in defining a long-term work programme and in preparing calls for proposals.

5. When implementing this instrument, the Commission shall ensure coordination and synergy with other Union funding



programmes and instruments, in particular with the European Competitiveness Fund including Horizon Europe as established by Regulations COM (...) and COM (...).

(...)

Article 31.1. “Union actions

New paragraph 2

2. Over the period 2028—2034, the Commission shall ensure that no less than EUR 4 000 000 000 of the financial envelope of the Facility is made available for the Union actions referred to in Annex XV (1), point (a).

Support for those actions shall be complementary to, and shall not reduce, the resources implemented under shared management and shall be used in particular to fund urban innovation and pilot projects and to reinforce resourced and tailored capacity-building and technical assistance for cities, in support of the Union's policy agenda for cities and in coordination with the measures set out in the Urban Chapters of the NRP Plans

Justification

The legal basis, scope, funding, and functional design of the I3 instrument, including its connection to Smart Specialisation Strategies (S3), should be reintroduced, as is currently the case under Article 13 of the ERDF Regulation. In the absence of such specifications, there would be no concrete legal basis for the design and implementation of the I3 instrument or its connection to S3 beyond the future work programmes of the Commission for the EU Facility.

Furthermore, the EU Facility should include a dedicated budget line for cities.

Amendment 23

Article 75 – Integrated territorial and urban development

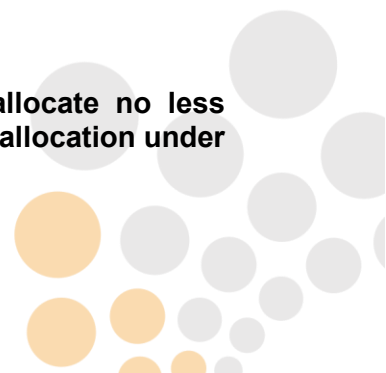
New paragraph Article 75 (4)

Text proposed by the Commission

Amendment

New Paragraph Article 74 (4)

Each Member State shall allocate no less than 8% of its total financial allocation under





the ERDF that is implemented under shared management in the framework of cohesion policy, excluding technical assistance, to measures implemented through integrated territorial and urban development strategies in cities and functional urban areas.

The corresponding financial allocation shall be clearly identified in the Plan, in particular in the Urban Chapter referred to in Article 22 (XX), and shall support measures that contribute to the objectives laid down in Articles 2 and 3.

Justification

Under the current period 2021-2027 a total of 8% of the ERDF funds need to be dedicated to urban development. This level of funding should be maintained also in the upcoming period.

Amendment 24

Article 76(a) – New article – Support for place-based innovation and smart specialisation

Text proposed by the Commission

Amendment

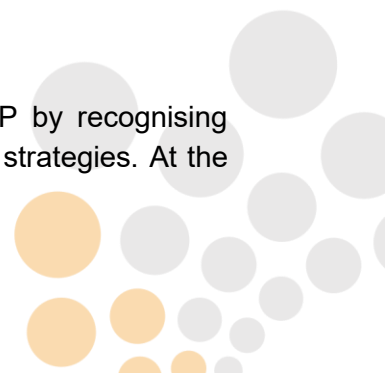
1. As part of the EU's ambition to promote competitiveness and close the innovation divide in Europe's regions, Member States shall support place-based innovation via renewed smart specialisation strategies which are transformational in ambition.

2. The support should include investment in innovation infrastructure, promotion of effective collaboration of the quadruple helix and the development of holistic strategies to improve regional innovation performance towards societal goals.

3. Special attention should be given to promoting innovation-driven territorial transformation, linking EU priorities with the European Competitiveness Fund's dedicated instrument.

Justification

Ensures that place-based innovation remains a core component of the NRPP by recognising regions as key actors in the design and implementation of smart specialisation strategies. At the





regional level, S3 is not a new layer but the main operational tool for aligning investments with territorial strengths, industrial ecosystems, and societal needs. Embedding this within the NRPP framework allows for more effective use of cohesion resources, stronger coordination with other EU instruments, and clearer links to deployment opportunities under the European Competitiveness Fund. This is essential to avoid fragmentation and to ensure that innovation-driven transformation reaches all regions.

Amendment 25

Article 13 – Technical assistance

Text proposed by the Commission

1. At the initiative of a Member State, the Fund may support technical assistance for the preparation, management, monitoring, evaluation, information and communication, networking and control of the NRP Plan and the Interreg Plan chapter, including the strengthening of the capacity of the authorities concerned and of beneficiaries

Amendment

1. At the initiative of a Member State, the Fund may support technical assistance for the preparation, management, monitoring, evaluation, information and communication, networking and control of the NRP Plan and the Interreg Plan chapter, including the strengthening of the capacity of the authorities concerned and of beneficiaries. **Member States shall ensure that a significant part of such technical assistance is used to strengthen the capacity of regional and local authorities, to design and implement the reforms and investments set out in the Plan, and that these authorities can access such support directly or through their representative associations**

Justification

Technical assistance in shared management is a key lever to build local capacity, but in practice it often remains concentrated at national level. This amendment specifies that a significant share of technical assistance should be used to strengthen the capacity of regional and local authorities, including cities and functional urban areas, and that these authorities should be able to access this support directly or via their associations. It aligns the use of technical assistance with the Fund's multilevel governance and partnership logic and with the central role of LRAs in implementing the Plans.

