Amendments from the Helsinki-Uusimaa Region

On the proposal for a Regulation establishing the European Regional Development Fund, including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [NRP] and establishing conditions for the implementation of Union support to regional development from 2028 to 2034 (2025/0238)

May 2026

The Helsinki-Uusimaa Region welcomes a strong and place-based ERDF and a well-resourced Interreg framework as essential instruments for strengthening Europe's competitiveness, resilience and territorial cohesion.

Cohesion policy must remain a long-term structural investment policy with predictable funding, clear territorial allocations and strong regional ownership. It should not become a short-term crisis response instrument. ERDF and Interreg must continue to support competitiveness, innovation, climate transition and resilience across all regions.

For Helsinki-Uusimaa, five priorities are particularly important.

1. EU support for regions located in member states bordering Russia and Belarus, must reflect actual territorial impacts, not only the currently used NUTS2 classification of Eastern border regions. The effects of Russia's war of aggression extend across the whole of Finland. Helsinki-Uusimaa region is central to security of supply, logistics, ports, airports and the resilience of Finland. Due to the Russian aggression, economic development in the region has slowed down, which has led to an above-the-national-average unemployment rate.
2. Sustainable urban development must be strengthened through clear territorial implementation and formal involvement of cities and regional authorities. Cities drive Europe's growth, innovation, and climate transition, and must be properly reflected in ERDF implementation.
3. Interreg Europe should be strengthened as a tool for promoting peer-learning, the co-creation and scaling-up of European solutions, including policy learning and policy uptake. Its value lies in integrating good practices into regional development policies, particularly through Smart Specialisation Strategies and by enhancing and connecting innovation ecosystems across Europe.
4. Climate objectives should be delivered through measurable territorial impact. Circular economy, clean technologies, sustainable mobility and energy systems are simultaneously climate, competitiveness and resilience investments.

Uudenmaan liitto // Nylands förbund // Helsinki-Uusimaa Regional Council
Esterinportti 2 B • 00240 Helsinki • Finland
+358 9 4767 411 • toimisto@uudenmaanliitto.fi • uudenmaanliitto.fi

5. Multilevel governance must be strengthened. Regions and cities are not only beneficiaries, but strategic implementation of actors and must be mandatorily involved in the preparation, implementation and monitoring of Interreg Plan chapters.

For Helsinki-Uusimaa, cooperation in the Central Baltic area, the Baltic Sea Region and Interreg Europe is strategically important for resilience, competitiveness and the security of the Baltic Sea macro-region.

Our key messages and proposed amendments

1. Ensure that support to eastern border regions covers all affected regions in the relevant member states
2. Strengthen sustainable urban development through dedicated mechanisms and with the formal involvement of cities and regions
3. Strengthen interregional cooperation in peer-learning, co-creation and scaling-up of European solutions, including policy learning and policy uptake
4. Deliver climate objectives through measurable territorial impact
5. Strengthen multilevel governance and the role of regions and local authorities

1. Ensure that support to eastern border regions covers all affected regions in the relevant member states

Amendment 1
Article 4 – Paragraph 1 – Support for disadvantaged areas in members bordering Russia and Belarus

Text proposed by the Commission	Amendment
"…regions bordering Russia, Belarus and Ukraine…"	"…regions **located in Member States bordering Russia and Belarus**"

Justification
The consequences of Russia's war of aggression do not follow NUTS2 borders. Helsinki-Uusimaa is central to Finland's and the EU's security of supply and strategic infrastructure such as ports and airports. Support should reflect actual needs based rather than follow administrative borders. An example from the region, as a result of the Russian border and airspace closure, the unemployment in Helsinki-Uusimaa is now higher than the national average.

2. Strengthen sustainable urban development through dedicated mechanisms and with the formal involvement of cities and regions

Amendment 2
Article 5 – Sustainable urban development

Text proposed by the Commission	Amendment
"As part of their territorial development, Member States shall support integrated urban development strategies which focus on sustainable development and tackle environmental, energy and climate challenges, in particular the fair transition towards a clean and climate-neutral and resilient economy by 2050, paying special attention to housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages."	As part of their territorial development, Member States shall support integrated urban development strategies **through dedicated territorial implementation mechanisms and with the formal involvement of cities and regional authorities, ensuring coherence with regional development policies. These strategies** focus on sustainable development and tackle environmental, energy and climate challenges, in particular the fair transition towards a clean and climate-neutral and resilient economy by 2050, paying special attention to housing, poverty, cultural heritage and to harnessing the potential of digital technologies for innovation purposes and energy efficiency, to supporting the development of functional urban areas, as well as supporting urban-rural linkages.

Justification
Cities are the main drivers of growth, innovation and climate transition in Finland. The ERDF should reinforce sustainable urban development through clear urban implementation structures and stronger territorial governance, consistent with the Helsinki-Uusimaa regions NRPP position on mandatory urban chapters and earmarked funding for Sustainable Urban Development.

3. Strengthen interregional cooperation in peer-learning, the co-creation and scaling-up of European solutions, including policy learning and policy uptake

Amendment 3
Article 7 – Paragraph 1 – Point (c) – Interregional cooperation

Text proposed by the Commission	Amendment
"(c) cooperation to reinforce the effectiveness of cohesion policy by promoting exchange of experiences,	-(c) cooperation to reinforce the effectiveness of cohesion policy by **promoting peer-learning, the co-creation and scaling-up of European**

Text proposed by the Commission	Amendment
innovative approaches and capacity building…"	**solutions through the identification and exchange of good practices and innovative approaches, with a focus on integrating them into regional development policies and, where relevant, to National and Regional Partnership Plans**…"

Justification

Interreg Europe's main value lies in policy transfer and implementation, not only exchange. The role of capacity building and policy uptake in these fields should be explicitly recognised.

4. Deliver climate objectives through measurable territorial impact

Amendment 4
Article 8 – Paragraph 3 – Point (b) – Climate contribution

Text proposed by the Commission	Amendment
"(b) describe the intervention strategy of the Interreg Plan chapter based on a clear analysis of territorial needs and gaps in the area covered, identifying the measures for cooperation, including any measures for territorial or local developement and explaining how these measures are expected to contribute to the objectives set out in Articles 2 and 3 [policy objectives] of Regulation (EU) [NRP Regulation] and the Interreg-specific objectives referred to in paragraph 4 of Article 7 of this Regulation and to transition to climate neutrality;"	(b) describe the intervention strategy of the Interreg Plan chapter based on a clear analysis of territorial needs and gaps in the area covered, identifying the measures for cooperation, including any measures for territorial or local developement and explaining how these measures are expected to contribute to the objectives set out in Articles 2 and 3 [policy objectives] of Regulation (EU) [NRP Regulation] and the Interreg-specific objectives referred to in paragraph 4 of Article 7 of this Regulation and to transition to climate neutrality **through measurable territorial impact, including circular economy, clean technologies, sustainable mobility, energy systems and nature-based solution.**

Justification

The climate objective should be delivered through real territorial outcomes rather than rigid financial earmarking. Climate, competitiveness and resilience investments are often the same investments.

5. Strengthen multilevel governance and the role of regions and local authorities

Amendment 5
Article 8 – Paragraph 3 – Point (e) – Governance and partnership

Text proposed by the Commission	Amendment
" (e) set out clear arrangements for the effective monitoring and implementation of the Interreg Plan chapter by each Member State, including the responsible authorities and created monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, and also the envisaged approach to information, communication and visibility in line with the rules laid down in Regulation xx[Performance Regulation]"	(e) set out clear arrangements for the effective monitoring and implementation of the Interreg Plan chapter by each Member State, including the responsible authorities and created monitoring committees reflecting the objective of establishing a robust multi governance system based on the partnership principle, **including the participation of regional and local authorities in the preparation, implementation and monitoring of Interreg Plan chapters,** and also the envisaged approach to information, communication and visibility in line with the rules laid down in Regulation xx[Performance Regulation]

Justification
Regional and local authorities are strategic actors in implementation, not only stakeholders. This should be clearly reflected in governance provisions.

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