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ANNEXES 1 to 4

ANNEXES

to the

REPORT FROM THE COMMISSION

ANNUAL REPORT 2025

ON THE APPLICATION OF THE PRINCIPLES OF SUBSIDIARITY AND PROPORTIONALITY AND ON RELATIONS WITH NATIONAL PARLIAMENTS

ANNEX I

List of draft legislative acts on which national Parliaments issued reasoned opinions[1] in 2025 regarding compliance with the subsidiarity principle

	Document[2]	Title	Number of reasoned opinions (Protocol No 2)	Number of votes expressed (Protocol No 2)[3]	National chamber submitting reasoned opinions
1	COM(2025) 102	Proposal for a Regulation of the European Parliament and of the Council laying a framework for strengthening the availability and security of supply of critical medicinal products as well as the availability of, and accessibility of, medicinal products of common interest, and amending Regulation (EU) 2024/795	2	3	SE *Riksdag* (2 votes) FR *Sénat* (1 vote)
2	COM(2025) 553	Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 as regards the school fruit, vegetables and milk scheme ('EU school scheme'), sectoral interventions, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties, rules on the availability of supplies in time of emergencies and severe crisis and securities	2	2	RO *Senat* (1 vote) FR *Sénat* (1 vote)
3	COM(2025) 435	Proposal for a Regulation of the European Parliament and of the Council on European fisheries and aquaculture statistics and repealing Regulations (EC) No 1921/2006, (EC) No 762/2008, (EC) No 216/2009, (EC) No 217/2009 and (EC) No 218/2009	2	3	ES *Cortes Generales* : *Senado de España and Congreso de los Diputados* (2 votes) RO *Senat* (1 vote)
4	COM(2025) 828	Proposal for a Regulation of the European Parliament and of the Council on phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938	2	4	HU *Országgyűlés* (2 votes) SK *Národná Rada* (2 votes)
5	COM(2025) 173	Proposal for a Directive of the European Parliament and of the Council on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction	1	1	IT *Camera dei Deputati* (1 vote)
6	COM(2025) 823	Proposal for a Directive of the European Parliament and of the Council amending Directives 2009/43/EC and 2009/81/EC, as regards the simplification of intra-EU transfers of defence-related products and the simplification of security and defence procurement	1	2	BG *Narodno Sabranie* (2 votes)

[1] For an explanation of the nature of reasoned opinions, see Annex IV, chapter 1.1.

[2] Each document number refers to the final version.

[3] Each national Parliament has two votes. Each chamber in a bicameral system has one vote. The 'yellow card' threshold is reached when the number of reasoned opinions received from national Parliaments is at least a third of all votes allocated to them (i.e. 18 out of 54). For draft legislative acts submitted in the area of freedom, security and justice, the threshold is one quarter of the votes (14 out of 54)

	Document[2]	Title	Number of reasoned opinions (Protocol No 2)	Number of votes expressed (Protocol No 2)[3]	National chamber submitting reasoned opinions
7	COM(2025) 524	Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality	1	1	IT *Camera dei Deputati* (1 vote)
8	COM(2023) 580	Proposal for a Council Directive on the structure and rates of excise duty applied to manufactured tobacco and tobacco related products (recast)	1	1	IT *Camera dei Deputati* (1 vote)
9	COM(2025) 581	Proposal for a Council Directive amending Directive (EU) 2020/262 as regards the general arrangements for excise duty in respect of tobacco and tobacco related products	1	1	IT *Camera dei Deputati* (1 vote)
10	COM(2025) 574	Proposal for a Council Decision on the system of own resources of the European Union and repealing Decision (EU, Euratom) 2020/2053	1	2	SE *Riksdag* (2 votes)
11	COM(2025) 335	Proposal for a Regulation of the European Parliament and of the Council on the safety, resilience and sustainability of space activities in the Union	1	2	SE *Riksdag* (2 votes)
12	COM(2025) 560	Proposal for a Regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034	1	1	RO *Senat* (1 vote)
13	COM(2025) 565	Proposal for a Regulation of the European Parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509	1	1	DE *Bundesrat* (1 vote)
14	COM(2025) 548	Proposal for a Regulation of the European Parliament and of the Council on the Union Civil Protection Mechanism and Union support for health emergency preparedness and response, and repealing Decision No 1313/2013/EU (Union Civil Protection Mechanism)	1	1	FR *Sénat* (1 vote)
15	COM(2025) 101	Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and of the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC	1	1	FR *Sénat* (1 vote)
TOTAL number of reasoned opinions received			**18**[4]		

[4] 1 opinion was received after the deadline, thus not counted to reasoned opinions, the opinion of the IT *Senato* on the proposal for a Directive of the European Parliament and of the Council on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction, COM(2025) 173.

ANNEX II

Number of opinions received by the Commission in 2025 per national arliament/Chamber (political dialogue and subsidiarity control mechanism)

Member State	Chamber	Total Number of opinions[5]	Number of reasoned opinions (Protocol No 2)
Spain	*Las Cortes Generales: Senado de España and Congreso de los Diputados*	80[6]	1
Italy	*Camera dei Deputati*	45	3
Germany	*Bundesrat*	43	1
Czechia	*Senát*	39	0
Romania	*Senat*	33	3
Romania	*Camera Deputaților*	31	0
Italy	*Senato della Repubblica*	22	0
Portugal	*Assembleia da República*	22	0
France	*Assemblée nationale*	20	0
France	*Sénat*	20	4
Netherlands	*Eerste Kamer*	19	0
Belgium	*Sénat de Belgique / Belgische Senaat*	11 ([7])	0
Ireland	*Houses of the Oireachtas: Dáil and Seanad Éireann*	10	0
Lithuania	*Seimas*	9	0
Slovakia	*Národná Rada*	9	1
Sweden	*Riksdag*	8	3
Netherlands	*Tweede Kamer*	6	0
Greece	*Vouli ton Ellinon*	3	0
Poland	*Senat*	3	0
Czechia	*Poslanecká sněmovna*	3	0
Hungary	*Országgyűlés*	3	1
Croatia	*Hrvatski Sabor*	3	0
Cyprus	*Vouli ton Antiprosopon*	2	0
Bulgaria	*Narodno Sabranie*	2	1
Luxembourg	*Chambre des Députés*	2	0
Poland	*Sejm*	1	0

[5] Including both opinions under the 'political dialogue' and reasoned opinions received from national Parliaments.

[6] For an explanation of the counting rules for opinions, see Annex IV chapter 1.2.

[7] Including 9 opinions issued by the Flemish Parliament and transmitted by the Sénat de Belgique / Belgische Senaat. Pursuant to Declaration No 51 by the Kingdom of Belgium on national Parliaments, annexed to the Treaty of Lisbon (OJ C 306, 17.12.2007, p. 267), the parliamentary assemblies of the Communities and the Regions act, in terms of the competences exercised by the Union, as components of the national parliamentary system or chambers of the national Parliament.

Member State	Chamber	Total Number of opinions[5]	Number of reasoned opinions (Protocol No 2)
Denmark	*Folketing*	1	0
Finland	*Eduskunta*	1	0
Slovenia	*Državni zbor*	1	0
Austria	*Bundesrat*	1	0
Malta	*Kamra tad-Deputati*	0	0
Estonia	*Riigikogu*	0	0
Latvia	*Saeima*	0	0
Germany	*Bundestag*	0	0
Belgium	*Chambre des Représentants de Belgique/ Belgische Kamer van volksvertegenwoordigers*	0	0
Slovenia	*Državni svet*	0	0
Austria	*Nationalrat*	0	0
TOTAL		**453**	**18**

ANNEX III

Documents generating the highest number of opinions[8] received by the Commission in 2025 (political dialogue and subsidiarity control mechanism)

	Document	Title	Total number of opinions[9]	Number of which were reasoned opinions (Protocol 2)
1	COM(2025) 45	Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Commission work programme 2025 Moving forward together: A Bolder, Simpler, Faster Union	12	0
2	COM(2025) 102	Proposal for a Regulation of the European Parliament and of the Council laying a framework for strengthening the availability and security of supply of critical medicinal products as well as the availability of, and accessibility of, medicinal products of common interest, and amending Regulation (EU) 2024/795	11	2
3	COM(2025) 101	Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and of the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC	9	1

[8] The table ranks all documents for which at least nine opinions were received.

[9] Including opinions under the 'political dialogue' and reasoned opinions received from national Parliaments.

ANNEX IV

Definitions and Methodology

1.1. DEFINITIONS

This report uses several terms that are specific to relations with national Parliaments and to the subsidiarity control mechanism. They are set out below to ensure consistency.

A 'reasoned Opinion' is an opinion submitted by a national Parliament to the Commission under Protocol No 2 of the Treaties. It must be issued within eight weeks of transmission of a draft legislative act (translated into all official EU languages) and it sets out why a national Parliament or chamber considers that the draft legislative act does not comply with the principle of subsidiarity.

An 'Opinion' in the framework of the political dialogue is an Opinion submitted by a national Parliament to the Commission outside the formal subsidiarity control mechanism. Such opinions concern legislative proposals, non-legislative initiatives, other Commission documents or broader policy issues within the Commission's remit. They provide a broader channel for parliamentary input into EU policymaking. An 'Own-Initiative Opinion' is an opinion submitted by a national Parliament on a topic of its own choosing, without necessarily referring to a specific Commission proposal or document. Own-Initiative Opinions allow national Parliaments to raise issues proactively, present policy ideas or express positions on matters they consider relevant.

In the chapter on the European Parliament, slightly different terminology is used. The European Parliament refers to all inputs received from national Parliaments as 'submissions. These are divided into 'reasoned opinions', as defined under Protocol No 2, and 'other contributions', which cover all non-reasoned opinions.

1.2. METHODOLOGY AND COUNTING RULES[10]

Unless stated otherwise, the figures in this report refer to the number of opinions received by the Commission from national Parliaments in 2025.

Each opinion is counted once, irrespective of the number of Commission documents or proposals to which it refers. This applies to both reasoned opinions and opinions submitted in the framework of the political dialogue. Reasoned opinions received outside the 8-weeks subsidiarity scrutiny deadline are counted as political dialogue opinions.

For own-initiative opinions, where an opinion is co-signed by several chambers, it is counted as one opinion for each chamber that signed it.

For other types of opinions, including reasoned opinions and political dialogue opinions on Commission documents, opinions adopted by joint committees of bicameral Parliaments are counted as one opinion. This applies in particular to opinions issued by the Irish Houses of the *Oireachtas* and Spanish *Congreso* and *Senado.* Although they have bicameral systems, these Parliaments can submit a single reasoned opinion which counts under Protocol No 2 of

[10] Sections 2.2 to 2.4 of this report are based on contributions from the respective EU institutions and bodies.

the Treaty on European Union for 2 votes. For visits and meetings, where a Member of the Commission visits both chambers of a bicameral Parliament, this is counted as two visits. The same approach applies to meetings with joint committees of bicameral Parliaments. Where, during a visit to a national Parliament a Member of the Commission meets several bodies of the same chamber, for example the President and several committees, this is counted as one visit to that chamber. Where a national Parliament visits the Commission in Brussels and has separate meetings with several Members of the Commission, each meeting is counted separately.

1.3. DATA SOURCES AND LIMITATIONS

The report is based on the opinions[11] issued by national Parliaments in 2025, the Commission's own statistics on direct engagement (visits and meetings) with national Parliaments, and contributions from the European Parliament, the Council of the European Union, the Court of Justice of the European Union, the European Committee of the Regions and regional Parliaments.

Terminology and classification criteria may vary between national Parliaments and EU institutions. For this reason, sections 1.1 and 1.2. of the Annex to the report set out the main definitions and counting rules used for Commission statistics.

[11] The opinions from national Parliaments referred to in this report, together with the Commission's replies are available on the Commission's website 'National Parliament opinions and Commission replies' and may be consulted for further details.